



Response to the New Towns Draft Programme

About

CoMoUK is the national organisation for shared transport, a charity for promoting its social, economic and environmental benefits. Shared transport means schemes such as car clubs and bike share where people can use a mode of transport without having to own it.

We work collaboratively with national, regional, transport and local authorities as well as the private sector to further these public benefits. We do this via research, operator accreditation, stakeholder engagement, policy work and advocacy.

We are grateful for the chance to respond to this consultation, and have limited our answers to the questions where we have specific comments based on our expertise.

Response

Introduction

Question 1

Which of the following best describes how you are responding to this consultation?

- as an individual member of the public
- on behalf of an organisation
- as both an individual and on behalf of an organisation

Answer: On behalf of an organisation

Question 2

Which area are you responding about?

- potential new town location
- wider region
- national interest
- I'm not responding about a specific location/region

Answer: National interest

Question 3

What is your connection to the proposed location/region?

- resident nearby
- landowner
- local authority
- developer
- environmental organisation
- professional interest
- no specific connection
- other

Answer: Professional interest

Question 4

If you are responding on behalf of an organisation, please select the type of organisation you are responding from below:

- private sector business
- charity
- social enterprise
- local authority
- government department or agency
- housing association / registered provider
- professional or representative body
- academic institution
- not applicable
- other

Answer: Charity

Question 5

If you are responding on behalf of an organisation, please provide the name of your organisation here.

Answer: CoMoUK

Question 6

If you are responding on behalf of an organisation, what size is your organisation?

- micro (1 to 9 employees)
- small (10 to 49 employees)
- medium (50 to 249 employees)
- large (250+ employees)
- not applicable / don't know

Answer: Micro (1 to 9 employees)

Question 15

Do you think there are any additional interventions that government should consider to ensure design and placemaking quality in new towns?

Answer: Yes

If you answered yes, please set out the additional interventions government should consider.

Answer: Among the priority interventions, the draft programme lists several sites where investment in transport will be needed to drive public transport mode share to relieve pressures on the road network, as well as listing sites where development could maximise the value of existing transport investments and high connectivity. However, the programme does not consider shared transport at these points, despite the potential contribution of shared transport to these considerations.

For sites where the road network is already under pressure, shared transport options embedded in development from the start can help to relieve that pressure by offering alternative transport modes which shift public behaviour. CoMoUK research has found that each car club vehicle in the UK replaces 23 private cars on average, with most active users taking less than 5 trips per year¹. Active car club users are much more likely to also cycle or take public transport than the average population – for example, 53% of

¹ [CoMoUK Annual Car Club Report 2025](#)

users also use a bus at least once a week, compared to a national average of 21% across England. Turning to shared micromobility, 40% of users drive less often since starting to use shared micromobility, with 16% of individual bike share trips replacing trips that would otherwise have been made by car. Shared micromobility can also be a gateway to active travel, with 47% of all active users stating that bike share had led them to cycle for the first time in at least a year, including 19% of users who had not cycled in 5 years or more². Shared transport is a key component in shifting public behaviour to reduce pressure on the road network and should be considered from the start in any development.

For sites in existing urban areas, such as Manchester Victoria North, consideration should be given not just to the value of existing public transport links, active travel routes, and road networks, but also to making use of existing successful shared transport schemes and maximising the potential public benefit of these schemes. Mobility hubs bring together public transport with shared transport and active travel in high quality spaces that both support multi-modal journeys and improve the public realm. The place making aspect of a mobility hub also brings social and community value for the surrounding area, by creating safe and attractive spaces where people want to dwell and connect with each other. The government should therefore consider mobility hubs as an intervention that can have a significant enabling effect on the use of sustainable transport.

Consideration of shared transport will be particularly key in developments where there are challenges with expanding the existing infrastructure; for example, the CPRE consultation response notes that the proposed Wychavon Town would be served by Worcestershire Parkway, where the 500-place car park is often full. Embedding car clubs from the start could ease the pressure on this parking space, normalise sustainable travel behaviours, and remove the need for work to add capacity to the car park.

Question 17

Do you think establishing the placemaking principles in the proposed planning policy is an effective way to implement the placemaking ambition of the programme?

Answer: No

If you answered no, how do you think the placemaking principles should be implemented?

Answer: There is much in the placemaking principles that we welcome, such as the aim of ambitious density, which will support the use of sustainable transport modes; the

² [CoMoUK Annual Shared Micromobility Report 2025](#)

aim of healthy and safe places that promote active lives; the ambitious environmental standards for buildings and neighbourhoods; and the aim for transport connectivity. However, these principles are lacking any mention of shared transport, which will be key in ensuring that New Towns are not dependent on private car ownership and have a range of accessible active travel options.

Particularly with respect to transport connectivity, shared transport can support sustainable first and last mile connections, can supplement public transport routes, and can make active travel networks accessible to those who don't own a bicycle or who have specific needs that shared e-bikes can meet. Shared micromobility can be used to replace trips that would otherwise be made by car; in CoMoUK's annual survey, we find that each active shared micromobility user per year reduces their personal CO₂ emissions by 61.7kg due to car miles that are replaced by shared bikes and e-scooters.

Shared transport can also support low carbon neighbourhoods by reducing the need for private car ownership. In CoMoUK's annual survey, we find that the majority of car club members use car clubs between 1 and 5 times a year, and that 50% of users would not be able to get to their destination without a car, showing that car clubs provide occasional car access for essential journeys. Car club members are also much more likely than the general public to use public transport or active travel (for example, 36% of car club users cycle at least once a week, compared to a national average of 12% in England), further supporting environmental and health goals.

Question 23

Do you think any additional planning policies are needed to support the delivery of the programme objectives?

Answer: Yes

If you answered yes, please provide details.

Answer: The draft programme makes no mention of the need to reduce private car use and, despite welcome nods to increased density and public transport connections, sets no expectations as to how new development can support reductions in car use. Additional planning policy is needed to specifically address the role of planning in private car ownership and use.

This need would be partly addressed by supporting the development of mobility hubs and planning for car sharing and shared micromobility as transport options in new developments, as outlined elsewhere in this response. It would also be supported by existing policy on investment in public transport and active travel, and policy on high density development. However, there is still a need for concurrent policy limiting the space taken up in providing parking for private cars.

Development plans are required by the NPPF to set local parking standards, but the planning policy for New Towns can and should go further to ensure that parking standards support the delivery of programme objectives, particularly the placemaking objective as it relates to sustainable transport and alignment with the government's Net Zero agenda. The planning policy would therefore benefit from an added requirement for maximum parking standards to be set with a view to reducing private car ownership, encouraging use of sustainable transport and benefiting from the reduced parking space required by car clubs, which remove an average of 27 private vehicles from UK roads for each car in the shared fleet. This is particularly relevant to the programme given several mentions of the need for interventions to avoid placing extra pressure on already congested road networks.

There is also a need for a specific spatial planning policy on mobility hubs. By bringing shared transport together with public transport and active travel, mobility hubs can help to embed sustainable travel behaviours for new residents, while also contributing to placemaking through the inclusion of green spaces, seating and other amenities. A default policy position that New Towns should be built around mobility hubs would set a clear direction on sustainable transport infrastructure and empower developers to embed sustainable transport in new developments from the start and support low-carbon, high-density living.

More broadly, there is a disconnect between the New Towns planning policy and the recently published Better Connected strategy for integrated transport. Better Connected states that in urban developments “micromobility options (e.g. e-bikes and e-scooters) should be available for short trips and to support first and last mile connectivity, particularly rental services that can provide more flexibility than ownership”, and that “promoting car and lift sharing should be used to manage congestion and overall traffic emissions”; meanwhile for suburban areas it recommends “car sharing schemes and car clubs should be readily available”, and across all policy it sets the goal on shared mobility to “expand access, improve integration and raise awareness”. However, there is nothing in the New Towns planning policy that connects with this ambition. If the New Towns Programme is to deliver housing supply in an ambitious and innovative way, and particularly to create excellent, sustainable places with all the infrastructure that they need to succeed, then the planning policy must include detail on the delivery of the intentions set out in Better Connected. Supplementary planning guidance should be developed to outline how spatial planning of New Towns will ensure delivery of mobility hubs that support the shared transport ambitions in Better Connected.