March 2026

The Chartered Institution of Highways and Transportation (CIHT) response to 'National Planning Policy Framework: proposed reforms and other changes to the planning system' consultation

The Chartered Institution of Highways and Transportation (CIHT) is a charity, learned society and membership body, with over 10,000 members across 12 UK regions and several international groups. CIHT represents and qualifies professionals who plan, design, build, manage, maintain and operate transport and infrastructure. The CIHT run and manage the national Bus Centre of Excellence with funding from the Department for Transport (DfT).

CIHT welcomes the opportunity to respond to this consultation on 'Proposed reforms to the National Planning Policy Framework and other changes to the planning system.' We encourage the Government to continue to engage with transport sector stakeholders throughout this process and would be happy to facilitate cross-sector discussions to assist with this.

CIHT appreciates the Government's ongoing commitment to an extensive planning reform programme and offer our ongoing support to the Ministry of Housing, Communities and Local Government (MHCLG). To best support this consultation, we have chosen to email this response rather than submit responses through the online portal. This is so that we can highlight general comments on areas not covered in the consultation, in addition to providing responses to some of the consultation questions.

We recognise that this significant restructuring of the National Planning Policy Framework (NPPF) has brought forward many welcome improvements to the document. Many aspects of the document including the introduction of Spatial Development Strategies, stricter timescales for producing Local Plans and the clear focus on growth and development, particularly for the delivery of housing, are positive. However, we suggest that the policy is overly focused on the assessment of major development proposals, particularly when considering transport implications. Although there is an emphasis on plans identifying 'sustainable patterns of development', there are ways around this, most notably when there is a shortfall in housing land supply. Notwithstanding the protection of the countryside set out elsewhere in the document, this could result in significant number of homes being built in small/modest size schemes in locations which would be almost entirely car dependent. The number of journeys may not be significant in number at the outset but they would be cumulative and be in perpetuity. This would directly conflict with the government's ambitions to adapt to climate change and promote more active travel to facilitate healthier lives.

Key points CIHT would like to highlight in this response are:

- **Stronger action is needed to reduce car dependence**. The NPPF needs to place greater emphasis on sustainable locations, sustainable transport connectivity. Reducing the need to travel must be a core placemaking goal.
- **Sustainable and inclusive transport - especially buses - must be a central consideration**, with clearer guidance and better signposting to tools such as the Department for Transport (DfT) Connectivity Tool, Manual for

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Streets and Bus Service Improvement Plans. The NPPF must recognise that perceptions of safety, particularly for women and girls, are fundamental to walking, wheeling and public transport.

- **Vague terminology in the draft NPPF risks weakening local authority powers** and enabling development to take place in unsuitable locations, particularly in the case of small-scale developments and areas where housing land supply is constrained.

It is strategically imperative that the NPPF does more to reduce car dependence. The shift to electric vehicles will contribute to carbon reduction. However, it will do nothing to reduce congestion on the network, encourage more efficient use of land by reducing the demand for parking space in development or improve public health outcomes by promoting physical activity. Meeting these broader objectives will require a significant reduction in car dependence and fundamental changes to travel behaviour. This cannot be achieved without more of a focus on sustainable locations and sustainable transport connectivity in the NPPF. Everyday trips to school, for shopping, leisure and health can all result in increased car dependency if those facilities are not available close by, or connected by, sustainable networks. The revised framework must clearly state that reducing the need to travel and significantly increasing the proportion of journeys which are short and can be done through active travel choices should be a key objective of placemaking.

Sustainable transport must be a central consideration in site allocation. There is clearly a need for new homes, but these developments must be serviced by sustainable transport networks, including walking, wheeling, cycling and public transport, if house building is going to unlock economic growth. Consideration must also be given to the location and accessibility of facilities well beyond individual sites. Access to public transport is an essential consideration in inclusive placemaking. Buses can provide a form of accessible transport for disabled people and people who have no access to a private car. This makes buses a key instrument of social mobility and fundamental to the government's growth mission, and its milestone of delivering higher living standards in every part of the UK. In many of our cities, the bus should be the mode of choice for many journeys in preference to the car.

Much of the terminology in the new NPPF continues to be quite vague. Clearer definitions than 'pattern of sustainable growth' and 'significant amount of movement' are needed. Carbon reduction interventions based on 'significant amounts of movement' may generate action in larger scale developments but are unlikely to prompt interventions for small scale residential developments of 10 houses. It could be argued they will not generate a significant amount of movement on a daily basis but that would fail to consider the long term and cumulative effects of motorised movement. Vague terminology creates loopholes and limits local authority power to safeguard against unsuitable development. Policies which empower local authorities to refuse development proposals are already limited in number; it is rare for development to be refused because of severe operational impacts on the network. However, in areas where there is no 5-year housing land supply, there is a risk that developments will be built in unsustainable locations perpetuating car dependence in the absence of further revisions to the framework.

Additionally, vague terminology risks overlooking how small and moderate developments can cumulatively create unsafe walking and public transport environments with impacts that disproportionately affect women and girls. The NPPF should therefore ensure that safety and inclusivity are core considerations in assessing development locations, regardless of scale.

The NPPF must be clear on what vision-led means in terms of planning inclusive and safe places which prioritise walking and wheeling in the revised framework. As noted in the recently published government policy paper, [Freedom from violence and abuse: a cross-government strategy to build a safer society for women and girls](#)[1], '*safety is not just about reducing risk, it is about creating environments that foster confidence, dignity, and freedom of movement. Design and planning are critical tools in achieving this*.' The revised framework does not adequately articulate this, particularly in terms of addressing women's safety and gender inclusivity.

We appreciate that the [Design and Placemaking Planning Practice Guidance](#)[2] (PPG) has been released alongside the NPPF. However, it is disappointing that vision-led transport PPG is not due out until after the NPPF consultation, given that the revised framework should be read in conjunction with this guidance. The lack of alignment with the Freedom from Violence and Abuse Strategy also raises concerns around a lack of alignment across different policy functions. For the planning system to support national objectives effectively, there must be clear cross-departmental coordination and engagement with key sector stakeholders.

We welcome many of the changes to the design policies in the revised framework, which have also been further strengthened by updates to the Design and Placemaking PPG. We particularly welcome that movement has been included as a key principle of well-designed placemaking. Nevertheless, we caution that the design principles in the NPPF seem more applicable to major development. While the Design and Placemaking PPG categorises microsites, small sites and major sites and discusses scalability and how it might work at different levels, this could be more clearly sign posted in the NPPF itself. We do not believe that the revised NPPF provides clear enough guidance on how development can support sustainable movement patterns, and the interrelated roles of densification, location and transport in this objective.

In addition, we do not believe the revised framework sufficiently embeds the principles of inclusive design in placemaking. Safety is not just about collisions on the road but the perception of feeling safe in a place. Perceptions of safety are a particularly important consideration for encouraging people of all ages and abilities to walk, wheel and cycle. Places need to be safe and inclusive for everyone to navigate around, and travel to and from. It is not sufficient for developments to be safe and inclusive internally, consideration must be given to how improving connectivity to destinations beyond the site to encourage the perception of active travel as being safe. We recommend the NPPF goes further by explicitly recognising the differing safety experiences of women and girls, particularly at night. This should align with the

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[1] Home Office (2026), [Freedom from violence and abuse: a cross-government strategy to build a safer society for women and girls](#), Home Office
[2] MHCLG (2026), [Draft for consultation: Design and Placemaking Planning Practice Guidance](#), Ministry of Housing, Communities & Local Government

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Government's Freedom from Violence and Abuse Strategy, which states that planning and design must support confidence, dignity and freedom of movement.

We welcome footnote 56 supporting policy TR4(2), which explicitly references Manual for Streets in the revised framework. However, we strongly suggest that Manual for Streets must be clearly signposted throughout the document, not just in Chapter 15 but also in Chapters 12 and 14. Manual for Streets should be a key point of reference when making planning decisions but its current status in the revised framework does not adequately reflect the importance of the document.

We also welcome policy TR1(1.a), which references alignment with local transport plans (LTPs) as a key consideration in plan making. Strengthening the links between development and transport planning is imperative to the way that sites ultimately operate and function within the context of their surrounding areas.

Where accessibility and connectivity are not considered at the earliest stages of design and development, sustainable transport interventions cannot be embedded resulting in car-centric behaviour which is difficult to change post construction. The DfT's Connectivity Tool should be encouraged as a key element of site selection.

We have serious concerns about the lack of support for bus services in the revised framework. In planning terms, bus services provide a distinct set of challenges to active travel infrastructure, particularly from a developer perspective. Stakeholders frequently highlight to us late road adoption as a key barrier to buses servicing new developments. When roads are left unadopted before residents move into new developments, bus services are often lacking in frequency or cannot access the development, allowing car-centric behaviours to set in. In the period before roads are adopted, support for passenger transport from developers is imperative to creating the conditions for the success of services to new dwellings. While highway adoption is down to local authorities, the NPPF can do more to ensure that bus services are in place prior to homes being occupied, ensuring that late road adoption does not prevent bus services from being available from day one.

We believe the revised framework must do more to ensure public transport is a key consideration in the decision-making process. While we welcome references to sustainable transport throughout the document, we also believe that it is necessary to provide more specific guidance on ensuring new developments are serviced by bus services, such as the CIHT publication Buses in Urban Developments[3] and Bus Services & New Residential Developments.[4] There are a wide range of advice and guidance documents relating to public transport for developers and local authorities which the NPPF could sign post. Many of these can be found in the resource library of The Bus Centre of Excellence, which is funded by DfT and run by CIHT. As noted in our response to question 150, we also strongly suggest that policy TR1(1.a) should also reference alignment with Bus Service Improvement Plans.

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[3] CIHT (2018), Buses in Urban Developments, the Chartered Institution of Highways and Transportation
[4] GoAhead, Stagecoach (2025), Bus Services and New Residential Developments- Second Edition, Go Ahead Group UK, Stagecoach

We do not agree with the definition of sustainable transport in the glossary of the revised Framework as it does not fully reflect the established transport hierarchy. The definition should be clear that walking, wheeling and cycling are the most sustainable modes, followed by public transport and car sharing. Finally, it should acknowledge that low emission vehicles have a role to play in reducing the environmental impact of movement but towards the bottom of the transport hierarchy. The use of EVs does not address issues of congestion or encourage more effective use of land. Enabling car-led schemes will not reduce car dependence or improve the safety of those walking, wheeling or using public transport.

Additionally, we recommend that the definition of Transport Assessment be amended to 'A comprehensive and systematic process that considers and sets out transport issues relating to a proposed development, in the context of the vision for the scheme and its impact on the surrounding area and transport network'.

5. Do you agree with the proposed approach to simplifying the terminology in the Framework where weight is intended to be applied? Partly agree

a) Please provide your reasons, particularly if you disagree.
'The consultation document notes that the current version of the NPPF uses different words - 'great,' 'significant' and 'substantial' - to imply a positive weighting should be applied to certain considerations. We welcome the proposals to simplify this terminology by only using the word 'substantial' in these cases, providing clearer and more consistent terminology.

However, we suggest that there is an over-use of the word 'substantial' throughout the document which is not helpful. Planning rules should encourage place-based solutions and therefore there should be flexibility by the decision maker taking account of the scale of any proposal and its impact. Overuse of the word substantial also means that there remains limited guidance in the NPPF on how much weight should actually be applied to certain considerations, such as sustainable transport, in the decision-making process.

We recognise that Paragraph 13 of the Introduction provides clarity on the relationship between the NPPF and PPG documents. We believe that direct reference to guidance documents in the NPPF ensure that more weight is given to guidance documents and we welcome that Manual for Streets and the Design and Placemaking PPG are directly referenced on p. 70 of the revised framework. We encourage MHCLG to go further and ensure appropriate weight is given to Manual for Streets in decision-making through reference to the document throughout the revised framework.

However, it is disappointing that vision-led transport planning policy guidance is not due out until after the NPPF consultation, given that the revised framework should be read in conjunction with this guidance.

6. Do you agree with the role, purpose and content of spatial development strategies as set out in Policy PM1? Partly agree

a) Please provide your reasons, particularly if you disagree.

The reference to LTPs in Policy PM1(2f) is welcome. However, this element of the policy is aspirational and may be difficult to achieve given the wide range of organisations, statutory bodies and stakeholders required to deliver across multiple issues and differing funding regimes.

11. Do you agree with the principles set out in policy PM6(1c), including its provisions for preventing duplication of national decision-making policies? <mark>Partly agree</mark>

a) Please provide your reasons, particularly if you disagree.
CIHT supports the principle that duplication should be avoided. However, we emphasise that this principle will rely on consistent policymaking.
This version of the NPPF is the third major revision of the document in as many years. We appreciate that the government has remained committed to an extensive planning reform programme and welcome many of the positive steps being taken. We emphasise that for further reform to build on this work effectively, it should be considered and constructive to ensure continuity in policymaking and allow for stable implementation by the sector.

13. Do you agree with the approach to the preparation of plan evidence set out in policy PM8? P<mark>artly agree</mark>

a) Please provide your reasons, particularly if you disagree.
We welcome that policy PM8 has expanded on the policy outlined in paragraph 32 of the current framework. We support the inclusion of PM8(2c), which highlights the role of joint working with neighbouring authorities to prepare evidence. We suggest that this principle could be strengthened by placing more emphasis on importance of collaboration at the earliest stage of plan making in PM10 and PM11.

14. Do you agree with the approach to identifying land for development in PM9? <mark>Partly agree</mark>

a) Please provide your reasons, particularly if you disagree.
Footnote 15 to the policy should make reference to the DfT Connectivity Tool to ensure that sites selected are in locations that provide good accessibility for all future users. Given the emphasis placed on location in new draft Design and Placemaking PPG, we suggest direct reference to this guidance to ensure that site allocation considers the suitability of a site in accordance with design and placemaking principles.

15. Do you agree with the policies on maintaining and demonstrating cross-boundary cooperation set out in policy PM10 and policy PM11? <mark>Partly agree</mark>

a) Please provide your reasons, particularly if you disagree.
We welcome the inclusion of PM10(1c), which encourages plan-making authorities to identify and address cross boundary matters, including the need for alignment between strategic planning authorities where major transport corridors support employment.

In line with our response to question 13, we suggest that the NPPF should stress the importance of collaboration at the earliest stage of plan making to encourage a more aligned and evidence-based approach.

We also caution that PM10(4) - which stipulates that '*Where there is uncertainty about the future direction of other parts of the development plan or the plans of infrastructure providers, such as due to misaligned timings, plan-making authorities should make pragmatic decisions on the basis of available information rather than waiting for a full set of evidence from other bodies*' - may leave too much scope for collaboration to be dismissed in the interest of expedient decision making.

Collaboration should not be viewed as a constraint on strategic decision making. Planning is unlikely to be truly 'vision-led' without strong cross-boundary communication and alignment.

16. Do you agree that policy PM12 increases certainty at plan-making stage regarding the contributions expected from development proposals? Partly agree

a) Please provide your reasons, particularly if you disagree.
We agree that PM12 does increase certainty at plan-making stage regarding the contributions expected from development proposals. However, we highlight that while developer contributions to affordable housing are very important, so too are contributions to other policy objectives, including transport and health. To increase certainty further, PM12 should also refer to other key strategic policy areas.

18. Do you agree with policy PM13 on setting local standards, including the proposal to commence s.43 of the Deregulation Act 2015? Partly agree

a) Please provide your reasons, particularly if you disagree.
We agree that open space, design and parking particularly are locally variable and require place-based solutions. For example, parking standards may need to be flexible and used as a means of encouraging investment in infrastructure that encourages walking, wheeling, cycling and public transport use. We therefore support policy PM13(1) in principle, because it clarifies that development plans can set quantitative standards around these matters for development proposals to meet.

However, we are concerned about the proposal to prevent local authorities from setting local energy efficiency standards beyond the minimum requirements set in the building regulations. This may impact local authorities ability to meet carbon budgets and could negatively impact policies across other areas of sustainable development such as embodied carbon and climate change resilience. We propose that local energy efficiency standards should be added as an exemption to policy PM13(1b).

19. Do you agree that the tests of soundness set out in policies PM14 and PM15 will allow for a proportionate assessment of spatial development strategies, local plans and minerals and waste plans at examination? Partly disagree

a) If not, please explain how this could be improved to ensure a proportionate assessment, making it clear which type of plan you are commenting on?

Effective spatial development requires the delivery of infrastructure, much of which local planning authorities do not have control over, such as health, utilities and highways. This will make a proportionate assessment of the soundness of these strategies challenging.

Plans should be based on collaboration across local authority policy functions (such as planning and highways) and key local service providers, not just cross-boundary joint working on strategic matters. The tests of soundness for all sets of plans would be strengthened if they included provisions to require local-level collaboration and joint working to be demonstrated.

20. Do you have any specific comments on the content of the plan-making chapter which are not already captured by the other questions in this section?
We believe more weight should be given to local transport plans (LTPs) in the plan-making process. Transport needs to be linked to the local plan because it is fundamental to the way sites operate and provides connectivity to both the surrounding area and destinations further afield. If sustainable transport options are not provided at the outset, people will default to car use and habits will be difficult to change. One way to achieve this is to ensure local plans are consistent with the LTPs as far as possible, particularly in addressing development locations and impacts.

24. Do you agree with the principles set out in DM3? <mark>Partly disagree</mark>

a) Please provide your reasons, particularly if you disagree.
The input of statutory consultees into the design and consideration of proposals can be essential. Whilst consultation needs to be effective and not unduly delayed, if additional information is required and negotiation on solution are essential, decisions should not be compromised for the sake of speed. It may be impossible to rectify errors later with detrimental and long-lasting adverse impacts. We suggest that DM3(1d) may be too strong in its insistence that decisions should not be delayed to seek advice from consultees. Whilst highway authorities are only one of many statutory consultees, we consider that decisions taken without their full responses would present significant risks to public safety as well as long term consequences for the operation of the highway network. There is an expectation within the revised framework that impacts on the transport network can be mitigated. This may require investigation and negotiation to agree appropriate measures. This requires sufficient time for appropriate infrastructure and interventions to be agreed and secured effectively.

30. Do you agree that policy DM7 clarifies the relationship between planning decisions and other regulatory regimes? <mark>Partly agree</mark>

a) Please provide your reasons, particularly if you disagree.
There are some areas of legislation where there are overlaps between regimes. An example is securing car-free housing. As this is an important policy objective in cities and clear guidance on how to deliver it would be advantageous.

34. Do you agree with the proposed approach to setting a spatial strategy in development plans? <mark>Partly agree</mark>

a) Please provide your reasons, particularly if you disagree.
The Presumption in Favour of Sustainable Development in the current framework includes a reference to sustainable locations, with footnote 9 directly linking this policy to Paragraphs 110 and 115. However, the proposed text at the start of chapter 4 promoting 'sustainable patterns of development' does not make any specific reference to the need for locations to provide accessibility to the facilities and services – such as education, employment, health and leisure – which future occupiers and users will need. There is therefore a need to be clearer about what criteria a 'sustainable pattern of growth' set out in S1(1b) would need to meet. This will be especially important where there is a shortage of housing land supply. If an unsuitable location was proposed where there was little or no choice of transport mode, the decision maker may not be able to apply the test of S1(1a.ii) and refuse the development because it appears to only apply if there were substantial adverse impacts to outweigh the 'substantial' benefits of any additional housing. That is likely to be a high bar. It should be remembered that a development will generate the need for movement throughout its entire lifetime. The number of journeys may not be significant in number at the outset but they would be cumulative and be in perpetuity. Any assessment made on short term and peak hour movements would not address the 'whole life' impact of the development or the need to mitigate and adapt the effects of climate change.

In assessing whether a pattern of development is genuinely sustainable, the safety and inclusivity of everyday movement routes, particularly those used by women and girls, must also be considered. Unsafe or poorly lit routes undermine the practical viability of active and public transport choices.

35. Do you agree with the proposed definition of settlements in the glossary?
Partly agree

a) Please provide your reasons, particularly if you disagree.
We agree that the definition of a settlement in the glossary is useful when applied to an area where there is a plan in place. However, we believe it is likely to be problematic when dealing with speculative development outside existing boundaries, where there is no development plan and/or a shortage of housing supply resulting in proposals on site which would provide future occupants with poor access to services and facilities.

39. Do you have any views on the specific categories of development which the policy would allow to take place outside settlements, and the associated criteria? Partly agree

a) Please provide your reasons.
The list of development that is permissible outside settlements in S5(1.a-g) is acceptable. Regarding criterion S5(1.h) - '*Development for housing and mixed-use development which would be: within reasonable walking distance of a railway station…*' - there is a need to define what is a 'reasonable walking distance'. This should not only be based on distance – e.g. within 800m but must also take account of the quality of such a route and its perceived level of safety and convenience. Routes which are attractive to users are direct, with footways, lighting and accessible road crossings, thus making them inclusive and easy for everyone to navigate. Whilst the footnote makes it clear that rail services would need to be frequent, there is likely

to be pressure to select sites close to stations with fewer services. These should only be considered acceptable if there are practical means of improving service frequencies. Assessment of 'reasonable walking distance' should explicitly consider night-time safety and the experiences of women and girls. This aligns with national VAWG commitments and ensures that station-led development does not rely on routes that feel unsafe after dark.

This policy makes no reference to the DfT Connectivity Tool which might identify alternative sites where there may be potential to improve the services available, thereby providing greater choice of travel mode.

In contrast to the restrictions set out in the other criteria, criterion S5.1(j) provides for development outside settlement boundaries where there is no 5-year housing land supply. In such cases the site's proximity to an existing settlement may be of little value if it does not have a reasonable range of facilities. The tests set out for any site to meet criterion S5.1(j.ii) should be strengthened so that the decision maker can take the provision of local facilities and services into account.

Policy S5.2 should be more clearly worded. If the only situations where the adverse effects would outweigh the benefits related to assets and protected areas named in footnote 23 of S1.1(a.i), this would be a retrograde step with respect of the sustainability of locations in relation to accessibility.

42. Do you agree with the approach to planning for climate change in policy CC1? <mark>Partly agree</mark>

a) Please provide your reasons, particularly if you disagree.
Modal shift to electric vehicles alone will not be sufficient to support the transition to net zero by 2050. If a radical reduction in Greenhouse gas emissions is to be achieved (30% of which come from domestic transport at present[5]), development patterns must seek to reduce reliance on the car and encourage the use of active travel and public transport. This should be stated more explicitly in Policy CC1(1.a).

43. Do you agree with the approach to mitigating climate change through planning decisions in policy CC2? <mark>Partly agree</mark>

a) If not, what additional measures could be taken to ensure climate change mitigation is given appropriate consideration?
The reference to locating development where there is a genuine choice of sustainable transport modes is highly welcomed. Referring to the DfT's connectivity tool as a means of identifying such sites would be helpful. In this part of the NPPF the implication is that this should apply to all development, regardless of its scale. This is also to be welcomed. However, this ambition should be cross-referenced and repeated in the chapter on transport, particularly in Policies TR3 and TR4. As currently drafted, the transport chapter focuses largely on the need to have a vision-based approach for large scale development but fails to consider the cumulative effects of placing development in inaccessible places, even if delivered as small and moderate scale schemes, when to do so would perpetuate car dependence and

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[5] UK Government (2026), 2024 UK greenhouse gas emissions: final figures - statistical summary, UK Government

emissions. In any event a switch to EVs completely ignores the problems of congestion, road safety and the need to promote activity to improve public health.

We recognise that 'sustainable transport' is a useful general term to summarise all forms of non-car transport from walking to rail. However, the revised NPPF only specifically mentions 'bus' once. It therefore completely fails to address the importance of providing bus services to serve new development. In many areas these may be the only means of providing access to city and town centres without reliance on the car. The NPPF should therefore be seeking to positively encourage provision of such services as part of development proposals. Whilst investment in infrastructure may be enough to encourage walking, wheeling and cycling, particularly for short journeys, that will not be sufficient to provide long term, viable bus services for journeys to more distant destinations. This has particularly detrimental consequences for people without access to a car.

62. Are any changes to policy HO7 needed in order to ensure that substantial weight is given to meeting relevant needs?
Attaching substantial weight to provision of accommodation could lead to housing development in the wrong place, if 'evidenced need' is only determined in relation to the supply of 5-year housing supply. Automatically giving substantial weight to any benefits when there is a lack of supply does not give the decision maker sufficient flexibility in weighing up other important considerations. There should be clear justification for development meeting a specific local housing need in such locations, particularly when sites are remote from a reasonable range of services and facilities.

87. Do you agree with the approach to rural business development in policy E4? Partly agree

a) Please provide your reasons, particularly if you disagree.
Rural business development should be supported, provided that it can provide clear reasons to justify a location outside settlement boundaries. This will be especially important where a development will be largely car dependent and may generate traffic along unsuitable rural roads and provide no choice of transport mode.
We propose an additional criteria E4.2(c) which requires proposals to provide evidence to justify a rural location. Any development in a rural area which would generate significant amounts of movement is unlikely to be acceptable without interventions to encourage access by non-car modes.

89. Do you agree with the approach to development in town centres in policy TC2? Partly agree

a) If not, please explain how you would achieve this aim differently?
We suggest that Policy TC1 and TC2 could be strengthened by referring to the importance of creating attractive town centres which prioritise movement by walking, wheeling and cycling over car use. Developments which contribute to the improvement of the public realm should be encouraged. Schemes which provide places where people can live close to the services and facilities that they need, will bring significant benefits by increasing active travel and reducing car dependency.

93. Do you agree that the updated policies provide clearer and stronger support for the rollout of 5G and gigabit broadband?

<mark>Partly agree</mark>

a) Please provide your reasons, particularly if you disagree.
The provision of high-quality communications infrastructure in new homes and businesses will also contribute to reducing the need to travel and adapting to climate change. These benefits should be highlighted in Chapter 9 and cross referenced to Policy TR3(1.a).

118. Do you agree the high-level design principles provided in policy L2(d) appropriate for national policy? <mark>Partly agree</mark>

a) Please provide your reasons, particularly if you disagree.
The intensification of residential uses in urban areas can result in demand for additional parking and in some places acute parking stress, which adversely affects quality of life. Therefore, proposals should be combined with mechanisms and incentives to promote use of sustainable transport choices, reducing car use and demand for parking, for example by use of car clubs. This would be in addition to the need to provide safe access and acceptable living standards for future residents and existing neighbours.

122. Do you agree with the minimum density requirements set out within policy L3? <mark>Partly agree</mark>

a) Please provide your reasons, particularly if you disagree.
Land could be used more effectively if the need for parking spaces could be reduced by improving sustainable transport choices as an integral part of development schemes.

Policy L3(1) states that 'development proposals should make efficient use of land, taking into account … a sites connectivity'. This should directly reference the DfT's Connectivity Tool.

While Policy L3(3) links minimum density requirements only to 'well connected' railway stations, we suggest there is an opportunity in Policy L3 to highlight the wider link between dwelling density and public transport. Access to transport services supports density growth, while higher densities help support the viability and sustainability of transport services. As per the CIHT guidance Buses in Urban Developments[6], we recommend that new developments be planned with sufficient compactness and density to enable the following maximum walking distances to bus stops-

- 500 metres for core bus corridors with two or more high-frequency routes (5 or more buses per hour)
- 400 metres for single high-frequency routes (5 or more buses per hour)
- 300 metres for less frequent routes (less than 5 buses per hour)
- 250 metres for town/city centres

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[6] CIHT (2018), Buses in Urban Developments, Chartered Institution of Highways and Transportation

124. Do you agree with the proposed definition of a 'well-connected' station used to help set higher minimum density standards in targeted growth locations? In particular, are the parameters we're using for the number of Travel to Work Areas and service frequency appropriate for defining a 'well-connected' station? <mark>Partly disagree</mark>

a) Please provide your reasons and preferred alternatives.

The NPPF focuses on encouraging development around stations with a reasonable connection to a suitably sized Travel to work area is generally welcome. However, the proposed definition of a 'well-connected' station outlined in footnote 45 – in a top 60 travel to work area with at least two trains per hour in each direction - seems a very arbitrary definition upon which to accept development. People travel to a considerably greater number of destinations for different purposes than just the local employment hub by train. The DfT's Connectivity Tool provides a genuine evidence base for locational matters and should be central to guiding site allocation.

Policy L3.3 should be strengthened by defining what is a 'reasonable walking distance'. This should not only be based on distance – e.g. within 800m but must also take account of the quality of such a route and its perceived level of safety and convenience. The assessment must be based on the actual routes taking quality into consideration. If found to be well connected; increased densities on a development site can then be supported. There should be cross references to the transport chapter on this issue. This assessment should incorporate an understanding of gendered safety perceptions, recognising that women and girls may experience station approaches differently, particularly in low visibility or isolated areas.

125. Are there other types of location (such as urban core, or other types of public transport node) where minimum density standards should be set nationally? <mark>Yes</mark>

a) If so, how should these locations be defined in a clear and unambiguous way and what should these density standards be?
There may be locations in cities where there are high frequency bus services. Such sites should be considered to be well connected and therefore capable of supporting a higher density of development. Bus services would need to be regular, reliable and at a frequency of at least three buses per hour in each direction. In some towns there may be opportunities for some sites to be served by a half-hourly bus service which could support additional development close to the bus stops.

As per the CIHT guidance [Buses in Urban Developments](#)[7], we recommend that new developments be planned with sufficient compactness and density to enable the following maximum walking distances to bus stops-

- 500 metres for core bus corridors with two or more high-frequency routes (5 or more buses per hour)
- 400 metres for single high-frequency routes (5 or more buses per hour)
- 300 metres for less frequent routes (less than 5 buses per hour)

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[7] CIHT (2018), [Buses in Urban Developments](#), Chartered Institution of Highways and Transportation

- 250 metres for town/city centres

133. Do you agree with proposals to better enable development opportunities around suitable stations to be brought forward? <mark>Partly agree</mark>

a) Please provide your reasons, particularly if you disagree.
Although Policy GB3 refers to Policy L3 it would be more helpful if it specifically referred to the intention to encourage development close to railways stations. The reference to sustainable development patterns in Policy GB4 is welcomed.

136. Do you agree policies GB6 and GB7 set out appropriate tests for considering development on Green Belt land? <mark>Partly agree</mark>

a) Please provide your reasons, particularly if you disagree.
The tests set out in GB6 and GB7 are appropriate. It would be helpful to strengthen GB7(1.h.i) by ensuring that walking routes are not only acceptable in terms of distance but also safety, inclusivity and quality. The frequency of the train services is also a reasonable starting point for considering the suitability of such sites. However, use of the DfT Connectivity Tool would also be a means of assessing site suitability, especially where there may be frequent bus services.

This comment also applies to policy GB8(1.c), which stipulates that major development proposed on land released from the green belt 'contribute provision of new green space, or improvements to existing green space, which is accessible to the public. New residents should be able to access good quality green spaces within a short walk of their homes, whether through on-site provision or through access to offsite spaces.' Walking routes to green spaces must be safe and inclusive for both adults and children. We also suggest a maximum distance is included so that the policy clearly defines what constitutes a 'short walk'.

145. Do you agree that proposed changes to the grey belt definition will improve the operability of the grey belt definition, without undermining the general protections given to other footnote 7 areas? <mark>Partly agree</mark>

a) Please provide your reasons, particularly if you disagree.
The simplification of the definition of grey belt land is welcomed. The previous reference to footnote 7 protections made it overly complex.

146. Do you agree that policy DP1 provides sufficient clarity on how development plans should deliver high quality design and placemaking outcomes? <mark>Partly agree</mark>

a) Please provide your reasons, particularly if you disagree.
We suggest that Policy DP1 should include reference to Manual for Streets, in addition to the current reference to the Design and Placemaking Planning Practice Guidance in DP1(1.d). Better integration of relevant guidance and documents in the NPPF would also support the establishment of a consistent framework for vision-led planning. CIHT has consistently called for the NPPF to signpost Manual for Streets. We welcome the footnote reference to Manual for Streets made in Chapter 15 of the revised framework, but we strongly suggest that Manual for Streets must be clearly

signposted throughout the document, not just in Chapter 15. Manual for Streets should be a key point of reference when making planning decisions but its current status in the revised framework does not adequately reflect the importance of the document.

148. Do you agree policy DP3 clearly set out principles for development proposals to respond to their context and create well-designed places? <mark>Partly agree</mark>

a) Please provide your reasons, particularly if you disagree.
We welcome the movement principle outlined in DP3(1.e), particularly the specific provision that prioritises walking, wheeling, cycling and public transport. However, it would be helpful to add an explicit reference in DP3(1.e) to the need to reduce car reliance as an objective of design, thereby reducing the need to provide space for parking, whilst retaining access for deliveries and emergency vehicles. We believe the NPPF should encourage development that reduces the need to travel throughout the document. Policy DP3(1.e) would be an appropriate place for the revised framework to clearly assert the need to reduce travel as a principle of placemaking. While we welcome these principles, we do not believe that the revised framework generally provides a sufficient explanation of the relationship between transport, densification and location, and how these factors work together to enable movements to be more sustainable.

We also emphasise that, as with principle DP3(1.f) on public space, routes and infrastructure that enables movement should be safe, inclusive and accessible. To be fully inclusive, design principles should explicitly consider the safety of women and girls, ensuring movement routes are well lit, overlooked and feel safe at all times of day and night.

150. Do you agree that policy TR1 will provide an effective basis for taking a vision-led approach and supporting sustainable transport through plan-making? <mark>Partly agree</mark>

a) Please provide your reasons, particularly if you disagree.
We welcome the new reference to LTPs in the revised framework, in addition to reference to Local Cycling and Walking Infrastructure Plans in policy TR1(1.a). We strongly recommend that policy TR1(1.a) should also reference alignment with Bus Service Improvement Plans. Reference to the Connectivity Tool in TR1(1.b) is also strongly welcomed.

Vision-led planning should also incorporate outcomes for gender inclusive mobility, recognising that fear of walking, wheeling or using public transport after dark directly affects travel choices and can undermine mode shift objectives.

Generally, policy TR1 is to be welcomed, but the approach should not only be followed at the plan making stage, but also when dealing with individual development proposals. The same principles should apply regardless of the scale of the proposal, recognising that the assessment and consideration of impacts should be proportionate to the particular scheme. Whilst there is an emphasis on infrastructure provision, it should be remembered that there should also be reference to the transport services that are or could be provided. Providing a bus stop, is not the sole

requirement of a bus service that will be effectively used or would provide a realistic choice for a user.

What constitutes a 'significant amount of movement,' as noted in policy TR1(2), will vary from place to place and be dependent on context. The thresholds should be low and not be solely related to the highway network's ability to accommodate additional demand. Movement by all modes should be considered and the proportion made by car may be a more important means of defining what is 'significant' than the actual number of trips. Even small developments are capable of generating significant demand for movement over time. If most journeys are undertaken by car this will be at odds with the aim of radically reducing emissions and will reduce the likelihood of delivering public health improvements that would come with the use of active travel. Leaving the way in which a 'significant amount of movement' is defined to individual local authorities, developers or other stakeholders is going to create controversy. This needs to be the subject of more guidance and advice to ensure compatibility with other objectives of the NPPF.

Overall, the revised framework does not provide a sufficient explanation of the relationship between transport, densification and location, and how these factors work together to enable movement to be undertaken more sustainably

Additionally, there is also no reference at all in the transport chapter to the importance of rail and railway stations as a potential means of encouraging development in locations close to rail services. It would be appropriate to cross reference Policies L3(3) and GB7(1.h.i&ii) to policy TR1(d).

151. Do you agree that policy TR2 strikes an appropriate balance between supporting maximum parking standards where they can deliver planning benefits, and requiring a degree of flexibility and consideration of business requirements in setting those standards?
Strongly agree

a) Please provide your reasons, particularly if you disagree.
We support the approach to parking standards. Parking standards should be prepared through collaborative work undertaken by highway and planning authorities enabling their adoption by the local planning authority.

152. Do you agree with the changes proposed in policy TR3(1a), including the reference to proposals which could generate a significant amount of movement, and the proposed use of the Connectivity Tool? Partly disagree

a) Please provide your reasons, particularly if you disagree.
Policy TR3(1a) is critical to the assessment of the suitability of the location of any site to accommodate additional development and its associated pattern of movement. At present this responsibility is in danger of falling between the responsibilities of the local planning and highway authorities. It is essential that collaborative work is carried out involving both parties to ensure a robust approach to this assessment. The aim of limiting the need to travel and offering genuine choice of modes should be considered regardless of the size of development or the amount of movement that could be generated. Even the smallest developments should consider the priority of providing first for pedestrians and cycle movements as required by TR4(1a). Leaving

the decision maker to decide what is a 'significant' amount of movement, even taking context into account, could open up opportunities to develop homes in the countryside for which there is no justification.

The phrase '*which could generate a significant amount of movement, in the context of the areas within which they are situation*' should be replaced with: '*Development proposals should be in locations that are, or can be made sustainable, by limiting the need to travel and offering a genuine choice of transport modes for residents and users, unless the nature of the use makes this impractical*.'

The reason for requesting this change is because even small numbers of car journeys from development located in areas where there is no choice of mode will generate those car-dependent trips in perpetuity. This would conflict with the NPPF's Policy CC1(1.a.i) clear aim of ensuring that patterns of development should contribute to radical reduction in greenhouse gas emissions. There is no current mechanism for guaranteeing that such journeys would only be undertaken by EVs. Consideration should be given to a presumption against development in areas which have very low levels of connectivity, without a specific justification for the location of a particular type of development.

In addition, it should be noted that even small developments can cumulatively create unsafe or unwelcoming walking and wheeling environments, particularly after dark. These impacts disproportionately affect women and girls and directly undermine the practical viability of sustainable transport choices. We therefore recommend that the assessment of sustainable locations under TR3 explicitly considers safety and gender inclusive mobility, in line with national commitments in the Government's Freedom from Violence and Abuse Strategy.

153. Do you agree that proposed policy TR4 provides a sufficient basis for the effective integration of transport considerations in creating well-designed places? Partly disagree,

a) Please provide your reasons, particularly if you disagree.
Policy TR4 as currently worded could be a 'get out' clause for small developments. All developments should consider how they could contribute to the criteria set out in this policy. They should do so in a proportionate way, thus ensuring that all development, regardless of scale, contributes in a positive way to these objectives. Policy TR4(1) should be amended from '*To contribute to creating well-designed places, transport considerations should be integral to the design of development, proposals for which should…*' to '*To contribute to creating well-designed places, transport considerations should be integral to the design of development, regardless of scale, proposals for which should…*' Simply including the phrase, '*regardless of scale*', to the first sentence of TR4(1) would deliver a better outcome. We also suggest that this would constitute a design principle and therefore suggest should be added to policy DP3(1).

This should include ensuring that walking and wheeling routes are designed to feel safe and inclusive for all users

We welcome the footnote reference to Manual for Streets, but we strongly suggest that Manual for Streets must be clearly signposted throughout the document, not just

in Chapter 15. Manual for Streets should be a key point of reference when making planning decisions but its current status in the revised framework does not adequately reflect the importance of the document.

154. Do you agree with policy TR5 as a basis for supporting the provision and retention of roadside facilities where there is an identified need? <mark>Partly agree</mark>

a) Please provide your reasons, particularly if you disagree.
Policy TR5 to support provision and retention of roadside facilities is welcomed. There should be reference to the DfT's circular 01/2022: Strategic road network and the delivery of sustainable transport[8]. It would also be helpful if local planning authorities were specifically required to identify sites in their areas working with local highway authorities where there is a demonstrable need for such facilities.

155. Do you agree that the amended wording proposed in policy TR6 provides a clearer basis for considering when transport assessments and travel plans will be required, and for considering impacts on the transport network? <mark>Partly disagree</mark>

a) Please provide your reasons, particularly if you disagree.
The need to assess transport impacts should not be confined to developments that are likely to generate 'significant amounts of movement'. The approach should mirror that which is done for the consideration of heritage assets, by providing any assessment that is proportionate to the scale of the development and its context. A small development may have a marginal transport impact, nevertheless measures should be considered that would reduce car dependence and provide or encourage the use of sustainable modes, particularly walking and wheeling.

The wording of the tests for highway and safety impacts has been changed. They are less clear. The possibility of refusing development because of unacceptable impacts on highway safety or severe effects on the operation of the highway network should be retained. However, it should be clear that these are purely 'highway and safety tests'. It therefore does not follow that when these are satisfied a site is sustainable in 'transport' terms. This would assist in distinguishing between highway assessments based on peak hour movements and broader considerations of other journeys that take place throughout the day, week and year, across all modes, the effects of which will be of concern to both highway and planning authorities.

Highway authorities should be encouraged to comment on location and wider accessibility issues even if they don't object because a scheme passes the 'highway tests'. This principle can be strengthened in the NPPF by adding the phrase '*on the surrounding area and transport network*' to the end of the definition of transport assessment in the glossary.

156. Do you agree the proposed text in policy TR7 provide an effective basis for assessing proposals for marine ports, airports and general aviation facilities? <mark>Partly disagree</mark>

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[8] DfT (2022), Strategic road network and the delivery of sustainable development, Department for Transport

a) Please provide your reasons, particularly if you disagree.
Policy TR7 relating to ports and airports appears reasonable but what it means in practice is likely to be highly controversial. These sites are amongst those that generate the largest number of land-based transport movements of any land uses. The transport assessments of any developments at ports and airports should be comprehensive and thorough and not confined to peak hour assessments in neutral months. Any assessment should quantify movements across all modes and consider daily, weekly and yearly effects on the surrounding transport networks.

157. Do you agree with the additional policy on maintaining and improving rights of way proposed in policy TR8? Partly agree

a) Please provide your reasons, particularly if you disagree.
Policy TR8 which addresses public rights of way (PROW) is welcomed and should encourage greater integration of the PROW network with the rest of the network in order to encourage more walking, wheeling and cycling to access to day-to-day facilities.

158. Do you agree with the approach to planning for healthy communities in policy HC1, including the expectation that the development plan set local standards for different types of recreational land, drawing upon relevant national standards? Strongly agree

a) Please provide your reasons, particularly if you disagree.
The importance of providing and locating facilities close to where they can be accessed by non-car modes is of critical importance to improving public health. The benefits of small amounts of exercise through walking, wheeling and cycling are well documented[9] and should be built into people's daily or weekly regimes wherever the opportunities arise. As shown in the CIHT policy briefing, Making the case for investment in active travel[10], a more proactive approach to health in policymaking can deliver long-term savings in reactive healthcare costs. Policy HC1(1.e) is therefore supported.

159. Do you agree that Local Green Space should be 'close' to the community it serves? Strongly agree

a) Please provide your reasons, particularly if you disagree.
Provision of Local Green Space close to the community it serves is strongly supported.

We welcome footnote 58 which references Natural England guidance on Green Infrastructure. CIHT has previously conducted research on Green and Blue Infrastructure (GBI) – Green and Blue Infrastructure: a transport sector perspective.[11] GBI brings many social, environmental and economic benefits to a local area.

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[9] AOMRC (2015) Exercise: The Miracle Cure and the Role of the Doctor in Promoting It, Academy of Medical Royal Colleges
[10] CIHT (2025), Making the case for investment in active travel, Chartered Institution of Highways and Transportation
[11] CIHT (2023), Green and Blue Infrastructure: A Transport Sector Perspective, Chartered Institution of Highways and Transportation

However, we have found that it is often under-utilised, particularly in streets and roads, and that knowledge gaps are slowing planning and implementation progress. We suggest that a lack of guidance is partly why local authorities (including the planning, development, highways operations, and maintenance functions) struggle to fully engage in the GBI process. CIHT would welcome the introduction of further guidance that supports the development of GBI in public spaces.

174) Do you agree with the proposed requirement in policy F8 for sustainable drainage systems to be designed in accordance with the National Standards? <mark>Partly agree</mark>

a) Please provide your reasons, particularly if you disagree.

It is essential for amenities in new developments to be designed to a standard that makes them adoptable by public authorities. This issue is particularly true of roads that, when left unadopted, can mean that a new development is not served by a public bus service. Road adoption needs to take place before properties are occupied to avoid residents becoming car dependent.

CIHT will also be submitting a response to MHCLG's consultation on Reducing the prevalence of private estate management arrangements.

<div align="right">Ends</div>