



The Rt Hon Steve Reed OBE MP
SoS for Housing, Communities and Local Government
Ministry of Housing, Communities and Local Government
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Please reply to:
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Dear Secretary of State

Putting 'vision-led transport' into practice

We write as representatives of organisations with a common interest in promoting new developments that offer a wider range of healthy and sustainable transport options. Amidst growing concerns about energy security and the cost of living crisis, we wish to put forward suggested changes to the National Planning Policy Framework (NPPF) that would concentrate more homes on less land, in places where demand is strongest, enabling people to make more of their day-to-day journeys without feeling their only option is to drive, or that their opportunities in life are hindered if they cannot do so.

The importance of reducing demand for travel has been recognised in successive versions of the NPPF and its predecessors, going back to 1994.¹ Yet in practice, recent studies by the Royal Town Planning Institute² and New Economics Foundation³ suggest the opposite has happened. There have been growing numbers of urban extensions in the last two decades, while urban core developments have declined markedly, even though this is where the unmet demand for housing is greatest.⁴ We recognise that the adoption of 'vision-led planning' in the latest NPPF, replacing the outdated 'predict and provide' approach, was intended to address this problem. Yet even now, the planning system continues to deliver low density housing, in locations with poor sustainable transport connectivity and few local amenities. This causes a wide range of adverse economic, environmental and social impacts and is contrary to the Government's desire to support urban agglomeration.

These problems are mutually reinforcing. The space taken up by roads and car parking in poorly-connected housing developments - often more than a third of the land - results in lower density housing, and hence population. This reduces the number of people within a short walk of schools, shops and other local amenities, while also making it harder to provide frequent, economically-viable public transport services. Low densities also require more land for a given amount of housing. Research by Create Streets and Sustrans showed that a 7,500-home

¹ Planning Policy Guidance PPG13. Department of the Environment / Department of Transport, 1994 (not available online).

² The Location of Development 4. RTPI 2024 (www.rtpi.org.uk/new-from-the-rtpi/the-location-of-development-4/).

³ Trapped behind the wheel. New Economics Foundation, 2024 (<https://neweconomics.org/2024/11/new-housing-developments-forcing-people-to-rely-on-cars>).

⁴ Solving Britain's housing crisis: where and how to build 1.5 million homes. Centre for Competitive Advantage in the Global Economy, University of Warwick, 2025 (https://papers.ssrn.com/sol3/papers.cfm?abstract_id=5832902).

development on the edge of Chippenham could fit on to a third of the land if the £75m funding for a new road was instead spent on improving walking, cycling and public transport connectivity, and on local service provision, delivering much better outcomes.⁵

Our concerns are exemplified by the 1,700-home 'Selwood Garden Community' development on the edge of Frome in Somerset. This was recently granted permission despite being contrary to the Local Plan, outside the town settlement boundary and with its main access off a busy bypass. The enclosed table documents the many problems with the location of the development, the lengthy walking distances to the town centre, the minimal provision for active travel and public or shared transport, and the wholly unrealistic increases in modal share that these are expected to achieve, despite the section 106 money being mainly allocated for junction improvements on the nearby A36. Moreover, Frome is one of several towns in the region with large town-centre brownfield sites awaiting regeneration, that could instead provide real benefits to the local economy and environment, while also being far more popular.

None of this received any of the scrutiny that would normally occur at a Local Plan inquiry, because Somerset Council's failure to provide a 5-year land supply had left it vulnerable to speculative development. Whilst this may result in homes being built, the additional motor traffic generated imposes huge economic, environmental and other costs on the community. Local planning teams must be empowered to maximise the opportunities of well-connected developments, rather than being obliged to accept whatever is put before them.

We therefore call for three specific changes to the NPPF before it is finalised. The first is to amend the "presumption in favour of sustainable development", ensuring that it isn't a barrier to proper scrutiny and sound decision-making. As things stand though, we fear the draft NPPF could cause even more problems, through the combination of policy S5(1J), which presumes development should go ahead in most areas where the local planning authority falls foul of either the 5-year land supply rule or the housing delivery test, and policy S5(2), which indicates that policies that do not mention "refusal" are less significant, a criterion that applies to several policies in the transport chapter that lack any additional weighting. Development proposals whose adverse effects demonstrably outweigh the benefits must be capable of being rejected.

Secondly, there is a need for a better, more objective test for what constitutes truly 'vision-led' development, perhaps drawing on the Department for Transport's Connectivity Tool.⁶ We urge the Government to develop a robust connectivity test to inform councils, developers and communities alike on what is acceptable in sustainable transport terms. This test should inform not only specific developments but also the broad distribution of housing within a strategic authority's spatial development strategy (SDS).

Finally, we suggest adopting such a test in preference to the presumption in favour of development near rail stations, as proposed in the latest consultation draft NPPF. Whilst we support the general principle of concentrating development in well-connected locations, the proposed change could force the approval of inappropriate development that undermines transport integration, or fails to make best use of the land. If instead the Connectivity Tool is used to identify potential improvements to public and shared transport, pedestrian and cycle accessibility and overall transport integration, this would produce much better outcomes than the NPPF policy as drafted, however well-intentioned the latter may be.

⁵ *Stepping off the road to nowhere*. Create Streets and Sustrans, 2024 (www.createstreets.com/steppingofftheroadtonowhere).

⁶ *Connectivity Tool*. Department for Transport, 2025 (www.gov.uk/guidance/connectivity-tool).

Taken together, these proposals would be far preferable to expecting rural districts to cope with housing allocations set by an algorithm that takes no account of land availability or public transport connectivity. We therefore hope they can be adopted, and a connectivity test developed which supports sound planning.

Paradoxically, making it easier for councils to reject poorly-connected developments could increase the amount of housing brought forward, concentrating it on less land but in places where it is most needed (particularly by those seeking affordable accommodation) and where it would carry much greater public support. Ensuring we build "the right homes in the right places" would help avoid the huge economic and other costs of continuing to do the opposite.

We would welcome an opportunity to discuss these proposals with officials from your department and the Department for Transport. We look forward to your response.

Yours sincerely



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cc Heidi Alexander, Secretary of State for Transport