

**Report to:** Partnership Board –Transport for the South East

**Date of meeting:** 28 October 2024

**By:** Chief Officer, Transport for the South East

**Title of report:** Responses to Consultations

**Purpose of report:** To agree the draft responses submitted in response to a consultation.

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***RECOMMENDATIONS:***

The members of the Partnership Board are recommended to:

- (1) Agree the draft response to the Kent County Council Local Transport Plan 5; and**
  - (2) Agree the draft response to the proposed reforms to the National Planning Policy Framework and other changes to the planning system.**
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**1. Introduction**

1.1 Transport for the South East (TfSE) has prepared responses to these recent consultations. This paper provides an overview of the responses to the following consultations:

- Kent County Council Local Transport Plan 5
- Proposed reforms to the National Planning Policy Framework and other changes to the planning system.

**2. Kent County Council Local Transport Plan 5**

2.1 Kent County Council (KCC) held a period of engagement for their Local Transport Plan 5 (LTP5), which includes setting out proposals for improving roads and public transport in Kent. It has been designed to strike a balance between the investment needed to improve the county's economy, to make living and working better, whilst also preparing our transport networks to meet the environmental challenges facing the county.

2.2 This consultation closed on 8 October 2024, and the officer level response that was submitted is contained in **Appendix 1**.

2.3 Overall, TfSE welcomed the opportunity to respond, TfSE recognises that the ambition covers many of the same points as TfSE's vision for the South East. Some areas of alignment between the TfSE vision and the LTP5 have been highlighted in our response.

2.4 TfSE applaud the inclusion of TfSE's role in supporting the success of LTP5 as well as highlighting cross boundary coordination with neighbouring authorities. TfSE highlighted an opportunity to include references to accessibility as this is a key part of making sure our transport network works for all, and also to the need for better integration between different modes of transport.

### **3. Proposed reforms to the National Planning Policy Framework and other changes to the planning system.**

3.1 The Ministry of Housing, Communities and Local Government was seeking views on proposed revisions to the National Planning Policy Framework (NPPF).

3.2 This consultation closed on 24 September 2024, and the officer level response that was submitted is contained in **Appendix 2**.

3.3 There are certain aspects of the proposed reforms to the National Planning Policy Framework (NPPF) and other changes to the planning system that are of interest to TfSE in its role as a sub national transport body (STB). The response focuses on questions related to changes that will impact on the interaction between the land use and transport systems. The TfSE response focuses on four aspects of the consultation:

- maintaining effective cooperation;
- a new Standard Method for assessing housing needs;
- building a modern economy; and
- a 'vision-led' approach to transport planning.

3.4 Within the maintaining effective cooperation TfSE supports amendments to improve cross-boundary cooperation in strategic planning. TfSE welcomes proposals for universal coverage of strategic land use planning across England through the roll out of Spatial Development Strategies across England. TfSE also supports the government's commitment to consult with local leaders and the sector on these arrangements before introducing legislation.

3.5 Within the building a modern economy TfSE supports amendments to identify sites for moder economic needs including freight and logistics. The importance of lorry parking facilities with driver welfare and alternative fuel options are also emphasised.

3.6 Finally, within a vision-led approach to transport planning TfSE supports proposed changes to NPPF paragraphs 114 and 115, advocating for a vision-led approach in transport planning. While welcoming the shift from 'predict and provide' to more sustainable methods, TfSE calls for clearer guidance on implementation and

suggests refining the language to ensure comprehensive consideration of transport impacts.

#### **4. Conclusions and recommendations**

4.1 The members of the Partnership Board are recommended to agree the draft responses to the consultations detailed in this report.

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## Kent Local Transport Plan 5

### Response from Transport for the South East

#### 1. Introduction

1.1 This document is the draft Transport for the South East (TfSE) response to the consultation on Kent County Council's Local Transport Plan 5 (LTP5). This is a draft officer response that will be presented to our Partnership Board on 28 October 2024 for their approval. A further iteration may therefore follow.

1.2 TfSE is a sub-national transport body (STB) for the South East of England. Our principal decision-making body, the [Partnership Board](#), brings together representatives from our 16 constituent local transport authorities, district and borough authorities, protected landscapes, business representatives, Highways England, Network Rail and Transport for London.

1.3 We have a vision led [Transport Strategy](#) in place to influence government decisions about where, when and how to invest in our region to 2050. This strategy is currently in the process of being refreshed.

1.4 Our [Strategic Investment Plan](#) provides a framework for delivering our Transport Strategy setting out transport infrastructure and policy interventions needed in our region over the next three decades.

1.5 TfSE welcome this opportunity to respond to the Kent LTP5. We trust that our response will provide value to the work of Kent County Council in this area, but also form the basis for further engagement, especially as TfSE is undertaking a refresh of its own transport strategy throughout 2024/5. Specifically, we are keen to establish a 'golden thread' in policy terms so that Kent – as well as other Local Transport Authorities (LTAs) – are able to achieve their own goals whilst playing a significant role in achieving a wider vision for the South East. We are welcome the inclusion and support for this approach set in the Kent LTP5.

#### 2. Vision and Objectives

2.1 The Kent LTP5 ambition covers many of the same themes as TfSE's 2050 vision for the South East set out in our Transport Strategy. We have highlighted some of the areas where there is close alignment in Table 1 below.

**Table 1: Alignment between Kent LTP5 Ambition and TfSE Transport Strategy Vision**

Kent LTP5 Ambition	TfSE Transport Strategy Vision
<p>We want to improve the health, wellbeing, and <b>economic prosperity</b> of lives in Kent by delivering a <b>safe, reliable</b>, efficient and affordable <b>transport network</b> across the county and as an <b>international gateway</b>. We will plan for growth in Kent in a way that enables us to <b>combat climate change and preserve Kent's environment</b>.</p>	<p>By 2050, the South East of England will be a leading global region for net-zero carbon, sustainable <b>economic growth</b> where integrated transport, digital and energy networks have delivered a step-change in connectivity and <b>environmental quality</b>. A high-quality, <b>reliable, safe</b> and accessible <b>transport network</b> will offer seamless door-to-door journeys enabling our businesses to compete and trade more effectively in the <b>global marketplace</b> and giving our residents and visitors the highest quality of life.</p>

2.2 The Kent LTP5 Ambition does not make reference to ‘accessibility’ or ‘integration’. It is our view these should be included in the ambition to make sure our transport network works for all and to highlight the need for different transport modes to work together and complement each other as seamlessly as possible. Inclusion would strengthen the golden thread between Kent LTP5 with the TfSE 2050 Vision and the Department for Transport’s five strategic priorities.

2.3 A comparison of the Policy Outcomes set out in the Kent LTP5 with TfSE’s Strategic Priorities is set out in Table 2. This demonstrates that there is a good general alignment between these Policies and 12 of the 15 Strategic Priorities included in the TfSE Transport Strategy. The three TfSE Priorities which are not covered by the Kent LTP5 Policies relate to the need for a more integrated approach to land use and transport planning, supporting the principle of biodiversity net gain,, and the need to minimise transports consumption of resources.

2.4 Policy Outcome 5 recognises the need to manage demand to reduce the amount of forecast future congestion and crowding on highways and public transport. However, this policy only refers to demand arising from new development. It will be necessary to manage demand more generally to tackle a number of the ‘Challenges We Face’ set out at the beginning of the document relating to congestion, declining public transport use, carbon emissions and public health. To address this the Text of Policy Outcome 5 would need to be amended to refer to the use of demand management measures, such as parking controls and traffic management measures, to tackle existing and future traffic levels on the network.

**Table 2: Kent LTP5 Policy Outcomes (proposed) compared to the Strategic Priorities set out in TfSE's Transport Strategy**

Kent LTP5 Policy Outcomes (proposed)	TfSE Transport Strategy Strategic Priorities
<p><b>Policy Outcome 1: The condition of our managed transport network is brought up to satisfactory levels, helping to maintain safe and accessible travel and trade.</b></p> <ul style="list-style-type: none"> <li>A) Achieve the funding necessary to deliver a sustained fall in the value of the backlog of maintenance work over the life of our Local Transport Plan.</li> </ul>	<ul style="list-style-type: none"> <li>A safely planned, delivered and operated transport network with no fatalities or serious injuries among transport users, workforce or the wider public.</li> </ul>
<p><b>Policy Outcome 2: Deliver our Vision Zero road safety strategy through all the work we do.</b></p> <ul style="list-style-type: none"> <li>A) Achieve a fall over time in the volume of people killed or very seriously (life-changing) injured occurring on KCC's managed road network, working towards the trajectory set by Vision Zero for 2050.</li> </ul>	<ul style="list-style-type: none"> <li>A safely planned, delivered and operated transport network with no fatalities or serious injuries among transport users, workforce or the wider public.</li> </ul>

<p><b>Policy Outcome 3: International travel becomes a positive part of Kent's economy, facilitated by the county's transport network, with the negative effects of international haulage traffic decreased.</b></p> <ul style="list-style-type: none"> <li>• A) Increase resilience of the road network serving the Port of Dover and Eurotunnel crossing, by adding holding capacity for HGVs across the southeast region to support establishment of a long term alternative to Operation Brock.</li> <li>• B) Increase resilience of the road network servicing the Port of Dover through delivery of the bifurcation strategy including improvements to the M2 / A2 road corridor and its links to the M20 and a new Lower Thames Crossing for traffic towards the north.</li> </ul>	<ul style="list-style-type: none"> <li>• More reliable journeys for people and goods travelling between the South East's major economic hubs and to and from international gateways.</li> <li>• A transport network that is more resilient to incidents, extreme weather and the impacts of a changing climate.</li> </ul>
<p><b>Policy Outcome 4: International rail travel returns to Kent and there are improved public transport connections to international hubs.</b></p> <ul style="list-style-type: none"> <li>• A) International rail travel returns to Ashford International and Ebbsfleet International stations, supported by the infrastructure investment needed at Kent's stations to ensure they provide secure and straightforward journeys across the UK-EU border within the entry exit system.</li> <li>• B) A fall in the time it takes by public transport to reach international rail stations compared to conditions in 2023.</li> </ul>	<ul style="list-style-type: none"> <li>• Better connectivity between our major economic hubs, international gateways (ports, airports and rail terminals) and their markets.</li> <li>• A seamless, integrated transport network with passengers at its heart, making it simpler and easier to plan and pay for journeys and to use and interchange between different forms of transport.</li> </ul>

<p><b>Policy Outcome 5: Deliver a transport network that is quick to recover from disruptions and future-proofed for growth and innovation, aiming for an infrastructure-first approach to reduce the risk of highways and public transport congestion due to development.</b></p> <ul style="list-style-type: none"> <li>• A) Strengthen delivery of our Network Management Duty to deliver the expeditious movement of traffic by using our new moving traffic enforcement powers and modernising the provision of on-street parking enforcement.</li> <li>• B) Reduce the amount of forecast future congestion and crowding on highways and public transport that is associated with demand from development by securing funding and delivery of our Local Transport Plan.</li> <li>• C) The prospects for the future of transport increase across the whole county, with new innovations in transport services having a clear pathway to trial or delivery in Kent.</li> </ul>	<ul style="list-style-type: none"> <li>• A transport network that is more resilient to incidents, extreme weather and the impacts of a changing climate.</li> <li>• A 'smart' transport network that uses digital technology to manage transport demand, encourage shared transport and make more efficient use of our roads and railways.</li> <li>• A reduction in the need to travel particularly by private car, to reduce the impact of transport on people and the environment.</li> </ul>
<p><b>Policy Outcome 6: Journeys to access and experience Kent's historic and natural environments are improved.</b></p> <ul style="list-style-type: none"> <li>• A) Proposals are clearly evidenced in terms of their contribution in providing new, quicker, or more inclusive access to historic and natural environment destinations in the county, with proposals targeting access to such locations where appropriate.</li> </ul>	<ul style="list-style-type: none"> <li>• A transport network that protects and enhances our natural, built and historic environments.</li> <li>• An affordable, accessible transport network for all that promotes social inclusion and reduces barriers to employment, learning, social, leisure, physical and cultural activity.</li> </ul>



**Policy Outcome 7: Road-side air quality improves as decarbonisation of travel accelerates, contributing towards the pursuit of carbon budget targets and net zero in 2050.**

- A) Reduce the volume of carbon dioxide equivalent emissions entering the atmosphere associated with surface transport activity on the KCC managed highway network by an amount greater than our forecast “business as usual” scenario. This means achieving a greater fall than those currently forecast of 9% by 2027, 19% by 2032 and 29% by 2037.
- B) No area in Kent is left behind by the revolution in electric motoring, with charging infrastructure deployed close to residential areas, reducing barriers to adoption.
- C) Proposals are clearly evidenced in terms of their contribution in providing lower emissions from transport in Air Quality Management Areas in the county.

- A reduction in carbon emissions to net zero by 2050 at the latest, to minimise the contribution of transport and travel to climate change.
- Improved air quality supported by initiatives to reduced congestion and encourage further shifts to public transport.

**Policy Outcome 8: A growing public transport system supported by dedicated infrastructure to attract increased ridership, helping operators to invest in and provide better services.**

- A) We will aim to obtain further funding to deliver the outcomes of our Bus Service Improvement Plan (or its successor) beyond its current horizon of 2024/25. We will ensure that our Local Transport Plan proposals are clearly evidenced in terms of their contribution towards achieving our Bus Service Improvement Plan.
- B) We will identify and support industry delivery of priority railway stations for accessibility improvements and route improvements to reduce journey times and improve reliability.

- A seamless, integrated transport network with passengers at its heart, making it simpler and easier to plan and pay for journeys and to use and interchange between different forms of transport

<p><b>Policy Outcome 9: Health, air quality, public transport use, congestion and the prosperity of Kent’s high streets and communities will be improved by supporting increasing numbers of people to use a growing network of dedicated walking and cycling routes.</b></p> <ul style="list-style-type: none"> <li>• A) We will aim to deliver walking and cycling improvements at prioritised locations in Kent to deliver increased levels of activity towards the Active Travel England target (of 50% trips walked, wheeled, or cycled in towns and cities by 2030) and support Kent’s diverse economy, presented in a Kent Cycling and Walking Infrastructure Plan.</li> </ul>	<ul style="list-style-type: none"> <li>• A network that promotes active travel and active lifestyles to improve our health and wellbeing.</li> </ul>
<p><b>Policy Outcome 10: The quality of life in Kent is protected from the risk of worsening noise disturbance from aviation.</b></p> <ul style="list-style-type: none"> <li>• A) Where there is evidence of impacts on our communities, we will make representations on airport expansion proposals and argue for measures to mitigate their effects.</li> </ul>	<ul style="list-style-type: none"> <li>• N/A</li> </ul>

## **4 Implementation**

3.1 We welcome the recognition of the supporting role that TfSE has in realising the proposals within LTP5, which are listed below:

- Integrated public transport timetables, fares, and ticketing
- Mobility-as-a-service initiatives
- Freight management
- Electric Vehicle infrastructure

## **4. Other Comments**

4.1 We welcome the recognition of TfSE's role in supporting the success of LTP5, as well as highlighting where cross boundary collaboration with neighbouring authorities is required. We will continue to support Kent, and other local transport authorities, in facilitating coordination and collaboration to most effectively deliver improvements to our transport network.

4.2 We note that in the 'Challenges We Face' section at the beginning of the document the challenges identified do not refer to the barriers some residents face in accessing transport to live, work, and socialise, or areas of deprivation. The 2021 Census reveals that in some areas of Kent up to 26% of households are without a car and that county-wide an average of 17% of households do not have a car<sup>1</sup>. This highlights the importance of access to alternative transport options. Similarly, in some parts of Kent up to 36% of households are deprived in one or more way<sup>2</sup>. We suggest that another challenge needs to be added recognising this issue, along with measures in the plan to address the accessibility and inclusion needs of disadvantaged residents in Kent.

4.3 Freight movements are a key challenge within Kent given the presence of international gateways in the county. Whilst there is good coverage of the challenges faced by larger and longer distance freight movement within the plan, there is opportunity to include reference to interventions to deal with local freight movements. Decarbonising local deliveries in Kent through logistics consolidation and first and last mile deliveries will not only reduce emissions, but also reduce road traffic levels.

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<sup>1</sup> Accessed on 30 September 2024 <https://www.ons.gov.uk/census/maps/choropleth/housing/number-of-cars-or-vans/number-of-cars-3a/no-cars-or-vans-in-household>

<sup>2</sup> Accessed on 30 September 2024 <https://www.ons.gov.uk/census/maps/choropleth/population/household-deprivation/hh-deprivation/household-is-deprived-in-one-dimension>

# **TfSE draft response to the consultation on proposed reforms to the National Planning Policy Framework (NPPF) and other changes to the planning system**

## **1. Introduction**

1.1 Transport for the South East (TfSE) welcomes the opportunity to respond to the consultation on proposed reforms to the National Planning Policy Framework (NPPF) and other changes to the planning system. This draft officer response will be presented to our Partnership Board on 28 October 2024 for their approval. A further iteration may therefore follow.

1.2 TfSE is a sub-national transport body (STB) for the South East of England, Our principal decision-making body, the [Partnership Board](#), brings together representatives from our 16 constituent local transport authorities, district and borough authorities, protected landscapes, business representatives, Highways England, Network Rail and Transport for London.

1.3 We have a vision led [Transport Strategy](#) in place to influence government decisions about where, when and how to invest in our region to 2050. This strategy is currently being refreshed.

1.4 Our [Strategic Investment Plan](#) provides a framework for delivering our Transport Strategy setting out transport infrastructure and policy interventions needed in our region over the next three decades.

1.5 Although TfSE does not have any responsibility for land use planning, the close interaction between land use and transport systems means that changes to the national planning policy framework will have impacts on the travel patterns of people and goods. One of the Strategic Priorities identified in TfSE's Transport Strategy and Strategic Investment plan is the need for more integrated land use and transport planning to enable the regions housing, employment and regeneration needs to be met more sustainably. As a consequence there are certain aspects of the proposed reforms to the National Planning Policy Framework (NPPF) and other changes to the planning system that are of interest to TfSE in its role as an STB. This response therefore focuses on those questions related to changes that will affect the interaction between the land use and transport systems. Our response therefore focuses on four aspects of the consultation:

- maintaining effective cooperation;
- a new Standard Method for assessing housing needs;
- building a modern economy; and
- a 'vision-led' approach to transport planning.

## **2. TfSE's draft consultation response**

### **2.1 Maintaining effective cooperation**

**Consultation question 12 - Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?**

*TfSE supports the proposed amendments to paragraphs 24-27 to ensure that the right cross boundary engagement is occurring on strategic planning matters. The Duty to Cooperate has not always worked well or effectively achieved collaboration. This is because neighbouring local planning authorities have differing priorities and visions so the Duty to Cooperate has hindered the delivery of cross-boundary solutions. More effective cross boundary co-operation will be needed if the Government is to secure its growth ambitions. It has a vital role in addressing key spatial issues – including meeting housing needs and delivering transport and other strategic infrastructure. Both TfSE's Transport Strategy and Strategic Investment Plan make the case for larger scale transport investment proposals that cross local authority boundaries. The proposed amendments will help secure the delivery the sustainable, effective and integrated infrastructure that works cross-boundary to deliver economic growth. A specific requirement has been added in paragraph requiring policies to be consistent with bodies where a strategic relationship exists "unless there is a clear justification to the contrary"; although Paragraph 11b and Footnote 7 continue to provide opportunities to avoid planning to meet this need.*

**Question 14 - Do you have any other suggestions relating to the proposals in this chapter?**

*TfSE supports the proposals set out in the consultation document that accompanies the proposed amendments to the NPPF, to enable universal coverage of strategic land use planning across England.*

*This would see the Spatial Development Strategies that are currently available to elected Mayors and Combined Authority ( e.g. the London Plan) introduced across the entire country. Employing a strategic planning approach through the development of SDSs would assist in identifying constraints, setting housing requirements, identifying strategic employment sites and identifying corresponding infrastructure needs that would ensure Local Plans are effective, deliverable and sustainable. It will also overcome some of the shortcomings of the current 'duty to co-operate'.*

*The Government is yet explore the most effective arrangements for developing SDSs outside of mayoral areas including the identification of the most appropriate geographies that should be used covering 'functional economic areas', as well as the right democratic mechanisms for securing agreement.*

*TfSE welcomes the Government's commitment to work with local leaders and the wider sector to consult on, develop and test these arrangements in the months ahead before legislation is introduced, including consideration of the capacity and capabilities needed.*

## **2.2 A new Standard Method for assessing housing needs**

**Consultation question 19** - Do you have any additional comments on the proposed method for assessing housing needs?

*Although it is not appropriate for TfSE to comment on the proposed approach to calculating housing needs, it is vital that housing delivery is not prioritised to the detriment of other land uses that are vital to achieving sustained economic growth.*

*In addition, significant housebuilding should be focused in areas where there is adequate capacity in existing transport infrastructure, or if there is not adequate capacity, then transport infrastructure should be invested in alongside new houses.*

*The level of infrastructure improvements needed to support existing levels of housing growth, particularly the large-scale and cross-boundary improvements, requires funding far beyond the ability of Local Plans to deliver. Without adequate funding / delivery from other sources, this pressure will only be exacerbated by any increase in housing numbers. However, further reforms, including strategic planning ( set out elsewhere in this consultation) and improved levels of, and procedures for, funding infrastructure provision could go some way to meeting those needs.*

## **2.3 Building a modern economy**

**Consultation question 62** - Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF?

*TfSE supports the proposed amendments to paragraph 86b that identify additional sectors for which sites should be identified to meet emerging needs and drive economic growth. The amendments require LPAs to identify "appropriate sites" for needs of the modern economy, with "laboratories, gigafactories, data centres, digital infrastructure, freight and logistics". This amendment identifies them as essential economic infrastructure.*

*TfSE's Freight Logistics and Gateways strategy recognises the vital role of this sector in facilitating economic growth in the region. As set out in the consultation document, nationally this sector contributes £84.9 billion in Gross Value Added each year and employs nearly 1.2 million people. It relies upon a national network of storage and distribution infrastructure to facilitate local, regional, national and international operations. Provision is needed at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods,*

*especially where this is needed to support the supply chain, transport innovation and decarbonisation.*

*A shortcoming in current planning practice is how many LPAs go about estimating the future needs and demands for economic development land, with the guidance not having kept pace with rapid changes in industry and business needs. The new policy provisions will need to be accompanied by an update in guidance on how the needs of these sectors should be calculated.*

*The NPPF already recognises the importance of providing lorry parking facilities at existing paragraph 113 “taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance”. TfSE’s Lorry Parking Study identified the current and future levels of shortfall in the provision of lorry parking provision in different parts of TfSE area. It is therefore vital that when local planning authorities are identifying “appropriate sites” for freight and logistics activity that this will include sites for lorry parking that also provide driver welfare facilities and infrastructure for recharging and refuelling alternative zero emission vehicles. New guidance on how the needs of the sectors that have been added into the NPPF will be needed and should include how provision should be made for lorry parking facilities.*

*Paragraph 87b has been amended to require the provision of “storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation”. This paragraph should be further amended to include the following text at the end of the paragraph “including sites for the provision of lorry parking, driver welfare facilities and HGV zero emission recharging and refuelling.”*

## **2.4 A ‘vision-led’ approach to transport planning**

**Question 69** - Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?

*TfSE supports the proposed changes to paragraphs 114 and 115.*

*In assessing sites that may be allocated for development in plans, or specific applications for development, the proposed changes to paragraph 114 now seek to ensure that ‘A vision led approach’ promoting sustainable transport modes is taken, taking account of the type of development and its location. TfSE utilised a vision led approach in the development of its Transport Strategy, through the development of a 2050 Vision for the region supported by the policy and infrastructure interventions that would be needed to realise it.*

*Planning decisions are currently made using a ‘predict and provide’ approach with transport infrastructure, and in particular highways, designed to deal with the ‘worst case’ forecast future traffic flows derived by extrapolating past growth trends.*

*The accompanying consultation document outlines how this vision led approach should work in practice “It means working with residents, local planning authorities and developers to set a vision for how we want places to be and designing the transport and behavioural interventions to help us achieve this vision.” However, it is unclear precisely what actions will be needed in order to demonstrate that proposals have been produced in accordance with a vision led approach. Further guidance will be needed on this to define the roles of developers, local planning authorities, local transport authorities to avoid misinterpretation. This guidance will also need to set out how the vision that is developed for a particular development should take account of the local plan, local transport plan and regional transport strategies produced by Sub-national Transport Bodies .*

*Turning to the proposed amendments to existing paragraph 114, the current requirement that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe, has been amended by the addition of the wording ‘in all tested scenarios’. This would overcome the current practice of designing new places defensively around worst-case highways assumptions. The effect of this proposed change would be to ensure that the worst-case scenario should not necessarily be used to determine the application. Instead, for a refusal to be justified on highways grounds, there will need to be unacceptable highway safety impacts, or severe residual cumulative impacts on the road network, in all tested scenarios. However, the phrase “in all tested scenarios” is too vague. Changing it to “in all agreed scenarios” alongside a proposed methodology for local planning authorities and transport authorities to agree the scenarios early, and together. In addition, the impact on the highway network would remain the prime focus whereas there is a need to shift to a consideration of impacts on the whole transport network.*

[Ends]