

# Response ID ANON-2CN7-MFBP-Y

Submitted to **National Planning Policy Framework and National Model Design Code: Consultation proposals**

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## A bit about you

**What is your name?**

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**What is your organisation?**

**Organisation:**

Cycling UK

**What type of organisation are you representing?**

Interest group or voluntary organisation

**If you answered "other" please provide further details:**

## Proposed changes to Chapter 2: Achieving sustainable development

**1 Do you agree with the changes proposed in Chapter 2?**

No

**Please provide comments:**

Cycling UK values the role that our land-use planning system plays in addressing the environmental, health and other adverse impacts of development and transport.

We share the concerns of the other co-signatories to the joint response coordinated by the Town & Country Planning Association (TCPA) and the Centre for Sustainable Energy, that the proposed amendments to the National Planning Policy Framework (NPPF) and National Model Design Code (NMDC) do not go anywhere near far enough towards ensuring that the planning system plays its part in meeting the 6th carbon budget set by the Committee on Climate Change (CCC), and hence towards averting temperature increases above 1.5C. In particular, they are not consistent with the vision set out in the Department for Transport (DfT) publication 'Decarbonising transport: setting the challenge' (namely for a zero-carbon future in which "Public transport and active travel will be the natural first choice for our daily activities. We will use our cars less"). Nor do they adequately support the aims and targets for increased cycling and walking by 2025 in DfT's Cycling and Walking Investment Strategy, or the more recent target for 2030 in DfT's 'Gear change' vision for cycling and walking.

As set out in the above joint response, we call for the insertion of the following paragraph following paragraph 9:

"Climate change is the greatest long-term challenge facing the world today. Addressing climate change is therefore the Government's principal concern for sustainable development. For the avoidance of doubt, achieving sustainable development includes securing the mitigation of, and adaptation to, climate change. All planning strategies, and the decisions taken in support of them, must reflect the Government's ambition to help businesses and communities build a zero carbon future and prepare for the impacts of climate change. Accordingly, planning policies and all planning decisions must be in line with the objectives and provisions of Climate Change Act 2008 (Target Amendment 2019), namely the 2050 net zero carbon target."

Our more detailed suggested amendments in this submission complement the other proposals made in that joint submission.

Our further suggested amendments to Chapter 2 aim to strengthen the role of the NPPF in bringing about visionary and fundamental change:

In paragraph 8(a), 'an economic objective', amend the phrase 'in the right places' to 'in environmentally sustainable locations', as the intended meaning of "the right places" is currently unclear. It may then be preferable to alter the word order (placing "at the right times" after "land of the right types").

In new paragraph 11(a), after the words “in urban areas”, add “and avoiding development in car-dependent locations”.

In paragraph 11(d), after the words “the application of policies in this Framework”, delete “that protect areas or assets of particular importance” and replace with “aimed at preventing adverse climate or ecological impacts”. This amendment would expand the environmental grounds on which a development can be refused, in situations where relevant development plan policies are either absent or out-of-date.

## **Proposed changes to Chapter 3: Plan-making**

### **2 Do you agree with the changes proposed in Chapter 3?**

No

#### **Please provide comments:**

We broadly agree with the proposed changes. However we suggest the following amendments or additions for clarity,.

Paragraph 20: replace the word “pattern,” with “location, layout,”

Paragraph 20(b): after “infrastructure for transport”, add “(particularly sustainable transport)”.

Paragraph 22: After the word “vision”, add “for sustainable development”. We suggest a definition for “sustainable development” in our proposals for the glossary.

Paragraph 31: After “up-to-date evidence”, add “including evidence from environmental impact assessments and other objective assessments of sustainable development.”

Paragraph 35(d): We recommend that the range of Government guidance documents that should count as ‘material considerations’ - e.g. those listed in the ‘References’ section at the back of the National Model Design Code - should be listed in an online document or URL library.

## **Proposed changes to Chapter 4: Decision making**

### **3 Do you agree with the changes proposed in Chapter 4?**

No

#### **Which option relating to change of use to residential do you prefer and why?:**

We do not agree that housing should be delivered through permitted development, because this undermines the democratic aspects of the planning system and breaks the vital process chain of planning application, permission and building control, which is an important check on the quality and safety of new construction. Permitted development is also seen to attract anti-social and criminal behaviour and create ‘no-go’ areas. Better-defined PD rights should be used in conjunction with other mechanisms to speed up delivery, such as preventing developers from hoarding sites with extant planning permissions, or by building ‘council’ housing.

## **Proposed changes to Chapter 5: Delivering a wide choice of high quality homes**

### **4 Do you agree with the changes proposed in Chapter 5?**

No

#### **Please provide comments:**

We broadly agree with the changes made - and particularly the proposed change to paragraph 73. However we are concerned that this chapter, as drafted, positively encourages the use of small plots in rural areas, including for affordable housing, without regard to the potential risks of increasing car-dependency. Lack of public transport in rural areas could be particularly problematic for those who are unable to afford a car.

In paragraph 64, after “or fewer”, add “where there is a demonstrable need for affordable housing for people who work locally, or have local family or other community connections.” Otherwise, this paragraph could lead to the creation of affordable housing in places that would merely exacerbate rural transport poverty.

In paragraph 65, insert a full stop after “affordable home ownership”, and start a new sentence, e.g. “Exceptions may be made where this would exceed...”. Then add the following at the end of the new sentence (i.e. after the words “needs of specific groups”): “in which case developer contributions should be secured to enable the provision of affordable housing in more accessible locations”. Without these words, developers would be able to create small amounts of highly profitable high-end housing in unsustainable locations, without making any provision for affordable housing. With them, this paragraph helps to secure funding for affordable housing in more environmentally sustainable locations, where it is also more likely to fulfil a social and economic need.

In paragraph 69(a), we do not see any justification for the requirement for authorities to provide at least 10% of their housing needs on small plots (below 1 hectare). It merely seems likely to have the significant disadvantage of requiring the provision of substantial amounts of housing in car-dependent locations with poor public transport provision, contrary to the aims of reducing car-dependence and its associated environmental and other impacts. We therefore propose its deletion. Alternatively, its purpose should be explained, and wording should be added to the effect that these small plots should be in environmentally sustainable locations.

In paragraph 70, we are concerned that housing may be situated in unsustainable locations if allocated in Neighbourhood Plans, unless it meets the criteria for sustainable development in Chapter 2. Therefore we recommend that the paragraph should include the phrase, “subject to other policies in the NPPF, particularly those relating to location, mode choice, removing dependency on the private car, and the availability and accessibility of a range of services, unless it can be shown that all of these requirements will be met by developers providing or seed-funding the necessary new infrastructure and services”.

We strongly agree with the addition, in paragraph 73, of a “genuine choice of transport modes”.

## **Proposed changes to Chapter 8: Promoting healthy and safe communities**

### **5 Do you agree with the changes proposed in Chapter 8?**

Yes

#### **Please provide comments:**

We agree with the proposed changes to paragraphs 92 and 97. However we also suggest a few other changes.

In paragraph 93(a), the meaning of “shared spaces” is unclear, and in other contexts has multiple different meanings. We therefore suggest either deleting it, or replacing it with something clearer, or explaining it in the glossary.

In paragraph 97, we suggest adding “parks and” before “open spaces”. Then after “open spaces,” add “woodland”.

In paragraph 99, before “rights of way networks, add “paths and”. Then, after National Trails (i.e. at the end of the paragraph), add “, the National Cycle Network, canal and river paths, and the coast.”

## **Proposed changes to Chapter 9: Promoting sustainable transport**

### **6 Do you agree with the changes proposed in Chapter 9?**

Yes

#### **Please provide comments:**

We agree with the proposed amendments, however we believe further changes are needed to this chapter, and particularly to paragraph 110. This is because transport is now the economy’s worst-performing sector in terms of greenhouse gas emissions (these have barely changed over the past 30 years); our levels of car-dependence are causing a range of other adverse environmental, health and economic and quality-life-impacts, all of which are at cost to the economy. Past policy efforts to contain car dependency have failed (indeed, the situation appears to have worsened) and the planning system as it stands remains part of the problem rather than an effective solution.

A few exceptional developments (such as the Marmalade Lane development in South Cambridge by TOWN, and a recent RIBA competition winning masterplan for Heath Park near Runcorn by Ecoresponsive Environments and ActivePlanning for SOG) show how a combination of good urban design, higher densities, community involvement in development and the ‘sharing economy’ can support sustainable transport and healthy living in attractive settings. However, as research by Transport for New Homes and others has shown, these are the exception rather than the norm. .

Paragraph 103: After “Transport issues”, insert: “and the potential adverse impacts of development on transport networks”. Note that these words are taken from sub-paragraph 103(a), with the addition of the word “adverse”.

Subparagraph 103(a) can therefore be deleted. Instead, we recommend placing subparagraph (c) first (making it subparagraph 103(a)), followed by subparagraph (e) (which becomes subparagraph 103(b)) to reflect a more appropriate hierarchy of modal consideration.

Subparagraph 103(c) should then be:

“(c) dependence on private motorised transport is minimised;”

This should be followed by the current subparagraph (b) (which becomes subparagraph (d)).

Finally, the current subparagraph 103(d) should be deleted, as this simply provides a basis for allowing unsustainable developments to go ahead if adverse impacts can be merely “mitigated” (in other words, made a bit less bad). Faced with a climate and ecological emergency, this is simply unacceptable.

In paragraph 104, we suggest the term “significant development” needs to be defined for each broad land-use classification. This could be done in the glossary.

At the conclusion of paragraph 104, we are concerned that the final sentence effectively gives the green light to car-dependent development in rural areas. We propose its deletion.

In paragraph 105(a), after the words “Support an appropriate mix”, add “and density”. Then, after the words “across an area,” insert, “in accordance with the principles of ‘15 minute cities’ in inner or central urban locations, or “20 minute neighbourhoods” elsewhere. We suggest definitions of 15 minute cities and 20 minute neighbourhoods in our proposals for the glossary.

In paragraph 105(c), after “and routes”, add “(such as disused railway lines)”.

Paragraph 105(d) is important, and we fully support its aims. However we believe it should reference current cycling infrastructure design guidance. Cycle parking

merits a paragraph of its own, which we propose inserting after paragraph 107. We therefore recommend that, after the words “walking and cycling networks,” the words, “with the latter being designed in accordance with Local Transport Note LTN 1/20, Cycling Infrastructure Design.” are included (N.B. We hope a subsequent revision of NPPF will enable the inclusion of a reference to future walking design guidance and/or the forthcoming revision of Manual for Streets).

We then propose deleting from this paragraph the words “with supporting facilities such as secure cycle parking”. Finally, at its conclusion, we propose adding “and statutory Rights of Way Improvement Plans” after “Local Cycling and Walking Infrastructure Plans.

Paragraph 106 needs to be re-cast so that development no longer slavishly serves artificially high parking standards. Parking standards should no longer be used to decide planning applications. Instead, parking benchmarks could be provided based on experienced demand combined with Government targets for active travel and public transport use. A process has been established in Ebbsfleet Garden Town, which first identifies the potential for walking, cycling and public transport, and then actual observed demand for parking drawn from other developments. It mixes this with policy and development aspirations to produce a final parking mix which is related to distance from frequent public transport corridors and the availability of safe and attractive walking and cycling routes. Paragraph 106 should therefore be amended to say:

“In order to avoid an oversupply of parking space in residential developments (and hence a loss of possible opportunities for higher densities or increased provision of green space), the following approach should be taken:

- (a) determine what proportion of trips will be made by sustainable modes, in the light of Government targets for increased cycling and walking, demand modelling tools such as the Propensity to Cycle Tool ([www.pct.bike](http://www.pct.bike)); and existing and planned high quality networks for walking and cycling
- (b) estimate the remaining parking demand;
- (c) provide mobility hubs, spaces for car-sharing club vehicles and other shared mobility solutions;
- (d) locate private parking spaces discreetly, not on-street but in small car parks distributed around the site, with good natural surveillance; and (e) provide electric vehicle charging facilities.”

Paragraph 107 should be deleted and re-written as follows:

“Maximum parking standards should be set within higher density development where reduced car use is desirable given access to a wider choice of other modes. In town centres, local authorities should prioritise accessibility on foot, cycle and public transport in combination with increasing the density of residential and office-based employment development that results in more footfall. Where possible, car parks should be redeveloped, incorporated into new buildings or placed beneath public spaces such as squares and parks.

Paragraph 108 should refer to the creation of urban micro-consolidation centres that enable smaller vehicles to transfer goods for last-mile delivery by cargo-bike and small electric vans. These centres should ideally be served by rail or water; alternatively they should be located as close as possible to major urban roads to minimise the impact of heavy vehicles on smaller streets.

Paragraph 110 should be amended to say: “Development that is unlikely to contribute to an overall reduction in the proportion of trips in the area made by private motor vehicles should be refused.”

We note that paragraph 133 identifies poor design as a justification for refusal. It is, if anything, far more important to mandate the refusal of developments that do not contribute to reducing climate, health and other adverse impacts of car-dependence. This is the single most important amendment we call for in the NPPF.

## **Proposed changes to Chapter 11: Making effective use of land**

### **7 Do you agree with the changes proposed in Chapter 11?**

Yes

#### **Please provide comments:**

We agree with the proposed amendment to paragraph 124. However we believe two further changes to this chapter are needed.

We broadly agree with paragraph 118. However we would replace the words “makes as much use as possible” (before the words “of previously-developed or brownfield land), with “prioritises the use of”. Then, after the words “previously-developed or brownfield land, add “with good public transport access, particularly for uses which generate high levels of traffic demand”. The next priority, sequentially, should be other (non-brownfield) land with good public transport access, while brownfield land with poor public transport access should be reserved for uses which generate relatively little transport demand. The requirement for authorities to maintain brownfield registers will support this aim.”

The aim of this amendment is to ensure that planning authorities always to identify and allocate brownfield land in sustainable, accessible locations, and adopt policies to ensure that these sites are developed first with higher density development than was previously the case. It is neither sustainable nor desirable to over-rely on greenfield land, in spite of the costs of decontaminating and redeveloping brownfield land, some of which could be met through Government Housing Infrastructure funding and recouped through higher densities. Re-use of land supports sustainable transport since it makes more efficient use of land that can more easily be served by walking, cycling and public transport as well as supporting a range of services.

Finally, we are surprised to note that the framework does not include any policy on tall buildings. We suggest that a policy is needed. However, in terms of safety for cyclists and other road users, one key point we believe needs to be included in such a policy is the need to avoid creating unpleasant and potentially dangerous wind tunnels. This problem has been known since the 32 Bridgewater Place skyscraper in Leeds caused dangerous wind-tunnels which caused the death of pedestrian Edward Slaney, when a lorry blew over onto him (see [www.yorkshirepost.co.uk/news/transport/owners-knew-leeds-skyscraper-was-wind-tunnel-long-lorry-blew-pedestrian-1861376](http://www.yorkshirepost.co.uk/news/transport/owners-knew-leeds-skyscraper-was-wind-tunnel-long-lorry-blew-pedestrian-1861376)). This is clearly also a cycle safety issue, particularly where tall buildings cause dangerous wind-tunnels on what are already dangerous roads and junctions.

## **Proposed changes to Chapter 12: Achieving well-designed places**

## 8 Do you agree with the changes proposed in Chapter 12?

Yes

### Please provide comments:

We strongly support paragraph 133. However we contrast the clarity with which this paragraph requires the refusal of poorly designed developments, with the hurdles created by paragraph 110 for local authorities wishing to refuse developments whose transport impacts make them unsustainable on climate or other grounds. This makes no sense: a beautiful development in an unsustainable location is still an unsustainable development. Faced with a climate and ecological crisis, we reiterate the critical importance of amending paragraph 110 to clarify that developments in car-dependent locations should also be refused.

## Proposed changes to Chapter 13: Protecting the Green Belt

## 9 Do you agree with the changes proposed in Chapter 13?

Not Answered

### Please provide comments:

We have no comments on this chapter.

## Proposed changes to Chapter 14: Meeting the challenge of climate change, flooding and coastal change

## 10 Do you agree with the changes proposed in Chapter 14?

Not Answered

### Please provide comments:

We do not have a view on the proposed amendments themselves. However we wish to suggest one other small amendment.

In paragraph 153, after “through its location”, we suggest adding “(including accessibility to sustainable transport)”.

## Proposed changes to Chapter 15: Conserving and enhancing the natural environment

## 11 Do you agree with the changes proposed in Chapter 15?

Yes

### Please provide comments:

We strongly support the addition of the words “and enhance public access to nature” in paragraph 179(d). The Environment Agency has recently highlighted how “universal access to a healthy natural environment could save the NHS billions of pounds a year” (see <https://deframedia.blog.gov.uk/2020/09/08/environment-agency-releases-new-state-of-the-environment-report/>).

However we believe the vital importance of securing access to nature also merits two references in paragraph 173, as follows.

In the opening sentence of paragraph 173, we propose inserting the words “the quality and accessibility of” before “the natural and local environment.”

In sub-paragraph 173(c), we propose replacing the words “where appropriate” with “provided that this is not incompatible with conservation objectives”. This amendment would create a presumption that increased access to nature will normally be sought, except where it is incompatible with conservation objectives, in accordance with the Sandford principle.

## Proposed changes to Chapter 16: Conserving and enhancing the historic environment

## 12 Do you agree with the changes proposed in Chapter 16?

Not Answered

### Please provide comments:

We have no comments on this chapter

## Proposed changes to Chapter 17: Facilitating the sustainable use of minerals

## 13 Do you agree with the changes proposed in Chapter 17?

Not Answered

### Please provide comments:

We have no views on the two amendments proposed. However we seek the inclusion of a sub-paragraph in paragraph 210, which we suggest should be inserted after subparagraph (b). It would read as follows:

“c) not grant permission if the transport of minerals is likely to have adverse impacts on road safety (particularly to pedestrians, cyclists or equestrians), or the tranquillity of rural lanes or their verges or adjoining vegetation, habitats and wildlife;”

## **Proposed changes to Annex 2: Glossary**

### **14 Do you have any comments on the changes to the glossary?**

Yes

#### **Please provide comments:**

We have one comment on one of the proposed amendments, two comments on unamended definitions, and three other possible suggested additions which arise from our responses to earlier consultation questions.

Our first proposed amendment is to the new definition of 'Green infrastructure'. We propose inserting the word "corridors," after "green and blue spaces", and before "and other natural features". This would indicate that green infrastructure can encompass linear features such as paths, disused railway lines, canal and riversides etc.

Our second is to the existing definition of "People with disabilities". We propose replacing the word "blindness" with "sight or hearing impairments". This is not a cycling-related issue, however one author of this response suffers hearing loss. It struck us as odd that this is not included.

Our third amendment is to the definition of 'sustainable transport modes'. We suggest replacing 'low and ultra low emission vehicles' with 'zero emission vehicles'. We believe this is justified now that the Government has committed to end the sale of vehicles with petrol or diesel engines by 2030.

Our comment on paragraph 105(a) (in response to Question 6) proposes referring to '15 minute cities' and '20 minute neighbourhoods', noting that these terms would then merit a definition in the glossary. We suggest the following:

\* That in urban areas it is reasonable to suggest that a range of local scale services, such as primary schools, surgeries and small shops, would normally be available within 15 minutes' walk, or 20 minutes in more suburban areas and self-contained towns; and

\* That larger-scale services, such as secondary schools, hospitals and council offices might be available within 15-20 minutes' cycle or bus ride within urban or suburban areas respectively.

We note the lack of a definition for the terms 'sustainable' or 'sustainable development'. We are nonetheless aware that the Government's Planning White Paper has proposed to introduce a single statutory sustainable development test", although it is currently unclear how this will work. However, given that these NPPF revisions are intended to take effect before any changes are made as a result of the White Paper process, we suggest that 'Sustainable development' should be defined in a way that incorporates objective measures of environmental impacts, e.g. from Local Plan evidence bases including Strategic Environmental Assessments and Habitats Regulation Assessments.

We also suggest that the glossary should include a definition of "significant development" (as referenced in paragraph 104 and our response to question 6). This should provide thresholds for what is "significant" for each major grouping of land-use classes, for example housing, employment, or heavy industry.

Finally, we suggest there may need to be a definition for the term Shared spaces (as referenced in paragraph 93 and our response to question 5), if this cannot be clarified by amending paragraph 93 itself.

## **National Model Design Code**

### **15 We would be grateful for your views on the National Model Design Code, in terms of a) the content of the guidance b) the application and use of the guidance c) the approach to community engagement**

#### **Please provide comments:**

Cycling UK believes that the White Paper and the National Design Code, together with amendments to the National Planning Policy Framework, provide a once in a generation opportunity to bring together transport planning and urban design in a way that has not been done before in UK policy. This could deliver huge benefits in terms of reducing dependence on private motor vehicles, and their associated environmental, health, safety and other adverse societal impacts.

We welcome the emphasis on urban design in the guide as one of the building blocks for sustainable transport locally. In general, we believe that integration of planning with urban design and transport should be a running theme throughout the entire suite of national planning policy documents and associated guidance.

We know what happens when due consideration is given to transport in planning. For example, in the Marmalade Lane co-housing project in South Cambridgeshire the amount and location of parking and cycle storage, and the strong relationship between the development and good public transport means that residents can live entirely without a car, something that is not the case with more 'typical' suburban developments. There has been no need to build parking bays in the 'passive' grassed provision that was set aside to meet local parking standards, and the peripheral parking means that street space has been freed up for community use and play.

Since the 1970s, development in the Netherlands been designed specifically to dissuade people from making short journeys by car, whilst at the same time

access on foot, cycle and public transport have been made convenient and attractive and streets are designed as social spaces. This is well-illustrated in the new town of Houten, where journeys across the railway line are direct for people on foot and cycle, and all car travel must be made via one of the two purpose-built ring-roads - there are no 'through routes' for motor traffic in the residential areas. It is no accident that the Netherlands has the world's happiest children (source: WHO).

Back in the UK, a recent winning RIBA competition entry for a concept masterplan in Runcorn provides filtered permeability for pedestrians and cyclists, alongside a range of initiatives to encourage and facilitate active travel, even before the streets are built. The site's owner is excited by these proposals which form part of their vision for a new, enlightened 'Port Sunlight' urban village fit for the 21st Century.

We believe that good urban design must build up from the simple idea of connected streets and urban blocks and incorporate more advanced considerations about transport and movement, giving emphasis to accessibility on foot, cycle and public transport, and that this should be reflected in local design codes. Doing this properly also means that 'nimbyism' needs to be tackled head-on to avoid the situation of 'connected streets in a disconnected bubble accessed from a roundabout on a link road' - a situation that seriously undermines efforts to reduce car dependency and its consequences.

\* Content of the guidance

We are pleased that the National Model Design Code (NMDC) draws on the advice contained in the National Design Guide (NDG) published in 2019 which re-establishes benchmarks for good urbanism and objectively sustainable development, whilst allowing local authorities to add detail at their local level. Our comments, if adopted, would therefore strengthen the NMDC's general conformity with the NDG.

As a cycling organisation we have focused most of our comments on transport matters. Where we 'stray' from this, it is to serve the transport objectives we are putting forward.

\* Paragraph by paragraph responses

In paragraph 15, we would like the Code to reflect our proposed amendment to NPPF paragraph 110. This calls on planning authorities to refuse developments which are in unsustainable, car-dependent locations, as well as those which are poorly designed. We believe this amendment is essential if the planning system is to play its part in helping to tackle the climate and other adverse impacts of car-dependence, and not to continue worsening them.

In paragraph 27, we would argue that a movement strategy is 'always appropriate', even if it describes already excellent networks (this is already inferred in paragraph 26). For large areas it is obvious that a strategy will be beneficial but, equally, having a transport strategy context for smaller areas is essential to test and determine accessibility. We would also argue that the scope of the transport strategies should be 'current and future opportunities to travel in an objectively sustainable way' with reference to active travel and public transport routes, as well as the pattern and connectivity of streets.

Transport for London has adopted best practice in its requirements for the appraisal of major development. It requires a narrative to be told about how a pedestrian, cyclist, bus, train or car user would access the site, and from this, derives transport planning and infrastructure requirements. Emerging transport assessment guidance for Ebbsfleet Garden Town are giving more emphasis to parking standards related to the availability of public transport and measurements of actual demand for parking, as opposed to assumed parking levels.

In the text accompanying Figure 5, we suggest replacing the first instance of the words "public transport accessibility" with "accessibility by walking, cycling and public transport". The second instance can then be replaced with "sustainable transport". At the end of this text, we also suggest adding " , along with plans showing walking and cycling accessibility including specific infrastructure for cyclists on busier distributor roads."

In the box after paragraph 37, change "consultation" to "engagement" in the heading and text, because what is described is actually a process of engagement.

In figure 11 (text), include public transport routes and stops near to the masterplan, and potential routes and infrastructure for buses, pedestrians and cyclists. In figure 11 (images), give emphasis in the drawing to the importance of parks and open spaces as part of the active travel network. Routes through parks should connect to something at each end, for example, primary schools and local centres. The routes should give an advantage over driving and they should be well-lit. The best examples of these include London Fields in Hackney, where the historic cattle drovers' route provides the desire line connecting the town centre with bustling Broadway Market, and writings by Jane Jacobs in 1964, where she describes the everyday life of a park which provides walkable connections in all directions.

It would be useful to add a further drawing to Figure 11 showing primary and secondary routes for walking and cycling. This would raise the status of these modes in their own right and show a wider choice of connections, including routes across open spaces. The hierarchy would show, broadly, where dedicated cycle infrastructure should be focused, incorporating direct quiet filtered routes rather than cycleways on main roads where this would be a better option.

Guidance for all area types: Movement (paragraph 50 and figures 13 - 14):

We believe that there is too much focus on car parking and motor vehicle movement in this chapter. These details (with modifications) should be placed in the Note Code Content section with only signposting from this chapter.

Instead, paragraph 50 and accompanying diagrams should show the preferred strategic approach to transport, which is to design places that are attractive for walking and wheeling first and foremost, covering street design and layout and incorporating spaces for social activity in the street such as parklets; places that are safe for cycling, by designing-out through traffic within a filtered street pattern that can be changed over time due to the connected layout; and direct links to nearby public transport services and streets with cycle infrastructure. In the words of the NPPF itself, priority should be given to the sustainable modes, and this means that these should also be the most convenient and attractive options for short journeys.

\* Code-wide guidance: Movement (paragraph 58 and figures 35 - 37)

We agree with the principles set out in paragraph 58i.

In paragraph 58ii, bullet 3 should state separate 'cycle tracks, preferably one on each side of the road, which should have priority over side roads or separation in time at signalised junctions. Cycle infrastructure should be built to the standards set out in LTN1/20'.

We urge the inclusion of as much detail about cycle parking as there is about car parking. The variety of cycles themselves is impressive and includes an increasing number of 'non-standard' cycles including cargo-bikes used by families and logistics companies, and cycles built or adapted for use by disabled people. This requires a variety of solutions that should be highlighted in the NMDC.

Details about car parking should be moved to this section. Emphasis should be given to minimising the impact of parking on public spaces, preferably by moving it to communal parking areas. Parking provision should not be a determinant of densities, which should be as high as feasible (we would prefer a minimum of 50dph / two party walls in suburban streets). The design guidance should ask authorities to consider providing a percentage of parking as 'passive parking provision' in the form of grassed space that can be converted if required - rather than assuming that a large amount of parking will be needed in any event.

## **Public Sector Equality Duty**

### **16 We would be grateful for your comments on any potential impacts under the Public Sector Equality Duty.**

#### **Please provide comments:**

The creation of safe and attractive cycling (and indeed walking) conditions could increase the mobility options for most people in society. However the current lack of safe cycling and walking conditions disproportionately affects children and young people, women and many older or disabled people. Many people in these groups - including all children - also lack the option of driving. It should also be remembered that many people with disabilities cycle, often using non-standard pedal cycles, as this is easier for them than walking.