

Chartered Institution of Highways & Transportation response to the DCLG white paper consultation 'Fixing our broken housing market – [2 May 2017]

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CIHT is a charity, learned society and membership body with over 14,000 members spread across 12 UK regions and a number of international groups. We represent and qualify professionals who plan, design, build, manage and operate transport and infrastructure networks. Part of our vision is to demonstrate transport infrastructure's contribution to a prosperous economy and a healthy and inclusive society. Our values are to be Professional, Inclusive, Collaborative and Progressive.

Introduction

CIHT welcomes the opportunity to respond to the consultation and is encouraged by the government's move to address the housing requirement challenges. The ambition to release surplus public land with capacity for 160,000 homes; the previously announced Home Building Fund and Affordable Homes programme and the Starter Home Land Fund are all welcomed.

CIHT are pleased with the announcement of the £2.3bn Housing Infrastructure Fund for new infrastructure to support new developments, however it is extremely important that this funding is used in the correct way to unlock and provide sustainable development. Maintenance and resilience of existing assets, especially the Local Road Network, must also be recognised. It is too often overlooked with focus on the funding model for capital expenditure on highways maintenance given precedence. It is vital to recognise that the highway maintenance service in local authorities is also dependent on revenue funding from Department for Communities and Local Government (DCLG) and other sources.

Quality of the whole place should be a key driver when considering housing provision and infrastructure for new developments, and therefore the location selected is crucial. Increased housing provision must be integrated with sustainable transport provision, consideration of environmental impacts and effects on health and wellbeing. As it stands the White Paper does not reflect the need for this integration of process and action.

Economics, housing and transport are all too often pursued separately, there is a need for a strategic overview and approach to housing delivery (including all the relevant infrastructure, transport, housing, schools, digital etc.) which relates it to "place".

At a national level CIHT has repeatedly called for a National Transport Strategy, including in its published Manifesto¹. The benefits of a national strategy - one that sets out a long-term framework over a sustained period (with a 20-30 year time horizon) – are clear when it comes to determining infrastructure priorities in the context of the national economy. This is more important than ever if the government are seeking to truly deliver on their housing ambitions in a way that also delivers on the objectives of "sustainable development" as set out in the NPPF as well as climate change targets.

This submission focuses on the important role transport has to play in planning for sustainable developments. It highlights the importance of the correct provision of sustainable transport as part and part of the provision of new housing, its relationship to national planning policy and any changes to it. CIHT are concerned how this White Paper and its outcomes will fit with several other current, on-going government initiatives, e.g. the Industrial Strategy and the work of the National Infrastructure Commission as well as reducing the environmental impacts of travel.

¹ [CIHT Making the Journey – A Manifesto for Transport](#)

Getting plans in place

The National Planning Policy Framework (NPPF) includes much of the necessary text to ensure the effective inclusion of sustainable transport as part of spatial planning and local plans. There are however two key problem areas that remain with both the Framework and the White Paper:

1. How the NPPF is implemented and;
2. The apparent focus on housing numbers rather than as part of the development of “place” and to the exclusion of all else.

As clearly established in the NPPF, transport is a critical element of delivering sustainable development whether for social, economic or environmental reasons: it is one of the core planning principles. It is acknowledged nationally that we need to change the way we travel: it is not sustainable to continue to meet transport needs in the way we have in the past given the scale of growth required and its impact. Our expectations as users of transport are also changing, this creates both the need and opportunity to use investment and planning to encourage a different approach. The Local Plan has a key role as part of the statutory requirements to plan, manage and monitor change and this includes transport.

Transport provision has to be assessed across all modes: walking, cycling, public transport, and other private or commercial vehicular modes. The Local Plan provides the opportunity during the life of the plan to address current shortfalls and deliver a better integrated sustainable transport network and infrastructure, service delivery. Guidance should therefore focus on the plan making function and just not development management.

The importance of effectively integrating transport policy and provision with any increased housing provision, and new developments is essential – only by doing this will we achieve the objective of sustainable growth, as set out in the NPPF.

Any changes to national planning policy with regards to Local Plans and the increased provision of housing and new developments should:

- Consider the essential requirement for integrated transport provision across all modes of transport; it is important that the planning framework provides people with choice.
- Ensure that preparation of Local Plans when considering the proposal fully addresses access and transport requirement in short and long term.
- Ensure assessments consider the nature and quantity of development and where it should be, i.e. addressing the spatial dimension and choices of how the land is used.
- Ensure planning put place making at the heart of the agenda, creating places that people and goods can move to, from and within, providing accessibility through travel choice is an essential component of place making, i.e. sustainable transport and development location.
- Address the delivery of infrastructure to meet the needs of development in the right place – so the preparation of Infrastructure Delivery Plans based on effective engagement with transport authorities, operators, schooling, hospitals, digital and other key agencies is essential.
- Require that all involved in plan making and delivering new developments engage with transport providers (bus/train/rail freight operators, PTEs) from the outset and vice-versa to ensure sustainable accessibility is feasible in the chosen locations.
- Assess health and wellbeing impact of local plans including transport policies. Assessing the health impact of local and transport plans while they are being prepared would help to create a policy framework that took account of health when decisions are being taken on development applications and transport proposals. For example, the six east London growth boroughs – Barking and Dagenham, Greenwich, Hackney, Newham, Tower Hamlets and Waltham Forest have published a [healthy urban](#)

[planning checklist](#) to help planners identify the main likely implications for health of a proposed developments.

Ensuring Infrastructure is provided in the right place at the right time

CIHT welcomes the £2.3bn Housing Infrastructure Fund and the measures set out in Step 1 'Planning for the right homes in the right place'. The principles of speeding up and shortening of local plans and the recognition of the importance of local community engagement is crucial. As it stands the White Paper is still focussed ultimately on development management policy and housing delivery numerically rather than the development of quality places. The consultation generally focuses on how land could be maximised to build at higher densities, and there is little acknowledgement of transport, accessibility and the suite of services and infrastructure that is essential for new housing, the key infrastructure that would support sustainability.

The Housing White Paper should recognise that existing infrastructure assets must be maintained. Inadequate revenue investment requires more capital investment as well as affecting the performance of existing networks. Preventing deterioration is a priority and will reduce longer term costs through encouraging a planned rather than reactive approach to maintenance investment.

Land allocation and transport provision need to go hand in hand and this should be with an emphasis on providing a choice of modes rather than a focus on car-based movements. Transport schemes should be selected to open up and enable land for development and growth and should be selected with this in mind. It is important that transport schemes are selected on the evidence and knowledge of where growth is planned, anticipated and allocated to occur. A considerable problem at the moment is that a significant number of local authorities do not have an adopted Local Plan that definitively clarifies where growth is to occur and the location of development is not linked to the potential for sustainable transport provision. The operation of the NPPF is also resulting in little weight being given to non car based transport access.

It is particularly important that sites are capable of the effective provision of sustainable transport. The Local Plan process should be underpinned by the concept of a 'place-making' framework, providing the means of delivering communities that are sustainable in the longer-term. Increased housing numbers must be balanced with sustainable transport provision, consideration of the environmental impacts and the effects on health and wellbeing. To be effective Local Plans must consider all of these to fulfil the obligations of the NPPF to provide sustainable communities.

CIHT agrees that there should be encouragement to develop around new and existing commuter hubs and transport schemes that are of national significance. The scale and cost suggests that anticipated growth should be directed towards and responding to where transport schemes are planned to occur, in line with a national or overall strategy of enhancing the configurations of the national, regional, local transport network.

It is important that there is also easy access to other services that families need. It is not just about the size of the housing unit, but thought needs to be given to a centre which is easily accessed containing retail, medical and educational functions. With this in mind:

- Accessibility should be assessed and encouraged on the basis of a hierarchy – reducing the need to travel through walking, cycling, public transport, private car - with priority given to the most sustainable means of travel first.
- Local plans should include an overall strategy on planning and transport. This should link land allocations with local sustainable and other transport priorities / resources for investment. Strategies for growth and development should be consistent with those for parking, traffic and demand management including Local Transport Plans. As it

stands, the White Paper could reinforce the current propensity to give planning permissions for any housing proposal wherever it is located and without effective consideration of the provision of sustainable transport.

- There should be a strong preference for locating land uses that are major generators of travel demand in city, town and district centres. Local plans should actively manage the pattern of urban growth and the location of major travel generating development to make the fullest use of existing public transport or the potential for its development.
- Day to day facilities, which need to be near their clients, should be located in local and rural service centres, along with measures to ensure safe and easy access, particularly by walking and cycling.
- Transport operators and transport authorities should be engaged in plan making and involved in development management decisions to ensure optimum provision of services.
- Priority should be given to reducing transport emissions and moving towards a low-carbon economy.
- All the above are consistent with the development and creation of good places. Good planning and quality design are needed to ensure that these streets and spaces contribute to the local social and cultural life, and to the enjoyment and enrichment that comes from social interaction, rest, recreation and play in a public setting.
- CIHT promotes the importance of strong inclusive design in the public realm and public highways aspects of development.

Providing greater certainty

Local authority planning departments are operating under significant pressures. The White Paper commitments will put further resource constraints on an already struggling local system. Investment is necessary to help address staff shortages, resources and skills at a local level. That said, the White paper also provides the opportunity to challenge the current planning regime – to ensure that redundancy/duplication in process is challenged and removed – that the focus of the system is on providing an enabling framework that encourages investors to say yes because they have confidence in the infrastructure and services being available.

- CIHT supports the need to take a co-ordinated approach to determining investment priorities for infrastructure in all its forms. There needs to be a recognition of the inter-dependency between infrastructure and the extent to which this can result in changes in the demand for and nature of travel demand. Providing the possibility to pool resources more at the local level allowing for joint local planning, through joined up local and neighbourhood plans, sub-national transport bodies and strategic alliances will assist the provision of strong spatial planning considerations. It is imperative the NPPF and Local Plans are considered by and as part of an overall strategy.
- Certainty and continuity of investment over a sustained period is essential if overall improvements to infrastructure is to be delivered effectively and efficiently. The UK has seen substantial levels of capital investment in transport infrastructure. This investment has been welcomed but there must be greater investment certainty if the UK is to operate, maintain and construct the required transport infrastructure network to support large increases in housing numbers.
- The White Paper must recognise that skills development in the planning sector, the delivery of houses and associated infrastructure is a key area of concern with regards to delivery of new settlements. The recruitment and careful development and retention of the next generation is central to delivery of the government's proposals. CIHT has recently developed [the CIHT Routes to Diversity and Inclusion toolkit](#). The toolkit offers practical guidance, case studies and links to reliable sources of expert advice for employers to help recruit, retain and develop a more diverse workforce. By doing so, employers will improve their own business performance and increase capacity within

the industry. This should be viewed in line with the Department for Transport's Skills Strategy – to which CIHT has contributed.

- The White Paper needs to recognise and plan for uncertainties, including change brought about by technology, societal change and adverse weather. Planning needs to create communities that are resilient to a wide range of factors.
- CIHT welcome the intent to increase nationally set planning fees allowing Local authorities to increase fees by 20% from July 2017 if they commit to invest the additional fee income in their planning department.

CIHT views on:

Affordable Housing - Any definition of affordable housing should take into account the availability and cost of transport which is of equal importance to those on lower incomes. Any 'new' such housing provision needs to be located where people can walk or cycle or have the option to use affordable public transport. This should be an explicit consideration of the affordable housing policy and the spatial distribution.

Brownfield sites – A question remains for the government – Why is brownfield land that has already been released/permission given to developers not being built on? CIHT have concerns about the intended presumption of housing planning permissions for brownfield land. This must make explicit the requirement to ensure the provision of sustainable transport as a key part of the decision and not ignored by the drive for housing numbers. This whole approach further strengthens the need for authorities to be much more explicit and show leadership around sustainable transport requirements in their local plans. Sustainable transport assessments should be a requirement.

There needs to be a recognition of the differences between rural and urban sites. The paper refers to brownfield as a solution, but without differentiating brownfield in urban areas (mostly sustainable) and those in rural areas (mostly unsustainable).

New settlements are to be welcomed, but again provision of transport choice is critical, especially providing for walking, cycling and public transport. This needs to be explicit in the NPPF and related NPPG and the points we make with regards to skills are equally valid here.

Small sites – the issues are the same – availability and access of services and transport should not be ignored but a key part of the evaluation. The cumulative effect of smaller housing developments on transport networks needs to be understood. Small ad hoc developments are a burden to the already capacity constrained networks. No assessment has been carried out on the effects such developments have on existing networks.

The focus on the **release of employment/retail land** is again based on viability whereas there should be clear explicit consideration for the accessibility by sustainable modes to employment, services etc. or children will not walk to school or people to shops or work etc. Again we should not just be providing housing areas but those of mixed use.

Rural development – there should be explicit reference to the potential to improve the viability of services and transport by the appropriate location of new development so it does not add to the "scattered" approach.

Land value uplift

This is a pertinent and emerging issue, the argument being that land value uplift with planning allocation and consent should be captured and then decanted into the delivery of infrastructure for the growth concerned. It is reliant however, on land ownership at the outset being in the hands of a public sector body that can then affect the diversion of funds to infrastructure. Should this body be a local authority for example, then Treasury Rules need to allow for ring

fencing of the value uplift and capture (once the land is then sold on at a higher value for development by the local authority) and diversion of it to local infrastructure. In turn this requires initiatives at the outset to purchase land at pre-growth value. A question may arise whether government action/rules are required to peg land at the lower value once this process starts, otherwise land value enhancement anticipation will nullify the opportunity for land value growth to be achieved.

To conclude, housing provision must not be seen in isolation from the need to provide jobs, improve health, protect the environment and enhance the quality and economic functionality of existing places and transport. Changes to planning policy and delivery of sustainable housing should recognise these connected requirements rather than focusing on a single policy area.

Planning must address the delivery of transport infrastructure to meet the needs of development in the right place at the right time. An improved planning system should include transport networks and acknowledge the important role they play in economic and social development.

The Housing White Paper has the potential to change the way we deliver and integrate new developments and the required supporting transport infrastructure. As it stands the White Paper is focussed ultimately on numerical housing delivery rather than the development of quality places. Transport schemes should be selected to enable land for development and growth and not added on as an afterthought. It is important that transport schemes are selected on the basis of evidence and knowledge as to where growth is planned, delivering effective land-use and spatial planning.