

Planning Policy Consultation Team  
Planning Directorate – Planning Policy Division  
Ministry of Housing, Communities and Local Government  
Floor 3, Fry Building  
2 Marsham Street  
London  
SW1P 4DF

***please reply to:***

70 Dynevor Road  
Stoke Newington  
London  
N16 0DX

[PlanningPolicyConsultation@communities.gov.uk](mailto:PlanningPolicyConsultation@communities.gov.uk)

[roger.blake@raifuture.org.uk](mailto:roger.blake@raifuture.org.uk)

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Dear MHCLG,

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

Raifuture is Britain's leading and longest-established independent national voluntary organisation campaigning exclusively for a better railway across a bigger network for passengers, and freight users, to support economic (housing and productivity) growth, environmental improvement and better-connected communities.

We seek to influence decision makers at national, regional and local levels to implement pro-rail policies in development and transport planning, and submit the following comments.

### **Chapter 3 – Planning for the homes we need**

#### **Maintaining effective co-operation and the move to strategic planning**

##### **Question 12**

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

##### **Yes**

#### **Draft NPPF 3. Plan-making**

##### **Strategic policies**

We question the advisability of the proposed full change to para. 20 of the draft NPPF: ~~(to ensure outcomes support beauty and placemaking)~~, and recommend that only 'beauty and' should be removed. The retention of "to ensure outcomes support placemaking" would then be consistent with Chapter 8 para. 7 referring, with implied criticism, to "insufficient regard for the quality of places being created."

##### **Maintaining effective cooperation**

Although we have no issue with the principles espoused in paras. 24-28 of the draft NPPF, we must observe that this is a consultation by MHCLG on some matters which overlap with some of the responsibilities of DfT, namely the Sub-national Transport Bodies. Proposed new para. 27 a) specifically mentions "major transport services/projects" and we recommend therefore that either STBs be cited as a further example in new para. 25 or included in a new footnote along with any other similar bodies with a strategic remit. Alignment between development and transport planning – at all levels of advice and decision-making – is in our view absolutely fundamental to successful socio-economic and environmental outcomes.

[www.raifuture.org.uk](http://www.raifuture.org.uk) [www.raifuturescotland.org.uk](http://www.raifuturescotland.org.uk) [www.raifuturewales.org.uk](http://www.raifuturewales.org.uk)  
[www.railwatch.org.uk](http://www.railwatch.org.uk)

**Chapter 8 – Delivering community needs**

**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?

**Yes**

**Draft NPPF 9. Promoting sustainable transport**

**Considering development proposals**

Although we have no issue with the principle espoused in new paras. 112 and 113 of the draft NPPF (previous paras. 114 and 115), we must observe that there are development and transport planning bodies at all levels of official advice and decision-making each of which regards themselves as a custodian of their own transport planning vision. A vision-led approach to transport planning is in principle and without doubt the way forward, away from ‘predict and provide’ towards a ‘decide and provide’ approach and to outcomes-based rather than inputs-defined processes. There will however, we believe, need to be an explicit recognition of the need for mechanisms to reconcile and resolve what may not always be complementary but sometimes competing, even conflicting, transport planning visions within different, and / or between adjacent, administrative geographies, given the plethora of statutory, shadow and other official advisory stakeholder organisations invested in development and / or transport planning.

Yours faithfully,

Roger Blake BA, MRTPI (Rtd), MTPS  
Railfuture  
Director for Infrastructure & Networks, national Board