



Department
for Transport

National Networks National Policy Statement

Government Response to Public Consultation

December 2014



National Networks National Policy Statement

Government Response to Public Consultation

Presented to Parliament
by the Secretary of State for Transport
by Command of Her Majesty

December 2014



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Purpose

The Government launched a public consultation in December 2013 seeking views on a draft National Networks National Policy Statement and its accompanying documents:

- Appraisal of Sustainability (AoS), incorporating a Strategic Environment Assessment
- AoS non-technical summary
- Habitats Regulations Assessment

The purpose of this document is to summarise the responses received to the consultation, highlight the main issues raised by respondents and explain the Government's final decisions made as a result of the views provided.

Executive summary

Introduction

1. National Policy Statements (NPSs) were established under the Planning Act 2008. By setting out a clear statement of national policy in one place they are intended to provide greater clarity and certainty on Government policy for scheme promoters, the planning inspectorate (PINS) and other interested parties.
2. NPSs set out the need for, and Government's policies to deliver, development of nationally significant infrastructure projects (NSIPs). They provide planning guidance and give the assessment and decision-making basis for the Examining Authority and the Secretary of State.
3. NPSs also bring together a range of social, environmental and economic policies with the objective of contributing to the achievement of sustainable development. They cover the need for new or expanded infrastructure, how impacts are to be assessed and weighed against benefits and the mitigation of impacts.
4. The purpose of the National Networks NPS is to streamline the planning inquiry stage by setting out national policy relevant to development proposals for nationally significant road and rail projects. It sits alongside a wider suite of documents that set out investment and policy on national networks. These include, but are not limited to, the Road Investment Strategy¹, the Rail Investment Strategy², Action for Roads³ and Transport an Engine for Growth⁴.

Response to the Consultation

5. In December 2013 the Government launched the public consultation on the National Networks NPS. The consultation ran for 12 weeks and asked for responses to 9 questions on the NPS and supporting documents.
6. The consultation received 5,800 responses. Of those, 140 substantive responses were sent in by organisations, including local authorities, environmental groups, road and rail user groups, transport groups, business organisations and developers/promoters, consultants and advisers, airport and port groups, professional groups and the supply chain. 160 responses were received from individual members of the

¹ <https://www.gov.uk/government/collections/road-investment-strategy>

² <https://www.gov.uk/government/publications/high-level-output-specification-2012>

³ <https://www.gov.uk/government/publications/action-for-roads-a-network-for-the-21st-century>

⁴ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/226244/transport-engine-for-growth.pdf

public. The remaining 5,500 were campaign responses run by two environmental groups.

7. Responses were also received from statutory consultees who were informed as part of the Department's obligations under the Planning Act 2008.

Key issues raised

8. Responses focused on the NPS itself rather than the accompanying documents and in many cases a general response was provided, rather than a specific response to the individual questions posed in the consultation paper. Of the 140 responses from organisations, the majority were largely supportive or neutral towards the NPS. Many of the local authorities, and some of the consultants, road user groups, contractors, business organisations and statutory environmental bodies, agreed with the general policy direction of the NPS and recognised that the efficient and safe operation of the road and rail network was important, although most did have comments or reservations about aspects of the assessment of need or the policy for addressing that need. Those that disagreed with the assessment of need and/or the policy, were mainly the environmental groups, professional groups and transport campaign groups.
9. Most of those who answered the questions relating to guidance agreed that what was provided in the NPS was sufficient or were neutral (and provided some comments or concerns). This was particularly the case with local authorities and transport campaign groups. Business organisations and statutory environmental bodies were also mainly neutral or in agreement with guidance provided.
10. A small number of respondents disagreed with the programme of investment for the Strategic Road Network, arguing that it will not necessarily help economic growth or re-balancing of the economy.
11. The 5,500 responses received via the campaigns run by two environmental groups were standardised responses disagreeing with the case for need and the policy for addressing that need. The responses also raised concerns around environmental protection and carbon impacts.
12. There were requests by some for the NPS to adopt a more integrated approach across transport modes and to provide more spatial specificity. Others felt that it should be more closely aligned with the National Planning Policy Framework and that environmental protection needed further strengthening.
13. Many respondents, including the majority of the environmental bodies, raised concerns over the treatment of carbon impacts, the policy around development on the Green Belt and the impact of air quality. The role and robustness of forecasts were also questioned along with concerns over the possible major impacts of large schemes on local roads and neighbourhoods.

Conclusions and next steps

14. The Government welcomes the comments made during public consultation and acknowledges that there is some opposition to wider transport policy, however that remains out of scope of this document. The NPS brings together current Government policy and does not introduce new policy, requests for which are also out of scope.
15. Following feedback, the Government has:
 - Made efforts to incorporate suggestions where it can and explained the reasons where it has not done so.
 - Had further discussions with statutory environmental bodies, environmental groups, professional bodies and scheme promoters to fully understand issues raised.
 - Published the final NPS, which incorporates amendments following consultation, and laid it before Parliament where it will be debated.
 - Published the response to the Transport Select Committee and the Post-Adoption statement for the Appraisal of Sustainability.
16. After consideration of the consultation responses and the Transport Select Committee inquiry, there remains a compelling need for development of the road and rail networks to relieve congestion on roads and overcrowding on rail. In doing so this will support local and national economic growth, increase resilience, improve integration between transport modes and improve the environment, safety and accessibility.
17. The National Networks NPS is a planning document which is now improved following consultation. It achieves its aim of being a good representation of Government policy for planning enquiries and should not be taken to be anything else.

1. The Policy Context

The Planning System

- 1.1** The Planning Act 2008 introduced a new planning regime for nationally significant infrastructure projects (NSIPs). These are infrastructure projects that support the country through the generation and distribution of energy, the disposal of waste and the transportation of goods and people. Such projects have the potential to affect a wide range of people and businesses, from those who will use them, to those who live or work close to proposed sites.
- 1.2** The Planning Act 2008 recognised both the imperative for these projects, and their potential to have very wide ranging effects. It established National Policy Statements (NPSs) which are intended to provide greater clarity and certainty on Government policy for scheme promoters, the planning inspectorate (PINS), decision makers and other interested parties.
- 1.3** NPSs have a special status under the Planning Act and go through an extensive process of consultation, parliamentary scrutiny and designation which means that after designation their contents are not open for debate at public inquiries held in relation to individual developments. This means that NPSs have the potential to speed up the process for receiving development consent and reduce the risk of legal challenge through the development consent process.
- 1.4** NPSs bring together a range of social, environmental and economic policies with the objective of contributing to the achievement of sustainable development. They cover the need for new or expanded infrastructure, how impacts are to be assessed and weighed against benefits, and the mitigation of impacts.
- 1.5** NPSs already exist for energy (overarching, fossil fuel, renewable energy, gas, electricity networks and nuclear power), ports, waste water and hazardous waste.
- 1.6** The National Networks NPS does not introduce new policy; it is based on existing Government policy for the national road and rail networks. This has been clearly set out in a range of other documents, including, but not restricted to, *Action for Roads* and *Rail Utilisation Strategies*.

The National Networks National Policy Statement

- 1.7** The National Networks NPS is a technical planning policy statement which sets out the need for development of the national networks and policy against which the Secretary of State for Transport will make decisions on applications for nationally significant infrastructure projects on the road and rail networks in England.
- 1.8** The thresholds for nationally significant road, rail and strategic rail freight projects are defined in the Planning Act 2008 as amended by The Highway and Railway (Nationally Significant Infrastructure Project) Order 2013. These developments are referred to as national road, rail and strategic rail freight interchange developments in this document.
- 1.9** The National Networks NPS does not cover High Speed Two as it will seek necessary legal powers through a Hybrid Bill process. The National Networks NPS sets out the Government's policy for development of the road and rail networks and strategic rail freight interchanges, taking into account the capacity and connectivity that will be delivered through HS2.
- 1.10** Once designated, the National Networks NPS will remain in force unless withdrawn or suspended in whole or in part by the Secretary of State for Transport.

2. Consultation Process

- 2.1** In December 2013 the Government launched the public consultation on the National Networks NPS. The consultation ran for 12 weeks and asked for responses to 9 questions on the NPS and supporting documents. The consultation questions can be found at Annex A of this document.
- 2.2** The consultation was open for anyone to respond, with a wide range of stakeholders encouraged to submit responses. These included environmental bodies, local authorities and other local bodies, road and rail user groups, supply chain and wider business organisations, planners and scheme promoters.
- 2.3** The consultation was run in accordance with the Government's consultation principles⁵.
- 2.4** In addition to notifying stakeholders of the consultation, meetings and workshops (including regional) were held with stakeholder organisations to explain the purpose of the NPS and to understand views and concerns. The comments received from these workshops were considered when preparing the final NPS.

Approach to analysing responses

- 2.5** Any responses to the consultation received on or before 26 February 2014 were counted and included in the formal analysis, as were postal responses dated on or before 26 February that may have been received later. We received some feedback that the email address on the consultation web page was not immediately obvious and so we also took into consideration responses received by email by 5.30pm on 27 February 2014.
- 2.6** Responses received were recorded and categorised into one of the following 'respondent groups':
- Airports and port authorities
 - Trade and business groups
 - Consultants and planning advisers
 - Environmental groups
 - Local authorities and other local bodies
 - Other organisations
 - Professional bodies

⁵<https://www.gov.uk/government/publications/consultation-principlesguidance>

- Scheme promoters
 - Rail user group
 - Road user group
 - Statutory environmental body
 - Supply chain
 - Road and rail transport campaign group
- 2.7** The analysis of consultation responses was divided into assessing the overarching views of respondents on each of the consultation questions (i.e. were they in favour of proposals or not), and assessing the more detailed comments and issues raised.
- 2.8** Not all respondents explicitly answered each question. Most answered questions 1 and 2 with many providing no comment on other questions. Some respondents answered with free text which was assessed as to whether it was in agreement with the NPS or disagreement with all or some of the policy outlined.
- 2.9** The second part of the analysis involved identifying and assessing the more detailed comments or issues raised. Key themes under each question were noted.
- 2.10** Many of the respondents made similar points for Questions 3, 4, 5 and 6. Those questions asked for comments on aspects of detailed planning guidance. It was felt that providing the Government response under key issues raised rather than for individual questions provides more clarity and avoids repetition.
- 2.11** There were a number of issues raised that were outside of scope of the consultation. These included wider issues of underlying Government policy or related to specific schemes in their particular local area that respondents disagreed/agreed with.

3. Consultation - Response volumes

3.1 A total of 5,800 responses were received through the consultation process, either online, by email or post. Table 3.1 provides further details about who responded.

Table 3.1 - Consultation responses	
Type	Number
Responses from organisations	140
Responses from individual members of the public	160
Responses from campaigns	5500
Total responses	5800

Campaign Responses

3.2 Two environmental groups ran online campaigns highlighting concerns around the statement of need and the policy outlined in the NPS. In total we received 5,500 responses from the campaigns and these were considered alongside all the other responses received. It is important to note that the campaign responses were on the whole identical but they were checked for any additional points that may have been made. The main concerns raised by the campaign responses were:

- Disagreement with the NPS's definition of national need, especially the role and robustness of national traffic forecasts.
- Disagreement with the NPS's balance of policy in the statement, especially in relation to road development.
- Concern around the protection provided to sensitive environments.
- Concern about the proposed policy regarding the consideration of carbon emissions from national networks projects.

4. Consultation - Key issues raised

- 4.1 This chapter sets out the views expressed in response to the consultation proposals and our proposed next steps based on these responses.
- 4.2 Many of the responses to the consultation were provided as single, broad responses covering a range of issues, rather than addressing the individual questions raised.
- 4.3 Almost all respondents focused their comments on the NPS itself with relatively few commenting on the Appraisal of Sustainability and the Habitats Regulation Assessment. Any comments on the Appraisal of Sustainability or the Habitats Regulations Assessment are outlined in the Post Adoption Statement, which has been published alongside this document.
- 4.4 Responses demonstrated widespread support for having a National Networks NPS in place, and broad support for the level of guidance provided by the draft NPS. However, many of the comments raised issues with, or sought clarification on, some specific areas of policy or process.
- 4.5 The sections below summarise the key points made through the consultation and explain how the Government has taken these into account in preparing the final NPS.
- 4.6 Many respondents also used the consultation process to raise concerns with several areas of underlying government policy that were reflected in the draft NPS. While these are outside of the scope of this consultation, which focuses on the guidance provided by the NPS rather than the underlying policy, we have sought to take account of these concerns where possible in the context of finalising the guidance provided in the National Networks NPS.

The need for development

- 4.7 On balance, the consultation analysis indicated that many respondents neither agreed nor disagreed with the need for development. However, those who did consider this question often expressed strong views.
- 4.8 Many respondents indicated strong support for the need for development of the national networks set out in the Government's draft NPS. This was particularly the case amongst local authorities, airports and port authorities and road and rail user groups, who felt that development of the networks was necessary to help encourage and facilitate economic growth, improve connectivity and improve the performance of the national road and rail networks.

- 4.9** Several others - particularly environmental groups and campaign respondents - disagreed with the case for need set out in the draft NPS. A number of professional and campaign groups also disagreed with the need for development
- 4.10** Those who opposed the need for development raised a number of concerns, which were primarily:
- A concern that future levels of demand indicated by road traffic forecasts were considered as an in-built assumption. Respondents were keen that policy goals such as relieving congestion in targeted areas should drive the need for schemes, rather than meeting forecast growth in demand - which some respondents felt might not take sufficient account of uncertainties in changing trends in behaviour;
 - A need to consider the case for development as part of a broader, more integrated approach in the form of an overarching transport strategy, noted in particular by professional groups;
 - A need for greater recognition of the importance of integration between networks and links to other networks, highlighted by a range of respondents, particularly airport and port authorities;
 - A belief that technological developments would reduce the need for travel to an extent was not reflected in the stated need for development. However, views on technology were not clear cut. Some agreed that although technology could play an important role, it would not remove the need for development, while others felt more certain that technology would play a significant role in tackling congestion in the future.
- 4.11** Several respondents also made specific comments about the need for development set out in the draft NPS, most notably:
- Resilience of the national networks, in particular to the long-term impacts of climate change, was highlighted by local authorities as a significant problem that should be given greater emphasis as part of the need for their development;
 - The professional planning community and scheme promoters also wanted the NPS to provide spatial specificity highlighting where development and specific schemes were needed.

Government Response

- 4.12** Following consultation, the Government is confident that there remains a compelling need for development of the road and rail networks to relieve congestion on roads and overcrowding on rail, support local and national economic growth, increase resilience, improve integration between transport modes and improve safety the environment and accessibility.
- 4.13** We welcome the valuable comments received through the consultation process, which raised a number of important concerns. We have sought to address the issues raised above in preparing the final National Networks NPS to clarify the need for development, as described below.

National road and rail demand forecasts

- 4.14** We agree that national demand forecasts, while a useful indicator of future demand and national need at an aggregate level, should not be the sole basis for decisions to justify need for specific schemes. The approach in the NPS has been revised to make clear that local transport models will be used for individual schemes and appropriate sensitivity testing needs to happen to consider the impact of uncertainties. We have clarified the role of national traffic forecasts in the context of planning inquiries for individual schemes to this effect.
- 4.15** The final NPS also includes updated national road and rail forecasts and explains that these forecasts will be updated as and when circumstances change or understanding improves.

Overarching transport strategy and integration between modes

- 4.16** As made clear in the original consultation, the NPS is not a vehicle for setting out a new transport strategy. Wider questions concerning the overarching transport strategy are therefore beyond the scope of this consultation. The NPS's purpose and function is to provide guidance and clarity about existing government policy to support and inform decisions about applications for the development of NSIPs on the road and rail networks and SRFIs.
- 4.17** The NPS includes an overall statement of need covering road, rail and SRFIs and we have reviewed and strengthened this in light of responses. In particular, we have considered how the final NPS can best support integration between transport modes, and clarified the overall statement of need to highlight the need for integration across other modes, including linkages to ports and airports.
- 4.18** Consideration of alternatives is expected to occur as part of the investment planning and decision making. However, we have also included a specific requirement for scheme promoters to consider reasonable opportunities to support other modes.
- 4.19** Sitting alongside the NPS are the investment programmes for the road and rail networks - the Rail Investment Strategy (HLOS) and the Road Investment Strategy. These, together with the business plans prepared by the relevant delivery bodies, provide detailed articulation of the Government's funding strategy for the road and rail networks and investment priorities over forthcoming periods.

The role of technology

- 4.20** The Government recognises that technology is taking an increasingly influential role in how we travel, and is already being utilised widely on the transport networks. However, while the general trend is clear there remains significant uncertainty about the effect technology will have on congestion or the nature and degree of the need for development in future.
- 4.21** Consequently, we believe that significant changes to the position established in the draft NPS on the role of technology would not be appropriate. However, we have sought to clarify that the NPS could be

revisited in the future if technological advances are expected to have a demonstrably significant impact on the need for development.

Resilience

- 4.22** Existing detailed planning guidance already requires scheme promoters to consider the design of new and improved infrastructure in light of the likely impacts of climate change resilience and adaptation.
- 4.23** However, following the responses received we have sought to strengthen the importance of resilience of the road and rail networks by including resilience as a key driver of the need for development.

Greater spatial detail

- 4.24** The Government believes that it would be inappropriate for the NPS to identify specific locations for investment. This is because decisions around specific locations are determined by separate investment planning processes, such as the national rail and road investment decision-making. However, we recognise the importance given to this issue by some respondents and we have sought to provide some additional context in the NPS around regional road congestion and SRFI pressures to give an indication of where development is most likely to be required to meet need. That said, it is important that the NPS retains enough flexibility to enable schemes to be developed if local evidence suggests it is required.
- 4.25** We have also recognised in the NPS that the location of road and rail developments will tend to be driven by economic activity, population and the location of existing transport networks.

Government's policy for addressing need

- 4.26** The majority of those who disagreed with the need for development also disagreed with the policy for addressing need. Although again, on balance, our analysis indicated that many respondents neither agreed nor disagreed but focused on making comments around specific issues.

Desire for clarification of guidance on policy for addressing need

- 4.27** A number of respondents from the professional planning community and scheme developers expressed some concerns around whether the NPS gave enough clarity to decision makers. The main issues highlighted were:
- A concern that the overall balance of policy appeared biased towards road development and was based on a 'predict and provide' approach. Some felt that the NPS was supporting a large scale programme of road building which would have significant environmental impacts.
 - A desire for greater consistency and alignment with the National Planning Policy Framework (NPPF) with regard to sustainable transport and the environment.

- 4.28** There was a call, particularly from the environmental groups, some local authorities and professional groups, for the NPS to include clear requirements for scheme promoters to demonstrate that they had considered and assessed alternative options for intervention when bringing a proposed scheme forward, including examining options involving other modes of transport.

Environmental issues

- 4.29** There were some strong views expressed, particularly from the environmental groups, campaign respondents and individuals, about perceived weakening of environmental protections and a lack of balance in the policy. Specifically:

- Most of the environmental groups, campaign responses and some local authorities felt that sensitive environments, for example biodiversity, ecological, and landscape assets, will only be protected as far as they do not conflict with national need.
- The campaign respondents specifically highlighted that the Green Belt, nationally treasured landscapes, ancient woodland and wildlife sites must be further protected.
- Noise impacts and consistency with noise planning policy was raised by a small number of local authorities, planning consultants/advisers and environmental groups, who also requested that noise impacts may be felt away from the actual development itself.
- Air quality was raised, particularly by the environmental groups and campaign respondents, as an issue. It was felt that the NPS did not have enough clarity on how to deal with air quality impacts and that any negative air quality impacts from a scheme that cannot be mitigated should be a basis for refusing consent.
- Treatment of carbon impacts was also criticised by many of the environmental groups, the campaigns, local authorities and transport action groups. They felt, along with the individual respondents, that the consideration of carbon emissions should not be removed from planning inquiries. Many of them raised concern that there was not enough evidence that the Government's overarching plan to reduce carbon emissions would work.

Local impacts

- 4.30** Some respondents also raised concerns about the guidance on local impacts of national schemes, specifically:
- Potentially adverse impacts of schemes on local transport networks and the environment were criticised, particularly by some of the environmental groups, consultants, scheme promoters and professional groups. It was felt that the NPS did not recognise the need to take account of local policies, models and constraints. Environmental groups in particular, wanted the NPS to strengthen the text around mitigating adverse impacts on the environment.

- Some consultants/advisers and rail freight interchange promoters requested that the NPS recognise that there will sometimes be unavoidable adverse impacts of schemes which will be difficult to mitigate against.

Government Response

- 4.31** The Government remains confident that the policies outlined in the NPS are those that will help meet the identified need. It supports a significant and balanced package of improvements and enhancements across the road and rail networks. It also supports improvements in safety, resilience, maintenance, environmental performance and access for cyclists and pedestrians.
- 4.32** However, we recognise that greater clarity is needed in a number of important areas and have sought to address many of the issues received through consultation.

Balance of Policy

- 4.33** In the interests of sustainability, the Government does not support a "predict and provide" strategy. The policy in the NPS aims to ensure that the safe provision of additional capacity and economic benefit is balanced with social, environmental and value for money factors.
- 4.34** Following consideration of consultation responses the text in the NPS has been amended to more explicitly state that the Government supports sustainable travel and the improvement of environmental performance.
- 4.35** The NPS now clearly acknowledges that different approaches across the road network will be appropriate for different places. This reflects differences in local preferences and choices, as well as the scope for alternatives to road travel.
- 4.36** The Government is committed to sustainable travel and is investing heavily in rail and modal balance. The text in the NPS has been clarified to recognise the level of ambition the Government has in developing a high quality cycling and walking environment to bring about a step change across the country.

Alignment National Planning Policy Framework

- 4.37** The NPPF and NPS have different roles in the planning system. The NPPF sets planning policy from which local authorities develop local plans. The NPS is the planning framework for decisions on nationally significant infrastructure projects on the national networks.
- 4.38** Nevertheless the NPPF and NPS are aligned - both support sustainable development and both recognise that different approaches and measures to transport will be appropriate for different places.
- 4.39** We believe that it is vital that policies in local plans need to be taken into account when bringing a scheme forward on the national networks and the NPS is now clear that this must happen.

Assessment of alternative scheme options

- 4.40** After considering responses to the consultation the Government agrees that the NPS should provide more clarity around the consideration of alternatives and that a more integrated approach should be taken when planning schemes.
- 4.41** The National Networks NPS deals with nationally significant infrastructure projects for road and rail. In practice, for many major national road schemes there is not a viable modal alternative - tackling congestion only through rail or other public transport interventions would often be a sub-optimal option.
- 4.42** However, our appraisal guidance (i.e. WebTAG) requires the consideration of alternatives and we want to ensure the option offering the best value for money in its broadest, strategic sense, is selected.
- 4.43** Given the importance of this issue to some stakeholders we have added a paragraph to the NPS which states that proportionate option consideration will have been undertaken as part of the investment decision making process. We have also made it clear that it will not be necessary for the Examining Authority and Decision Maker to review this process but that the Examining Authority and Decision Maker should satisfy themselves that an assessment of alternatives has been undertaken.

Environmental protections

- 4.44** The NPS is clear that there is a need to balance the national need for development against local impacts, and includes protections for sensitive environments. The protections for sensitive environments are largely based on existing planning guidance.
- 4.45** It is important that sufficient flexibility and discretion are left to the decision maker to enable decisions to take account of local circumstances and preferences. We have included text in the NPS to specifically acknowledge that whilst the Government expects scheme promoters to deliver projects in an environmentally sensitive way and consider opportunities to deliver environmental benefits, it may not always be possible to entirely eliminate all adverse effects associated with development.
- 4.46** We have made a number of changes to the text on biodiversity, including reflecting the principles of the Natural Environment White Paper⁶ and recognising the status of nature improvement areas.
- 4.47** We have strengthened the text around protection for National Parks, ensuring consistency with the NPPF and introducing a presumption against significant road widening or the building of new roads and strategic rail freight interchanges in National Parks, The Broads and Areas of Outstanding Natural Beauty (AONBs). The NPS also states that the requirements set out in Defra's English National Parks and The Broads; UK government vision and circular 2010⁷, need to be fulfilled.

⁶ <http://www.publications.parliament.uk/pa/cm201213/cmselect/cmenvfru/492/492.pdf>

⁷ <https://www.gov.uk/government/publications/english-national-parks-and-the-broads-uk-government-vision-and-circular-2010>

- 4.48** We have also reflected the duties in relation to National Parks and AONBs set out in section 11A of the National Parks and Access to Countryside Act 1949 and section 85 of the Countryside and Rights of Way Act 2000.

Noise

- 4.49** In light of comments from planning consultants/advisers and environmental groups, we have redrafted the guidance for decision making to clarify that noise policy must be seen in context of Government policy on sustainable development.
- 4.50** We have also addressed the need to consider possible noise impacts of increased road and rail traffic movements elsewhere on the national networks and added an expectation that scheme promoters should consider reasonable opportunities to address problems raised through Defra's noise action planning process.

Green Belt

- 4.51** The NPS clarifies that scheme promoters need to recognise the special protection given to Green Belt land. It would have to be clearly demonstrated (and the Secretary of State would have to be convinced) that very special circumstances exist to justify what would be inappropriate development in the Green Belt.
- 4.52** The final NPS also recognises the status of Local Green Spaces as being subject to the same policies as the Green Belt. We have strengthened the guidance around factors to consider when revising existing rights of way and made a number of other clarifications in light of consultation responses.

Air quality

- 4.53** The Government has carefully considered the concerns of consultees and has addressed these issues where possible.
- 4.54** We acknowledge that air quality is a public health issue and can have adverse impacts on human health and on protected species and habitats. That said we are also mindful that developments on the national networks can have beneficial effects on air quality, for example, through reduced congestion or through modal shift.
- 4.55** We have amended the text in the NPS to clarify the Government's position. Defra publishes national projections of air quality based on evidence of future emissions, traffic and vehicle fleet. Projections are updated as the evidence base changes. We have clarified in the NPS that these projections can be used or, if the applicant considers it more suitable, other evidence can also be used.
- 4.56** We advise in the NPS that where a project is likely to lead to a breach of air quality thresholds, applicants should work with the relevant authorities to secure appropriate mitigation measures.
- 4.57** The NPS highlights that air quality considerations are likely to be particularly relevant within or adjacent to Air Quality Management Areas (AQMAs), roads identified as being above Limit Values or nature conservation sites (including Natura 2000 sites and SSSIs, including

those outside England); and where changes are sufficient to bring about the need for a new AQMA or change the size of an existing AQMA, Limit Values, or where they may have the potential to impact on nature conservation sites.

- 4.58** The text in the NPS has been amended to clarify that the Secretary of State must give air quality considerations substantial weight where, after taking into account mitigation, a project would lead to a significant air quality impact in relation to the EIA and / or where they lead to a deterioration in air quality in a zone/agglomeration.
- 4.59** The NPS also now highlights that the implementation of mitigation measures may require working with partners to support their delivery.

Carbon Impacts

- 4.60** The NPS is very clear that transport has an important role in helping the Government to meet its carbon reduction commitments. The Government's overarching plan for delivering carbon reductions, including a range of non-planning policies, will ensure that any carbon increases from road development do not compromise its overall carbon commitments.
- 4.61** The Department for Transport has a long-term goal of reducing the UK's greenhouse gas emissions and has plans and commitments in place to achieve that goal. The commitments include the following transport actions:
- A programme of investment to encourage the use of Ultra Low Emission Vehicles.
 - The Roads Investment Strategy includes a £300m fund to support environmental improvements, £100m to tackle air quality issues and around £100 million on cycling improvements on strategic roads. In addition, the Highways Agency has commenced work to provide improved training for all highways engineers to design roads that are safe and easy for cyclists to use, and will aim to cycle-proof any new schemes as standard.
 - The Local Sustainable Transport Fund⁸ is providing £600 million between 2011 and 2015 to 96 local transport projects across England to promote economic growth and cut carbon emissions.
 - The electrification of the North Trans-Pennine route from Manchester to York via Leeds, which will result in significant carbon savings as well as increased reliability and shorter journey times.
 - The fourth round of the Green Bus fund, providing a further £13million for the purchase of low carbon emission buses, bringing the total support for this initiative to £88 million since its launch.
 - Putting a total of £8 million into low emission HGVs and their supporting infrastructure.
- 4.62** The NPS has been amended to state that an increase in carbon emissions is not a reason to refuse consent unless a project would

⁸<https://www.gov.uk/government/collections/local-sustainable-transport-fund>

materially impact on the Government's ability to meet carbon reduction targets. .

- 4.63** Amendments to the NPS have also been made so that it is clear that carbon impacts will continue to be assessed through the overall economic case for road and rail schemes and that obligations to assess climate impacts under the EIA Directive still need to be complied with.

Appraisal of Sustainability and Habitats Regulations Assessment

- 4.64** Only a few of those who responded commented on the Appraisal of Sustainability or Habitats Regulations Assessment. The Post Adoption Statement, which has been published alongside this document, picks up points raised during consultation. We did note however, that a small number of environmental groups suggested that the strategic alternatives in the Appraisal of Sustainability are not sufficient and other alternatives, including 'do nothing' should have been considered.

Government response

- 4.65** The strategic alternatives looked at in the Appraisal of Sustainability are those that meet the NPS objectives and to some extent by cost/budget. The post adoption statement of the Appraisal of Sustainability gives more detail.
- 4.66** The Government believes that the alternatives chosen fully meet the objectives of the National Networks NPS. In terms of 'do nothing', this would not achieve the objectives of the NPS so would not represent a viable alternative.

Other Issues

- 4.67** In addition to the extensive comments offered by respondents on the key themes some responses referenced issues that were considered out of scope of this consultation. These comments included:
- Funding for local roads, local cycling and bus schemes.
 - Arguments against/for a proposed scheme in specific area.
 - Requests to consider links specifically to airports and international transport networks, and to ports.
 - Not enough truck stops on motorways.
 - Calls for Department for Transport to change how it produces its traffic data.

Annex A - Consultation Questions

Question 1

Does the draft NN NPS clearly establish the need for development of the national networks? If not why not? (Chapter 2 of the NN NPS)

Question 2

Does the draft NN NPS adequately explain the Government's policy for addressing the need set out in the NN NPS? If not why not? (Chapters 2 and 3 of the NN NPS)

Question 3

Do the Assessment Principles provide adequate guidance to the Secretary of State on how he should assess applications for developments of the national networks? If not why not? (Chapter 4 of the NN NPS)

Question 4

Does the draft NN NPS give appropriate guidance to scheme promoters? If not why not? (Chapter 5 of the NN NPS)

Question 5

Does the draft NN NPS consider all of the significant potential impacts of national network development? If not, what other impacts should be included and why? (Chapters 4 and 5 of the NPS)

Question 6

Does the draft NN NPS give appropriate guidance on appropriate mitigation measures? If not why not? (Chapter 5 of the NN NPS)

Question 7

Do you have any comments on the Appraisal of Sustainability of the NN NPS?

Question 8

Do you have any comments on the Appropriate Assessment on the draft NN NPS?

Question 9

Please provide any further comments regarding any aspect of this consultation.

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