11 May 2018

Rt Hon James Brokenshire MP
Secretary of State for Housing, Communities and Local Government
Ministry of Housing, Communities & Local Government
2 Marsham Street
London, SW1P 4DF

Dear Secretary of State,

National Planning Policy Framework 2018 Consultation

We write as a group of professional bodies, charities and other organisations who are actively involved in the planning and delivery of sustainable development and the infrastructure and transport services that supports it.

We recognise the overriding aim of the proposed revise of the NPPF is in “bringing more land forward for development and that permissions are turned into homes as soon as possible”. Tackling the housing shortage is rightly a key policy priority for Government.

Our reason for writing collectively is to propose some limited but, in our view, vital changes that, if you accept them, will we believe significantly improve the pace at which development proposals clear the planning process and result in high-quality, genuinely sustainable development.

First, many objections to development proposals are made on transport and environmental grounds. These could be pre-empted if the NPPF provided clear criteria for the siting of development, taking account of the full range of government policy priorities affected (i.e. cutting carbon, improving air quality, promoting healthy living, and providing good accessibility to employment and services). Location is fundamental.

Second, the accessibility of a development location by an appropriate range of sustainable transport options should be a key factor in determining the suitability of a development proposal, so that residents ultimately benefit from having good accessibility to a wide range of services by the most sustainable modes of transport.

Third, that could best be achieved by involving transport authorities and operators throughout the planning process from initiating the local or strategic plan through to the determination of planning applications, thereby making transport provision part of the solution rather than transport impacts being a hurdle to overcome.

Fourth, the site layout for developments should make appropriate provision for buses, cycling and walking – reducing car dependency carries the added benefit of reducing the traffic impact of new development on existing infrastructure.

We hope that you will agree to make the changes needed to accommodate these points – we have shared the detail with your officials and would be happy to discuss them with you.

We are writing in similar terms to Chris Grayling, Dominic Raab, and Heather Wheeler.
Yours sincerely

Sue Percy, Chief Executive

Lynda Addison, Chair

Victoria Hills, Chief Executive

Joe Irvin, Chief Executive

Jonathan Bray, Director

Hugh Ellis, Head of Policy

Phil Southall, Managing Director

Stephen Joseph, Chief Executive

Michael Bach, Chairman: Planning, Environment & Transport Committee