

Dear Secretary of State,

The Draft NPPF and the Prospectus for the further review of the NPPF

The Transport Planning Society, Chartered Institution of Highways and Transportation, Transport for New Homes, Sustrans, Living Streets and CPRE the countryside charity, have collaborated to respond to the consultation on the updated Draft National Planning Policy Framework (NPPF) and Levelling-up and Regeneration Bill (LURB) in respect of the proposed further changes to the NPPF.

Such a collaboration is not normal but has been prompted by the serious shared concerns of these professional and other bodies that the Draft NPPF is missing an obvious and timely opportunity to address the stubbornly high contribution of surface transport to Greenhouse Gas Emissions.

We are all very pleased to see that changes are proposed but we have, however, several critical concerns set out below which we would appreciate discussing with you.

Our main concerns centre on the future spatial distribution of new development in terms of achieving sustainable transport provision, and the lack of integration at an early stage of planning with ensuring the provision of modern public transport and for active travel resulting in further compounding identified problems.

Acting now is crucial as the next review of the NPPF could take three or more years before being approved, preventing change on the ground for some time. This is a significant concern, given the pace we need to meet our Net Zero targets, the failure to decarbonise transport and facilitate sustainable travel, and the continued development of poorly located and car dependent housing schemes. Rapid and comprehensive integration of transport, spatial planning and decarbonisation is essential to mitigate these risks.

A coalition of transport, planning and decarbonisation organisations are calling for the Department for Levelling Up, Housing and Communities to:

1. Amend paragraph 113 in the Draft NPPF **now** as it currently states developments should only be prevented or refused if they would cause an unacceptable impact to highway safety, or create an unacceptable cumulative impact to the road network. Instead, developments should be prevented or refused if they:
 - are unable to demonstrate access by sustainable modes of transport, including high quality walking, wheeling, cycling and public transport, with daily and weekly services
 - would undermine Local Transport Plans especially the drive to decarbonisation
 - would cause an unacceptable impact on the local highway's capacity and safety
2. Amend paragraph 69 in the Draft NPPF to include the requirement:
 - To ensure that sites identified can be sustainably accessed by walking, wheeling, cycling and public transport
3. Explicitly mention in the next NPPF, outlined in the LURB further review, the responsibility planning teams have to ensure new and existing developments have effective access to sustainable transport options. This would highlight the key role of planning in meeting Net Zero by reducing carbon emissions. It would also ensure sustainable transport provision is

integral to the planning process, both at the local plan stage and in the context of development management decisions on development.

4. Equally, mention in the future NPPF the role planning teams must play if we are to meet levelling up missions 7 and 8 on health and wellbeing respectively, which are considerably affected by our built and natural environment.
5. Include a National Development Management Policy in the future NPPF to encourage and support local living and walkable neighbourhoods.
6. Review the Draft NPPF in relation to how it can support development and drive **low carbon** economic growth, not just economic growth. Integrating transport into the framework will support development, deliver on Levelling Up, and create sustainable economic growth.

We look forward to the opportunity to discuss the above with you at your earliest convenience.

Yours sincerely,

Transport Planning Society - Mark Frost (Chair)

Chartered Institution of Highways and Transportation - Neil Johnstone (President)

Transport for New Homes CIC – Jenny Raggett (Coordinator)

Sustrans – Xavier Brice (Chief Executive)

Living Streets – Stephen Edwards (Chief Executive)

CPRE the countryside charity – Paul Miner (Acting Director of Campaigns & Policy)