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Project

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NATIONAL NETWORKS NATIONAL POLICY STATEMENT

APPRAISAL OF SUSTAINABILITY POST ADOPTION STATEMENT



Bright ideas. Sustainable change.



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1. INTRODUCTION

1.1 National Networks National Policy Statement

The National Networks National Policy Statement (hereafter referred to as the NNNPS) sets out the need for the development of a “Nationally Significant Infrastructure Project” (NSIP) on national road and rail networks, and strategic rail freight interchanges (SRFIs). It provides guidance for decision-makers on the application of government policy when considering planning consent for these types of major infrastructure projects, as is required under the Planning Act 2008¹, and sets out planning guidance for these NSIPs and the basis for their examination by the Examining Authority and decisions by the Secretary of State (SoS).

The SoS for Transport identified the need for the 2015 NNNPS to be reviewed owing to the changes to transport planning policy and legislation since its publication in 2015. The final revised NNNPS once designated will remain in force unless withdrawn or suspended in whole or in part by the SoS. It will be subject to review by the SoS at least every 5 years, or earlier if necessary, to ensure that it remains appropriate.

The [final revised NNNPS](#), Appraisal of Sustainability ([AoS](#)) and Habitats Regulations Assessment ([HRA](#)) are available on the gov.uk website.

1.2 Appraisal of Sustainability (AoS)

The [Planning Act 2008](#) requires that an AoS is completed prior to an NPS being designated. The purpose of the assessment is to promote sustainable development through the following:

- Examine the likely social, economic and environmental effects of designating an NPS (and the reasonable alternatives to the NPS); and
- Set out measures to mitigate any significant negative effects identified (and enhancement measures for all effects).

Through completing these measures, the AoS can help to determine whether an NPS is appropriate given the reasonable alternatives identified.

In addition, Strategic Environmental Assessments (SEAs) are a requirement of the [Environmental Assessment of Plans and Programmes Regulations 2004](#) (SEA Regulations). [Central government guidance](#) has merged these processes (the application of AoS and SEA) to allow for a single joint assessment to be carried out in the form of an AoS.

The AoS for the revised NNNPS was undertaken at the same time as the drafting of the revised NNNPS, which ensured that findings from the assessment were considered and influenced the revised NNNPS, where practicable, prior to and following the public consultation stage.

1.3 Habitats Regulations Assessment

The Habitats and Species Regulations (2017, as amended) stipulates the need for a Habitat Regulations Assessment (HRA) to be conducted to evaluate the potential effects of a plan or project on conservation sites that are designated to be of European importance. The HRA for the revised NNNPS was undertaken in a separate report.

Effects identified in the AoS that are directly linked to the HRA have been reviewed to ensure consistency between the HRA and the AoS in relation to potential effects on designated sites.

1.4 Purpose of this Post Adoption Statement

Regulation 16 of the SEA Regulations requires that when a plan or programme is adopted, a statement summarising the following is to be made available:

- How environmental considerations have been integrated into the plan or programme;
- How the environmental report has been taken into account;
- How opinions expressed in response to consultation have been taken into account; and
- The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with.

A further requirement at regulations 16(4)(f) and 17 of the SEA Regulations is to make available the measures that are to be taken to monitor the significant environmental effects of the implementation of plans and programmes to enable early identification of adverse effects. This then allows for appropriate remedial measures to be implemented.

2. HOW SUSTAINABILITY (INCLUDING ENVIRONMENTAL) CONSIDERATIONS HAVE BEEN INTEGRATED INTO THE REVISED NNNPS

2.1 Introduction

DfT recognises that prioritising sustainability in the development of road, rail and SFRI networks presents opportunities for the prevention and/or minimisation of adverse environmental and health and wellbeing effects, both now and into the future. Therefore, the revised NNNPS details social, economic and environmental policies which have been designed to support sustainable development.

The following sub-sections outline the how sustainability considerations were embedded into the revised NNNPS through the scoping phase, engagement with stakeholders and through the drafting of the AoS.

2.2 Scoping

Article 12 of, and Schedule 2 to, the SEA Regulations require that assessments consider likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between those factors.

The AoS Scoping report acted as the foundation for the assessment. It was issued to the Statutory Bodies in March 2022.

In order to ensure that a complete baseline, containing all of the relevant aspects of the current environmental state were made, the AoS Scoping report captured the key policy and legislative drivers, objectives and targets, as well as the sustainability context of relevance to the revised NNNPS. Using this information, the key sustainability issues to be accounted for in the preparation of the revised NNNPS were identified.

An AoS framework was then established; this sets out a list of criteria that the NNNPS and reasonable alternatives were to be assessed against. This framework facilitated a consistent approach to the assessment, thus allowing for a clear comparison between alternatives. The following criteria formed the basis of the sustainability appraisal:

- AOS Criteria 1: Greenhouse Gas Emissions;
- AOS Criteria 2: Biodiversity and Geodiversity;
- AOS Criteria 3: Air Quality;
- AOS Criteria 4: Climate Change Resilience;
- AOS Criteria 5: Community Impacts and Accessibility;
- AOS Criteria 6: Heritage;

- AOS Criteria 7: Landscape and Townscape;
- AOS Criteria 8: Noise and Vibration;
- AOS Criteria 9: Critical Infrastructure and Security;
- AOS Criteria 10: Macro-Economic Impacts;
- AOS Criteria 11: Levelling Up;
- AOS Criteria 12: Circular Economy;
- AOS Criteria 13: Water Resources;
- AOS Criteria 14: Soil, Land, Minerals and Agriculture;
- AOS Criteria 15: User Experience; and
- AOS Criteria 16: Safety.

To allow for a systematic and robust approach to the assessment of the potential effects associated with each AoS criteria, a scoring system, with defined levels of significance was developed. This has been set out in Table 2.1.

Table 2.1: Appraisal of Sustainability Scoring Criteria

Effect	Description	Score
Significant positive	Major positive effect on relevant receptors and fully supports the achievement of sustainability targets and objectives relevant to national networks. For example, the effect: <ul style="list-style-type: none"> • Substantially accelerates an improving trend. • Substantially decelerates a declining trend. • Substantially supports delivery of a declared objective or target. 	++
Minor positive	Minor positive effect on relevant receptors and partly supports the achievement of sustainability targets and objectives relevant to national networks. For example, the effect: <ul style="list-style-type: none"> • Improves or accelerates an improving trend but in a marginal way. • Decelerates a declining trend but in a marginal way. 	+

	<ul style="list-style-type: none"> Supports delivery of a declared objective but in a marginal way. 	
Neutral	No change. Either no effects, or on balance (taking account of positive and negative effects) a neutral contribution.	0
Uncertain*	<p>The potential for an effect is unclear. This may be due to:</p> <ul style="list-style-type: none"> Lack of clarity of how the policy will be applied / affect the baseline; or Due to data gaps in the environmental / sustainability baseline (or both). <p><i>Please note that uncertain effects will be treated as significant negative effects and mitigation and monitoring recommended.</i></p>	?
Minor Negative effect	<p>Minor negative effect on relevant receptors and could conflict with the achievement of sustainability targets and objectives relevant to national networks. For example, the effect:</p> <ul style="list-style-type: none"> Decelerates an improving trend, but in a marginal way. Accelerates a declining trend, but in a marginal way. 	-
Significant negative effect	<p>Major negative effect on relevant receptors and actively works against the achievement of sustainability targets and objectives relevant to national networks. For example, the effect:</p> <ul style="list-style-type: none"> Substantially decelerates an improving trend. 	--

	<ul style="list-style-type: none"> • Substantially accelerates a declining trend. • Substantially detracts from delivery of a declared objective or target. 	
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2.3 AoS

The AoS was undertaken in parallel to the drafting of the revised NNNPS. The appraisal process was iterative, and the various versions of the assessment helped to shape the revised NNNPS, which in turn also informed the AoS. This approach helped to ensure that sustainability principles were considered during the development of the revised NNNPS. Any emerging issues identified through the appraisal were communicated to the team preparing the revised NNNPS, who then incorporated several recommendations during the drafting of the revised NNNPS.

2.4 Engagement with Stakeholders

Stakeholder consultation was fundamental to the appraisal process. It supplemented the considerations given to sustainability (including environmental) issues during the preparation of the AoS.

Engagement on the AoS occurred through a range of mechanisms, including a formal statutory consultation phase with Statutory Bodies.

The key stages involved in the AoS consultation process are summarised in Table 2.2.

Table 2.2: Summary of AoS Process and Key Consultation Stages

Engagement	Date	Purpose
Preparation of AoS Scoping Report	Published January 2023	To set the policy context and objectives to allow for the environmental baseline to be established and thus the scope of the assessment to be defined. The appraisal methodology was also outlined. This document was prepared in consultation with Statutory Bodies.
Consultation on AoS Scoping Report	March 2022	For consultees to provide comment on the review of key policy and legislative drivers, objectives and targets; the baseline data; the key sustainability

		issues; and the proposed methodology and framework for the appraisal.
Preparation of draft AoS Report (alongside preparation of consultation draft NNNPS)	Published March 2023	To appraise the potential impacts of the revised NNNPS, and its alternatives, and to make recommendations for future monitoring of potential effects scored as significant.
Public consultation on AoS Report (alongside consultation draft NNNPS)	March 2023 – June 2023	To determine whether the AoS covered all likely sustainability impacts, identified reasonable alternatives, sufficiently described impacts and cumulative impacts, identified suitable mitigation, and made suitable proposals for monitoring.
Preparation of final revised NNNPS	June 2023 – March 2024	To incorporate, where appropriate, consultation feedback and feedback from the Transport Select Committee. NNNPS amendments reviewed in relation to the AoS (see Section 5).
Laying of final revised NNNPS and designation	March 2024	Final version of the revised NNNPS laid before Parliament for Parliamentary consideration and debate. The House of Commons voted to approve the final revised NNNPS on 26 March 2024.
Issue of Post Adoption Statement	April 2024	Following consultation on the consultation draft NNNPS and AoS Report, this Post Adoption Statement sets out how the consultation and the appraisal have been taken into account in deciding whether the final revised NNNPS is to be designated.

In addition to these formal consultation stages, DfT undertook a range of engagement during the period of reviewing the NNNPS through workshops with external stakeholders and engagement with other key departments and key government agencies to discuss specific policy concerns.

3. HOW THE RECOMMENDATIONS OF THE AOS REPORT HAVE BEEN TAKEN INTO ACCOUNT IN THE REVISED NNNPS

The AoS has been undertaken alongside development of the revised NNNPS and has been an iterative process. Assessment work has included reviews of emerging drafts of the revised NNNPS against the AoS framework, with recommendations made to strengthen the revised NNNPS. Some key amendments made to the consultation draft NNNPS prior to consultation as a result of these reviews include the following:

- Stronger references to any future species or habitats targets which may be set in the future as part of the Environment Act process;
- A reframing of the biodiversity mitigation section to clarify the importance of enhancement in addition to mitigating harm and providing compensation;
- Strengthened requirements for air quality assessments ensuring that all schemes likely to have adverse effects on air quality are assessed, and a requirement for refusal of consent where the increase in air pollutant emissions resulting from the proposed scheme would significantly impact the government's ability to comply with a statutory limit or statutory air quality objective;
- Strengthened requirements for applicants to work with relevant authorities to avoid any breach of air quality limits or objectives;
- A stronger requirement in the section on impact on transport networks which requires applicants to provide evidence that new severance issues (relating to non-motorised users) have been addressed;
- The land use section been strengthened to require applicants to consider whether prior extraction of minerals would be appropriate; and
- A recognition that soils are important carbon sinks.

4. HOW OPINIONS EXPRESSED ON THE AOS DURING PUBLIC CONSULTATION HAVE BEEN TAKEN INTO ACCOUNT

The AoS scoping report defined the scope and level of detail of the assessment via the development of an AoS framework. The scoping report was subject to consultation in accordance with the SEA Regulations in March 2022. The scoping report was updated in line with consultee comments where appropriate and an updated version of the scoping report was published at the same time as the AoS report (as Appendix 2 of the AoS report). Amendments to the scoping report included adding additional text relating to specific sustainability topics and themes and additional references to specific policy documents.

Consultation on the consultation draft NNNPS was undertaken between 14 March 2023 and 6 June 2023.

Following review and consideration of the responses to this consultation and the outputs of the parliamentary scrutiny process, the government made changes to the revised NNNPS. A [government response to the public consultation](#) on the consultation draft NNNPS was published in March 2024, which identifies the comments received and the responses from DfT to the consultation on the consultation draft NNNPS and AoS.

Table 4.1 presents a high-level summary of the themes raised in comments received specifically on the AoS in the public consultation and a response to the themes raised.

Table 4.1: Responses to key themes arising from consultation comments on the AoS

Consultation Comments Theme	Response
Appropriateness of alternatives included in AoS	The development of the alternative scenarios was guided by DfT. The government is committed to a vision led approach to transport development, as opposed to investment solely to address forecasted 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. DfT considers that the alternatives presented in the revised NNNPS included in the AoS 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

	<p>infrastructure and scenarios need to be plausible. No road or rail building was not considered plausible within the English policy context.</p>
<p>Comments on AoS findings relating to greenhouse gas emissions from road users</p>	<p>There is uncertainty relating to the scale of investment in NSIPs on the road network under the revised NNNPS, relating to the rate of transition to low emissions vehicles and to management of demand.</p> <p>Therefore, it is considered that effects are uncertain. The AoS includes recommendations to monitor these effects.</p>
<p>Comments on AoS findings relating to biodiversity and geodiversity</p>	<p>The assessment acknowledges the potential adverse impacts on habitats, as is reflected in the minor negative impact. This reflects the measures put in place to manage such risks, as well as the legislations in place for environmental protection, which help to facilitate the minimisation and/or avoidance of negative impacts where practicable. As the revised NNNPS is not scheme specific, it is not possible to identify the specific nature of impacts, nor to identify the sites which will be impacted. This is a high-level assessment which represents a balance between the potential opportunities and risks that could occur as a result of road and rail schemes.</p>
<p>Comments on AoS findings relating to macro-economic impacts of road investment</p>	<p>Approval of investment in improvement schemes on the road network requires demonstrable value for money through business cases and is enforced through strict control processes. Economic analysis of Road Period 2 major enhancements, which includes NSIP schemes, undertaken at the beginning of Road Period 2, predicts an overall Benefit Cost Ratio of 2, and a ratio of 1.6 for new major enhancement schemes. Analysis indicates economic benefits resulting factors including journey time savings, agglomeration and reliability. Overall, it is considered that significant positive macro-economic effects could result.</p>
<p>Comments on AoS findings relating to operational effects on safety</p>	<p>The revised NNNPS places strong emphasis on safety. Some NSIPs may have safety as a key objective, but even if this is not the case, the revised NNNPS requires that the opportunity should be taken to improve safety. The revised NNNPS also requires applicants to show that all reasonable steps have been taken to minimise the risk of death and injury. It should also be noted that traffic volumes are not the sole driver of safety. Overall, it is considered that significant positive effects could result.</p>

5. CHANGES MADE TO THE NNNPS AND RESULTING IMPLICATIONS FOR THE AOS

As mentioned in Section 4.1.2, a range of responses were submitted during the March 2023 – June 2023 consultation period. All responses were considered and a number of changes were made to the consultation draft NNNPS in response to issues raised during the public consultation or by the Transport Select Committee, whose report into the consultation draft NNNPS was published on 20 October 2023. A review was undertaken of these changes to assess potential implications for the AoS, particularly in appraisal findings.

Following this review, the AoS concluded that the changes made to the revised NNNPS following consultation did not materially alter the results of the original AoS. As such, the results of the assessment of the final revised NNNPS presented within the updated version of the AoS remained unchanged from the original AoS that was subject to consultation alongside the consultation draft NNNPS.

6. REASONS FOR CHOOSING THE REVISED NNNPS AS ADOPTED IN THE LIGHT OF OTHER REASONABLE ALTERNATIVES

6.1 Introduction

The SEA Regulations require that reasonable alternatives to the policies outlined in the NNNPS be identified and assessed.

6.2 Process of Identifying Reasonable Alternatives

The process of identifying reasonable alternatives is complex, and the potential exists to identify a vast range of alternatives. However, an extensive number of nuanced alternatives, each with minor variations, do not best serve the planning or sustainability requirements. Planning practice has demonstrated that identifying a set of well-defined and meaningful alternatives, addressing points that the plan can significantly influence, is a more practical approach which allows for both a more logical decision-making process and supports a more sustainable plan outcome.

The development of the strategic policy alternatives was guided by DfT, who focussed on the key strategic choices that the government has in setting policy related to the development of national networks during their development.

Owing to the fact that the government is committed to a vision led approach to growth and adaptation of road and rail networks, which moves away from unconstrained traffic growth and towards tackling specific issues using investment, the alternative scenarios do not differ vastly. They instead provide subtle alternatives to the way in which issues are prioritised.

Details of what is included in the reasonable alternatives can be found in Appendix 1 of the AoS report.

6.3 Reasonable alternatives considered for the revised NNNPS

DfT has highlighted three reasonable alternative approaches to the development of the revised NNNPS. These are as follows:

- An approach which delivers balanced national priorities (as selected by DfT as the basis of the revised NNNPS);
- An approach which prioritises environmental sustainability benefits (Alternative 1); and
- An approach which prioritises wider economic and levelling up benefits (Alternative 2).

Preferred option for the revised NNNPS

The alternatives have been assessed in the AoS and HRA report. The revised NNNPS sets out the need for development of the national networks and alternatives have been assessed against the policy objectives of the revised NNNPS. Alternatives 1 and 2 were found to not fully achieve the objectives that must be addressed by the revised NNNPS, relative to the balanced approach to economic, environmental, and socioeconomic factors promoted by the revised NNNPS.

7. MONITORING

The SEA Regulations stipulate that the significant environmental impacts of plans and programmes should be monitored in order to identify any unforeseen effects, which then provides the opportunity to undertake appropriate remedial action.

In addition to this, monitoring for uncertain effects has been recommended.

Table 7.1: Proposed monitoring of significant and uncertain effects

Significant and uncertain effects identified	Proposed Monitoring	Responsibility for Data Collection	Proposed Frequency
Greenhouse Gas Emissions Uncertain effect on greenhouse gas emissions from construction and	Emissions associated with construction phases on individual NSIPs, and over the networks.	Applicants Collation by DfT at networks level	Five-yearly

maintenance activities (Road, Rail and SFRIs) –.			
Greenhouse Gas Emissions Uncertain effect on greenhouse gas emissions from road users due to investment in road infrastructure (Operation)	Emissions associated with operational phases on individual NSIPs, and over the network.	Applicants Collation by DfT at network level	Five-yearly
Greenhouse Gas Emissions Uncertain effect on greenhouse gas emissions from railways	Emissions associated with operational phases on individual NSIPs, and over the network.	Applicant Collation by DfT at network level	Five-yearly
Air Emissions Uncertain effect on direct emissions to air from railways	Emissions associated with operational phases on individual NSIPs.	Applicant Collation by DfT at network level	Five-yearly
Macro – Economic Impacts Significant positive effect on economic contribution of road investment	Macro level impacts of road investment delivered under the revised NNNPS.	Applicant Collation by DfT at network level	Five-yearly
Macro – Economic Impacts Significant positive effect on economic contribution of rail and SRFI investment	Macro level impacts of road investment delivered under the revised NNNPS.	Applicant Collation by DfT at network level	Five-yearly
User Experience Significant positive effect on improved user experience (including congestion) on the SRN and Rail Network (operation)	Monitoring of user experience/satisf action before and after implementation of NSIPs.	Applicant Collation by DfT at network level	Five-yearly

<p>Safety</p> <p>Significant positive effect on operational road, rail SRFI safety improvements delivered through new schemes upgrades. Effects on users, communities and transport operatives</p>	<p>Monitoring of safety before and after implementation of NSIPs.</p>	<p>Annual</p> <p>Collation by DfT at network level</p>	<p>Five-yearly</p>
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