



Department
for Transport

Government response to the public consultation on the draft National Networks National Policy Statement



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1. Introduction

Overview

- 1.1 This document provides a summary of the responses to the government consultation on the draft revised National Networks National Policy Statement¹ (the draft NNNPS), which ran from 14 March 2023 to 6 June 2023. The consultation included the accompanying Appraisal of Sustainability² and the Habitats Regulations Assessment³ for the draft NNNPS.
- 1.2 The existing NNNPS was designated in 2015. A Written Ministerial Statement⁴ published in July 2021 committed to a review of the NNNPS to ensure it remains fit for purpose and reflects new government policies and environmental commitments.
- 1.3 National Policy Statements (NPS) are designated under the Planning Act 2008 to provide guidance to applicants when applying for, and decision-makers when determining applications for, development consent in relation to Nationally Significant Infrastructure Projects (NSIPs). The main purpose of an NPS is to set out the need for the infrastructure and the impacts that a proposed development must address. The NPSs provide the primary basis for Planning Inspectorate consideration of an application for development consent and its recommendation on whether the Secretary of State (or the delegated Minister) should grant or withhold development consent. A revised NNNPS will ensure that future development consent applications are considered against a robust, up-to-date policy framework which takes into account the country's need for national network infrastructure.
- 1.4 A period of consultation and parliamentary scrutiny is required before an NPS can be designated. Alongside the public consultation, the draft NNNPS was subject to an inquiry by the Transport Select Committee between 24 March 2023 to 20 October 2023. The Committee invited written evidence from stakeholders and held two oral evidence sessions on 28 June 2023 and 19 July 2023. The Transport Select Committee's report was published on 20 October 2023.

¹ GOV.UK consultation. '[Draft revised national networks national policy statement](#)'

² GOV.UK Consultation. '[National networks national policy statement appraisal of sustainability](#)'

³ GOV.UK Consultation. '[National networks national policy statement habitats regulations assessment](#)'

⁴ Written Ministerial Statement. '[Review of National policy statement for national networks](#)'

- 1.5 The draft NNNPS has been revised, where appropriate, to take account of consultation responses and recommendations from the Transport Select Committee following their scrutiny of the draft NNNPS, and is referred to in this document as "the revised NNNPS". This document sets out where and how the revised NNNPS has been amended in response to the responses received during the public consultation.

2. Consultation responses

- 2.1 Responses were received from a wide range of respondents including individual members of the public, Arms-Length Bodies, the freight industry, transport groups, environmental organisations, Non-Governmental Organisations, sub-national transport bodies and local authorities.
- 2.2 Responses could be provided via an online survey which was accessible via the consultation webpage, via email to nationalnetworksNPS@dft.gov.uk, or via post to the Great Minster House address.
- 2.3 The Department received 186 responses to the public consultation. 99 responses were received via the online survey and 87 responses were received via email or post. We also received a further 479 campaign responses.
- 2.4 Whilst all responses have been considered, this document does not attempt to set out the government's response to every single point raised. Instead, it concentrates on the key themes which arose from the consultation and explains how they have been taken into account in shaping the revised NNNPS and associated documents.
- 2.5 This government response is organised into sections following the numbering of the consultation questions. Questions 1-3 covered the respondent's name and organisational details, so this response addresses question 4 onwards. We have set out the questions asked, a summary of the key themes identified in the responses, and the Government's response to these. Some respondents raised similar issues under multiple questions; where this has occurred we have addressed these issues once. Where these themes are overarching, for instance in relation to the role of the NNNPS in setting an overarching transport strategy, these have been addressed under question 4.

Question 4

Question 4: In your view does the draft NNNPS provide suitable information to those engaged in the process of submitting, examining and determining applications for development consent for nationally significant infrastructure projects on the: a. strategic road network, b. strategic rail network, and c. strategic rail freight interchanges?

What you said

- 2.6 Many responses welcomed the changes, particularly around the recognition of the development of Strategic Rail Freight Interchanges (SRFIs) in increasing the amount of freight transported by rail. Other respondents were supportive of the increased certainty which the draft NNNPS provides to developers seeking planning consent, such as the additional clarity on the consideration of alternatives. Some respondents also welcomed the updated text in the draft NNNPS to reflect changes in carbon and air quality policy since 2015.
- 2.7 Many respondents disagreed with the question. Issues raised by these respondents included:
- Calls for an overarching transport strategy that is focused on meeting net zero and environmental goals. Respondents wanted the draft NNNPS to have a presumption against road building and instead focus on road maintenance and investment in alternatives to private cars. There were calls for an increased focus on modal shift, and the need to direct future transport investment to improving public transport and active travel networks. A few respondents raised that there needs to be greater investment in passenger rail and rail freight if growth targets and environmental goals are to be met.
 - Some respondents felt there was too much focus on congestion in the draft NNNPS and that this supported road expansion and induced demand rather than maintenance of the road network. Respondents argued that road building has negative environmental and public health consequences and suggested that it didn't reduce congestion, contribute to economic growth or improve safety. Many respondents felt that the draft NNNPS should have a greater focus on strengthening environmental commitments.
 - Calls for greater consideration of alternatives to road building in meeting travel demand, drawing on evidence and taking into account an evaluation of multi modal options. Some respondents also commented on the relative lengths of text on road development in the draft NNNPS compared to rail development, and queried whether this suggested a preference towards road development.
 - There were requests for the draft NNNPS to be monitored to ensure it remains effective.

- There were calls for greater consideration of transport poverty in the NNNPS and the need for assessment of the impacts of NSIPs on vulnerable groups.

2.8 Other issues raised by respondents included:

- A request for greater clarity on whether the draft NNNPS would apply to schemes that are directed into the regime under section 35 of the Planning Act 2008.
- A comment that there needed to be greater engagement with stakeholders throughout the development of NSIPs.
- Criticism that the draft NNNPS is too lengthy and the wording can be vague; greater clarity is required.
- Calls for the draft NNNPS to be reviewed more often than every 5-10 years or reviewed when there is a significant change in policy rather than on a specified timescale.

Government response

- 2.9 We welcome the valuable comments received through the consultation process, which raised a number of important comments and concerns. A number of these concerns related to the role of the NNNPS and its ability to address wider transport concerns such as modal shift and public transport. The NNNPS'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. The NNNPS 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.
- 2.10 The government notes the concerns raised about building more roads. The government is determined to maintain a top-quality strategic road network because of the vital role it plays in growing our economy and delivering long-term prosperity. The revised NNNPS recognises that there may be a range of interventions beyond building new capacity that would be suitable in addressing the challenges that have been identified and, at paragraph 3.42, it sets out some examples of what these other interventions might be. However, it is often not possible to identify viable technology solutions, public transport or local alternatives because the strategic road network (SRN) is used for driving long distances. The revised NNNPS concludes that other interventions may not be sufficient and therefore infrastructure development may still be required.
- 2.11 A number of respondents argued that the government needs to reduce car kilometres travelled in order to achieve net zero. It is not the policy of government to reduce demand for travel. People should enjoy fair access to jobs, education, health, shopping, recreation, friends and family and government wants to facilitate that, not restrict it. The government is addressing carbon emissions from road transport through the measures announced in the Transport Decarbonisation Plan 2021, primarily the transition to EVs, which has now been taken forward by the enactment of the Zero Emission Vehicle mandate. The Carbon Budget Delivery Plan sets out how the sixth carbon budget (2033-37) will be delivered across the whole economy. Annex D paragraph 37 states: "Despite the intrinsic uncertainties of long-term sectoral emissions projections, we still have a reasonable to high level of confidence that the proposed policy package will deliver in line with what is needed to enable

carbon budgets to be met.” As a result the government believes that the policy choices set out in the Transport Decarbonisation Plan are the right ones, subject to the proviso set out that the government will keep them under review.

- 2.12 We recognise the importance of protecting the environment and have aimed to strike the right balance in ensuring that infrastructure development can come forward where necessary but in a way that provides protection for the environment. A number of changes have been made to the revised NNNPS to provide greater clarity on the environmental requirements and reflect updates to environmental policy - these are covered in more detail under question 6.
- 2.13 The revised NNNPS has amended text regarding the consideration of alternatives to a development consent order (DCO) scheme which is intended to reflect current case law. Schemes that are identified within an investment strategy process such as the Road Investment Strategy or the Rail Network Enhancement Programme go through numerous stages considering different options and the government believes that this is the appropriate process and stage through which these options should be considered. The process for considering alternatives at options appraisal stage is independently scrutinised because Examining Authorities will consider whether the options appraisal process has been carried out. They also have the ability to interrogate alternatives as part of their reporting to the Secretary of State if they consider it relevant to do so or where the law requires it. As the applicability of the "exceptional circumstances" test will depend on the particular scheme, its impacts and any alternatives proposed during Examination, the revised NNNPS does not seek to define "exceptional circumstances".
- 2.14 Some respondents felt that the draft NNNPS provided too much text on roads and not enough on rail and that this might be indicative of their relative priority. The government is committed to Britain's rail network. Rail is an important contributor to the government's efforts to hit net zero targets and a vital part of the UK's transport infrastructure. This balance of text is not indicative of the government's desired balance between transport modes.
- 2.15 The NNNPS operates in the existing legislative and policy context for NPSs and in undertaking the review relevant guidance has been complied with. The government has committed to undertaking a review of NPS guidance, including the consideration of modular structures for future NPSs, and DfT will take that into account in any future reviews of the NNNPS. The review provisions within the revised NNNPS have been updated to reflect the government's commitment to review NPSs at least every 5 years and the Department will consider whether a review is necessary in light of any significant changes in policy or legislation.
- 2.16 We recognise the importance of early engagement in the development of NSIP schemes. While the draft NNNPS contains numerous references to the need for early engagement with critical stakeholders, we have added a further paragraph (paragraph 4.5) that sets out the importance of early engagement in general.

2.17 We note the request for further clarity on schemes directed into the NSIP regime under section 35 of the Planning Act 2008. The text had been updated in the revised NNNPS to ensure consistency with the EFW judgment⁵.

⁵ [EFW Group Ltd v Secretary of State for Business, Energy And Industrial Strategy \[2021\] EWHC 2697 \(Admin\)](#).

Question 5

Question 5: Does the draft NNNPS adequately set out: a. the need for developing national networks, b. our policy for addressing the need for the development of national networks?

What you said

- 2.18 Some respondents felt that the need case was compelling, clear and justified and in particular a number of respondents were supportive of rail freight and the needs case for SRFIs (although some wanted it to go further with a recognition of the role of expanded SRFIs). The drivers of national network development were appropriate and welcomed as an improvement on the narrative in the existing NNNPS which focuses on congestion and overcrowding. Other comments included adding social inclusion as a driver, strengthening the text on environment and adaptation, and questioning whether economic growth should be re-focused on levelling up.
- 2.19 Many respondents disagreed with the statement of need in the draft NNNPS and raised similar issues to those covered in question 4. In addition to those themes covered under question 4, issues raised by respondents included:
- Criticism that the text on induced demand in the draft NNNPS was not supported by the evidence and the draft NNNPS should do more to take into account induced demand. Respondents commented that adding capacity to the SRN would undermine attempts by local authorities to reduce capacity locally and achieve net zero ambitions.
 - Some respondents felt that the use of the National Road Traffic Projections (NRTP) core scenario was flawed because it accepted traffic growth rather than reflecting any policy measures intended to reduce traffic. Consequently respondents argued that the draft NNNPS was based on a predict and provide model – a capacity increase is brought forward to address forecasted traffic growth, and the capacity increase generates more traffic growth as a result of induced demand. They felt that the draft NNNPS should not rely on historic trends to predict future demand and instead should move to the vision and validate approach as recommended in the Transport Decarbonisation Plan.
 - Some respondents commented that the need case was too generic and lacked justification based on evidence. Respondents wanted the need to be demonstrated at specific locations and thought this should be underpinned by a spatial plan.

- There were comments on whether the needs case for rail had been set out sufficiently. Concerns raised included whether it was appropriate for the pandemic to continue to influence rail investment, and whether it needed to say more on supporting modal shift. There was support for more electrification. There was divided opinion on reallocating rail space – some respondents were concerned that this would be at the expense of passengers. There was also concern that rail applicants could not assess financial sustainability.

2.20 There were a number of areas where respondents wanted the draft NNNPS to say more, including:

- The needs of the freight and logistics industry, including more on promoting the shift from road to rail freight.
- Infrastructure for bus and coaches on the SRN (such as interchanges).
- Climate change adaptation, including extreme temperatures and adaptation for SRFIs.
- Walking and cycling, and in particular providing active travel options alongside the SRN.
- The alignment between the draft NNNPS with energy demands and digital technology.
- Reinstating the text within the existing NNNPS relating to road charging and in particular for river crossings.
- Alignment with other objectives e.g. housing.

Government response

2.21 As with question 4, many respondents commented on matters outside the scope of the NNNPS, such as the need for an overarching transport strategy, encouraging modal shift, and investment priorities. These are not matters for the NNNPS. Some respondents called for the draft NNNPS to adopt a spatial strategy, identifying locations for development. The Government believes that it would be inappropriate for the NNNPS to identify specific locations for investment. This is because decisions around specific locations are determined by separate investment processes, such as the national rail and road investment decision-making.

2.22 Following consultation, the government remains confident that the revised NNNPS sets out an appropriate needs case for developing strategic road and rail infrastructure and that development may be needed to respond to a wide variety of challenges which national networks may face. While other interventions will support effective use of the SRN (and local roads), these may not be sufficient in addressing specific issues at particular locations. In light of consultation remarks relating to predict and provide, the revised NNNPS has been updated to refer to the Common Analytical Scenarios used in the National Road Traffic Projections other than the core scenario, focusing on scenarios which have forecast lower levels of traffic growth than the core scenario. This is not intended to provide a "prediction" of traffic growth; instead the inclusion of these scenarios suggest that traffic will continue to grow to some extent even under lower growth scenarios. The government is clear that the draft NNNPS is not based on a predict and provide model - it has not identified a specific level of traffic growth nor has it identified a volume of development necessary to meet that growth. The revised NNNPS has been updated to make that position

more explicit. On induced demand, evidence suggests that the impacts of induced demand vary depending on circumstances but is likely to have only a very marginal effect on overall traffic demand (and is taken into account as part of scheme modelling and appraisal). We have updated the sentence in the NNNPS to state more clearly that induced demand is likely to be higher for urban schemes.

- 2.23 We have also reinstated the text relating to tolls for river crossings and given greater recognition to the role of the SRN in helping to deliver sustainable transport options (paragraph 3.44).
- 2.24 With rail, the statement of need was developed after the COVID-19 pandemic. Post-COVID-19 rail passenger numbers have remained lower, and priorities have shifted. The revised NNNPS statement of need reflects this shift by not only focusing on customer needs but also supporting government priorities such as net zero and economic growth. The statement of need has been updated to reflect the latest Government commitments, including the recent Network North announcements. The projects included in the Network North announcement have been chosen to reflect economic, social and environmental need which the revised NNNPS promotes.

Questions 6, 7 and 8

Question 6: In your view, is there any information missing from the “General principles and considerations” chapter?

Question 7: If yes, provide comments on missing information, referring to specific sections of the NNNPS in your response.

Question 8: If yes, there is an option to provide any supporting evidence of your view (using file upload function)

What you said

2.25 The majority of respondents to question 6 indicated that they thought something was missing from chapter 4 of the draft NNNPS. Many respondents raised similar issues to those covered under question 4 of the consultation and felt that the draft NNNPS ought to have a stronger environmental focus. Other issues raised by respondents included:

- The biodiversity net gain section does not acknowledge mandatory biodiversity net gain for NSIPs from November 2025, or environmental net gain and they were unclear why the proposed government biodiversity gain statement cannot be included in the draft NNNPS.
- There is inconsistency in referencing of the mitigation hierarchy throughout the NNNPS and a few respondents suggested that the mitigation hierarchy should be applied before biodiversity net gain.
- The introduction of a requirement for developers to provide information where a statutory nature conservation body gives an indication that a project is highly likely to have an adverse impact on an area creates an impediment to development.
- There were suggestions of different scales at which cumulative effects should be considered and the inclusion of climate change as a multiplier effect to all risks.
- The business case section could be further clarified by setting out whether the information contained in the business case should be submitted as part of a DCO application. One respondent suggested that the business case should include a Distributional Impact Assessment of both the benefits and adverse impacts.
- The role of the local transport authority and sub-national transport bodies was missing from the draft NNNPS.

- The text on design should be clarified to align more strongly with the National Infrastructure Commission Design Principles. One respondent noted that the draft NNNPS does not refer to the design standards for the SRN set out in the Design Manual for Roads and Bridges or how these standards should be considered as part of the application.

2.26 Other changes suggested included:

- Adding safety as a benefit to scheme development.
- Giving greater recognition to the importance of early engagement.
- Introducing a single section on requirements.
- Giving greater recognition to the historic environment, including adding a requirement to consult statutory environmental bodies rather than statutory nature conservation bodies.

Government response

2.27 The draft NNNPS is clear that there is a need to balance the national need for development against local impacts and protecting sensitive environments. We have included text in the revised NNNPS 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.

2.28 Many respondents commented that the draft NNNPS should have a greater environmental focus or wanted stronger protections for sensitive landscapes. The revised NNNPS reflects legislation and existing government policy (including in planning guidance such as the National Planning Policy Framework) and we consider that the revised NNNPS strikes the right balance.

2.29 In response to the consultation comments we have made a number of changes to the draft NNNPS including:

- Introducing a definition of environment to paragraph 4.3 which includes reference to historic environment.
- The application of the biodiversity mitigation hierarchy has been clarified.
- In order to clarify the legal position and future proof the revised NNNPS, we have added a reference to the biodiversity net gain statement.
- Comments regarding what is included within a business case is outside the scope of the NNNPS, but we have amended paragraph 4.6 to clarify that decisions on funding and the business case are subject to a separate process outside of the NSIP regime.
- Updating the good design section. This has included adding in reference to the Green Infrastructure Guide and clarification on the role of the Design Council and the National Infrastructure Design Principles. We have also added text to recognise that not all applications will be able to resolve detailed design matters at the application stage.
- Introducing a new paragraph on early engagement (paragraph 4.5).
- Introducing a sub heading on “requirements”.

- Introducing a reference to the Design Manual for Roads and Bridges at paragraph 4.29.
- Reinstating the paragraph from the existing NNNPS about how to manage uncertainty once a DCO application has been submitted.

2.30 Whilst we recognise the concerns raised by respondents in relation to the Habitats Regulations Assessment (HRA) process, it is vital that the Secretary of State has the relevant information necessary to complete the HRA process. Consequently we consider that the text regarding information to be provided following a Statutory Nature Conservation Body noting that an adverse impact was highly likely strikes the right balance. This text is consistent with the approach adopted in the Planning Inspectorate's advice note 10, which was republished in August 2022.

Questions 9, 10 and 11

Question 9: Does the draft NNNPS support development of: a. freight facilities on the SRN, including lorry parking facilities, b. freight interchange infrastructure that encourages modal shift from road to rail?

Question 10: In your view, are the changes to the SRFI section useful for the draft NNNPS?

Question 11: Explain why, referring to specific sections of the draft NNNPS in your response.

Question 9 - what you said

2.31 The two parts of the question attracted a range of views. On balance, there was broad agreement amongst respondents that the draft NNNPS supported development of freight facilities on the SRN and a modal shift from road to rail, with some respondents agreeing strongly that road to rail was the right step.

2.32 Conversely, a few respondents strongly disagreed with the question's proposal and felt the draft did not go far enough. Particular respondents' concerns included a lack of forecasting and empirical evidence within the draft's justification for the supportive policy on SRFIs; that there was little understanding or insight given to how best to manage Rail Freight Interchanges with logistics to ensure a more coherent and efficient movement of freight; and, more generally, a need for the draft to offer more guidance on the criteria upon which the conflicting demands of passengers and freight should be decided.

2.33 The main issues raised by respondents included:

- The rail network must be capable of serving the planned capacity of the SRFI with adequate train paths, which would mean investment in rail should be prioritised over the SRN. Respondents noted that Mode Shift Revenue support and charges to freight operators should be set at levels that would enable and encourage modal shift to rail.
- Government, rather than local developers, should consider relatively small sites as strategically important if they widen a conurbation's access to sustainably transported building materials, and to classify them as NSIPs so that the Secretary of State can decide whether to approve such projects.

- Priority should be given to hydrogen refuelling infrastructure in the UK, for government and industry to realise their decarbonisation ambitions. They noted that modal shift from road to rail may not be the only option for the freight industry to reach a net zero future; development of electric and hydrogen propelled Heavy Goods Vehicles (HGVs) could help improve environmental impact of road freight.
- There should be better lorry parking and driver facilities on the SRN to benefit drivers (e.g. showers, secure parking and toilet facilities). Respondents noted that improved facilities would also help driver recruitment and retention.
- To encourage modal shift, Rail Freight Interchanges must be part of a wider integrated logistics approach across modes, and there needs to be more SRFIs. If necessary, more potential sites should be identified. Respondents felt that a national strategy of potential sites located in the right place should be produced with adequate information for communities to understand their impacts.
- Freight can be constrained by the lack of rail connected freight terminals, inadequate gauge clearance, unsuitable paths for freight, network closure and cost of infrastructure improvements. Respondents also felt that another key constraint was the relative priority of rail freight compared with passenger rail, the former receiving lower levels of investment.
- Consideration should be given to the differential costs between modes to help inform decision making, and to include assumptions around the future relative cost of different modes. Some felt that the development of freight facilities on the SRN needs a more holistic and strategic approach. Some commented that there is no clear policy that sets out whether rail should be expanded to handle a greater proportion of certain categories of freight.
- Some respondents wanted to see a systematic approach to discouraging road freight and expanding rail freight along with zero carbon 'last mile' delivery introduced. This could mean new legislation requiring logistics companies to move less freight, more efficiently and primarily by rail, and to situate themselves accordingly.

Question 10 and 11 - what you said

- 2.34 Many respondents were supportive of the statement of need for developing SRFIs in the draft NNNPS. They felt that the text recognised the importance of SRFIs and the need for an expanded network. Some respondents commented on the shortage of SRFIs capacity and the challenges of bringing forward SRFI sites given the scale of developments and the need for access to the SRN and rail network.
- 2.35 Some wanted the statement of need to go further. Suggestions included giving greater recognition to the role which rail and SRFIs play in enabling a circular economy, giving greater recognition of freeports, and making a stronger statement on the role of SRFIs in modal shift.
- 2.36 However, there were some respondents who felt that the statement of need for SRFIs was too vague and weak. To strengthen the evidence base they wanted to see reference to the most up to date demand forecasts for freight (such as Network Rail's Rail Freight Forecasts). As a result they felt that the draft NNNPS had not made a case for developing SRFIs. In particular a number of respondents commented on the importance of a network of smaller Rail Freight Interchanges but that the case for developing SRFIs in place of this network hadn't been proven. A number of respondents wanted a spatial strategy for SRFIs, indicating the nature and location of projects.

2.37 In terms of the changes proposed to the draft NNNPS:

- Paragraph 4.79 and connectivity: opinions were divided on connectivity. Some respondents wanted the draft NNNPS to say more on rail connectivity whilst others felt that linking SRFI locations with rail connectivity risks the project being non-compliant. Another respondent wanted SRFIs to have direct access to the SRN to minimise traffic impacts on local communities.
- Respondents generally welcomed the changes to paragraph 4.86 relating to the timing of connecting SRFI to the rail network, welcoming it as a clearer and more pragmatic approach. There were some concerns that other paragraphs (such as 4.84) conflicted with this approach. Others were concerned that this enabled the development of road served warehouses which would harm the countryside. There were also concerns about what a timely manner meant.
- Paragraph 4.84 – one respondent was concerned that this should not be interpreted as encouraging the provision of additional rail infrastructure as a prerequisite of SRFI growth.
- Views were divided on whether the changes relating to providing HGV facilities at SRFI facilities were helpful. Some were welcoming of the change, with a view that driver welfare was important and facilities should be provided (and already are being provided in some cases). Others were concerned that providing a truck stop for lorries not connected to the SRFI would undermine the environmental benefits of SRFIs.
- Support for the change to paragraph 4.8 was limited. Many respondents were concerned that introducing proximity considerations could limit the development of some SRFIs that are already underway and particularly those in underserved parts of the country. There were calls for further clarity on what “take into account” means and what distance was appropriate.
- Paragraph 3.107 of the consultation draft – all respondents who commented disagreed with the changes proposed as they didn’t want the consideration to locate SRFI’s in areas where there is currently lesser provision to exclude opportunities for new SRFI infrastructure where there is existing provision.

Government response

2.38 Many of the comments received in response to question 9 related to a wider strategy for rail freight (such as the role of rail freight interchanges) which is outside the scope of the NNNPS.

2.39 Following consultation the government remains confident that the needs case for developing SRFI is robust. The government is clear on the importance of rail freight, and has published a rail freight growth target to achieve an increase of at least 75% in freight moved by rail by 2050. The government notes the comments relating to evidence and the use of rail freight demand forecasts in the draft NNNPS; however, extensive work was carried out to provide an evidence base to ensure the rail freight growth target is credible and realistic. SRFIs play an important role in achieving that target.

2.40 The government considers that the approach to SRFIs adopted within the draft NNNPS remains appropriate. Government policy is that SRFI provision is market led but government ambition is to have a strategic network of facilities. While we note the concerns raised around in particular proximity of facilities to each other, and provision

of new facilities where there are already existing facilities, we consider that the policies adopted are necessary to help to facilitate the achievement of this aim. A new SRFI should grow rail freight and increase modal shift, not just take traffic from a nearby existing SRFI. Therefore, it is important that the strategic viability of a new SRFI can be demonstrated, particularly if it is in close proximity to an existing SRFI. Similarly, the government is keen to encourage SRFIs in areas where there is less provision. However, the revised NNNPS does not preclude a new SRFI being located near another one and recognises that in certain locations there is likely to be a cluster of SRFIs. Paragraphs 3.105 and 3.106 of the revised draft NNNPS have been updated to make this clearer.

- 2.41 We note the support for changes to the timing of rail connections and are satisfied that other paragraphs are not in conflict with this one.
- 2.42 The government recognises the importance of HGV drivers having access to appropriate welfare facilities. The recent call for evidence on the future of freight and the planning system sought evidence on how the planning system can facilitate a high-quality supply of HGV parking and driver facilities. In this context, the government continues to believe that the references to the importance of lorry parking within the revised NNNPS are appropriate.
- 2.43 Opinion was divided regarding whether the approach to lorry parking at SRFIs was sufficiently clear and appropriate. We have therefore clarified that SRFIs are expected to provide facilities for drivers accessing the SRFI rather than the provision of general facilities.

Question 12

Question 12: Does, in your view, the draft NNNPS adequately address: a. carbon considerations in the development of national networks, b. wider environmental targets in the development of national networks?

What you said

- 2.44 For questions 12a and 12b, many respondents expressed concern about the climate and environmental impacts from road building, and how this would affect the UK's ability to meet climate and environmental legislative requirements. Those respondents asked for Government to prioritise investment in public transport, active travel and existing roads instead of building new roads, and to strengthen climate and environmental protections in the draft NNNPS. There were also calls for the draft NNNPS to consider demand management measures to manage emissions.
- 2.45 Some respondents welcomed the policy position taken on carbon but sought clarity on the required assessments and the carbon impact test in decision making. Likewise, some respondents welcomed the references to the Environment Act 2021 targets but sought clarity on how applications to develop national networks would be assessed to contribute to those targets and objectives.
- 2.46 There was mixed opinion from respondents as to whether carbon considerations and requirements were stronger or weaker than the current NNNPS.
- 2.47 The main themes raised by respondents under question 12a included:
- Clarity is needed on the purpose and role of each of the required assessments and how they connect with one another.
 - The need to consider direct and indirect emissions from land use and land use change in the whole life carbon assessment.
 - Policy needs to be strengthened in the draft NNNPS to prevent individual NSIPs receiving consent if they cause an increase in emissions or residual carbon emissions.
 - The cumulative impacts of granting consent to multiple transport schemes with a net increase in emissions should be considered as it risks impacting the UK's net zero trajectory.

- Clarity is needed on how the draft NNNPS aligns with government's net zero commitments and there should be an explanation of how the draft NNNPS contributes to the delivery of the Transport Decarbonisation Plan and decarbonising the transport network.
- Whether the NPS adequately addresses the desirability of mitigating carbon emissions (as required by section 10(3) of the Planning Act).

2.48 A few respondents questioned the need for applicants to explain the level of emissions and their impact at a regional or sectoral level in the absence of regional or sectoral carbon targets. Others thought that the draft NNNPS had omitted reference to local carbon targets.

2.49 The main themes raised by respondents under question 12b included:

- The draft NNNPS needs to prioritise nature and habitat preservation over building new roads.
- Development that impacts on irreplaceable habitats, such as ancient woodland and veteran trees should be a reason for refusal.
- There was concern for how infrastructure development would impact on air pollution and human health; respondents suggested that pollution reduction measures should be considered further in the draft NNNPS.
- The references to the Environment Act 2021 in the NNNPS were welcomed, but respondents wanted clarity on how national networks would be assessed to ensure they contributed to achieving the Environment Act 2021 targets and objectives.
- Biodiversity net gain and nature-based solutions were positively reflected in the draft NNNPS, but respondents felt there were further opportunities to strengthen the draft NNNPS to minimise the risks of infrastructure development on the environment.

Government response

2.50 Many of the themes raised under question 12a relate to matters outside the scope of this NNNPS, such as demand management, which we have covered under question 4.

2.51 The government is committed to ensuring that transport plays its part in decarbonising the economy and protecting the environment. The response provided to the Climate Change Committee on 26 October 2023 sets out government's progress to achieving net zero emissions by 2050. The UK's climate change framework sets overarching targets, leaving it to the government to determine how carbon reductions should best be balanced across the economy. This is acknowledged in paragraphs 5.41 and 5.42 of the revised NNNPS to explain why emissions from national network infrastructure is allowable. The government will continue to regularly review its progress and take further action to decarbonise transport if needed.

2.52 We have made a number of amendments to the revised NNNPS in order to respond to comments raised during the consultation and consider that these amendments demonstrate that the government has considered the need to mitigate carbon emissions. These amendments include:

- In the revised NNNPS, we have provided greater clarity to enable developers to effectively assess carbon. The new text states that greenhouse gas emissions, measured as carbon dioxide equivalent, are referred to as "carbon emissions" in the document. After some consultees queried the role and purpose of the required carbon assessments, we reviewed and determined that the greenhouse gas reduction strategy and carbon management plan were duplicating one another. We have therefore removed the requirement for developers to provide a greenhouse gas reduction strategy and have retained the requirement to produce a carbon management plan.
- We have also provided more information on the requirement for a whole life carbon assessment and have signposted Publicly Available Specification (PAS) 2080 as the standard for managing and reducing carbon in the built environment. Some consultees raised the need to consider direct and indirect emissions from land use and land use change in the whole life carbon assessment. Existing guidance supplied by the RICS Whole Life Carbon Assessment (WLCA) in the Built Environment Professional Standard specifically mentions how developers should incorporate land-use change emissions within a WLCA.
- We have provided clarity that any residual carbon emissions should be assessed against legally binding carbon targets. The statutory carbon budgets are the only legally binding carbon targets, so we have removed references to regional or sectoral targets.
- We have reinstated the material impact test from the current NNNPS to enable the decision maker to appropriately consider NSIPs which cause an increase in emissions. The text now states that "where the increase in carbon emissions resulting from the proposed scheme are so significant that it would have a material impact on the ability of Government to achieve its statutory carbon budgets, the Secretary of State should refuse consent."

2.53 With regard to local carbon targets, the only legally binding targets for carbon reduction are set at national level pursuant to the Climate Change Act 2008 and, given the nature of an NSIP, there may be practical difficulties in applying a local, sector-specific carbon reduction target to one. We consider the current approach, where Examining Authorities and decision-makers decide what (if any) weight to give to local targets, having regard to any Government guidance on local transport plans, to be preferable.

2.54 With regard to question 12b, the draft NNNPS reflects changes in environmental legislation and references that the government has set legally binding long-term targets for England under the Environment Act 2021, covering air quality, water, biodiversity, resource efficiency and waste reduction, tree and woodland cover and Marine Protected Areas. Following the consultation, we have provided additional text to clarify the relationship between the statutory biodiversity net gain requirement introduced under the Environment Act 2021 and the revised NNNPS. Some of this policy and legislation is still emerging and the revised NNNPS has balanced providing enough detail, whilst ensuring it remains resilient to any future changes.

2.55 Following consultation, clarity on the mitigation hierarchy has been added. Applicants should look for opportunities to design infrastructure with a holistic approach to avoiding, or where adverse impacts are unavoidable, mitigating and, as a last resort, compensating for impacts on the natural, historic, or built environment, on landscapes and on people by using nature-based solutions.

Questions 13, 14 and 15

Question 13: In your view, is there any information missing from the Generic Impacts chapter (chapter 5)?

Question 14. If yes, provide comments on missing information, referring to specific sections of the draft NNNPS in your response.

Question 15: If yes, there is an option to provide any supporting evidence of your view (using file upload function).

What you said

2.56 The majority of responses offered comprehensive and detailed drafting suggestions for specific paragraphs which were considered on an individual basis, relating to specific sections within this chapter. The themes of these suggestions ranged from clarification on wording and missing definitions to policy changes, some of which were to reflect current policies and some which were out of scope for the NNNPS, such as references to specific local schemes.

2.57 Several themes were raised in responses to questions 13-15 ranging from general points to specific environmental topics. The main themes related to carbon, air quality, and biodiversity.

General

2.58 Many respondents welcomed inclusions to the draft chapter including reference to: the historic environment, nature-based solutions, sustainable urban drainage systems, whole life carbon assessment, and the range of issues covered under biodiversity.

2.59 Many respondents noted that the National Planning Policy Framework (NPPF) is updated more regularly than the NNNPS and proposed that consideration should be given to how best to reflect the most up to date policies within the NNNPS.

2.60 Some respondents noted that:

- the targets set under the Environment Act 2021 and the Environmental Improvement Plan 2023 could have been better recognised throughout the chapter.

- the mitigation hierarchy was not followed or referenced to consistently throughout the chapter.
- there should be greater emphasis on modal shift throughout the chapter, particularly when referring to mitigation measures.

2.61 A few respondents felt that socioeconomic factors could be given greater consideration throughout the chapter for example through including an assessment of negative impacts of road schemes such as on deprived communities.

Carbon / Greenhouse Gases

2.62 Many respondents expressed the view that residual carbon emissions should not be allowable given net zero commitments. Some respondents elaborated on this point and proposed additional requirements to be included such as:

- rejecting road schemes based on any increase in carbon emissions.
- developers to explain what they are considering as residual emissions and how they can be mitigated.
- increasing carbon emissions in one area should require further action and/or mitigation in another i.e. accelerating electric vehicle adoption.
- giving negative weight to schemes where mitigation measures are not guaranteed.

2.63 A few respondents felt that it was unclear whether a whole life assessment of carbon emissions included an assessment of indirect emissions from infrastructure projects i.e. carbon generated from materials imported from outside of the UK.

Air Quality

2.64 Many respondents felt that the air quality section included a lot of ambiguity or was not clear. Some of the reasons included:

- the decision-making test was particularly noted as not being clear, such as whether the decision to refuse consent is based on the limit values alone, and that some paragraphs were contradictory, noting clearer examples from the existing document.
- terminology such as 'area' and 'adverse effect', needs defining.
- the removal of the word 'significant' created some uncertainty and confusion.
- the reference to 'emissions' but not 'concentrations'.

2.65 Many respondents requested that the section should reflect the recent targets for fine particulate matter (PM_{2.5}) set under the Environment Act 2021 with some respondents also requesting additional references to Air Quality Management Areas.

2.66 Other issues raised included:

- the reference to nature-based solutions was not appropriate for air quality mitigation given the evidence indicating how this may not be effective and can sometimes exacerbate the problems.
- the document should refer to World Health Organisation air pollution targets and a few respondents also expressed the need to go further to protect deprived populations from higher levels of air pollution.

Biodiversity

2.67 Many respondents felt that there should be stronger protection for biodiversity, such as through rejecting any development that adversely impacts important habitats and species and irreplaceable habitats.

2.68 Other issues raised included:

- A request for clarity on the policy tests within the decision-making process, noting that references to ‘exceptional circumstances’, or similar language, has been expressed in different ways but holding similar intent.
- the document should acknowledge that some sites of regional and local biodiversity interest are of equivalent ecological value to Sites of Special Scientific Interest.
- the impacts of nitrogen deposition should be explicitly considered.

Noise

2.69 Many respondents felt that the text on noise assessment methods, particularly the reference to Common Noise Assessment Methods, could be clarified, with some noting the suggested wording was overly prescriptive or inaccurate.

2.70 Other issues raised included a request for further clarification on some of the wording such as when referencing ‘weekends’ or ‘groups’, and comments that the section did not adequately consider vibrational impacts, given that ‘noise’ is also taken to mean ‘vibration.’

Other topics

2.71 A few respondents felt that the Flood Risk section should be more consistent with the NPPF particularly when referencing the Planning Practice Guidance, for example, in relation to flood risk, sustainable drainage systems, and the application of the Sequential and Exception Test.

2.72 In regard to the Landscape section, a few respondents felt that there should not be any developments built within National Parks or within an Area of Outstanding Natural Beauty and that approving so on ‘exceptional circumstances’ requires further defining.

2.73 A few respondents requested further clarity and guidance on Land Use, particularly regarding developments in the Green Belt including when this is appropriate, and mitigation.

2.74 A few respondents felt that the waste hierarchy was not adequately referred to within the Resource and Waste Management Section, noting that there should be greater emphasis on waste reduction.

2.75 Some respondents raised concerns that it was unclear which requirements applied to all NSIPs and which applied to SRFI developments only, at paragraphs 5.272 - 5.276. And some respondents felt that there was a lack of reference to local transport, and in particular active travel.

Government Response

- 2.76 We are very grateful to all respondents for their detailed comments and drafting suggestions, which we have considered carefully. Following the consultation, we recognise that greater clarity is needed in several important areas and we have made a number of amendments to provide that clarity. We have noted the concerns regarding future proofing the revised NNNPS. We have worked closely with other government departments to provide as much detail as possible on emerging policy or legislation where appropriate, such as environmental outcomes reports, whilst providing sufficient flexibility to respond to any future developments of those policy areas. Subsequent changes in legislation will apply to NSIPs irrespective of the NPS. The government has committed to looking again at the guidance for NPS reviews in order to make the process more streamlined and the Department for Transport is fully engaged in this process.
- 2.77 Our consideration of changes made to the carbon section is set out under question 12.
- 2.78 On air quality, we note the many comments received in response to this section and, with input from Defra, have revised the section to try and provide a greater level of clarity. In particular:
- On the applicant's assessment we have sought to provide more clarity on when an assessment is required through the reintroduction of text on significance and reference to legislative requirements. We have also provided more detail on what the assessment should cover to provide greater clarity.
 - References to nature-based solutions have been deleted given the unclear/uncertain evidence on their effectiveness.
 - Text on mitigation has been closely linked with the legislative framework with reference to The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023. We have also clarified the text under the mitigation section including deleting unclear text regarding mitigation beyond the project application.
 - The decision-making section has been streamlined in order to address consultee's comments that it was contradictory and to provide a clear and concise set of tests for the decision maker to apply. We have sought to clarify when substantial weight should be given to air quality impacts, including through re-introducing a reference to significance.
- 2.79 On biodiversity, we consider that the protections within the draft NNNPS are appropriate for biodiversity and consistent with the level of protection in the NPPF. We have also clarified throughout the revised NNNPS the mitigation hierarchy and added an additional sentence to ensure that the mitigation of harms in a Site of Special Scientific Interest is acceptable.
- 2.80 Following feedback from other government departments we have also clarified the text on ancient woodland and updated the footnote definition of ancient woodland and ancient and veteran trees to refer to definitions provided in 'Keepers of Time: ancient and native woodland and trees policy in England'.
- 2.81 On noise, we have amended the text to provide clarity including on the appropriate methodology for assessment.

- 2.82 We have sought to provide greater clarity through updating the sections on land contamination and instability, landscape, and resource and waste management. The flood risk chapter has been revised to provide clarity although the policy intent has not changed.
- 2.83 We have added a sub heading to the decision-making section of transport impacts to show requirements which apply to all NSIPs and which requirements apply to SRFIs only, below the sub heading. In response to concerns raised about the lack of reference to local transport, we have added a reference to local strategies with paragraph 5.270 referring to Local Transport Plans and Local Cycling and Walking Infrastructure Plans.
- 2.84 One respondent had raised issues relating to safeguarding of airports and we have introduced an additional paragraph on managing the risk of bird strike in aerodrome safeguarding consultation areas.

Questions 16 and 17

Question 16: Do you agree with the findings of the Appraisal of Sustainability?

Question 17: Explain why, referring to specific sections of the Appraisal of Sustainability in your response.

What you said

2.85 Some respondents agreed with the findings of the Appraisal of Sustainability (AoS). There were also positive comments particularly related to the recommended mitigations for the draft NNNPS, including climate and habitats. Points raised by these respondents included:

- The AoS recognises the important role of soil in storing carbon.
- The recommended mitigations give a stronger direction on the protection of irreplaceable habitats and marine, although this is not fully reflected in the draft NNNPS.
- Supportive of the recommended mitigations such as carbon sinks and climate change resilience.
- Supportive of the recommended mitigations for net zero, including prioritising electrification.

2.86 Many respondents disagreed with the findings of the AoS and found the assessment process was unclear as to how it had awarded certain scores. Respondents were sceptical of some scores including economic contribution, user experience and safety. Respondents also felt the assessment of alternatives was not robust and failed to adequately consider sustainable alternatives to the draft NNNPS. They also commented that the alternatives were not sufficiently distinct to clearly assess environmental impacts and that the balanced approach to the economy and environment had incorrectly caused a trade-off of environmental objectives against other objectives.

2.87 The main themes which were raised by respondents included:

- The AoS lacks up-to date supporting evidence and road traffic forecasts to justify the assessments made.

- The alternatives to the draft NNNPS are not sufficiently distinct to clearly assess environmental impacts and there isn't a 'do nothing' scenario which could be a sustainable solution.
- The AoS lacks clarity on how road building benefits the economy when schemes deliver poor value for money, on user experience despite congestion and the positive effects awarded to safety.
- The AoS does not recognise the environmental impacts of road building and there is no clear reasoning provided to justify the uncertain effects score for greenhouse gas and air quality emissions.
- The AoS fails to consider demand management as a measure to address carbon impacts.
- It is unclear what changes have been made to the AoS since the scoping consultation in the absence of seeing the results.
- Negative impacts have been omitted from the final AoS results.
- The current NNNPS has not been monitored or assessed to inform the AoS assessment.
- The AoS should consider environmental impacts at an individual scheme level, and not just at a strategic road network level.
- The AoS excludes important factors such as noise pollution, biodiversity loss and severance.

Government response

2.88 The draft NNNPS was supported by an independent AoS to ensure it contributes to the achievement of sustainable development. The AoS is robust and transparent and has been produced in line with statutory processes.

2.89 The government is committed to a vision led approach to transport development, as opposed to investment solely to address forecast demand growth. The revised NNNPS describes a range of challenges underpinning the statement of need, which could then be addressed by targeted investment in national networks. The alternative scenarios tested all represent realistic options for delivering the government's policy. They quite deliberately do not demonstrate the widest possible set of conceivable options. We consider that the alternatives presented in the revised NNNPS are robust and appropriate, presenting realistic options with variation in the relative focus on the economy and the environment. A 'do nothing' scenario was not included as the national network is vital to our economy and transport infrastructure and scenarios need to be reasonable. Neither was a scenario which focused on reducing demand for car, as this is not reflective of current government policy (see paragraphs 2.11-2.12 above). No road or rail building was not considered reasonable within the English policy context and the geographical scope of the plan.

2.90 To ensure that effects were defined in a robust, consistent way, a set of significance criteria was developed by external consultants to guide the assessment. The terms used to identify significant effects are aligned with the Strategic Environmental Assessment Guidance.

2.91 The AoS scoring of "uncertain" means that the potential for an effect is unclear. The NNNPS is a non-spatial plan (likely locations of developments are not specified) and on this basis the AoS is a high-level assessment of the likely effects of the revised NNNPS and does not include the assessment of individual projects or schemes.

- 2.92 The Environmental Assessment of Plans and Programmes Regulations 2004 (the 2004 Regulations) require the significant environmental effects of plans and programmes to be monitored, to identify unforeseen negative effects. There were no significant adverse effects identified from the current NNNPS so no monitoring measures were taken forward in the current AoS. NSIP schemes are usually supported by environmental management plans which seek to manage the environmental impacts from the construction and operation of schemes.
- 2.93 In the event that the revised NNNPS is designated following a Parliamentary vote, a post adoption statement will be produced in line with the 2004 Regulations. This will set out in more detail how the completed AoS process and consultation process has been taken into account in producing a final NNNPS.

Questions 18 and 19

Question 18: Do you agree with the findings of the Habitats Regulations Assessment?

Question 19: Explain why, referring to specific sections of the Habitats Regulations Assessment in your response.

What you said

2.94 Some respondents agreed with the findings of the Habitats Regulations Assessment and key reasons for this included:

- Support for the assumption that adverse effects could occur and agreement that the Habitats Regulations Assessment and IROPI (Imperative Reasons of Overriding Public Interest) is required.
- Agreement that individual schemes must complete a project level Habitats Regulation Assessment.

2.95 Many respondents disagreed with the findings of the Habitats Regulations Assessment. Issues raised by these respondents included:

- The impossibility of compensating for destroying habitats and the view that there is no acceptable level of destroying the environment.
- Respondents felt that there was presumption in favour of development at the expense of protected sites.
- That roads should not be built over habitat sites, SSSIs, ancient woodland or Local Nature Reserves.
- That the AoS alternative 1 ("An approach which prioritises environmental sustainability benefits") is better option for the environment and that public transport improvements rather than new roads would have fewer negative impacts.

Government response

2.96 A number of comments related to the approach taken within the draft NNNPS to protecting sensitive sites. We consider that the draft NNNPS strikes the right balance between enabling necessary infrastructure to come forward in a way that protects the environment, including protecting sensitive sites.

- 2.97 The draft NNNPS was supported by an HRA to ensure it considered the potential effects on the national sites network. The HRA is a legal requirement that must take place prior to the revised NNNPS being authorised.
- 2.98 The revised NNNPS does not contain spatial proposals or any nominated sites for strategic road or rail projects and could form the basis for decision-making for projects anywhere in England. As such, it is not possible to determine which habitats sites may or may not be affected by projects brought forward under the revised NNNPS. The HRA and the revised NNNPS sets out that individual NSIPs brought forward following adoption of the revised NNNPS must complete project-level HRA as appropriate to their potential to cause Likely Significant Effects to the national sites network. The findings of the HRA should not be taken to predetermine; the potential for individual NSIPs to lead to effects on any habitats sites, the outcome of any individual project HRA or the decision by the SoS as to whether or not grant a DCO for any individual NSIP.
- 2.99 An updated HRA, reflecting the revised NNNPS and taking into account relevant consultation comments, has been published.

Questions 20 and 21

Question 20: Do you think the draft NNNPS could further support the aims of the Public Sector Equality Duty (PSED), particularly relating to the characteristics protected by the Equality Act 2010?

Question 21: If yes, please provide details of how the draft NNNPS could further support PSED aims, specifying the protected characteristic where possible and providing any supporting information you wish to be considered.

What you said

2.100 Many respondents did not express a view on this question. For those who did, the main themes raised included:

- Many respondents suggested that the draft NNNPS needs to demonstrate greater support for alternatives to the private vehicle, since many vulnerable groups may not have access to a car and are reliant on public transport as a means of travel.
- Some respondents raised that road building has a negative impact on air quality and that the impact of NSIPs on vulnerable groups should be assessed.
- Some respondents raised that there should be greater reference to PSED throughout the draft NNNPS.
- Some respondents raised that there should be greater engagement with vulnerable groups on NSIP proposals to allow stakeholders to influence the development of NSIPs.
- A few respondents raised that the draft NNNPS should include a requirement for applicants to address severance issues, including legacy severance.
- A few respondents felt that references to PSED should also consider how schemes can impact people of different ages and sexes.

Government response

2.101 The Government is committed to ensuring that the draft NNNPS aligns with PSED aims and we have sought to reflect this throughout the draft NNNPS where appropriate. The draft NNNPS is supported by an Equalities Impact Assessment which reflects the PSED aims in greater detail.

- 2.102 In recognition of the consultation comments raised, we have added new text at paragraph 4.5 of the revised NNNPS which strongly encourages applicants to undertake early engagement with stakeholders on their proposals. This is intended to support vulnerable groups in raising concerns with NSIP proposals at the earliest stage and encourage a collaborative approach between the applicant and stakeholders in the development of the NSIP proposal.
- 2.103 We recognise that some stakeholders expressed concern that NSIP schemes may affect accessibility, particularly for other transport modes. The text in the revised NNNPS requires applicants to consider severance in their proposals, including community severance and identifying opportunities to reduce severance for non-motorised users. This is evidenced at paragraphs 4.77 and 5.274. Further, paragraph 4.71 states applicants should identify enhancement opportunities to create safe and attractive routes to encourage health and wellbeing, including for vulnerable groups within society.

Additional comments (question 22)

Question 22 asked respondents whether they had any additional comments beyond those comments which had been provided on the other consultation questions.

2.104 Many of the key themes raised were similar to those raised in response to other consultation questions including:

- the need for increased investment in public transport and active travel.
- requirements for stakeholder engagement at an earlier stage.
- greater consideration of alternatives.
- the need for a single NPS which covers all transport infrastructure.
- greater consideration of the socio-economic impacts of NSIPs.
- continued focus in the draft NNNPS on predict-and-provide.
- disagreement with the draft NNNPS statement on induced demand and the evidence base on it.

2.105 Other key themes raised by respondents included:

- Many respondents raised that the draft NNNPS should follow the approach of other countries in reducing road building, citing Wales and other European countries as examples.
- Some respondents raised that the draft NNNPS lacks an evidence base to inform the policy.
- Some respondents raised that the draft NNNPS has much greater focus on economic growth and that the economy and environment should be considered together rather than separately.
- A few respondents raised that they would have preferred other response methods to the public consultation, rather than the online survey.
- A few respondents raised that the draft NNNPS lacks clarity on transitional arrangements.

Government response

2.106 Many of the key themes raised in response to this question are included within the key themes raised to prior consultation questions. The government response on the

prior questions has therefore already addressed many of the key themes raised to Q22.

- 2.107 The revised NNNPS reflects existing government policies and a range of analytical data has been used to inform the NNNPS conclusions. The data sources are referenced throughout the document.
- 2.108 Multiple response methods were available for consultation responses to be submitted, including an online survey, email contact address and postal address.
- 2.109 The Planning Act 2008 provides the legislative context for preparing NPSs and determining DCOs where a NPS has been designated. The transitional provisions have been drafted to provide as much clarity as possible in the context of these legislative provisions.

3. Campaign responses

3.1 An environmental group ran an online campaign to the consultation (titled "better public transport, not more roads"). 479 responses were received and these were considered alongside all of the other responses received. The campaign responses were on the whole identical and contained an underlying narrative against future road building. The responses included statements of strong disagreement in response to consultation questions 4, 5, 12 and 16 and a statement that the review process for the draft NNNPS should be started afresh. The key themes in the responses included:

- the need for a radical rethink to transport policy which has a greater focus on investment in public transport and active travel networks.
- the negative impact of road building on air quality.
- the negative impact of road building on the natural environment.
- the need for greater consideration of alternatives within the draft NNNPS.