0. Introduction

According to the draft NPPF (December 2025) and the accompanying consultation document, there is a clear step-change in how transport is positioned in national planning policy. The shift towards a vision-led approach represents a significant and welcome evolution in the relationship between movement and placemaking.

However, from a transport development planning practitioner perspective, the draft still leaves critical ambiguity that will be exploited in practice (and, inevitably, tested at appeal), risking delay, inconsistency and outcomes that do not meaningfully reduce car dependence. This is particularly significant in the context of the Government's stated objective of accelerating plan-making and decision-taking. Without greater clarity on evidential expectations, institutional alignment and transitional arrangements, there is a material risk that transport considerations become a source of additional dispute and prolonged negotiation, running counter to the ambition of streamlining the planning system and providing certainty for investment.

Vision-led planning relies on meaningful alignment between Local Plans and Local Transport Plans. However, Local Transport Plans do not currently carry equivalent statutory weight and are not subject to the same examination process. Without stronger integration between spatial and transport strategy, there is a risk that site-level visions are not supported by deliverable network-level commitments, particularly where Local Plans are out of date or evidence bases remain rooted in historic assumptions.

Clear transitional guidance will therefore be essential. Many adopted plans and supporting transport evidence remain grounded in predict-and-provide methodologies. Without clarity on how weight should be applied during the transition to a vision-led framework, authorities and applicants face uncertainty that may increase appeal risk and lead to inconsistent decision-making.

Development viability and investor confidence depend on clarity of evidential requirements. A system that requires multiple parallel modelling exercises, unclear scenario testing, or competing interpretations of statutory duties increases cost and uncertainty, particularly for smaller developers. If reform is to succeed, the evidential framework must be proportionate, consistent and capable of being applied without excessive duplication.

The Transport Planning Society (TPS) is supportive of the policy intent, but candid about the operational and legal realities of delivering it. The principal risk of the current drafting is that it shifts the language of transport policy without sufficiently reforming the evidential and decision-making framework that underpins it. In the absence of clearer guidance, Inspectors will be required to arbitrate not only on impact but on interpretation, determining the meaning of "sustainable transport", "significant movement" and "vision-led" on a case-by-case basis. This risks inconsistent appeal outcomes during the transition period.

There is also a wider issue of credibility. If the definition of sustainable transport is interpreted broadly enough to encompass car-led development packages that do not materially reduce dependence on private vehicles, the distinction between transitional mitigation and genuine mode shift becomes blurred. Public confidence in vision-led reform depends on a clear and credible framework that differentiates between the two.

A further source of uncertainty arises from the decision not to publish the long-awaited Planning Practice Guidance (PPG) on Vision-Led Transport Planning alongside this draft NPPF. Without sight of that guidance, it is not possible to determine the extent to which

some of the ambiguities identified in this response may be clarified or resolved through detailed procedural direction. The NPPF and PPG must operate as a coherent package. There is therefore a real risk that once the Vision-Led PPG is published, misalignments between policy wording and procedural expectations may become apparent. It may be necessary to subsequently revisit elements of the NPPF to ensure effective alignment with the operational framework set out in the PPG.

The collective views from TPS are therefore outlined below in our combined response to the current NPPF consultation.

1. Overview

The draft improves the structure of the document. The new Chapter 15 (TR1–TR8) makes a stronger, more legible statement that transport should be integral to plan-making and scheme design, and it explicitly prioritises walking, wheeling, cycling and public transport in scheme layouts and connections. This is clearly expressed in TR1 and TR4. The draft also embeds transport within design and placemaking expectations (e.g., “Movement” and “Public Space” as design considerations).

However, the draft also creates a new problem: it widens the meaning of “sustainable transport” in a way that severely risks diluting the term, as it explicitly includes ultra-low/zero emission vehicles and car sharing within “sustainable transport modes”. This definition creates a route for applicants to argue that a car-based package is “sustainable transport” even where it does not reduce car dependence, does not support mode shift, and does not deliver the public realm outcomes that underpin good placemaking.

At the same time, the draft introduces semantic changes that will increase ambiguity and contestability. In particular, TR3 and TR6 are anchored to proposals generating a “significant amount of movement in the context of the area”, with the option for plans to set thresholds. For example, what might be a “significant amount of movement” in the context of rural area is very different to significant amounts of movement in urban areas. If a road only has 1-2 car per hour travelling along it a small development of 5 houses could be considered a significant amount of movement to a local resident but in traffic impact terms it would have very little impact. The proposed plan to set thresholds sounds pragmatic, but it opens a large gap between (a) what policy aspires to achieve and (b) what decision-makers can reliably require as evidence, especially for the many small/medium schemes that cumulatively create long-term car dependence.

TPS is concerned that, without tighter drafting and aligned national guidance, the draft will increase argument about meaning (what “sustainable” is; what “significant movement” is; what “reasonable walking distance” is), which in turn increases legal risk, slower determinations, and defensive evidence practices (including “belt-and-braces” modelling). This concern aligns closely with the practitioner issues raised: the system’s embedded behaviours, uncertainty in appeal decision-making, and the risk of small schemes being treated as de minimis when cumulatively they are not.

Our recommendation is that these are clearly defined in the glossary section to reduce potential reinterpretation that could contradict the intended policy objective.

Gender-Inclusive Mobility

The draft also contains a fundamental omission with important implications: it says nothing about gender inclusive mobility or the safety of women and girls. As highlighted in recent commentary and reporting, including the Guardian’s analysis, the NPPF includes no

references to women, girls, gendered safety or reducing VAWG, despite the Government's updated VAWG Strategy being released two days earlier, which states that "well-lit streets, accessible transport, and thoughtful urban design can deter violence and make public spaces safer for everyone." This gap weakens the credibility of a vision-led system: walking, wheeling, cycling and public transport cannot become default modes if people do not feel safe using them, especially after dark. The omission also contradicts the Strategy's commitment to "updating national design guidance to reflect a VAWG perspective."

In short, the NPPF overlooks a foundational dimension of sustainable movement: safety and gender-inclusive mobility, without which its wider aims for mode shift and placemaking are harder to realise.

2. Key Recommendations

2.1. Sustainable Transport Definition

The glossary definition currently includes "ultra low and zero emission vehicles" and "car sharing" within sustainable transport modes. TPS recommends revising and rewording the definition so that "sustainable transport" is anchored primarily in modes and patterns of movement that reduce car dependence (walking, wheeling, cycling and high-quality public transport), with EVs and car share treated as transitional demand-management tools, not equivalent substitutes.

The "car sharing" term, in particular, is ambiguous and should be clarified, potentially replaced with "car clubs". There should be a definition of the services within the glossary. Residents want "access" to a vehicle as certain trips can only be undertaken using a car or van. For every car club vehicle made available, there is evidence of reduced vehicle ownership, making car clubs an excellent intervention.

Why this matters in practice:

1. It determines what applicants will argue is policy-compliant mitigation.
2. It influences how Inspectors interpret whether a scheme is genuinely aligned to the NPPF's stated direction (especially where local policy is out of date).
3. It changes the balance between "placemaking-led movement" and "vehicle-impact mitigation".

The following wording would better reflect the importance of the widely accepted sustainable transport hierarchy:

> ***Sustainable transport modes:*** *Efficient, safe and accessible means of transport that are considered to follow a hierarchy from lowest impact on the environment starting with walking, then cycling, then public transport, then car sharing and finally ultra-low and zero emission vehicles.*

Any definition must also recognise that safety (particularly for women and girls) is a precondition for sustainable mode shift, as fear of walking, wheeling and using public transport after dark directly affects travel choices.

2.2. Significant Movement Gateway

TR3(1a) applies the “sustainable locations” test to development that “could generate a significant amount of movement”. This phrase invites argument and even small developments can generate significant car-dependent travel in perpetuity, particularly when the cumulative impacts are considered. Leaving definition to local discretion will invite controversy and inconsistency.

TPS recommends either:

A. deleting the gateway wording so the sustainable location principle applies (proportionately) to all development; or
B. introducing a national “baseline” so that local thresholds cannot be used to exempt most development from the central sustainable location test.

Careful consideration needs to be applied to ensure clarity in how the process is expected to operate in practice, so that the policy objective is not undermined by inconsistent application.

2.3. Vision-Led Section

The draft is still very ambiguous about when 'the vision' comes in and at what geographical level. It would benefit from greater clarity about when ‘the vision’ is established. In TR1 it talks about a vision for the 'plan area', in TR3/6 it talks about the vision for the site or development with no real clarity on who sets the vision and when in the planning process. Some vision parameters for a site should be set at local plan stage and checked to ensure that they clearly align with the sustainable transport objectives of the Local Transport Plan. There is currently a marked gulf in technical work between the local plan and transport assessments. This appears to be the stage when quality, in terms of sustainable transport outcomes and public realm design, is severely diluted. The masterplanning stage is typically where this focus can most effectively be embedded, yet masterplans are not referenced in the transport section. A clearer linkage between the design and transport sections would also be helpful, requiring site-based visions (including for transport) to be created as part of masterplans. This is also the point at which the best outcomes in terms of transport and land use interactions could be discussed, agreed and acted upon so that the (vision-led) transport strategy responds to deliver outcomes not ‘mitigate’ impact.

The draft introduces a helpful glossary definition of “vision-led approach”, framing it as outcomes-led rather than “predict and provide”. This addresses a key ask from the previous TPS response which was to publish an unambiguous definition of vision-led.

But definition alone is insufficient. TPS recommends MHCLG (working jointly with DfT, National Highways, and the profession bodies) issue a national outcomes/scoping framework that answers, at minimum:

- What outcomes must be specified (mode share, trip internalisation, network quality, safety, inclusion, carbon proxies)?
- What evidence is proportionate at each scale (micro, small, major), so the system does not default to “do everything, three times”.
- How many scenarios should be tested as a maximum, and who has authority to agree them.

This is not theoretical: practitioners are already experiencing dispute about scenario-count and evidence burden, particularly where strategic road interests request “worst case” protection in parallel with vision-led objectives.

This is a particular issue with the contradiction between the policy aspirations of vision-led planning and with National Highways' operating licence reinforced by the Department for Transport Circular 01/2022 – *Strategic Road Network and the Delivery of Sustainable Development*. This conflict will need to be resolved through changes to the licence for National Highways and an updated Circular. In the meantime, current National Highways guidance that sets out its unilateral interpretation of how vision-led transport planning should be undertaken should be removed and disapplied, to avoid creating further contradiction and confusion that will subsequently provide harder to change.

Critically, a move to vision-led transport planning is highly unlikely to be effective if the strategic sustainable transport movement objectives of a development are continued to be benchmarked and compared to a so-called 'worst-case' traffic scenario. The very assumption that there is either a worst-case or a 'normal' level of traffic removes the required focus on delivering successful sustainable transport outcomes, to one that continues to be fixated on mitigating historical trip rates derived from the well-established TRICS database.

2.4. Station Policy Section

The consultation document is explicit that policy S5 would allow development (including housing and mixed-use) around "railway stations offering high levels of connectivity", including outside settlements, with constraints such as being "physically well-related" and "within reasonable walking distance", and it notes that where development is "not inappropriate" in Green Belt, a similar approval approach should be taken.

TPS emphasises that clarity will be critical to effective implementation. High levels of connectivity need to be carefully defined, with reference to outputs from the DfT Connectivity Tool should be used.

TPS recommends that any "station-led" policy should also require a demonstrable package that makes the location sustainably functional in practice, including:

- safe, continuous walking/wheeling/cycling routes to the station and key services,
- a frequency of services and services provided to places people actually want/need to go for school/work/leisure etc (without this it risks being like PTAL where there is no indication about how useful these stations might actually to be people);
- interchange quality (bus-rail integration, passenger environment),
- station capacity and crowding pathways where densification is promoted,
- management of kerbside pressure, drop-off and servicing impacts (which can otherwise degrade place).

Without this, "near a station" risks becoming a policy device to justify development that is not viable in sustainable movement terms (especially where station access is hostile, severed or unsafe).

2.5. Gender Inclusive Mobility

The draft NPPF contains no references to women, girls, gender inclusive mobility or VAWG responsive design, despite the explicit commitments in the national VAWG Strategy to update design guidance so that safety shapes how public spaces are planned. This omission weakens both the credibility and deliverability of vision-led planning. TPS recommends the NPPF include explicit requirements that planning policies and decisions support safe, inclusive and accessible movement, considering all times of day and night, and demonstrate

how developments reduce fear and risk for women, girls and other groups exposed to disproportionate safety barriers. At the very least it is suggested that ‘women’ are added to the specific groups mentioned in in TR4 1c).

2.6. Freight and Servicing

Vision-led planning must explicitly recognise that freight and servicing are integral to placemaking, not external constraints. The draft NPPF refers to movement and public space, but does not sufficiently address how goods movement, last-mile delivery and servicing are to be reconciled with high-quality public realm and active travel priorities.

Without clearer guidance, freight may continue to be treated as a residual highway function rather than designed as part of the transport hierarchy. This risks undermining both sustainable transport outcomes and place quality. For example, poorly planned servicing can erode pedestrian priority, compromise safety and generate kerbside conflict.

TPS recommends that the NPPF clarify that freight and servicing strategies should be embedded within vision-led transport approaches from the masterplanning stage, including:

- consolidation and last-mile solutions,
- timed servicing strategies,
- kerbside management plans aligned with pedestrian and cycle priority,
- and integration with town centre and retail strategies.

A vision-led system must address how goods move through places as carefully as how people move within them.

2.7. Carbon

The draft NPPF signals alignment with decarbonisation objectives but does not explicitly require measurable transport carbon outcomes as part of transport assessment.

If transport planning is to move from traffic impact mitigation to outcome delivery, carbon reduction must become an explicit performance measure. At present, assessments often quantify vehicle trips and junction performance but treat carbon impacts as secondary or derivative.

TPS recommends that guidance clarifies how transport-related carbon should be considered within vision-led planning, including:

- the relationship between mode share targets and carbon reduction,
- the use of proportionate carbon proxies at different scales,
- and monitoring mechanisms to ensure commitments translate into measurable outcomes.

Without measurable benchmarks, the transition to vision-led planning risks remaining conceptual rather than operational.

2.8. Monitoring and Accountability

A recurring weakness in the current system is the limited monitoring of transport outcomes once development is delivered. Travel Plans are often secured but inconsistently monitored or enforced.

If vision-led transport planning is to represent a fundamental reset, it must include mechanisms to:

- monitor actual mode share and trip patterns,
- review the effectiveness of agreed interventions,
- and adjust measures where outcomes are not achieved.

This is particularly important if historic trip rates are no longer treated as the default benchmark. A system that allows flexibility in assessment must strengthen accountability in delivery.

TPS recommends that the forthcoming Planning Practice Guidance clarify expectations regarding post-consent monitoring and adaptive management within a vision-led framework.

2.9. Institutional Alignment

There remains a structural tension between the draft NPPF's vision-led ambition and the statutory framework within which highway authorities operate. In particular, the Network Management Duty under the Traffic Management Act 2004 requires authorities to secure the expeditious movement of traffic on their networks. In practice, this duty is frequently interpreted as prioritising vehicular throughput and minimising delay, even where wider placemaking or sustainable transport objectives point toward reallocating road space or managing demand.

At the same time, the Road Traffic Reduction Act 1997 empowers local authorities to set targets for reducing road traffic levels and to report on progress. Although rarely enacted in a meaningful way, it remains on the statute book and provides a legislative basis for managing and reducing traffic demand. In theory, this Act could sit comfortably alongside a vision-led transport planning framework: authorities could establish traffic reduction trajectories aligned with Local Transport Plans and spatial strategies, using development planning as a mechanism to support those outcomes.

In practice, however, these legislative instruments pull in different directions. The Network Management Duty is often applied as a real-time operational obligation focused on maintaining traffic flow, while the Road Traffic Reduction Act is treated as aspirational and rarely embedded into development management decisions. The result is institutional discomfort: authorities seeking to rebalance road space or suppress car demand may feel exposed to challenge under one statutory duty while lacking practical backing from the other.

The draft NPPF signals a shift towards shaping demand rather than accommodating it, yet it does not explicitly reconcile these legislative tensions. Without clearer alignment between MHCLG, DfT, National Highways and the statutory framework governing highway authorities, local decision-makers are left navigating competing interpretations of their responsibilities. A genuinely vision-led system requires clarity that managing and, where appropriate, reducing traffic demand in support of sustainable placemaking is consistent with, not in conflict with, their statutory duties.

Consideration should therefore be given to how the forthcoming Planning Practice Guidance could clarify the relationship between the Network Management Duty, the Road Traffic Reduction Act and the NPPF's vision-led objectives, providing authorities with confidence that rebalancing networks toward sustainable modes is both lawful and policy-compliant.

3. Detailed critique

3.1. "Sustainable transport" is too elastic and will be used to re-label car-based solutions

Because the glossary definition includes EVs and car sharing, an applicant can plausibly argue that:

> EV charging + car club + parking management = "sustainable transport provision", even where the settlement pattern remains car-dependent and where walking/cycling/PT are marginal.

That is exactly the pathway that risks "every site is sustainable", because the definitional bar becomes "lower environmental impact vehicles", not "reduced need to travel by car". Ideally every new development would incorporate a holistic, integrated and sustainable transport offering. This emphasises the need to refer to the travel hierarchy to ensure walking and cycling do not run the risk of continuing to be marginalised.

The very real effect of the current policy wording is that Inspectors are pulled into adjudicating semantics (what "sustainable" means) rather than outcomes (what the place will actually deliver), and the legal profession will exploit the definitional breadth to argue compliance.

3.2. TR3/TR6 "significant movement" introduces uncertainty at the very point the draft claims to provide clarity

The consultation explains that "significant development" has been replaced by "significant amount of movement… to provide greater clarity". In practice, this will often do the opposite:

- it creates argument about what "significant" means,
- it invites "threshold shopping" between authorities,
- it risks small and medium sites escaping the sustainable location discipline even though their cumulative impact is profound over time.

Standardised thresholds should be set low. Car-mode share is likely to be a more important "significance" signal than absolute trip numbers and that leaving this to local definition will create controversy and undermine decarbonisation aims.

3.3. TR1 is plan-making focused; the system's problem is that many decisions are taken without updated plans (and the "gap" is where car dependency proliferates)

TR1 is welcome and sets the right intent: early engagement, alignment with LTP/LCWIP, and using the Connectivity Tool for site selection.

But the practitioner reality is that:

- plan-making is slow and uneven,
- local plans based on a predict and provide transport approach and misaligned with LTP (that are not considered to have similar statutory status and are not subject to statutory consultation),
- many areas operate with out-of-date plans,
- smaller schemes and "in principle" decisions often proceed without the strategic transport framework needed to make vision-led outcomes real.

Unless the “sustainable location” discipline applies robustly at decision-taking (not only plan-making), the draft risks creating a two-speed system: exemplary on big schemes, permissive on the many smaller ones that collectively set the pattern. There is currently a significant data-gap on the number of developments that have been subject to a transport statement or assessment and the outcomes of this requirement. Research is needed to better understand the mechanisms of policy in this regard.

Where decisions occur without updated plans, the lack of gender-inclusive design expectations risks perpetuating unsafe, car-dependent conditions contrary to both VAWG commitments and vision-led planning principles.

3.4. Station-led densification can be used to justify otherwise non-viable development outside settlements

The consultation’s station policy is framed as supporting high density development in “relatively sustainable locations”, including outside settlements, and it explicitly references circumstances where there is not a five-year housing land supply, and states that development should be “well-related” to an existing settlement (unless inappropriate), with an approval approach unless adverse effects substantially outweigh benefits.

This can be used to justify schemes that would otherwise be resisted on:

- settlement hierarchy grounds (development outside settlements),
- countryside protection grounds (in non-Green Belt areas),
- or (where applicable) Green Belt policy arguments that become less resistant when “not inappropriate” forms are in play.

Transport risks being reduced to a proximity proxy (“near station”), even where:

- access is unsafe or indirect,
- the station is functionally disconnected from daily services to the places people need/want to go at the times they want to travel,
- public realm and interchange capacity cannot absorb growth, or,
- the development form still produces high car mode share for non-rail trips.

TPS recommends the station policy be explicitly conditioned on deliverable access and movement quality, not distance alone.

3.5 Progress against the previous TPS response: what has been addressed, and what remains outstanding

TPS raised several issues in the prior response, including: a clear definition of vision-led; clarity on scenarios; guidance on implications for plans and LTPs; and reducing ambiguity that could drive legal challenge.

Addressed (partly):

- A definition of “vision-led approach” is now included in the glossary, which is a material improvement.
- TR1/TR4 more explicitly integrate sustainable movement priorities into plan-making and street design.

Not yet addressed (or only weakly addressed):

- Scenario-setting and scoping discipline remains undefined; the draft creates new triggers (“significant movement”) but does not provide the operational rules that are vital to reduce dispute.
- The ambiguity risk has increased in one key place: “sustainable transport” now explicitly includes car-based measures (EVs/car share), which will be used to reframe car-led development as policy compliant.
- The “hard truth” from practice: you cannot always produce convincing evidence for a different future if the system still defaults to proving the car-led baseline.
- The draft still contains no reference to gender-inclusive mobility or VAWG sensitive design, despite national commitments requiring safety considerations to inform planning and design guidance.

A recurring practitioner problem is that the system remains biased toward asking “what is the forecast traffic impact?” rather than “what must be delivered to achieve a different outcome?”.

If decision-makers (and key statutory actors) continue to require:

- multiple “worst case” tests,
- conventional traffic growth assumptions derived from historic patterns, and
- highway LoS/flow protection as the dominant measure of success,

then the evidential centre of gravity of the planning system remains car-led. Vision-led planning cannot function as intended if sustainable movement strategies are continually benchmarked against a default assumption of continued traffic growth. This creates a twin-track assessment process: one track articulating a sustainable transport vision, the other protecting network capacity based on legacy baselines. The result is increased modelling burden, prolonged negotiation over scenario selection, and reduced certainty for applicants and authorities alike. In such a framework, vision-led planning is layered on top of the existing system rather than replacing it, rendering it ineffective.

This tension is particularly evident in the interaction between the draft NPPF and the Strategic Road Network protection framework set out in DfT Circular 01/2022 and National Highways’ operating licence. Where SRN policy continues to prioritise network performance protection based on forecast traffic growth, it pulls decision-making back toward conventional “predict and provide” logic. Without clearer alignment between MHCLG, DfT and National Highways on how vision-led objectives should be applied in practice, applicants and authorities are left navigating parallel expectations that are difficult to reconcile within a single coherent assessment. Business-as-usual, predict and provide approaches continue to be the comfortable practitioner policy position.

It is important to recognise that much of the “worst-case” evidence base currently relied is derived from established trip rate databases such as TRICS. TPS wishes to be clear that this is not a criticism of TRICS itself, nor of the quality of its data. TRICS reflects observed travel behaviour from existing developments, many of which were planned and delivered within car-dependent contexts under a “predict and provide” paradigm.

However, the widespread professional practice of treating historic trip rates as the default benchmark inadvertently anchors assessments to past car-dominant patterns. Even where practitioners seek to promote vision-led outcomes, there remains a strong cultural and procedural tendency to validate proposals against historic, traffic-led baselines. This makes

it difficult to evidence genuinely different mobility futures, particularly where decision-makers continue to prioritise capacity protection.

If the NPPF is to deliver a true reset, it must explicitly acknowledge this evidential inheritance and provide clearer guidance on how historic trip rates should be interpreted, adjusted or contextualised within a vision-led framework.

TR6 4 should be reworded to ensure Vision-led transport planning does not lead to detailed assessment of multiple scenarios which brings uncertainty to the nature of the scheme and results significant delay and additional expense to planning process through multiple Transport Assessments in practice.

The following wording is suggested;

> *The Vision-led Transport Planning approach requires all reasonable alternative future scenarios to be initially considered and evaluated before agreeing the scenario to be pursued and assessed in detail. The agreed scenario should be considered, taking into account impacts at different times of the day, potential cumulative impacts, multimodal trip generation and the promotion of sustainable modes of travel, and realising the transport vision for the development itself.*

Concluding Thoughts

TPS recommends that MHCLG treats transport assessment reform as a programme of change, not a wording change, with deeper engagement than has been evident to date. Fundamentally, the shift towards vision-led signals a move from ‘assessment’ of traffic impact on the highway that must be mitigated to one that requires the creation of a stated transport objective or ‘vision’ that needs to be delivered. This is a fundamental transformation of approach. To achieve this, we believe that it will be critical to clearly signal an end to the ‘transport assessment /statement’ approach and the introduction of a Planning Practice Guidance note that firmly establishes the new procedures necessary. We are conscious that the profession is ready, but the institutional alignment (including National Highways’ role) is not yet reset. We would welcome the focussed engagement of MHCLG and DfT with transport practitioners to finally make vision-led transport planning a reality.