

Proposed reforms to the National Planning Policy Framework (NPPF) and other changes to the planning system – response from Community Rail Network – September 2024

Introduction and about us

Community Rail Network is a not-for-profit organisation working across Britain to support, champion and represent community rail: a growing, thriving grassroots movement that works to engage communities with their railways, and ensure local people benefit from railways and stations.

This growing movement now includes 75 community rail partnerships (CRPs) and c. 1,300 station friends' groups and other local groups, spread across Britain.

These are community-based and -led groups and organisations, working closely with the rail industry, to:

- Enhance the railways' contribution to local sustainable development and community wellbeing, including by maximising access to and use of the railways;
- Ensure the community has a voice and plays a part in the development and improvement of our railways, so this meets community needs and aspirations and delivers maximum benefit;
- Communicate the development and importance of our railways to communities, enhancing understanding and pride, and promoting rail as a key part of sustainable, healthy travel.

Find out more about our work, and our members, at communityrail.org.uk.

We are providing answers to two questions within the NPPF consultation (69 & 70), informed by insights from across the community rail movement.

Question 69

Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?

Based on our experience within community rail, we support the amendments to the NPPF outlined above, and a move towards a 'vision-led' transport planning approach.

The NPPF states that transport should be considered from the earliest stages of development proposals, with opportunities to promote walking, cycling and public transport pursued. We agree that this early consideration is vital, and clearly not happening enough at present. However, consideration of transport is not enough on its own: transport needs to be considered and prioritised in a way that aligns with the sustainable transport hierarchy, prioritising sustainable and inclusive mobility, and supporting the shift we need away from private car dependency. We therefore recommend overt and strong recognition and reflection in the NPPF of the need to support and encourage far greater levels of active travel, public transport, community transport and shared mobility, over and above private car use, in order to achieve Net Zero, widen access to opportunity, tackle inequalities, and achieve sustainable and inclusive economic development. This aligns with the new Government's transport priorities and missions.

The NPPF makes it clear that developments of new homes/businesses should be in locations that are already connected, or can be connected, via sustainable means. It also commits to the sustainable travel hierarchy in stating that priority should be given to walking and cycling, and second to access to high quality public transport and shared travel.

Despite these commitments in the NPPF, developments currently still often do little or nothing meaningful to encourage and enable sustainable transport, and options are sometimes not fully considered until the development control stage of planning applications, which is too late. To better integrate transport into the planning system, we support embedding meaningful community engagement and a dual commitment to low-carbon and inclusive mobility in the planning process.

Local groups, especially those involved in sustainable and inclusive travel and mobility such as community rail partnerships, need to have the opportunity to influence local plans and development proposals from an early stage, to ensure those without access to a car are well catered for and their needs understood, and to help inform developments that steer people towards greater public transport use rather than locking in car dependency. We feel that a 'vision-led' transport approach could help to facilitate this.

Community rail experience shows that:

- Communities are passionate about local public transport, fair access to opportunity, and improving local environments. They tend to have a diverse range of local groups working on these issues, and they hold the knowledge on what will and will not work regarding sustainable mobility. Policymakers can, and should, harness and encourage this passion and knowledge to unleash locally led change;
- Empowering communities and local groups to influence and drive infrastructure and service improvements helps to get transport working better for local people, while enabling resources to be pooled and used efficiently, and building local awareness and ownership. This helps measures to be well-received and better used, and reduces risk of backlash;
- Effective community engagement (going beyond consultation) enables policymakers and transport providers/planners to properly understand practical barriers and misgivings local people have, and work across modes, sectors, and scales to break these down;
- It is essential that community members with diverse needs and lived experience, and local groups and partners can come together and feed in ideas, needs and opportunities for sustainable transport to be inclusive and accessible for all, and to spur innovation;
- Community groups and organisations like community rail partnerships, station friends, active travel groups and social inclusion charities can spearhead and deliver positive change, such as: projects building confidence with public transport and active travel; engagement with diverse groups to understand local needs; and managing local

enhancements and schemes, e.g. community transport, car share, bike hire and station improvements.

To ensure effective and meaningful community engagement in rail and transport projects, we recommend that any 'vision-led' approach related to the NPPF should ensure that planners and developers *treat communities as partners* in the planning process, including:

- Drawing on the knowledge and input of local groups and organisations and their beneficiaries, including through transport policymaking, planning, and regeneration/development, seeking to understand and address local needs and barriers, to at once support modal shift and tackle transport-related social exclusion;
- Using meaningful, empowering community engagement to identify and overcome barriers to sustainable transport use and address car dependency. This should include a range of methods that enable people to come together, deliberate and feed in views, creating momentum and positivity about change. As much as possible local agents should be empowered to lead engagement, such as interactive workshops, participatory mapping, creative projects, youth/citizen-led campaigns, community-led audits, meetings, and events.

Question 70

How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?

In answering this question, we are focusing on what could be done in relation to the NPPF to enhance the active and sustainable travel element of promoting healthy communities.

Our experience within community rail shows that increasing the modal share of public transport, combined with active travel and community and shared mobility, delivers profound benefits in terms of social mobility and access to opportunity, improved health and wellbeing and reduced health inequalities, due to more active lifestyles, decreased air pollution, and more liveable, pleasant, and cohesive communities.¹

Despite this, we know that integration and coordination between sustainable modes and their development is greatly lacking in communities almost everywhere across the UK, contributing to socio-economic exclusion, preventing people from getting value from existing transport assets and services, and forming a major barrier to modal shift. Evidence shows that modal shift, including dramatically increasing the modal share of public transport and reducing private car use, is essential to achieving Net Zero, while serving many wider public policy goals.²

In relation to active travel, we find that many, if not most, railway stations have poor, unsafe or unsuitable active travel routes and access. Greater attention is needed as to how local active travel investment and development joins up with public transport stops and stations.³

¹ <https://communityrail.org.uk/wp-content/uploads/2024/03/CRN-Sust-travel-PPS-FINAL.pdf>

² <https://communityrail.org.uk/wp-content/uploads/2024/04/CRN-Accelerating-Modal-shift-25.4.24.pdf>

³ See our Connected Stations report outlining how this can be achieved, led and informed by local communities: <https://communityrail.org.uk/wp-content/uploads/2023/06/Connected-stations-a-guide-to-community-led-station-travel-planning.pdf>

Encouraging and enabling greater use of public transport, active travel, and community and shared mobility depends on making these modes more joined-up, reliable, convenient, and affordable in combination, so they compete with the private car. They also need to be given greater priority in transport and planning development, with consistent, positive messaging around the array of benefits a shift towards more sustainable travel can bring for everyone and our local places.

We suggest that national planning policy could better promote healthy communities by:

- Putting the importance of public transport, including rail specifically, and the need to shift towards more sustainable, inclusive mobility, at the forefront of policy frameworks, strategies, and decision-making on transport, planning, climate, and economic development;
- Applying the sustainable transport hierarchy in planning and development policy to ensure that appropriate investment is directed to support greater use of public transport, active travel and community and shared mobility, rather than responding to projected demand levels and assumptions that driving is a necessity and the norm;
- Showing positive leadership and being honest about the evidenced need to reduce private car use to tackle the climate crisis, and the socio-economic benefits of more journeys being made by public transport, active travel, and community and shared mobility;
- Recognising the myriad of practical and perceptual barriers to increasing use of public transport, active travel, and community and shared mobility; bringing together transport, government, and community partners, and supporting locally-led initiatives to break these down and reduce car dependency as a key strand of Net Zero, transport and development policy.

We also more broadly recommend that the government implement ambitious targets and clear pathways for increasing the modal share of rail, bus and tram, active travel, and community and shared mobility, to enable decarbonisation, tackle transport poverty, and widen access to opportunity. We recommend strong cross-departmental working to ensure that the revised NPPF is designed to allow for and support these potential policy developments, given that initial announcements and communications from the Department for Transport suggest the new administration is fully switched on to the importance and value of modal shift and a more sustainable, inclusive transport future.