

Rt Hon Greg Clark MP  
Minister for Decentralisation and Cities  
Dept. for Communities and Local Government  
Eland House  
Bressenden Place  
London SW1E 5DU

Wednesday 14 September

Dear Mr Clark

Campaign for Better Transport and the RAC Foundation are writing to express shared concerns about the draft National Planning Policy Framework and to suggest some amendments which might address them.

Our main concerns are:

- The removal of office and some other commercial development from the “town centre first” policy.
- The requirement that planning authorities must prove that the transport/traffic impact of a development must be severe for this impact to be treated as a reason to reject an application.
- The move away from requirements to produce a travel plan, which might mitigate the transport impacts of a development proposal.

In conjunction with a presumption in favour of sustainable development, these could lead to development proposals (especially of offices but also of some other commercial development) being approved in locations where significant extra strain would be placed on local and trunk roads and without any requirement or ability to avoid or mitigate this.

Clearly the Government is committed to deregulating planning as part of its growth plan, and any response must recognise this. A few key changes could be made that would help address these issues. These include:

- A presumption in favour of locating development next to existing public transport (or where it can be served by improved public transport). This would enable more cost-efficient development with less need for new infrastructure.
- The impact of new development on traffic and road congestion should be treated as a material consideration and therefore as grounds on which development could be rejected or sites not designated for development in plans and strategies.

- Linked to this, a requirement for developers to assess the traffic and transport impacts and accessibility of their developments and produce a travel plan with measures to reduce impacts. This might include promoting remote working and multi-occupancy/pool cars as well as public transport. The requirement for this should not be left to local authorities as the draft suggests, though the formulation of the assessment/plan might be.
- “Town centre first” policy to include commercial/office development as it did before.

A number of other possible changes to the NPPF would also help ensure that development can proceed while avoiding unsought traffic consequences:

- The release of sites for major traffic generating development may need to be phased to co-ordinate growth with necessary transport improvements.
- Local plans should be linked to local transport plans; transport authorities (where not the planning authority), Network Rail and the Highways Agency should be statutory consultees and there should be a requirement to engage with transport operators.
- Disused rail alignments and other land should be protected from development where there is a reasonable expectation that the land would have a future beneficial transport use, such as freight, public transport or roads.

Both Campaign for Better Transport and the RAC Foundation are considering proposing other amendments to the NPPF and we anticipate that these will be the subject of separate responses.

We would of course be pleased to discuss our concerns with you and other appropriate Government departments if this would be helpful.

Yours sincerely



Stephen Joseph OBE  
Chief Executive, Campaign for Better Transport



Stephen Glaister CBE PhD FICE FTRF FCGI  
Director, RAC Foundation

Copied to: Norman Baker MP, Parliamentary Under-Secretary of State for Transport  
Clive Betts MP, Chair, Communities and Local Government Committee  
Joan Walley MP, Chair, Environmental Audit Committee