

Anca Seaton

From: Mitchell Barnes <[REDACTED]>
Sent: 16 October 2023 15:44
To: Planning Policy
Cc: Nicola Lea
Subject: 10298 Tunnel Road, Nuneaton - Representations to the Nuneaton and Bedworth Borough Plan Review (Regulation 19) Draft Publication Plan Consultation
Attachments: 10298 Tunnel Road, Nuneaton - Representations to NBBC Publication Draft Consultation .pdf; Appendix 1 - Sustrans Walkable Neighbourhoods May 2022.pdf; Appendix 2 - Red Line Location Plan.pdf; Appendix 3 - Masterplan 19-94 02C.pdf; Representation Form A_Personal Details.pdf; Representation Form B_Your Representations.pdf

Dear Sir/Madam

Please see attached our submissions, on behalf of Cartwright Homes, in relation to the site at Tunnel Road, Nuneaton, to the Nuneaton and Bedworth Borough Plan Review (Regulation 19) Draft Publication Plan Consultation.

The submission comprises:

- Representation Form A
- Representation Form B
- Representations to the NBBC Publication Draft Consultation
- Appendix 1 - Sustrans Walkable Neighbourhoods May 2022
- Appendix 2 - Location Plan
- Appendix 3 - Masterplan (drawing no. 19-94 02C)

Please could you confirm receipt of the attached?

Let me know if you have any questions.

Kind regards,

Mitchell Barnes
BA(Hons), MSc, MRTPI


Associate Director



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 <p>Nuneaton & Bedworth United to Achieve</p>	<p>Borough Plan Review Publication Stage Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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Name of the Local Plan to which this representation relates:

Borough Plan Review Publication Stage

Please return to Nuneaton and Bedworth Borough Council by 16th October 2023 via:

Email: planning.policy@nuneatonandbedworth.gov.uk

Post: Planning Policy, Nuneaton and Bedworth Borough Council, Town Hall, Coton Road, NUNEATON, CV11 5AA

This form has two parts –

Part A – Personal details.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

	1. Personal details* * If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.	2. Agent's details (if applicable)
Title	Mr	Mr
First name	Andrew	Mitchell
Last name	Cartwright	Barnes
Job title (where relevant)		Associate Director
Organisation (where relevant)	A R Cartwright Ltd	Frampton Town Planning Ltd
House no. and street		Oriel House, 42 North Bar
Town		Banbury
Postcode		OX16 OTH
Telephone number		
Email address (where relevant)		

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Borough Plan does this representation relate?

Paragraph	
Policy	DS3, DS4, H1 and TC3
Policies Map	

4. Do you consider the Borough Plan is:

4.(1) Legally compliant?

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

4.(2) Sound?

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

4.(3) Complies with the Duty to Cooperate?

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

Please mark with an 'X' as appropriate.

5. Please give details of why you consider the Borough Plan is not legally compliant, is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Borough Plan, or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

See accompanying submission

6. Please set out what modification(s) you consider necessary to make the Borough Plan legally compliant or sound, having regard to the matter you have identified in part 5 above, where this relates to soundness (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this modification will make the Borough Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See accompanying submission

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?


No , I do not wish to participate at the oral examination	
Yes , I wish to participate at the oral examination	X

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

See accompanying submission

Please note the Inspector will determine the most appropriate procedure to adopt, to hear those who have indicated that they wish to participate at the oral part of the examination.

9.

Signature: (Please sign the box if you are filling in a paper copy. If you are filling in an electronic copy, the box can be left blank)	
Date:	16.10.2023



NUNEATON AND BEDWORTH BOROUGH PLAN REVIEW 2021-2039

PUBLICATION DRAFT CONSULTATION (REGULATION 19)

SEPTEMBER 2023

LAND TO THE REAR OF 89-169 TUNNEL ROAD, NUNEATON

REPRESENTATIONS ON BEHALF OF

CARTWRIGHT HOMES LIMITED

OCTOBER 2023

REF: PF/10298

1. INTRODUCTION

- 1.1. These representations are made to the Nuneaton and Bedworth Borough Plan Review 2021-2039 Publication Draft Consultation, on behalf of Cartwright Homes, in relation to land to the rear of 89-169 Tunnel Road, Nuneaton.

The representations respond to the following policies:

- Policy DS3 – Overall development needs.
- Policy DS4 – Residential allocations
- Policy H1 – Range and mix of housing
- Policy TC3 – Hierarchy of centres

2. SUBMISSIONS TO THE NUNEATON AND BEDWORTH BOROUGH PLAN REVIEW

Strategic Policy DS3 – Overall development needs.

- 2.1. It is noted that Policy DS3 proposes, as a minimum, that the Borough will provide for at least 9,810 homes (545 per annum). This is a reduction from the 14,060 identified in the adopted Borough Plan.
- 2.2. The explanatory text explains that the Standard Method, suggests a per annum requirement of 442 dwellings, whilst the trend based requirement (taken from the sub-regional HEDNA) suggests 409 dwellings per annum.
- 2.3. Cartwright Homes shares the concerns of NBBC *“that this level of growth did not reflect the economic aspirations for the Borough over the plan period.”* Carwright Homes agree that a higher housing provision is justified to support a higher provision of housing to assist the economy in performing stronger and align the Councils aims for the Borough’s economy and planning for homes, jobs and infrastructure.

Policy DS4 – Residential allocations

- 2.4. The Publication Draft seeks to take forward seven strategic allocations from the adopted Borough Plan, totally a provision of 4,769 dwellings.
- 2.5. The plan also identifies 15 non-strategic sites, which make a provision of 689 dwellings.
- 2.6. The table below identifies these strategic allocations and their current status:

Table 1: Proposed Strategic Allocations in Borough Plan Review

Borough Plan Review Policy	Site	Dwellings	Adopted Borough Plan Policy	Current Status
SHA1	Top Farm	1,700	HSG1	Outline Granted (34615) – 1700 units)
SHA2	Arbury	1,525	HSG2	No applications

SHA3	Tuttle Hill	350	HSG11	Outline under consideration (35595 - 400 units)
SHA4	Hospital Lane	445	HSG5	Outline approved subject to S106 – 455 units
SHA5	West of Bulkington	348	HSG8	FPA (38375 - 89 units) approved. FPA (38856 - 149 units) approved (subject to S106). OPA (37425 - 42 units) approved. OPA (39111 - 95 units) approved (subject to S106).
SHA6	Former Hawkesbury Golf Course	176	HSG12	FP Granted (36870 - 204 units) Outline Granted (37807 - 176 units) RM under consideration (39446 - 110 units)
SEA2	Wilsons Lane	75	EMP2	Outline Granted (37237 - 73 units)
SEA6	Bowling Green Lane	150	EMP7	

- 2.7. As can be seen from the above, there is a large reliance on two strategic sites (Top Farm and Arbury), together these make a provision of 3,225 dwellings.
- 2.8. The table above highlights that there is no current application at Arbury (SHA2). Furthermore, late last year Top Farm received outline planning permission five years after an outline application was submitted.
- 2.9. Cartwright Homes consider that the preferred options is heavily reliant on large sites, which are uncertain. Therefore, NBBC should seek to identified additional smaller sites to ensure a healthy supply of homes earlier in the plan period.
- 2.10. Section 3 identifies land to the rear of 89-169 Tunnel Road, Nuneaton, adjacent existing development at Tunnel Road, Nuneaton, which Cartwright Homes believe should be included within the Borough Plan to provide additional certainty for the delivery of homes the early stages of the plan period.

Policy H1 – Range and mix of housing

2.11. Policy H1 sets out that development is required to provide an appropriate mix of housing types and sizes “based on the need and demand identified in the most up-to-date HEDNA or equivalent”. It continues to states that “the Council will seek to re-address by actively promoting the delivery of housing schemes, where the housing mix proposed aligns with the identified needs and demands, of the Borough, in the HEDNA”.

2.12. Cartwright Homes object to this policy.

2.13. The LPA refers to the HEDNA in its determination of the appropriateness of the proposed housing mix. However, the HEDNA itself states at para 8.28 and 8.29 (appendix 11 of the Statement of Case) that:

“2.28 The analysis has quantified this on the basis of the market modelling and an understanding of the current housing market, but it does not necessarily follow that such prescriptive figures should be included in the plan making process– demand can change over time linked to macro-economic factors and local supply.

8.29 The suggested figures can be used as a monitoring tool to ensure that future delivery is not unbalanced when compared with the likely requirements as driven by demographic change in the area. The recommendations can also be used as a set of guidelines to consider the appropriate mix on larger development sites, and the Council could expect justification for a housing mix on such sites which significantly differs from that modelled herein.”

2.14. The HEDNA itself sets out that the figures are prescriptive, they are a “set of guidelines to consider the appropriate mix on larger development sites”, and that demand can change over time linked to macroeconomics.

- 2.15. The policy needs to allow for a degree of flexibility, it should not slavishly seek to enforce the mix set out in the HEDNA, based on the conclusions of the HEDNA itself.
- 2.16. It is suggested that the policy wording should be revised to allow flexibility depending on locational and macroeconomic factors.

Policy TC3 – Hierarchy of centres

- 2.17. Policy TC3 sets out that any new residential development should be within:
1. 800m walking distance of a district or local centre (existing centre’s threshold can be outside the Borough’s administrative boundaries); and
 2. 8 minutes motor vehicle drive time to a district centre. Applications must demonstrate this on the basis of:
 - a. Post development impact.
 - b. During peak drive time.
- 2.18. This would reduction of what was proposed in the Preferred Options and the Adopted Borough Plan, which seeks for facilities to be within 1.2km.
- 2.19. Cartwright Homes note that Sustrans state in their Walkable Neighbourhoods report (dated May 2022) (**Appendix 1**) that *“800m, or approximately half a mile, is generally considered a standard walkable distance as it typically takes approximately 10 minutes to walk, and a 20 minute walking trip (1,600m total) has been found to be the longest distance a majority of people are willing to walk to meet their daily needs.*
- 2.20. It is therefore considered that 1.2 or 1.6km would be a more appropriate measure to include within policy.
- 2.21. The function of Local Centres is set out in the Table 24, and considers that they *“Provide for the day-to-day top-up shopping needs of local people on a smaller scale than a district centre.”*

2.22. It considers that the appropriate uses for Local Centres include:

- Hairdressers.
- Newsagents.
- Small convenience store.
- Sub-post offices.

2.23. Carwright Homes consider that there are clusters of facilities that have been omitted from inclusion as Local Centres.

3. LAND TO THE REAR OF 89-169 TUNNEL ROAD, NUNEATON

- 3.1. Land to the rear of 89-169 Tunnel Road, Nuneaton is able to accommodate up to 70 dwellings.
- 3.2. The site location is available at **Appendix 2**.
- 3.3. The site layout is available at **Appendix 3**.
- 3.4. The site extends 3.6 ha and is formed by four fields bound by mature hedgerows with occasional mature hedgerow trees. A watercourse runs through the northern part of the site, with an area of woodland/tree belt and mature vegetation defining this boundary.
- 3.5. The immediate context to the south east of the site forms the settlement's edge of Galley Common. The rear of the existing properties on Tunnel Road defines the eastern and part of the southern boundary of the site. To the west of the site is open countryside. To the north east of the site is open countryside with a range of small commercial operations dotted through the landscape.
- 3.6. There is minimal relationship between the site and the wider landscape setting due to the localised landform and the adjacent elevated built form on Tunnel Road. There is a distinct change in character and appearance of the site, with small scale rectangular field patterns enclosed by hedgerows, to the more open and 'expansive' visual appearance of the wider countryside beyond.
- 3.7. There are a range of semi-derelict buildings, of no architectural merit located close to the south eastern boundary. The buildings negatively impact the character and the appearance of the site.
- 3.8. The site is located adjacent to the suburb of Galley Common, around two miles west of Nuneaton. The proposed settlement hierarchy identifies Nuneaton as having the *"primary role for employment, housing, town centre, leisure and service provision"*, and therefore most sustainable location in the Borough.

- 3.9. The site does not lie within or in close proximity to any Conservation Areas or Scheduled Monuments. The nearest listed building is the Church of St Peter located on higher ground, approximately 610m to the north east of the site. The site does not lie within any designated or valued landscape settings, although the area is located within an Area of Restraint (AOR).
- 3.10. Galley Common has a range of every day facilities including: two grocery stores, a Londis with post office, and a Co-Op; Browns Pharmacy; Galley Common Infant School and Medical Centre; all within easy and safe walking and cycle distance of the site.
- 3.11. There is an extensive cycle network in the local area. Tunnel Road and the adjoining Plough Hill Road are classified as advisory cycle routes by Warwickshire County Council, both connect with Galley Common as well as the National Cycle Route (NCN) route 524, which extends to Nuneaton Town Centre. Route 524 further connects to NCN 52 to, Bedworth to the south and Leicester to the north. The Centenary Way Long Distance Route (LDR Footpath N54) runs through the centre of the site, adjacent to the central field hedgerow and connects with Footpaths N54 and N51.
- 3.12. There is an hourly bus service to Nuneaton Town Centre (Routes 18 and 19), with bus stops within an easy 145m walk. Nuneaton Railway Station provides regular trains to London Euston (half hourly peak hours, hourly after that), Birmingham New Street (20 minutes peak hours, half hourly after that) and Coventry (4 trips during peak times and hourly after that).
- 3.13. The site is within cycle/pedestrian routes of every day facilities and services, as set out in Table 2 below.

Table 2: Location of Every Day Services from the Site

Facility	Distance (km)	Walking (minutes)	Cycling (minutes)
Galley Common Medical Centre	0.40	5	1
Haunchwood Park Industrial Estate	0.35	5	1
Bus stop	0.15	2	1

Café	0.40	5	1
Haunchwood Sports and Social Club	0.60	8	2
Co-op Convenience Store	0.90	12	3
Hairdressers	0.90	12	3
Orford Rise Park	0.45	6	1
St Peters Church	0.80	11	3
Haunchwood Recreation Ground	0.90	12	3
Galley Common Infant School	0.90	12	3
Park Lane Primary School and Nursery	1.4	19	5
Stockingford Academy	3.2	44	11
The Nuneaton Academy	3.8	51	13
Aldi	2.7	36	8
Nuneaton Town Centre	5.5	n/a	17
Nuneaton Railway Station	6.2	n/a	20

3.14. Vehicle access will be from a new short section of road between numbers 147 and 155 Tunnel Road.

3.15. It is considered that land to the rear of 89-169 Tunnel Road, Nuneaton is in a suitable and sustainable location for residential development.

3.16. As per paragraph 69 of the Framework, *“Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly”*.

3.17. Therefore, it is submitted that this site should be included within the Borough Plan Review as a non-strategic site to provide further certainty to housing delivery in the early stages of the plan period, given the heavy reliance on uncertain, large, strategic sites.

Walkable neighbourhoods

Building in the right places to reduce car dependency

This paper explores the extent to which the proximity of services is used as selection criteria by English local planning authorities when allocating sites for development.

It highlights the lack of consistency in approach across England and makes recommendations for both UK Government and local government, with a view to ensuring that new development does not lock in car-dependency.

Author: Megan Streb

Date of publication: 16 May 2022



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Sustrans

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Executive summary

Walking's role in planning, net-zero and levelling up

Arguably the two biggest long-term challenges facing the UK today are the climate emergency and levelling-up. Currently, however, the planning system delivers new developments which work to the detriment of both of these.

This is because often we build in the wrong places; too far away from existing communities and services, and at densities too low to support everyday services or public transport routes within them. Here, the location and design of new developments mean that people need to rely on using a car for basic, everyday journeys.

This is not just bad for the climate but, crucially, it also limits opportunities for people who don't have access to a car, whether that's missing out on a new job, a family party, or even access to affordable, healthy food.

What's wrong with current guidance?

When journeys are short enough, most people walk. 800m, or approximately half a mile, is generally considered a standard walkable distance as it typically takes approximately 10 minutes to walk, and a 20 minute walking trip (1,600m total) has been found to be the longest distance a majority of people are willing to walk to meet their daily needs.

However, many new developments aren't within walking or wheeling distance of existing services, despite guidance being in place which encourages planners to do so.

The National Planning Policy Framework (NPPF) has a social objective to support strong, vibrant and healthy communities and suggests development should be focused on locations that "offer a genuine choice of transport modes". But this is not reflected in new developments delivered on the ground.

Research exploring this problem has been undertaken by Megan Streb, formerly of Sustrans and currently of the thinktank Centre for Cities, to consider whether a consistent approach is used to assess walkable distances in site allocation. The study surveyed officers from 100 Local Planning Authorities (LPAs) in England and reviewed planning documents in seven LPAs.

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Research results

- Most Local Planning Authorities do include access to services within their site allocation process in some way.
- However, approaches to measure service accessibility by walking are inconsistent and do not align with evidence on actual walking distances.
- Where walkable distance is considered, it is often not given priority in final decisions.
- A lack of nationally recognised standards is a major barrier to using walking distances to reject sites where walking distance to services are too far.

Recommendations

The findings of this research show that walkable distances are not consistently considered or assessed in the site allocation process, with decisions often made without regard for evidence on the distances that most people are willing to walk or wheel to reach services.

This section includes several recommendations for both national and local government. In the absence of consistent national guidance and resources on site allocation and proximity, some recommendations ask local government to “go further” than current national policy requires. Accordingly, we are also asking national government to provide the policy context and support that will make this easier for local government.

We have developed a framework of recommendations and actions primarily for local and national governments across the UK.

Recommendations for the UK Government

1. There should be a new strategic policy in the National Planning Policy Framework for the delivery of high quality and inclusive walking and wheeling environments including streets and other routes, with a particular focus on walkable proximity to local services and facilities.
2. Create a digital tool which supports LPAs to measure proximity to services and more effectively and consistently incorporates proximity as a determining factor in site allocation.

Recommendations for local planning authorities (LPAs) in England

1. LPAs should agree a spatial vision, using mapping to clearly show stakeholders the locations with best accessibility.
 - To have developments in the right locations we need more proactive spatial planning

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- LPAs should set out a spatial vision that includes accessibility as a core criterion. Accessibility mapping should be used to clearly show the most sustainable locations.
2. LPAs should develop Supplementary Planning Documents that set accessibility standards based on 800m walking and wheeling distances to key services, and 400m to bus stops.
 - The social objective of the current NPPF emphasises the need to provide accessible services and to support healthy communities.
 - Local planning policy can define this further, setting out standards for walking and wheeling distances to key services.
 3. LPAs should develop accessibility background papers to reinforce the importance of walkable distances
 - A background paper provides the evidence and precedent for the accessibility standards. This can support planning policy, methodology for site allocation, and Supplementary Planning Documents.
 - In the absence of set standards of distances from the UK Government, background papers would set out a robust evidence base for decisions made by LPAs.
 4. LPAs should measure proximity to services for sites in the site allocations process, whether or not they are within a settlement boundary
 - Settlement boundaries are not necessarily based around walkable distances to services; there may be several miles to get from the boundary to the town centre.
 - Applying walkable distances across all sites can help to reinforce a brownfield-first policy as well as highlighting gaps in provision of facilities.
 5. LPAs should include proximity to services as a criterion within their Sustainability Appraisal to discount unsuitable sites
 - Proximity to different key services can be included in the Strategic Housing Land Availability Assessment as part of the suitability assessment.
 - Proximity can also be included as part of several Sustainability Objectives in the appraisal of sites.
 - The scoring used within a Sustainability Appraisal should be considered carefully, starting with 800m as a maximum acceptable distance, and then determining whether a different threshold or a range is more appropriate.

Introduction

Our current planning system is failing to create happier, healthier neighbourhoods.

At a time when we face the global crisis of climate change, coupled with record levels of physical inactivity; it is more important than ever that communities are created where the vast majority of what people need is within a walkable distance. If we do this, then the most obvious and easiest choice for many people will be to walk and cycle the majority of their everyday journeys. This will reduce car dominance and increase physical activity creating connected, healthier communities.

Climate change and levelling up

The UK Government's commitment to tackling climate emergency and levelling up is reflected in governmental rhetoric and ambition but not yet in joined-up policy and practical action, including within planning policy.

To meet our legal targets on climate change and to reduce inequity as we do so, we need not just to electrify motor vehicles, but also to rapidly reduce car use¹.

Housing and car dependency

The way we get around has a key role to play in addressing climate change, as currently 27% of the UK's emissions come from domestic transport². Reducing the need to use a private car to reach everyday services, education and employment is also key to reducing the risk of people experiencing transport poverty³.

However, reducing car use will be made much harder if we continue to build housing developments which lock people into car dependency for years to come. Far too many new housing developments are built too far away from existing urban centres and are designed at low densities, meaning that there are too few people to support services, such as schools, shops and a GP's surgery, within them (see Figure 1 for a detailed list of services). Some new developments lack the most basic provision such as pavements, with public transport services that are infrequent or patchy, and lack of infrastructure to support cycling.

Accordingly, people who do not have access to a car are forced to walk or wheel⁴ long distances or rely on public transport, which can be infrequent and expensive, to meet their everyday needs. The lack of alternative transport options can also push people into running a car that represents a considerable portion of their income.

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Issues with current planning guidance

While current planning guidance offers encouraging words on embedding sustainable transport within new developments, this is not typically reflected in their design or delivery.

For example, the National Planning Policy Framework (NPPF)⁵ has a social objective to support strong, vibrant and healthy communities and advocates for creating developments that are sustainable and offer a genuine choice of transport modes.

However, no planning guidance or standards currently exist to set out how this should be achieved in practice, and so developments which deliver car dependency continue to be approved and built.

With government language focusing increasingly on decarbonisation and reducing the need to travel, ensuring services are within a walkable or wheelable distance from new homes should be increasingly important in spatial planning, and planners should be provided with guidance and tools which will help them to achieve this.

The case for walking

When journeys are short enough, most people walk

- Analysis of the National Travel Survey data⁶ in 2015 showed 50% of single-stage walking trips were under 800m.
- In 2012, analysis of trip data in four English city regions found that 69% of trips made by walking were less than 800m and of these, 89% of trips under 400m and 70% of trips 400-800m were walked⁷.
- 800m, or approximately half a mile, is generally considered a standard walkable distance from services as it typically takes approximately 10 minutes to walk, and a 20 minute walking trip (i.e. 1600m total) has been found as the longest distance a majority of people are willing to walk to meet their daily needs⁸.
- Depending on local health, topography and population demographics, such as an older population, the 800m standard may need to be reduced to adhere to the 20 minute return trip standard, with amenities such as seating or spaces to rest also provided.

Need for walkability

- Making it easier for everyone to walk to the every-day places they need to and making sure that people don't have to rely on a car for making short trips can help to boost access to

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work and local services, reduce congestion⁹, cut air pollution¹⁰, prevent ill health and reduce costs to the NHS¹¹, and help to sustain or revitalise local high streets and economies¹².

- Conversely, failing to provide for walkable services, or providing public transport links to those services, locks people into car dependency, with a report by Transport for New Homes outlining that “many new greenfield housing estates are adding to traffic jams, carbon emissions and are trapping communities into car-dependence”¹³.

However, many new developments are not within walkable distances of services

- Recent studies by the RTPI¹⁴, Place Alliance¹⁵, Transport for New Homes¹⁶ and others¹⁷ have demonstrated that many new housing developments are being built in locations that are too far away for residents to walk or wheel to key services.
- This is highlighted by the fact that in England in 2018, almost 20% of journeys under one mile were made by car¹⁸. These could be walked in 15 minutes.

Planning guidance on walking does exist but is inconsistent

- Guidance does exist to encourage planners to ensure developments are within a walkable distance of 800m from most services.
- This includes the Department for Transport’s Manual for Streets¹⁹, alongside guidance from Sport England²⁰, the Chartered Institute of Highways and Transportation (CIHT)²¹ and the Local Government Association²².
- Some guidance even recommends that some facilities should be closer. For example, CIHT recommends a 400m distance to bus stops in residential areas.²³
- However, this approach is not a requirement, and so there is inconsistency in whether / how walkability to services is considered during the site allocation process.

Government planning policy doesn’t support its own design guidance in clearly setting out what ‘accessible services’ means or how they should be implemented:

- The Government’s National Design Guide²⁴ defines “walkable” well-designed places as having local facilities within 800m. It also discusses the role of the built environment, including density and junction design, in encouraging walking. The

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National Design Guide also states that people should be able to get to facilities and local services without needing a car.

- Despite the National Planning Policy Framework calling for places that are not well-designed to be refused, there is no matching guidance for planners in England in the NPPF or PPG that defines a walkable distance, or how a walkable distance should be implemented, when assessing site locations or planning applications.

Research aims and approach

Aims

Given the challenges, opportunities and shortcomings set out in the introduction, research was undertaken to better understand if and how proximity to services (defined as being walkable for most people, i.e. within 800m) determine housing site allocation in England, and how consistently, or otherwise, decisions on proximity as a determining factor are made.

This study aimed to answer the following questions:

- Is a consistent approach used in assessing walkable proximity in site allocation across England?
- Is the existing Governmental planning guidance - and guidance from other bodies - enough to support local planning authorities to consider walkable distances in their site allocations?

Methodology

A survey was undertaken with officers from Local Planning Authorities (LPAs) in England:

- The survey was sent out to LPA planning teams across England in December 2019 and January 2020.
- Planning officers from 100 Local Planning Authorities responded to the survey.

In-depth interviews were carried out with officers, alongside a review of planning documents in seven case study LPAs:

- Remote interviews with planning officers and a review of the policy documents from seven LPAs helped to provide a deeper understanding of the process, the barriers, and perceptions of accessibility.
- The interviews were with planning policy officers from five predominately rural and two predominately suburban LPAs.

Representation

- Planning officers from all of England's regions were represented, except for London
- Overall, 16% of responses were from LPAs that described themselves as 'urban', 34% from 'predominately urban/suburban' LPAs and 50% of responses were from 'predominately rural' LPAs.

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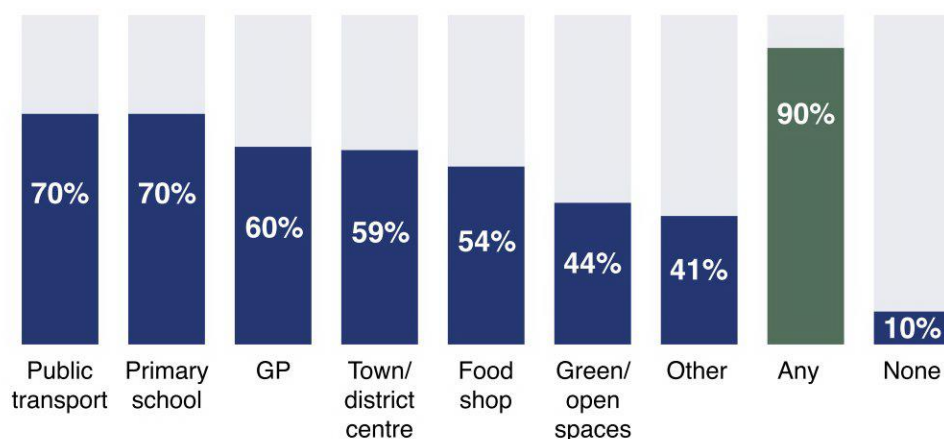
The headline findings from the research were that:

- The accessibility of local services is typically considered in Local Planning Authority site allocation processes
- However, approaches to measure service accessibility by walking are inconsistent
- Approaches to measurement do not align with the evidence that suggests services should be within 800m of a home if people are likely to prioritise walking
- Even where proximity is considered, barriers often prevent it from being considered in the final decision making
- A lack of national standards is a major barrier to using proximity as a more significant reason to discount sites

The accessibility of local services is typically considered in Local Planning Authority site allocation processes

Most LPAs do include access to services within their site allocation process in some way. 90% of LPAs consider accessibility to at least one type of amenity in their site allocation process, and over half consider proximity to 5-7 types of services (Figure 1).

Figure 1: Proportion of LPAs that include proximity to each service as a criteria/sub-criteria within the suitability assessment



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The interviews and the review of policy documents suggest that the main way in which service accessibility is considered is in Sustainability Appraisals (which appraise the social, environmental and economic effects of a plan²⁵), where they are scored alongside other sustainability objectives.

Accessibility distances are often noted earlier in the suitability assessment within the Strategic Housing Land Availability Assessment (SHLAA), but not consistently, and are usually not scored.

However, approaches to measure service accessibility by walking are inconsistent

There is no consensus across LPAs on how to measure proximity, nor on what is considered 'an acceptable' distance.

The distance from a service over which a site would be classified as 'poor' or 'unacceptable' ranged from 240m to 5km.

Furthermore, distance is measured by some LPAs following the road and path network, while others measure 'as the crow flies' Table 1. Depending on the area, a straight-line distance could be considerably longer when using the existing road network, as people often can't travel as far as a straight line would indicate, particularly if streets are not permeable, as illustrated below in Figure 2²⁶.

Figure 2: Taken from CIHT (2018) Buses in Urban Developments



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Table 1: Service accessibility measurement approach

Setting	Road/ network distance	% Straight line (as the crow flies)	# Total respondents
All settings	56%	44%	82

Further inconsistencies exist in where distances are measured from. Some LPAs base measurement from the edge of the site, others from the centre of the site, and a small number from the centre of Lower Super Output Areas (areas with an average population of 1500 people or 650 households).

Half of rural LPAs and 45% of urban LPAs use the edge of the site to measure proximity. Depending on the scale of the future development and the street and path layout within the site, this could add several hundred metres to residents' journeys (Table 2).

Table 2: Service accessibility measurement approach in relation to the site

Setting	Centre of develop.	Centre of LSOA	Edge of develop.	Other	# Total respondents
Rural	39%	0%	50%	11%	44
Urban/ suburban	66%	3%	24%	7%	29
Urban	27%	0%	45%	27%	11
All settings	46%	1%	40%	12%	84

Additional differences exist in LPAs' methods for assessing whether a site would be close enough to services.

Some use a range of distances, such as <400m, 400-800m, 800-1200m, >1200m, with sites closer to services scoring better than those further away.

Others use a threshold, where any site within a set distance of services would be acceptable, no matter how near or far it fell within that distance.

All of this results in vastly different outcomes in relation to the distances to services that are considered acceptable in different parts of the country.

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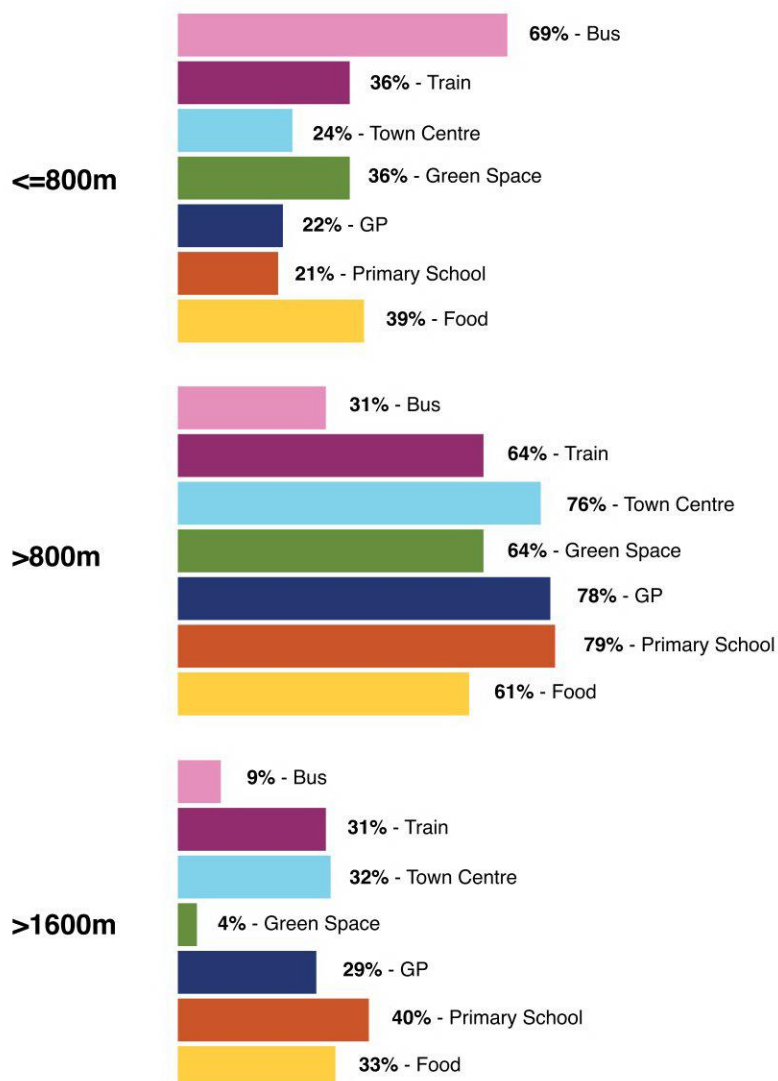
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Approaches to measurement do not align with the evidence that suggests services should be within 800m of a home if people are likely to prioritise walking

Despite research and guidance from several professional bodies, as well as National Design Guidance giving 800m as a distance a majority of people are willing to walk, fewer than half of responding LPAs use a distance at or below 800m as the maximum acceptable distance for accessibility. In addition, many LPAs also use an ‘as the crow flies’ approach to measuring 800m distances, which may add considerable distances depending on the road and path network.

This varies by setting and by destination. For example, 40% of LPAs use 400m as the maximum distance for proximity to bus stops, but only 20% use the greater distance of 800m as a maximum to primary schools or GP surgeries. Many LPAs consider over 1600m acceptable for some types of service, more than double the recognised 800m distance (Figure 3).

Figure 3: Proportion of maximum acceptable distance at or below 800m, above 800m and above 1600m by service type



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In some LPAs, there is also an assumption that if a site is allocated within a settlement boundary, the site must be in a sustainable location.

“If it is within a built-up area, it’s always assumed that it can come forward” **Officer at a rural LPA**

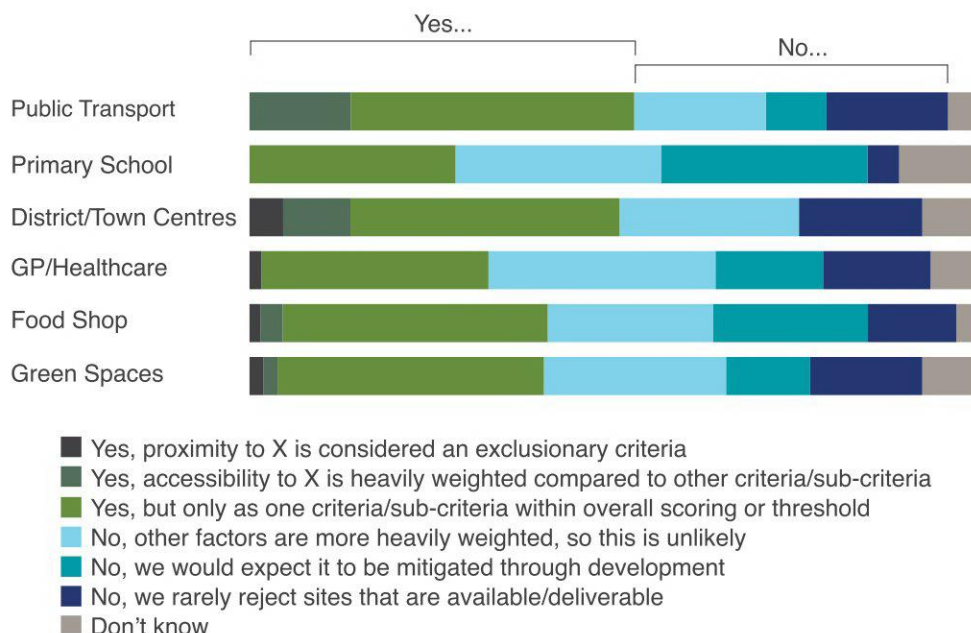
However, many LPAs use audits of services within their towns and villages that are several years old, a process that rarely includes mapping specific locations, meaning that these assessments may not be accurate or that the services may no longer exist.

For larger towns, the settlement boundary may be several miles walking or wheeling distance from the town centre, making this an unsatisfactory way of assessing walkable proximity.

Even when proximity is considered, it rarely leads to sites being rejected

Overall, 47% of LPAs reported that they have discounted or excluded sites with lack of accessibility to at least one type of service as a contributing factor. However, 20% of LPAs reported that they rarely reject sites that are deliverable/achievable, no matter what the assessment of proximity shows. As shown below, some services are used by LPAs to discount sites more than others.

Figure 4: Proportion of respondents’ answers to ‘During the Strategic Housing Land Availability Assessment/site allocation process, has access to X been used to reject a site’s suitability?’ by service type.



Note: Percentages are based on respondents who indicated their LPA considers proximity to that destination within the site allocation process, not the total respondents.

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Only 16% of LPAs reported proximity as a major reason for a site being discounted. Instead, interviews highlighted that LPAs felt more comfortable assessing accessibility alongside other criteria. Most often, this was done in the Sustainability Appraisal.

“Accessibility is ... a very good yardstick. But then, you need to bring in the other factors to get that sort of main measure ... It’s not the only measure.” **Officer from rural LPA**

Even for those who do consider proximity and have policy and an evidence base to support this decision, there is a reluctance to exclude sites solely based on proximity, and we identified several barriers to doing so.

As well as a lack of robust planning guidance or regulation, a lack of deliverable sites within walking distance, and the prioritisation of other suitability criteria were considered to be of particular importance (Table 3).

Table 3: Barriers to using proximity to shops and other services in site allocation

To what extent do you feel that the following are barriers to using accessibility/walkability of facilities as a more important criteria within the site allocation process? (tick all that apply)	Total ‘important’ & ‘very important’
Lack of robust planning guidance or regulation	64%
Lack of deliverable sites in areas within walking distance of services	61%
Greater priority of other suitability criteria	60%
Lack of datasets/GIS resource to determine accessibility/walkability	54%
Existing local planning policy doesn’t include robust evidence of the need for walkability	49%
Quality vs quantity - prioritising the number of houses over the impact of health	48%
Political priorities and buy-in from local politicians	43%
Lack of capacity within the planning team	42%
Lack of coordination with the team responsible for the Local Transport Plan	36%
Planning inspectors do not support walkability as a key suitability criterion	33%

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Amongst the 20% who rarely reject sites that are considered available, the pressure of housing delivery was cited as the second most important factor in not discounting sites based on proximity. Interviews also suggested that the pressure of housing delivery limits the ability for proactive spatial planning.

“... we really don't have much say in how much land or what our housing targets need to be for the next Local Plan. So we've just got to ... 'find the best fit for all these new houses.’” **Officer in rural LPA**

“We were a bit careful not to just say, ‘Oh, it's not accessible to these 10 facilities, that's it, we're not going to allocate it in the plan.’ Particularly because we're aware of...the level development pressure that we had. We felt like it wouldn't stand up too well in examination, if that was the only reason for refusal.” **Officer in suburban LPA**

In relation to prioritising other suitability criteria, interviewees explained that proximity is not given as much priority as flood risk, for example, due to the latter being an exclusionary criterion supported by a sequential test and methodology set out in the NPPF.

A lack of national standards is a major barrier to using proximity as a more significant reason to discount sites

‘Lack of robust planning guidance or regulation’ was rated as an important or very important barrier to using walkability of facilities within site allocation by 64% of all survey respondents – the top-rated barrier.

Furthermore, six of seven interviewees mentioned the lack of national standards or guidance as a barrier as they worried decisions would not stand up to scrutiny if the exclusionary criteria were not explicitly mentioned in national guidance.

“Without an obviously clear ... steer from ... Practice Guidance ... you have to try and convince the Inspector that this is the correct methodology” **Officer in suburban LPA**

“You could put moveability and distances into the Plan as well. But then people would say, ‘well, it's nowhere mentioned in national planning guidance’.” **Officer in rural LPA**

One LPA, for example, uses accessibility scores as part of both its Strategic Housing Land Availability Assessment and the Sustainability Appraisal but won't use accessibility as the sole reason for discounting a site without the backing of national standards laid out in guidance.

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This suggests that the introduction of national guidance on proximity and walkability would be a vital tool in ensuring that these issues are given proper consideration during site allocation.

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The findings of this research clearly show that, despite UK Government recognition of the role of increasing walking journeys (and reducing car journeys) in tackling the climate emergency and supporting levelling up, walkable distances are not yet reflected consistently in local decisions about the location of new housing developments.

Where proximity to services is reflected in planning decisions for the location of new developments, it is done inconsistently and often without regard for the evidence on the distances that most people are willing to walk or wheel to reach services.

This section includes several recommendations for both national and local government. In the absence of consistent national guidance and resources on site allocation and proximity, some recommendations ask local government to “go further” than current national policy requires. Accordingly, we are also asking national government to provide the policy context and support that will make this easier for local government.

For UK Government

1. There should be a new strategic policy in the National Planning Policy Framework (NPPF) for the delivery of high quality and inclusive walking and wheeling environments including streets and other routes, with a particular focus on proximity to local services and facilities.

- The NPPF should set out a new strategic policy for the delivery of high quality walking and wheeling environments including streets and other routes.
- Walkable proximity to local services and facilities should inform the site allocation process. Great weight should be given to the issue of proximity to services and facilities, which should be fully taken into account in the final decision making.
- Planning Practice Guidance should be developed to clearly define walkable proximity to existing and new services and facilities for new developments, better aligning with the National Design Guidance. Within this Planning Practice Guidance there should be a single and objective measure of accessibility.
- Local Plans must identify what provision for high quality walking and wheeling infrastructure will be needed to support new development over the plan period.
- Planning policies and decisions must also identify, safeguard and deliver high quality walking and wheeling networks, drawing on Local Cycling and Walking Infrastructure Plans (LCWIPs) or equivalent spatial pedestrian network planning.

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- All new development must add to and/or connect with these high quality walking and wheeling networks.
- Major new development must deliver high quality walking and wheeling environments on streets and other routes.

2. Create a digital tool which supports LPAs to measure proximity to services and more effectively and consistently incorporates proximity as a determining factor in site allocation

- The tool should be similar to the National Audit Office's Accessibility Tool, which examines transport accessibility to key local services in England, but should incorporate Ordnance Survey Points of Interest data and road network information, to provide an overview of Access to Opportunities and Services (ATOS) and public transport accessibility level (PTAL) across England.
- This tool could provide a consistent resource that is currently beyond what many LPAs have access to.

For local government

1. Local planning authorities should agree a spatial vision, using mapping to clearly show stakeholders the locations with best accessibility

- To have developments in the right locations we need more proactive and integrated spatial planning. As emphasised in 'Better planning, better transport, better places', "The process of selecting sites for development should not be driven by developers or land owners; it should be driven by the local authority. However, the process should be informed by developers."²⁷
- Currently, there isn't a comprehensive, consistent approach being taken by LPAs.
- LPAs should set out a spatial vision that includes accessibility as a core criterion. As part of the development of this vision, accessibility mapping should be used to clearly show the most sustainable locations. This can be through infrastructure mapping such as ATOS or PTAL, or PedShed or catchment mapping around key services.²⁸

2. Local planning authorities should develop policies and/or Supplementary Planning Documents that set accessibility standards based on 800m walking and wheeling distances to most key services, and 400m to bus stops

- The suitability of sites can be assessed against an adopted development plan or emerging plan, according to current Planning Practice Guidance.²⁹ However, for that to happen, there must be clear policies around walkable developments.

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- The social objective of the current NPPF emphasises the need to provide accessible services and to support healthy communities. Local planning policy can define this further, setting out standards for walking and wheeling distances to key services, as well as distances from specialist housing. If walkability standards are set for development management, they should extend to site allocation as well.

3. Local planning authorities should develop accessibility background analysis to reinforce the importance of walkable distances

- A background paper provides the evidence and precedent for the accessibility standards, highlighting precedent in planning policies elsewhere, and allaying fears of elected members. This can support planning policy, methodology for the site allocation, and Supplementary Planning Documents.
- In the absence of set standards of distances from the UK Government, background papers would set out a robust evidence base for the planning policy and site allocation decisions made by LPAs.

4. Local planning authorities should measure proximity to services for all sites, whether or not they are within a settlement boundary

- Settlement boundaries are not necessarily based around walkable distances to services. In many places, as settlements have grown out over recent decades, there may be several miles to get from the boundary to a supermarket or the town centre.
- By applying walkable distances across all sites, it can help to reinforce a brownfield-first policy by showing sites that score highly on access to services, as well as to highlight gaps in provision of facilities.

5. Local planning authorities should include proximity to services as a criterion within their Sustainability Appraisal to discount unsuitable sites that may have made it through the Strategic Housing Land Availability Assessment process

- Proximity to different key services can be included in the Strategic Housing Land Availability Assessment as part of the suitability assessment. Suitability includes whether the site is aligned with emerging Local Plan policy. In addition, proximity can also be included as part of several Sustainability Objectives in the appraisal of sites. Interviews for this research highlighted the role of the Sustainability Appraisal in providing a finer sift to discount sites after the Strategic Housing Land Availability Assessment was completed.

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- The scoring used within a Sustainability Appraisal should be considered carefully, starting with 800m as a maximum acceptable distance, and then determining whether a different threshold or a range is more appropriate. There is also a risk of double counting between multiple sustainability objectives. This can be a useful way to add weighting to particularly important criteria, but should be done in a considered way.

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Birmingham City Council: walkable distances in the Local Plan

The [Birmingham Development Plan \(2017\)](#) includes a number of policies that call for access to services, as well as including walkable distances in the Sustainability Appraisal of their site allocations.

Within the development management policies, Policy TP45 Accessibility Standards for New Development clearly sets out walking accessibility standards for new developments of 10 dwellings or more based on a walking time of 3mph, and requires footpaths and roads that can be easily crossed.

Destination:	Walking distance:
GP surgery	15 min (1200m) or 10 min (800m) if retirement dwellings
Local shops with a good range of food items	15 min (1200m)
Public transport frequency > every 30min to shops that provide a range of items, including a good range of food items	10 min (800m)
Residences that are not retirement dwellings, student accommodation or single-person apartments should be within:	
Primary school with sufficient additional capacity	10 min (800m)
Secondary school catering for both sexes with sufficient additional capacity.	20 min (1600m)

By including walkable distances within the Local Development Plan, this provides the policy rationale for additional standards and guidance on walkability. Although in this instance several distances used are higher than the research suggests a majority of people will walk to the various destinations, it is particularly positive to note that shorter distances are used for retirement housing, highlighting that 'accessibility' is not a blanket term.

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Braintree District Council: including walkable distance thresholds in Sustainability Appraisals

The [Sustainability Appraisal and Strategic Environmental Assessment \(2013\)](#) provides a good example of the use of walkable distances as criteria within a range of sustainability objectives. The table below sets out the criteria, the distances included, as well as the relevant sustainability objective.

Sustainability Objective	Criteria	Distance
Improve the health of the District's residents and mitigate/reduce potential health inequalities	Distance to nearest NHS GP surgery or hospital.	- < 800m + > 800m
Improve the health of the District's residents and mitigate/reduce potential health inequalities	Distances to publicly accessible natural greenspace (ANG), including country park, woodland, grassland, river or canal bank, as per Natural England ANG Standards (ANGSt)	- None or one ANGst criteria met + Three or more ANGSt criteria met ≤ 300m from ANG 2+ ha ≤ 2km from ANG 20+ ha ≤ 5km from ANG 100+ ha ≤ 10km from ANG 500+ ha
Promote the vitality and viability of all service centres throughout the District	Distance to primary shopping area or Local Centre boundary	- > 800m for sites within or adjacent to Main Towns, > 8km for allocations elsewhere + ≤ 800m, ≤ 8km
Achieve sustainable levels of prosperity and economic growth	Distance from existing employment area	- > 800m + ≤ 800m
Promote more sustainable transport choices and uptake	Distance to public transport	- > 400m bus AND > 800m train + ≤ 400m bus or ≤ 800m train ++ Provision of a new bus stop or public transport hub

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Sustainability Objective	Criteria	Distance
Promote accessibility and ensure the necessary transport infrastructure to support new development	Allocation to settlement with a good level of services.	+ village with services ++ Main Towns
Promote accessibility and ensure the necessary transport infrastructure to support new development		- > 400m bus AND > 800m train + <= 400m bus OR <= 800m train 'infrequent' ++ <= 400m bus OR <= 800m train 'frequent'
Improve the education and skills of the population	Distance to a primary school.	- > 800m + <= 800m, > 400m ++ <400m
Improve the education and skills of the population	Distance to a secondary school.	- >4.8km + <= 4.8km, > 2.4km ++ <= 2.4km

The use of the Sustainability Appraisal as a 'finer sift' is used by many LPAs. Depending on how the Sustainability Appraisal is used, spreading walkable distances to destinations across different objectives could weight proximity more heavily, although the methodology for using the Sustainability Appraisal results are not included in the Braintree example.

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Fareham Borough Council: setting out the rationale for walkable distances

Fareham Borough Council developed a [Background Paper: Accessibility Study \(2018\)](#) to set out the accessibility standards used in the Sustainability Appraisal within the site allocation process. The paper also sets out the evidence base used to inform the accessibility standards, including guidance by CIHT, DfT, WYG analysis published by the RTPi, as well as planning precedent from The London Plan and Eastbourne Borough Council.

Facilities and Associated Accessibility Standard⁹⁰

Facilities	Accessibility Standard in Metres (m)	Approximate Walking Time (minutes)
GP surgeries	1,200m	15
Bus stops	400m	5
Train station	1,600m	20
Community and leisure	800m	10
Secondary schools	1,600m	20
Primary schools	1,200m	15
Newsagents/convenience store	800m	10
Town/district centres/parades	1,600m	20
Designated employment areas	1,600m	20
Accessible green spaces (unrestricted and not including greenways or incidental spaces) or play space	800m	10

The use of a background paper sets out the evidence behind both policy and the site allocation methodology. It should be noted that several of the distances used by Fareham Borough are higher than the research suggests a majority of people will walk to the various destinations. This is likely due to a reliance on the 85th percentile used in the WYG report 'How far will people walk?' as opposed to the 50th percentile as found in Wakenshaw's full analysis.

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North Lincolnshire Council: walking distances in suitability assessments

The North Lincolnshire Housing and Employment Land Allocations Development Plan Document (2016) includes walkable accessibility criteria used to identify sites early in the site allocation process. The council used Accession modelling software to ensure that the road and path network was used for distances. This was used alongside the Sustainability Appraisal to choose between sites or rank sites.

“Each site will be accessed according to the criteria set out below and given either a positive or negative score. Where a site attains 5 or more positives (always including a positive score for proximity to key bus/ rail network) it is concluded that any future development of this site would be easily accessible to services and the wider population by public transport. If the site scores five or more negatives the reverse is true and the future development of the site would be considered unsuitable in accessibility terms.”

Including set accessibility criteria within the site allocation process sets out a clear methodology that developers and other stakeholders can use to inform their decisions. Also positive is North Lincolnshire’s use of both a threshold distance, and distance calculated using the road and path network.

Sefton Council: Using a Sustainable Travel SPD

The [Sefton Sustainable Travel Supplementary Planning Document \(2018\)](#) includes an accessibility checklist and scoring process for developments around walking, cycling and public transport, as well as criteria around site layout that supports walking and cycling. It should be noted, however, that this only includes walkable distances to bus stops (<200m), train stations (<400m) and district or local centres (<800m).

The use of a Supplementary Planning Document can add important additional detail and standards for achieving policy outcomes. However, although the Sefton SPD aligns well with policy in the Local Plan, it only partially matches the distances and destinations in the site allocation methodology. Ideally this should be standardised so that both planning officers and stakeholders can see a consistent application of distances from sites through to planning approval of developments.

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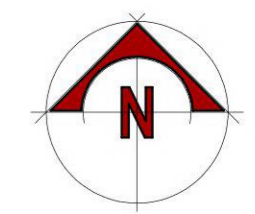
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open farmland (arable)

Informal public footpath has developed around perimeter of field as a preferred alternative route to the adopted definitive route which crosses the middle of the field

reinforce existing hedge with additional tree planting and retain open field to provide wide landscaped buffer to soften edge of development

definitive route of public footpath

frontages looking out towards the open countryside

tree planting to countryside boundary to soften the built form

KEY

- site boundary
- suggested dwelling (B denotes bungalow)
- parking
- indicative road network
- principle internal footpaths
- country walks
- existing hedges retained with root protection area
- 8m development exclusion zone from edge of watercourse
- T21 existing trees numbered (see arb report)

new nature walk along existing watercourse provides pedestrian connectivity along length of the development

pedestrian gateway to site potential for creating a feature bridge over stream to replace the existing

CENTENARY WAY public footpath

existing hedge retained

existing hedge retained

open farmland (pasture)

new nature walk along existing watercourse provides pedestrian connectivity along length of the development

frontages looking out towards the open countryside

near garden fences will be hidden behind the existing hedge

storm water attenuation (SuDS) meadow will contribute to the wildlife corridor along stream

one side of existing hedge will be visible and accessible from the public domain ensuring the hedgelines are always visible and maintained

faul water pumping station within 15m zone

accesses through existing openings in hedges

existing hedges retained

frontages looking out towards the open countryside

link through the development providing pedestrian connectivity and a route for services

frontages to dwellings

near garden fences will be hidden behind the existing hedge

narrow pedestrian gateway through hedge will not affect the integrity of the hedgeline

houses to front public footpath providing alternative route and passive surveillance making the footpath more user friendly

one side of existing hedge will be visible and accessible from the public domain ensuring the hedgelines are always visible and maintained

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access provided to rear of existing properties along Tunnel Road

20m+ rear gardens

open farmland (arable)

intersection of public footpaths

emergency vehicular access

PRINCIPLE ACCESS
TUNNEL ROAD

highway modifications to be in accordance with the engineer's details

REVISIONS
A - additional notes Mar 2020
B - minor amendments to avoid RPA's 2020
C - amendments in accordance with engineer's & landscape architect's requirements July 2020

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project		proposed housing Tunnel Road, Galley Common Nuneaton		ARCHITECTS LTD	
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scale	1: 500	sheet	A1	job No	19/94
author	JRH	date	Mar 2019	drawing No	02C

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