



Department for Transport

Revised National Policy Statement for Ports

Appraisal of Sustainability - Post Adoption
Statement





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1 Introduction

This report forms the Post Adoption Statement (PAS) to accompany the final version of the Revised National Policy Statement for Ports. The report describes the way in which DfT has taken environmental considerations and the views of consultees into account in the adopted NPS for Ports and fulfils the plan and programme adoption requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 No. 1633).

1.1 Revised National Policy Statement (NPS) for Ports

- 1.1.1. The original National Policy Statement (NPS) for Ports was published in 2012. The Secretary of State (SoS) for Transport concluded that the policy should be reviewed to ensure it continues to support decision-making effectively. The revised NPS for Ports:
- Sets out the need for (and Government's policies to deliver) development of Nationally Significant Infrastructure Projects (NSIPs) in relation to ports; and
 - Provides planning guidance for promoters of NSIPs, and the basis for their examination by the Examining Authority and decisions by the Secretary of State.

1.2 Appraisal of Sustainability Report of the revised NPS for Ports

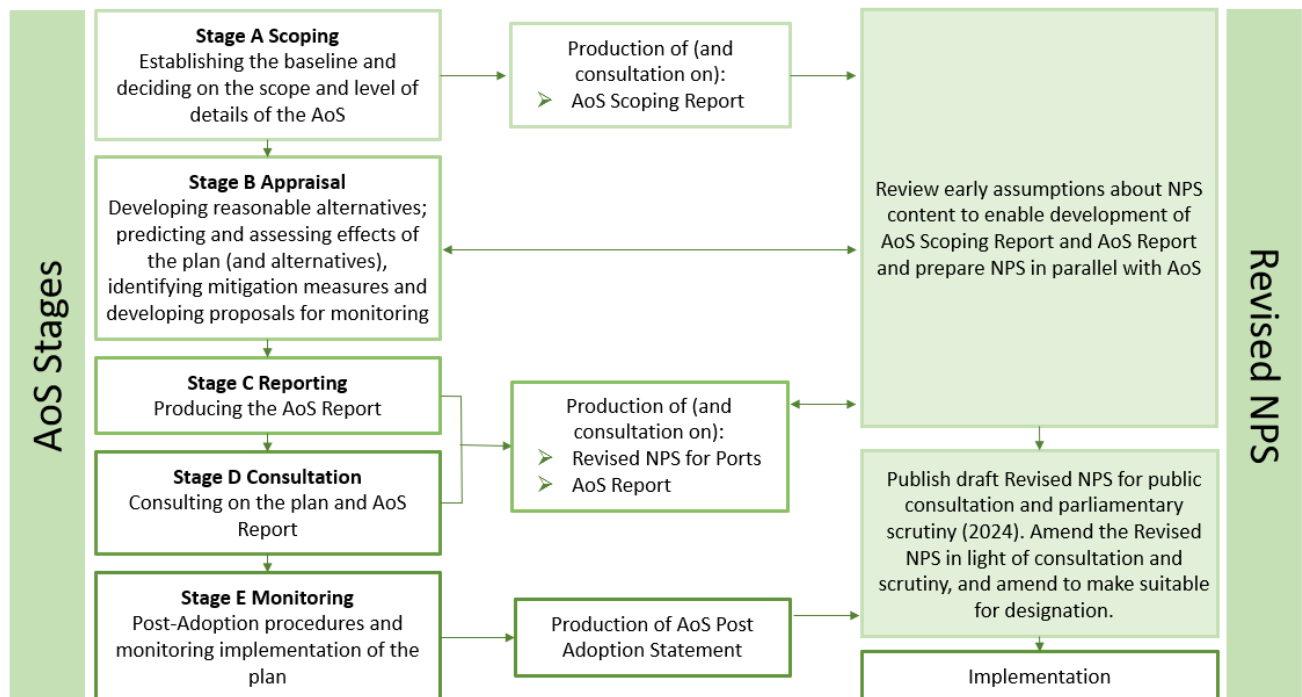
- 1.2.1. Before designating an NPS, Section 5(3) of the Planning Act 2008 requires that the SoS carry out an Appraisal of the Sustainability (AoS) of the policy set out in the statement. The AoS ensures that the likely environmental and socio-economic effects of the NPS are identified, described, and evaluated. In undertaking the AoS, it also satisfies the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004¹ (hereafter referred to as the 'Strategic Environmental Assessment (SEA) Regulations').
- 1.2.2. The SEA Regulations aim for a high level of environmental protection and to promote sustainable development. The SEA Regulations apply to certain plans that are likely to have significant effects on the environment. The draft Revised NPS for Ports is being treated as a plan for the purpose of the SEA Regulations.

¹ The Environmental Assessment of Plans and Programmes Regulations 2004 S.I. 2004 No. 1633 and The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 S.I. 2004 No. 1656, as amended by the Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 and the Environmental Assessment of Plans and Programmes and the Environmental Impact Assessment (Miscellaneous Amendments) (Wales) (EU Exit) Regulations 2019, respectively.

Stages of the AoS process

- 1.2.3. The main stages of AoS mirror those of SEA and are iterative, building on evidence and consultation responses over time to inform the development of the Revised NPS. **Figure 1-1** outlines the stages of the AoS and the associated reporting requirements.

Figure 1-1 - Stages of the AoS



- 1.2.4. A Scoping Report was completed and a consultation on the report took place between 23 January and 1 March 2024 with statutory environmental bodies in England (the Environment Agency, Historic England and Natural England) and Wales (Cadw and Natural Resources Wales) (**Stage A** highlighted above in **Figure 1-1**). The Scoping Report was also sent to the statutory bodies in Scotland (Scottish Environment Protection Agency, Scottish Natural Heritage and Historic Environment Scotland) for review and comment from 29 January and 04 March 2024. **Appendix B** contains a schedule of the consultation responses received and indicates how they have been taken into account and addressed within this AoS Report.
- 1.2.5. The appraisal framework (comprising AoS objectives and guide questions) in Chapter 4 of this report, has then been used to appraise the social, economic and environmental effects of the revised NPS, as well as the reasonable alternatives (**Stage B**). These appraisals (**Stage C**) are presented in the AoS Report which was available for public consultation (**Stage D**) alongside the draft revised NPS for Ports from 4 June 2025 until 29 July 2025. This report is the AoS Post Adoption Statement (**Stage E**) which sets out the results of the consultation and appraisal and the extent to which the views and AoS findings have been addressed in the designated revised NPS. It also sets out measures to monitor the significant and unforeseen effects of implementing the revised NPS.

1.3 Purpose of this Post Adoption Statement

- 1.3.1. Regulation 16 (4) of the SEA Regulations requires that when a plan or programme is adopted (in this case, the NPS for Ports), the consultation bodies, the public, and any EU Member States consulted on the Environmental Report be informed and the following specific information is made available:
- the plan or programme as adopted; and
 - a statement summarising:
 - how environmental considerations have been integrated into the Revised NPS for Ports;
 - how the AoS Report has been taken into account;
 - how opinions expressed in response to the consultation on the Revised NPS for Ports and the AoS Report have been taken into account;
 - the reasons for choosing the Revised NPS for Ports, as adopted, in the light of the other reasonable alternatives dealt with; and
 - the measures that are to be taken to monitor the significant environmental effects of the implementation of the Revised NPS for Ports.
- 1.3.2. The purpose of this PAS is to provide the specific information outlined under each of the points listed above and which is presented in the following sections of this statement.

2 How environmental and sustainability considerations have been integrated into the revised NPS for Ports

2.1 Environmental and sustainability considerations in the revised NPS for Ports

- 2.1.1. The DfT recognises that prioritising sustainability in the development of port infrastructure presents opportunities for the prevention and/ or minimisation of adverse environmental and health and wellbeing effects, both now and into the future. The revised NPS for Ports details to planning decision-makers, applicants and others the approach they should take to proposals, including the main issues which, in the Government's view, will need to be addressed to ensure that future development is fully sustainable and resilient. The revised NPS highlights that, *"ports are critical to the Government's economic growth mission due the UK's reliance on imports, but also have an important role in transitioning to a green economy, and making Britain a green energy superpower."*
- 2.1.2. The revised NPS comprises four chapters, as follows:
- **Chapter 1:** provides an introduction to the revised NPS, its role, duration and territorial extent. It also explains that an AoS process has been carried out alongside the development of the draft revised NPS.
 - **Chapter 2:** outlines the essential role of ports in the UK economy, Government policy for ports, the Government's assessment of the need for new infrastructure, and guidance to the decision-maker on assessing the need for additional capacity.
 - **Chapter 3:** outlines the key principles to which all decision-makers and applicants must give consideration. These are to be considered in addition to the generic impact guidance provided in chapter 4. The chapter is structured as follows:
 - Key considerations
 - Consideration of benefits and impacts;
 - Socio-economic impacts;
 - Commercial and competition impacts
 - General approach to environmental impacts and Environmental Impact Assessment;
 - Alternatives;
 - Biodiversity Net Gain
 - Criteria for good design for port infrastructure;
 - Climate change mitigation;
 - Climate change adaptation;
 - Health and nuisances; and
 - Security considerations.
 - **Chapter 4:** gives guidance on generic impact types often relevant to ports applications and/or associated development. Guidance is provided across the following topics:

- Biodiversity and geological conservation;
- International Sites;
- Sites of Special Scientific Interest (SSSIs);
- Marine Conservation Zones and Highly Protected Marine Areas;
- Regional and Local Sites;
- Irreplicable habitat including ancient woodland, ancient and veteran trees and woodlands;
- Protection of species;
- Habitats Regulations Assessment;
- Dredging;
- Pollution control and other environmental regulatory regimes;
- Flood risk;
- Coastal change;
- Traffic and transport impacts;
- Waste management;
- Water quality and resources;
- Air quality and emissions;
- Dust, odour, artificial light, smoke, steam and insect infestation;
- Noise and vibration;
- Landscape and visual impacts;
- Historic environment; and
- Land use including open space, green infrastructure and Green Belt.

2.1.3. The contents and topics outlined above clearly demonstrates that environmental and sustainability considerations have been integrated throughout the revised NPS.

2.2 Environmental and sustainability considerations in the AoS

2.2.1. Environmental and sustainability considerations were integrated into the preparation of the revised NPS throughout the AoS process.

Scoping

2.2.2. To provide the context for the AoS, and in compliance with the SEA Regulations, the relevant aspects of the current state of the environment and its evolution without the revised NPS were considered at the outset of the AoS process, along with the environmental and socio-economic characteristics likely to be significantly affected by the plan. This information was contained in the AoS Scoping Report and subsequently updated as part of the AoS Report. The key environmental, social, and economic issues identified and reflected in the assessment of the revised NPS for Ports are summarised in

2.2.3. **Table** 2-1 below.

Table 2-1 – Key issues and opportunities

AoS Topic	Key issues and opportunities
1. Biodiversity and Nature Conservation	■ There are numerous international and nationally designated sites spread across England and Wales and within 30km of the coast. ■ The construction and operation of port related infrastructure has the potential to give rise to a number of impacts that could have adverse effects on designated and non-designated habitats and species. ■ Ensure BNG or net benefit (for habitats and species) is designed into every scheme at the outset, taking into account how ecosystems are expected to change under climate change scenarios. ■ Effective reporting, maintenance and monitoring should be clearly established as part of each NSIP to ensure that biodiversity commitments will be fulfilled in their entirety as part of the aftercare period (i.e., minimum 30 years of mandatory BNG in England). ■ Delivery of wider environmental net gains relevant to the local area (by connecting to Local Nature Recovery Strategies) and those that support national priorities such as reductions in green-house gas emissions, reduced flood risk, improvements to air or water quality, or increased access to natural green and blue space. ■ Ports should contribute to the use of nature-based solutions and multi-functional green/ blue infrastructure, to deliver climate change adaptation, resilience and other environmental and social outcomes, such as encouraging greater active travel for employees. ■ Where ports intersect with or are adjacent to or otherwise likely to affect designated sites including those with significant geodiversity, protected habitats (including irreplaceable habitats) and species, there is a need to balance infrastructure needs with protection and enhancement of those sites. In addition, there is a need for effective protection measures to be in place for the soils that support these designated and protected sites. ■ There is also a need for sites that are not in favourable condition to be better managed and ensure the SSSIs management plans are taken forward. ■ The introduction and/ or increased of invasive and non-native species is a risk for port development. Protect, maintain and where possible enhance natural habitat networks and green infrastructure, to avoid fragmentation and isolation of networks. This includes the movement of fish within estuaries. ■ Protect and enhance endangered or important species and habitats, including those considered irreplaceable such as Ancient Woodland and Ancient and Veteran trees.

AoS Topic	Key issues and opportunities
2. Population and Human Health	■ Large inequalities exist in terms of accessibility to goods, services and community facilities. ■ Populations living very near expanding ports may increase as a result of new strategic employment opportunities at the port, and this expansion may outstrip local services including health facilities, leading to negative effects on people. ■ Where ports do not effectively serve a region of the country, net migration away from that region may occur. ■ Environmental effects from port development (e.g. emissions to air, noise and visual disturbance and impacts on the water environment) can reduce the quality of living environments of local communities. ■ Access to high quality green and blue spaces can deliver health benefits. ■ Improve access to nature, including protecting National Trails and the King Charles III England Coastal Path (KCIECP).
3. Economy and Skills	■ The qualifications of the working age population in 2021 for England and Wales are broadly similar. With England having a slightly higher percentage of the working age population with a NVQ4 or equivalent qualification and above. ■ Slow/ weak economic growth is expected to persist for a number of years. ■ The delivery of strategic port infrastructure will provide a boost to local and regional economies and provide new employment opportunities. ■ The central provisional freight forecasts provided by the DfT suggest increases by 2050 over a 2022 base of: • 21% in terms of total tonnage, from 445 million to 537 million tonnes; • 69% in unitised freight tonnage (Load-on/Load-off (Lo-Lo) and Roll-on/Roll-off (Ro-Ro)), from 156 million to 264 million tonnes; • 90% in unitised freight (Lo-Lo and Ro-Ro) traffic, from 17 million TEU to 33 million TEU (excluding transshipment); and • 34% in motor vehicles (accompanied and unaccompanied) traffic, from 2.6 million to 3.5 million vehicles.
4. Land Use, Geology and Soils	■ The setting of the UK's earth heritage features, including geological SSSIs should be protected and enhanced where possible. ■ Of UK land, 7% is currently classified as 'urban', and this coverage is increasing. Development pressure remains a constant factor in parts of the country, and it is not expected that previously developed land will be able to fully deliver the UK's future needs.

AoS Topic	Key issues and opportunities
	■ Coastal geodiversity and processes, including the management and maintenance of natural shoreline processes are a key issue for port development. ■ There is a need to protect, maintain and enhance geomorphological functions and services. ■ Some 1.6% of land in the UK is contaminated from industrial activity, although this is progressively being remediated as sites are redeveloped; however, this can be expensive. ■ There is currently increasing pressure on rural and agricultural land from developers as urban areas expand. Future infrastructure growth will put more pressure on protected land including important geological sites. ■ Soils in England and Wales continue to be degraded by human actions including intensive agriculture, historic levels of industrial pollution and development, making them vulnerable to erosion (by wind and water), compaction and loss of organic matter. Appropriate management and control of soils and sediments is key to their long-term sustainability. ■ As the climate (including temperature and rainfall patterns) changes in the future, it is likely that soils have the potential to be further degraded, due to increased seasonal aridity and wetness and variations in temperature. The effect of industry, agricultural practices, forestry and climate change upon soils, particularly carbon rich peat soils, is also a key issue. Key pollutants include chemicals, oil or waste. Organic waste, including sewage sludge, is one of the main sources of heavy metal contamination of soils from humans. ■ Healthy soils are more resilient, and contribute to natural flood management solutions, SUDS, climate change mitigation and adaptation [25YEP]. Therefore, soils need to be sustainable used and managed.
5. Water Resources	■ There is considerable pressure on water resources in many parts of England and Wales, which can in turn affect water quality leading to impacts on biodiversity and availability for sustainable supplies. ■ There is a legacy of groundwater pollution from historical mining and other industrial activities. ■ Climate change is expected to have significant impacts on the water environment. Areas where the underlying geology is generally impermeable are expected to be particularly affected as river flows would be likely to fall to low levels in drier periods and quickly react to rainfall episodes. There is also the potential for sea level rise and an increase of flood risk from all sources.

AoS Topic	Key issues and opportunities
	Climate change is also expected to lead to changes in water temperature and cause sedimentation. ■ Many waterbodies are subject to pressure from multiple sources including rural diffuse pollution, waste water discharges, acidification and urban diffuse pollution. ■ A significant portion of rivers and canals, and lakes, are yet to reach good or higher Water Environment Regulations classification. ■ Approximately a quarter of estuarine and coastal waterbodies are failing to meet good Water Environment Regulations status. ■ Over 50% of land in England is designated as a Nitrate Vulnerable Zone. ■ A higher number of designated bathing waters were classified as poor in England and Wales during the 2022 bathing season than previous years. ■ There is a need to encourage the efficient use of water throughout the life of development and this should be considered early in the design-stage. ■ A number of catchments have been designated as sensitive catchment areas for phosphorus and nitrogen under the Water industry Act 1991.
6. Air Quality	■ Poor air quality is generally associated with urban/ industrial areas and major road infrastructure. A relatively large number of AQMAs are located in in urban areas, many of which have been designated due to high NO₂ and PM₁₀ levels. ■ Domestic policy on transport-related air pollutant emissions to-date has largely focused on roads (particularly in relation to nitrogen dioxide concentrations); however, as long-term emissions from road transport begin to decrease, the relative contribution of other sources of air pollution, including the maritime sector, will increase.
7. Noise	■ Ambient noise levels are gradually rising as a result of a growing - and increasingly mobile - population. This, in turn, increases the value of tranquil places. The cumulative impacts of noise on sensitive groups in local communities may create or exacerbate existing health issues. ■ Road traffic is a dominant source of noise. ■ Noise from the construction and operation of ports infrastructure will need to be assessed and where possible reduced or mitigated through guidance in the draft Revised NPS. ■ Noise is difficult to measure on a national scale. ■ Dissatisfaction with noise levels is increasing as more people are adversely affected by noise.

AoS Topic	Key issues and opportunities
	■ Noise can have serious detrimental impacts on physical and mental health and wellbeing, as well as causing disruption to everyday life. ■ The number of noise complaints is increasing across both England and Wales. ■ Millions of people across England and Wales live with high levels of noise from road traffic and railways.
8. Climate Change (Mitigation and Adaptation)	■ The emission of greenhouse gases (GHGs) resulting from fossil fuel usage, agriculture and other land use has been linked with atmospheric warming and undesirable climate change. ■ Fossil fuel dependency remains high and is likely to remain so for some time. ■ Legally binding government targets seek to reduce emissions by 100% on 1990 levels by 2050, with an interim target of 68% by 2030. ■ Changes in temperature and rainfall patterns, along with more frequent extreme weather events will require adaptation actions that can lead to a greater degree of resilience and must be incorporated into plans and proposals. ■ The UK's Climate Projections (UKCP18) show that the UK as a whole is likely to experience hotter, drier summers, warmer, wetter winters and increased flood risk including and rising sea levels, particularly in the south east of England. This is likely to have a significant effect on a range of environmental conditions. ■ Sensitive ecosystems are likely to come under increasing pressure as a result of climate change. ■ Climate change will exacerbate flood risk and coastal change, which can cause major issues for ports infrastructure. ■ Flooding, changes in wind patterns, higher wind speeds, changes in wave height/frequency, more extreme storms and storm surges, extreme high/low flows, increased fog, proliferation of underwater plant growth can all have impacts on navigability. ■ Resilience of infrastructure that ports depend on, e.g. roads and railways that could flood or overheat. Planning for new port infrastructure should be aware of the interdependencies with wider infrastructure resilience. ■ Climate impacts disproportionately impact those experiencing deprivation and can exacerbate existing inequalities. Climate change mitigation and adaptation measures should be incorporated to enable a fair transition. ■ The carbon storage of existing sites, e.g. peat and woodland (mitigation). ■ Nature-based solutions to help adapt to changes in climate, including sea level rise.

AoS Topic	Key issues and opportunities
	■ Need to plan for worst case scenarios for sea level rise including the impacts on the natural environment.
9. Materials and Waste	■ The consumption of non-renewable sources will deplete overall stocks and result in a scarcity of resources for future generations. ■ Large scale port development may require both short-term (<i>i.e.</i> during construction) and long-term (<i>i.e.</i> during operation) use of materials that are non-renewable or are imported. In doing so, schemes may have an environmental impact that extends beyond the local area/ region. ■ Encourage a move towards a ‘circular economy’ in the ports industry, which involves maximising resources and resource efficiency, and minimising waste.
10. Traffic and Transport	■ All modes of transport have been affected by the Covid-19 pandemic, and although movement is increasing, levels of transport and travel generally remain below 2019 levels. ■ The development of port infrastructure has the potential to increase levels of terrestrial and marine transport. ■ HGV traffic in England is still suffering from the impacts of the recession, though has been increasing. ■ There are areas of the UK’s transport network which are stretched beyond their capacity at peak times. ■ There is a need for investment in transportation infrastructure to meet future demand and support economic growth. ■ There is a need to reduce the need to travel and facilitate a shift towards more sustainable modes of transport. ■ Port development will play an important role in enabling the decarbonisation of freight and shipping.
11. Cultural Heritage	■ There are numerous designated and non-designated heritage assets (terrestrial and marine) spread across England and Wales and within 30km of the coastline where port related development is likely to occur. ■ The significance and setting of designated and non-designated heritage assets are at risk from the delivery of new infrastructure. ■ Increase awareness of buried archaeology / unknown heritage – and recognition that some historic assets can be offshore. ■ Challenging economic conditions are reducing the funds available to conserve and manage heritage assets. ■ New port related development could provide an opportunity to restore and enhance access to designated and non-designated heritage assets. ■ The effects of climate change (<i>e.g.</i> storm events and extreme weather conditions, rising sea levels, shoreline change/coastal

AoS Topic	Key issues and opportunities
	erosion and ocean acidification) will increase in frequency and intensity, posing a threat to underwater and coastal heritage assets (e.g. protected wrecks).
12. Landscape, Townscape and Seascape	■ There are numerous nationally designated landscapes across England and Wales and within 30km of the coastline. ■ Port development and the intensification of any coastal developments as a result of development pressures can impact on coastal landscape and seascape. ■ Light pollution appears to have increased considerably in recent decades across much of the UK. The growth of urban areas, road networks and industrial areas are all major contributors to increased light levels. Light pollution can reach coastal waters from nearby urban areas, whilst areas further out to sea are affected by shipping and offshore industry and exploration as well as light from the land, scattered in the atmosphere and reflected back down. ■ The increasing effects of climate change (and effects arising from the increased frequency and intensity of storm and flood events, increasing sea levels (and associated increases in coastal erosion), increased likelihood of droughts and the anticipated increased in wildfires) can all significantly affect landscape, townscape and seascape. Human responses/prevention measures implemented to address the effects of climate change (e.g. increased flood/coastal defences) can also have impacts on the landscape/ seascape. ■ New energy and associated infrastructure (e.g. offshore wind) can have a negative impact on local landscape/ seascape.

2.2.4. A draft appraisal framework was developed to assess the environmental and sustainability effects of the revised NPS, and revised to reflect scoping consultation comments. The appraisal framework (AoS Framework) sets out a number of assessment objectives relating to the key issues identified in **Table 2-1**. For each assessment objective, guide questions were also provided. The AoS Framework shown in **Table 2-2** was used to assess the revised NPS.

Table 2-2 – AoS Framework

AoS Topic	AoS Objective	Guide Questions
1. Biodiversity and Nature Conservation	To protect, restore and enhance biodiversity (habitats, species and ecosystems) working within environmental capacities and limits to contribute to ecosystem resilience and habitat connectivity and deliver a net biodiversity/ environmental gain.	Will the revised NPS for Ports: ■ protect, restore and/or enhance internationally and nationally designated nature conservation sites e.g. SACs, SPAs, Ramsar sites, MCZs, SSSIs, HPMAs and NNRs or those of local importance e.g. LNRs? ■ affect habitats or species, including those that are non-designated as well as those that are protected? ■ affect the structure, function and resilience of ecosystems and the services they provide? ■ prioritise onsite delivery and provide opportunities to deliver biodiversity/ environmental net gain in England or net benefits in Wales? ■ help to deliver the outcomes legislated through the Environment Act 2021 and Environment (Wales) Act 2016? ■ prioritise the consideration of nature-based solutions and green-blue infrastructure in scheme design? ■ maintain the biodiversity mitigation hierarchy? ■ seek to minimise impacts of physical modifications?
2. Population and Human Health	To minimise disturbance to local communities, maximise positive social impacts and protect and enhance the health, safety and wellbeing of workers and communities.	Will the revised NPS for Ports: ■ affect the social infrastructure and amenities available to local communities? ■ affect local population demographics and/ or levels of deprivation in surrounding areas? ■ protect and/or enhance the health and safety of workers? ■ protect and/or enhance the health, safety and wellbeing of local communities and specific groups within those communities? ■ minimise the risk or consequences of a major accident? ■ help to deliver the outcomes legislated through the Environment Act 2021 and Environment (Wales) Act 2016?

AoS Topic	AoS Objective	Guide Questions
		■ affect access to the coast and the route of the King Charles III England Coastal Path (KCIIECP)? ■ help deliver green infrastructure and opportunities for access to nature? ■ ensure that port schemes deliver improved local environment and infrastructure to local communities affect by development?
3. Economy and Skills	To promote a strong, diverse, and stable economy with opportunities to improve education and skills, and employment.	Will the revised NPS for Ports: ■ support the economic growth of the port sector and wider sectors? ■ affect opportunities for investment in education and skills development? ■ affect the number and types of jobs available in local economies? ■ affect how diverse and robust local economies are? ■ help to deliver the outcomes legislated through the Environment Act 2021 and Environment (Wales) Act 2016?
4. Land Use, Geology and Soils	To conserve and enhance soil health and geology and contribute to the sustainable use of land.	Will the revised NPS for Ports: ■ have an effect on soil health/function, variety, extent, and/or compaction levels? ■ increase the risk of, or affect known and existing land contamination? ■ protect and/or enhance sites protected for their geology and features of wider geological interest? ■ affect land stability? ■ change patterns of land use including effects on best and most versatile agricultural land? ■ ensure the efficient use of land through use of previously developed land and/or reclaimed land? ■ help to deliver the outcomes legislated through the Environment Act 2021 and Environment (Wales) Act 2016? ■ protect Best and Most Versatile (BMV) land, protect peat and carbon store, manage the long-term value of soil?

AoS Topic	AoS Objective	Guide Questions
		■ impact on coastal processes and the effect this will have on coastal habitats, including consideration of coastal squeeze?
5. Water Resources	To protect, enhance and increase resilience of water quantity and quality.	Will the revised NPS for Ports: ■ encourage the efficient use of water? ■ protect and enhance the quality of surface, groundwater, estuarine and coastal water quality? ■ prevent the deterioration of Water Environment Regulations (WER) waterbodies? ■ ensure a new activity or new physical modification does not prevent the future achievement of good status for estuarine (transitional) and coastal waters? ■ help to deliver the outcomes legislated through the Environment Act 2021 and Environment (Wales) Act 2016? ■ support the achievement of WER objectives, including protected area objectives and mitigation measures in heavily modified waterbodies? ■ protect and enhance the resilience of water resources from the risk of flooding and drought? ■ seek to minimise or suitably mitigate the impacts of physical modification of estuaries and waterbodies as a result of port development? ■ avoid impacts on or help to improve protected sites/ catchments designated as sensitive catchments for phosphorus and nitrogen under the Water Industry Act 1991?
6. Air Quality	To minimise emissions of pollutant gases and particulates and enhance air quality.	Will the revised NPS for Ports: ■ affect air quality? ■ create a nuisance for people through, for example, dust or odours? ■ help to deliver the outcomes legislated through the Environment Act 2021 and Environment (Wales) Act 2016? ■ protect habitats from adverse air quality impacts including eutrophication, direct toxicity, acidification, and accumulation?

AoS Topic	AoS Objective	Guide Questions
7. Noise	To minimise noise pollution and the effects of vibration.	Will the revised NPS for Ports: ■ help to minimise noise and vibration effects from construction and operational activities on residential amenity and effects on sensitive locations and receptors? ■ help to deliver the outcomes legislated through the Environment Act 2021 and Environment (Wales) Act 2016?
8. Climate Change (Mitigation and Adaptation)	To minimise GHG emissions as a contribution to climate change and support the transition to a net zero economy, and ensure ports and associated places and infrastructure are resilient to the consequences of climate change, anticipating a range of future climate scenarios and impacts.	Will the revised NPS for Ports: ■ help to ensure a low carbon design solution to the construction and operation of ports to minimise GHG emissions? ■ embed adaptation to climate change in development projects to increase resilience to rising temperatures, more extreme weather events and sea level rise, wind, storm surges, coastal erosion, wave height/frequency? ■ help reduce flood risk and as a consequence, help to mitigate and adapt to climate change, thereby build resilience into development proposals? ■ help to deliver the outcomes legislated through the Environment Act 2021 and Environment (Wales) Act 2016? ■ contribute to ensuring climate mitigation and adaptation measures support a fair transition to a net zero economy and climate resilient places? ■ help deliver nature-based solutions and green infrastructure to allow adaptation to climate change? ■ consider carbon storage potential of existing sites including woodlands and peat, seagrass and saltmarsh and other coastal margin habitats?
9. Materials and Waste	To minimise waste arisings, promote reuse, recovery and recycling, minimise the impact of wastes on the environment and	Will the revised NPS for Ports: ■ maximise re-use and recycling of recovered components and materials? ■ help achieve government targets for minimising, recovering and recycling waste? ■ increase the burden on limited natural resources? ■ make best use of existing infrastructure and resources?

AoS Topic	AoS Objective	Guide Questions
	communities and contribute to the sustainable use of natural and material assets.	■ help to deliver the outcomes legislated through the Environment Act 2021 and Environment (Wales) Act 2016?
10. Traffic and Transport	To minimise the volume of traffic and promote more sustainable transport choices.	Will the revised NPS for Ports: ■ help to minimise traffic volumes? ■ help to improve road infrastructure to support the delivery of new port infrastructure? ■ encourage alternative means of transporting freight, waste and minerals? ■ encourage the provision of sufficient parking for HGVs? ■ help to deliver the outcomes legislated through the Environment Act 2021 and Environment (Wales) Act 2016?
11. Cultural Heritage	To conserve and where appropriate enhance the historic environment including cultural heritage resources, historic buildings and archaeological features and their settings.	Will the revised NPS for Ports: ■ avoid damage to, conserve or enhance internationally and nationally designated heritage assets (onshore and offshore) and their settings? ■ avoid damage to, conserve or enhance non-designated heritage (onshore and offshore) assets, archaeological remains and their settings? ■ conserve or enhance heritage assets and the wider historic environment including landscapes, townscapes, buildings, structures and archaeological remains? ■ affect the fabric and setting of historic buildings, places or spaces that contribute to local distinctiveness, character and appearances? ■ improve access to, and interpretation, understanding and appreciation of, the significance of heritage assets? ■ affect the heritage of communities? ■ help to deliver the outcomes legislated through the Environment Act 2021 and Environment (Wales) Act 2016?

AoS Topic	AoS Objective	Guide Questions
12. Landscape, Townscape and Seascape	To conserve, protect and enhance landscape, townscape and seascape quality and visual amenity.	Will the revised NPS for Ports: ■ have significant visual impacts (including those at night)? ■ avoid adverse effects to, and enhance where possible, designated landscapes and the settings of designated landscapes (including woodlands) such as National Parks or National Landscapes? ■ protect and enhance the intrinsic character of local landscapes, townscapes or seascapes? ■ help to deliver the outcomes legislated through the Environment Act 2021 and Environment (Wales) Act 2016?

- 2.2.5. In response to the AoS Report Natural England commented that they were content that the broad AoS topics identified are appropriate. However, they would welcome emphasis on connectivity of habitats and species, and opportunities to deliver enhancements at a landscape scale. Opportunities to support strategic solutions for mitigating/compensating impacts would also be welcomed. They also highlight that all ecosystems are likely to be under pressure as a result of climate change and that there is an increasing risk of tipping points as climate change accelerates, including for habitats and species populations.
- 2.2.6. NE noted that the AoS objectives are generally appropriate, but the sub-objectives could be refined to better reflect current policy instruments like the Environmental Improvement Plan (2025), drawing out specific relevant Environmental Regulation Targets could help provide further steer for monitoring opportunities. They encouraged further consideration of connectivity for habitats and species particularly at a landscape scale, which can support identification of additional areas for strengthening the revised NPS focusing on opportunities for ports to deliver environmental opportunities at a strategic landscape scale. No changes have been made at this stage, given the late stage in the AoS and plan-making process and that the proposed changes would not significantly change the nature and significance of effects identified in the AoS Report.

Assessment and report preparation

- 2.2.7. The draft revised NPS and any reasonable alternatives were appraised against the AoS Framework, to identify any likely significant effects arising from its implementation. Through the appraisal of the revised NPS, the cumulative effects of the plan as a whole (intra-plan) and in-combination with other plans and programmes (inter-plan) have been considered on a topic by topic basis.
- 2.2.8. The revised NPS was assessed based on the nature of the effect, the sensitivity of the receptor that could be affected, how long any effect might last and recommendations made for mitigation and/ or enhancement where necessary. Assessment matrices were used to record the assessment findings.
- 2.2.9. In addition, a HRA was carried out to inform both the AoS and the development of revised NPS.

3 How the findings of the AoS Report have been taken into account

3.1 Overview

- 3.1.1. The AoS was undertaken in a series of stages and was developed alongside the revised NPS for Ports in an iterative fashion, with environmental and wider sustainability considerations made in each stage. The AoS Framework of objectives and guide questions was a fundamental component of the AoS and was used as a mechanism to consistently test the environmental and wider sustainability performance of the revised NPS with all appropriate issues addressed. The AoS Framework was developed during the scoping stage and applied during the assessment of the NPS stage.
- 3.1.2. The AoS process (as documented in the AoS Report 2025) has informed the development of the NPS for Ports by identifying the baseline environmental conditions, assessing likely significant effects and reasonable alternatives, and outlining mitigation measures.
- 3.1.3. A monitoring framework setting out indicators and supporting targets was also developed. These indicators have been informed by the AoS and will help to assess the implementation of the NPS for Ports and identify significant environmental effects arising from implementation of the NPS.
- 3.1.4. **Table 3-1** below details key stages of the IIA and its relationship with the development of the NPS for Ports.

Table 3-1 – Key stages in the development of the AoS Report and its relationship with the NPS for Ports

AoS Stage	AoS outputs	Relationship with the revised NPS for Ports
Scoping	The AoS Scoping Report: - Identified other relevant plans, programmes and environmental protection objectives which could be affected by, or which could affect, the revised NPS; - Characterised the relevant aspects of the current state of the environment and its evolution without the revised NPS; - Identified key environmental and sustainability issues; and - Presented the AoS framework of objectives to address the key issues and appraise the revised NPS.	The information presented in the Scoping Report, including policy context, baseline information and key issues was available early in plan-making to inform the development of the revised NPS.

AoS Stage	AoS outputs	Relationship with the revised NPS for Ports
Appraisal and Reporting	The AoS Report presented: ■ Appraisal of the revised NPS and reasonable alternatives against the AoS framework of objectives. This included recommendations for areas where the policy could be strengthened or improved in order to enhance the overall sustainability of the policy; ■ Appraisal of the cumulative effects arising as a result of the revised NPS interacting with other plans, programmes and projects; ■ Outline reasons for the selection of the preferred approach in light of alternatives; and ■ Proposal for monitoring.	The AoS appraisal findings and recommendations were available to inform the development of the revised NPS. The AoS appraisal findings informed the selection of the preferred approach and rejection of the reasonable alternative. The consultation responses received on the AoS Report and the revised NPS informed the development of the final plan.
Post Adoption Statement	This Post Adoption Statement includes a monitoring framework which sets out monitoring measures to assess potential effects arising from the revised NPS (Section 6).	Monitoring measures have been informed by the AoS and will help to assess the implementation of the revised NPS and identify significant environmental effects arising from implementation of the NPS.

3.2 Key findings

- 3.2.1. As demonstrated in **Table 3-1** above, the AoS process and findings have been available to inform the development of the revised NPS for Ports. The key findings of the appraisal of the revised NPS and its reasonable alternative (a revised NPS that is more explicit in terms of the quantum of growth required to meet forecasted demand) are summarised in **Table 3-3**. The scoring system used in the appraisal and guidance on determining significant effects is presented in **Table 3-2**.

Table 3-2 - Key for the assessment of significance

Effect	Description	Score
Major Positive (Significant)	Effects on relevant receptors that fully support the achievement of sustainability targets and objectives relevant to ports. For example, the effect: - Substantially accelerates an improving/ positive trend. - Substantially decelerates a declining/ negative trend. Substantially supports the delivery of a government objective/ target/ outcome.	++
Minor Positive	Effects on relevant receptors that partly support the achievement of sustainability targets and objectives relevant to ports. For example, the effect: - Accelerates an improving/ positive trend, in a marginal way. - Decelerates a declining/ negative trend, in a marginal way. Supports the delivery of a government objective/ target/ outcome but in a marginal way.	+
Neutral	No effects or a neutral contribution.	0
Uncertain	The potential for an effect is unclear. This may be due to lack of clarity on how the policy will be applied, and/or data gaps in the baseline. Uncertain effects will be treated as significant effects (in order to present a precautionary approach).	?
Minor Negative	Effects on relevant receptors that could conflict with the achievement of sustainability targets and objectives relevant to ports. For example, the effect: - Decelerates an improving/ positive trend, but in a marginal way. - Accelerates a declining/ negative trend, but in a marginal way. Detracts from the delivery of government objective/ target/ outcome but in a marginal way.	-
Major Negative (Significant)	Effects on relevant receptors that actively works against the achievement of sustainability targets and objectives relevant to ports. For example, the effect: - Substantially decelerates an improving/ positive trend. - Substantially accelerates a declining/ negative trend. Substantially detracts from the delivery of a government objective/ target/ outcome.	--

Table 3-3 - Appraisal summary

AoS Topic and Objective	Likely Residual Significant Effect	
	revised NPS	Reasonable Alternative
Biodiversity and Nature Conservation To protect, restore and enhance biodiversity (habitats, species and ecosystems) working within environmental capacities and limits to contribute to ecosystem resilience and habitat connectivity and deliver a net biodiversity gain.	+	+
Population and Human Health To minimise disturbance to local communities, maximise positive social impacts and protect and enhance the health, safety and wellbeing of workers and communities.	0	0
Economy and Skills To promote a strong, diverse, and stable economy with opportunities to improve education and skills, and employment.	+	+
Land Use, Geology and Soils To conserve and enhance soil health and geology and contribute to the sustainable use of land.	0	0
Water Resources To protect, enhance and increase resilience of water quantity and quality.	+	+
Air Quality To minimise emissions of pollutant gases and particulates and enhance air quality.	0	0
Noise To minimise noise pollution and the effects of vibration.	+	+
Climate Change (Mitigation and Adaptation) To minimise GHG emissions as a contribution to climate change, support the transition to a net zero economy, and ensure ports and associated places and infrastructure are resilient to the consequences of climate change,	+	+

AoS Topic and Objective	Likely Residual Significant Effect	
	revised NPS	Reasonable Alternative
anticipating a range of future climate scenarios and impacts.		
Materials and Waste To minimise waste arisings, promote reuse, recovery and recycling, minimise the impact of wastes on the environment and communities and contribute to the sustainable use of natural and material assets.	+	+
Traffic and Transport To minimise the volume of traffic and promote more sustainable transport choices.	+	+
Cultural Heritage To conserve and where appropriate enhance the historic environment including cultural heritage resources, historic buildings and archaeological features and their settings.	+	+
Landscape, Townscape and Seascape To conserve, protect and enhance landscape, townscape and seascape quality and visual amenity.	+	+

- 3.2.2. The results of the appraisal generally found that both the revised NPS and its reasonable alternative contributed positively to the achievement of most of the objectives, but that in both cases, the contribution was only minor, and therefore not significant. In the case of three AoS Topics, for population and human health, air quality and land use, geology and soils, the contribution (for both the revised NPS and its reasonable alternative) was considered to be neutral. The appraisal also demonstrated that there were no differences in terms of the likely significant effects between the revised NPS and the reasonable alternative.
- 3.2.3. A number of recommendations were made through the AoS on how to further improve the positive effects of the draft revised NPS, or improve the neutral contributions into positive ones.
- 3.2.4. In determining the significance of effects of a plan or programme, the SEA Regulations require that consideration is given to the secondary, cumulative and synergistic nature of the effects. This includes cumulative effects as a result of interactions with other plans and programmes (inter-plan).

- 3.2.5. Further to the assessment of the revised NPS and its alternative, an appraisal of the interactions between the draft revised NPS and other plans, programmes and projects was also carried out.
- 3.2.6. The appraisal concluded that as the revised NPS does not set a requirement for the scale or location of growth to be delivered, it is not likely to have significant negative cumulative effects as a result of interactions with other plans, programmes and projects. It found that there is the potential for minor positive cumulative effects, as the revised NPS and other plans and programmes, guided by wider national policy and legislation, provide a positive framework for future development, that seeks to avoid and minimise/ mitigate impacts and deliver enhancements where possible.
- 3.2.7. In response to the AoS Report, Natural England commented that other plans that were not included in Table 5-2 in the AoS Report and could interact with the revised NPS include River Basin Management Plans, Landscape plans/ strategies, Site Management Plans, Air Quality Strategies and Local Nature Recovery Strategies. It is determined that the inclusion of these plans does not change the nature and significance of the inter-plan cumulative effects presented in Table 5-3 of the AoS Report.

4 How the opinions expressed in response to the consultation have been taken into account

4.1 Overview

- 4.1.1. Consultation has been an integral part of the AoS of revised NPS. In line with the SEA Regulations the following main stages of consultation have taken place:
- Consultation with the statutory SEA bodies on the scope of the AoS from 23 January to 1 March 2024; and
 - Formal public consultation on the AOS Report of the revised NPS for Ports from 4 June 2025 until 29 July 2025.
- 4.1.2. The development of the NPS for Ports has included the completion of the following:
- Early engagement with the public in January 2024;
 - Publication of the draft NPS for Ports and AOS Report for public consultation from 4 June 2025 until 29 July 2025;
 - Laying of a proposed Final NPS before Parliament on 6 July 2026;
 - Publication of a Final NPS for Ports.

4.2 AoS Consultation

AoS Scoping Consultation

- 4.2.1. Consultation on the Scoping Report took place between 23 January and 1 March 2024 with statutory environmental bodies in England (the Environment Agency, Historic England and Natural England) and Wales (Cadw and Natural Resources Wales). The Scoping Report was also sent to the statutory bodies in Scotland (Scottish Environment Protection Agency, Scottish Natural Heritage and Historic Environment Scotland) for review and comment from 29 January and 4 March 2024. The comments were taken into account and amendments made to the scoping information where necessary.
- 4.2.2. All responses and how they have been taken into account are presented in **Appendix B**.

AoS Report Public Consultation

- 4.2.3. The AoS Report was published for public consultation from 4 June 2025 until 29 July 2025, alongside the revised NPS for Ports and other technical documents. Any representations received on the AoS Report have been taken into account and are presented in **Appendix B**.

4.3 Consultation on the NPS for Ports

- 4.3.1. The draft revised NPS for Ports was published for public consultation 4 June 2025 until 29 July 2025, alongside the AoS Report and other technical documents. The response to the transport committee and to the consultation are presented in a separate document, which is



available for review and download here:

<https://assets.publishing.service.gov.uk/media/6a463efd045e1108aaa5e997/transport-committee-consultation-response-web-version.pdf>

5 The reasons for choosing the Revised NPS for Ports as adopted, in light of the reasonable alternatives assessed

5.1 Assessment of Reasonable Alternatives

- 5.1.1. The SEA Regulations require the identification and assessment of ‘reasonable alternatives’ to a plan. Extant guidance on the SEA process² discusses possible interpretations of handling ‘reasonable alternatives’ as required by Regulation 12 (2). It states that “*Only reasonable, realistic, and relevant alternatives need to be put forward. It is helpful if they are sufficiently distinct to enable meaningful comparisons to be made of the environmental implications of each*”. The assessment of reasonable alternatives does not need to include all possible alternatives, but only those that are realistic.
- 5.1.2. Following the application of the reasonableness test in compliance with Regulation 12 (2) of the SEA Regulations, one alternative to the revised NPS was identified as reasonable and taken forward for appraisal through the AoS process. This is an alternative NPS that is more explicit in terms of the quantum of growth required to meet forecasted demand.
- 5.1.3. The results of the appraisal generally found that both the draft revised NPS and its reasonable alternative contributed positively to the achievement of most of the objectives, but that in both cases, the contribution was only minor, and therefore not significant. In the case of three AoS Topics, for population and human health, air quality and land use, geology and soils, the contribution (for both the draft revised NPS and its reasonable alternative) was considered to be neutral. The appraisal also demonstrated that there were no differences in terms of the likely significant effects between the draft revised NPS and the reasonable alternative.

5.2 Outline reasons for selection of the preferred approach in light of the reasonable alternative

- 5.2.1. The inclusion of a specific quantum of growth to meet forecasted demands is not likely to result in any differences to the predicted nature and significance of the effect identified for the revised NPS. While identifying a specific quantum of growth could help the port industry to understand the scale of infrastructure needed to meet forecasted demands, it is unlikely to result in the delivery of more/ less infrastructure or influence the location of development than the revised NPS. The decision on the scale, location and timing of nationally significant port infrastructure will be made by the port industry on a case-by-case basis. It is

² ODMP (2005) *A Practical Guide to the Strategic Environmental Assessment Directive*. Available from https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf [Accessed October 2023].

assumed that as for the revised NPS, the alternative would still take account of the potential direct and indirect effects, including cumulative effects, of port infrastructure and associated development on the AoS Topics. The alternative would also set out the same Government policy, assessment principles and generic impact guidance as for the revised NPS. As a result, there are no significant differences between the revised NPS and its alternative in terms of the potential for likely significant effects (alone or cumulatively).

- 5.2.2. The preferred approach is for the revised NPS not to identify a quantum of growth that is required to meet forecast demand, which provides greater flexibility and resilience. The alternative approach would require the DfT to determine the scale of infrastructure needed to meet future demand based on the updated forecasting data. The challenges associated with this approach are that the forecasts provide a snapshot of predicted demand based on available evidence at that point in time, subject to substantial uncertainty, and the markets in cargo sub-sectors are difficult to predict. Providing for a fixed quantum of growth based on forecasts might not reflect the reality of market demands in the future. As a result, this approach would reduce the flexibility and resilience of the ports sector to respond to demand as it changes.

6 Measures that are to be taken to monitor the significant environmental effects

6.1 Monitoring the effects of the Revised NPS for Ports

6.1.1. The SEA Regulations require the significant environmental effects of plans and programmes to be monitored, in order to identify unforeseen negative effects. The monitoring should help to:

- Monitor the significant effects of the revised NPS;
- Track whether the revised NPS has had any unforeseen effects; and
- Ensure that action can be taken to reduce/ offset the significant effects of the revised NPS.

6.1.2. The aim of monitoring is to check whether the plan is having the significant effects that were predicted in the AoS (including cumulative effects), and to deal with any unforeseen problems. While no significant or uncertain effects have been identified at this stage, it is recognised that there is a requirement to monitor any potential unforeseen effects. As a result, **Table 6-1** below sets out some existing monitoring measures set out in the 25 Year Environment Plan that align with the AoS Topics. The monitoring below will help to demonstrate how wider environmental targets set out in the Environmental Targets (England) Regulations 2023 are being met.

Table 6-1 - Proposed monitoring measures

AoS Topic	Potential indicator(s)	Possible source(s) of information
Biodiversity and Nature Conservation	Relevant Outcome Indicators from the 25 Year Environment Plan: <i>Theme A – Air:</i> ■ A6: Exceedance of damaging levels of nutrient nitrogen deposition on ecosystems <i>Theme C – Seas and Estuaries:</i> ■ C3: Diverse seas: status of marine mammals and marine birds <i>Theme D - Wildlife:</i> ■ D1: Quantity, quality and connectivity of habitats; ■ D2: Extent and condition of protected sites - land, water and sea; ■ D3: Area of woodland in England; ■ D4: Relative abundance and/or distribution of widespread species;	25 Year Environment Plan

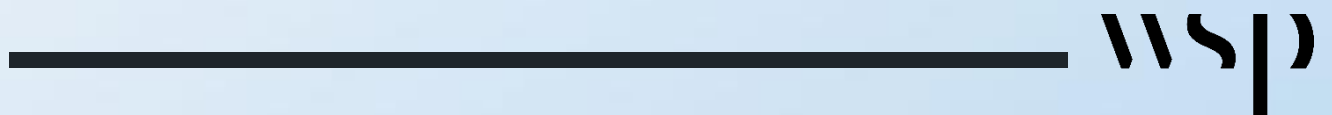
AoS Topic	Potential indicator(s)	Possible source(s) of information
	■ D5: Conservation status of our native species; ■ D6: Relative abundance and distribution of priority species in England; and ■ D7: Species supporting ecosystem functions.	
Population and Human Health	Relevant Outcome Indicators from the 25 Year Environment Plan: <i>Theme G – Natural Beauty and Engagement:</i> G7: Health and wellbeing benefits	25 Year Environment Plan
Economy and Skills	While there are no directly relevant indicators in the 25 Year Environment Plan, it is assumed that port statistics, including the sectors contribution to the UK economy, will continue to be monitored.	Office for National Statistics
Land Use, Geology and Soils	Relevant Outcome Indicators from the 25 Year Environment Plan: <i>Theme E – Natural Resources:</i> ■ E1: Area of productive agricultural land E7: Healthy soils	25 Year Environment Plan
Water Resources	Relevant Outcome Indicators from the 25 Year Environment Plan: <i>Theme B - Water:</i> ■ B1: Pollution loads entering waters ■ B2: Serious pollution incidents to water ■ B3: State of the water environment ■ B4: Condition of bathing waters ■ B5: Water bodies achieving sustainable abstraction criteria ■ B6: Natural functions of water and wetland ecosystems ■ B7: Health of freshwaters assessed through fish populations <i>Theme C – Seas and Estuaries:</i> ■ C7: Healthy seas: fish and shellfish populations ■ C11: Productive seas: status of sensitive fish and shellfish stocks <i>Theme E – Natural Resources:</i> E8: Efficient use of water	25 Year Environment Plan

AoS Topic	Potential indicator(s)	Possible source(s) of information
Air Quality	Relevant Outcome Indicators from the 25 Year Environment Plan: <i>Theme A - Air:</i> ■ A1: Emissions for five key air pollutants ■ A2: Emissions of greenhouse gases from natural resources ■ A3: Concentrations of fine particulate matter (PM_{2.5}) in the air ■ A4: Rural background concentrations of ozone (O₃) ■ A5: Roadside nitrogen dioxide (NO₂) concentrations ■ A6: Exceedance of damaging levels of nutrient nitrogen deposition on ecosystem ■ A7: Area of land exposed to damaging levels of ammonia (NH₃) in the atmosphere	25 Year Environment Plan
Noise	Relevant Outcome Indicators from the 25 Year Environment Plan: <i>Theme H – Biosecurity, Chemical and Noise:</i> H5: Exposure to transport noise	25 Year Environment Plan
Climate Change (Mitigation and Adaptation)	Relevant Outcome Indicators from the 25 Year Environment Plan: <i>Theme A - Air:</i> ■ A2: Emissions of greenhouse gases from natural resources <i>Theme F - Resilience:</i> ■ F1: Disruption or unwanted impacts from flooding or coastal erosion ■ F2: Communities resilient to flooding and coastal erosion F3: Disruption or unwanted impacts caused by drought	25 Year Environment Plan
Materials and Waste	Relevant Outcome Indicators from the 25 Year Environment Plan: <i>Theme C – Seas and Estuaries</i> ■ C1: Clean seas: marine litter <i>Theme J – Resource Use and Waste:</i>	25 Year Environment Plan

AoS Topic	Potential indicator(s)	Possible source(s) of information
	■ J1: Carbon footprint and consumer buying choices ■ J2: Raw material consumption ■ J3: Municipal waste recycling rates ■ J4: Residual waste arising by type and sector ■ J5: Prevent harmful chemicals from being recycled ■ J6: Waste Crime	
Traffic and Transport	Relevant Outcome Indicators from the 25 Year Environment Plan: <i>Theme A - Air:</i> ■ A1: Emissions for five key air pollutants ■ A3: Concentrations of fine particulate matter (PM_{2.5}) in the air ■ A5: Roadside nitrogen dioxide (NO₂) concentrations <i>Theme H – Biosecurity, Chemical and Noise:</i> H5: Exposure to transport noise	25 Year Environment Plan
Cultural Heritage	Relevant Outcome Indicators from the 25 Year Environment Plan: <i>Theme G – Natural Beauty and Engagement:</i> G2: Condition of heritage features including designated geological sites and scheduled monuments	25 Year Environment Plan
Landscape, Townscape and Seascape	Relevant Outcome Indicators from the 25 Year Environment Plan: <i>Theme G – Natural Beauty and Engagement:</i> ■ G1: Changes in landscape and waterscape character G3: Enhancement of green and blue infrastructure	25 Year Environment Plan

Appendix A

SEA Compliance



Appendix A – SEA Compliance

Table A-2 details the SEA Regulations' requirements of the Post Adoption Procedures and indicates where relevant information required can be found in this report.

Table A-2 – Compliance of this report with the requirements of the SEA Regulations

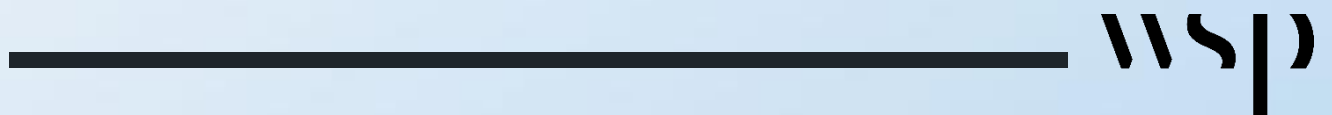
SEA Regulations Requirements	Location in the Post Adoption Statement (where appropriate)
Information as to adoption of plan or programme (SEA regulation 16) (1) As soon as reasonably practicable after the adoption of a plan or programme for which an environmental assessment has been carried out under these Regulations, the responsible authority shall - (a) make a copy of the plan or programme and its accompanying environmental report available at its principal office for inspection by the public at all reasonable times and free of charge; and (b) take such steps as it considers appropriate to bring to the attention of the public (i) the title of the plan or programme; and (ii) the date on which it was adopted.	A copy of the final NPS for Ports, the AoS Report and this Post Adoption Statement will be made available online.
(2) As soon as reasonably practicable after the adoption of a plan or programme – (a) the responsible authority shall inform— (i) the consultation bodies; (ii) the persons who, in relation to the plan or programme, were public consultees for the purposes of regulation 13; and (iii) where the responsible authority is not the Secretary of State, the Secretary of State; And (b) the Secretary of State shall inform the Member State with which consultations in relation to the matters referred to in paragraph 3. (3) The matters are – (a) that the plan or programme has been adopted;	A copy of the final NPS for Ports, the AoS Report and this Post Adoption Statement will be made available online. This Post Adoption Statement addresses 3(iii) and contains particulars specified in paragraph (4) as outlined below.

SEA Regulations Requirements	Location in the Post Adoption Statement (where appropriate)
(b) the date on which it was adopted; and (c) the address (which may include a website) at which a copy of— (i) the plan or programme, as adopted, (ii) its accompanying environmental report, and (iii) a statement containing the particulars specified in paragraph (4), may be viewed, or from which a copy may be obtained.	
(4) The particulars referred to in paragraphs (1)(b)(iii) and (3)(c)(iii) are – (a) how environmental considerations have been integrated into the plan or programme;	Section 2
(b) how the environmental report has been taken into account;	Section 3
(c) how opinions expressed in response to – (i) the invitation referred to in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), - have been taken into account;	Section 4
(d) how the results of any consultations entered into under regulation 14(4) have been taken into account;	Not applicable - no transboundary consultation with EU Member States took place.
(e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and	Section 5
(f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.	Section 6
Monitoring of implementation of plans and programmes (SEA regulation 17) Content	Monitoring measures are set out in Section 6 .

SEA Regulations Requirements	Location in the Post Adoption Statement (where appropriate)
(1) The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.	DfT will identify effects and undertake remedial action (as necessary) as the NPS for Ports is implemented.
(2) The responsible authority's monitoring arrangements may comprise or include arrangements established otherwise than for the express purpose of complying with paragraph (1).	The monitoring measures set out in Section 6 will complement existing monitoring arrangements where possible.

Appendix B

Schedule of Consultation Responses



Appendix B - Schedule of Consultation Responses

The Scoping Report was available for review and comment by environmental bodies in England (the Environment Agency, Historic England and Natural England) and Wales (Cadw and Natural Resources Wales) between 23 January and 1 March 2024. The Scoping Report was also sent to the statutory bodies in Scotland (Scottish Environment Protection Agency, Scottish Natural Heritage and Historic Environment Scotland) for review and comment from 29 January and 4 March 2024. **Table B-1** contains a schedule of the consultation responses received and indicates how they have been taken into account and addressed within the AoS Report.

The AoS Report was presented for public consultation alongside the draft revised NPS. **Table B-2** contains a schedule of the consultation responses received and indicates how they have been taken into account.



AoS Scoping Report consultation

Table B-1 - Comments received on the AoS Scoping Report and how they have been taken into account

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
Environment Agency (EA)				
EA1	Question 1 - key issues	The impacts and opportunities of physical modifications on estuaries and waterbodies from port development are significant and should be recognised as a key issue. The long term integrity of habitats and species are affected by modifications associated with port development, for example modifications to watercourses and coastal habitats impacting the ability of species to recolonise isolated reaches/areas, and the genetic viability of species at isolated sites.	Noted, this issue has been included as a guide question under the Water Resources topic in the AoS Framework.	See Chapter 4, Table 4-1.
EA2	Question 1 - key issues	There are national targets for habitats and species, including those established under the Environment Act 2021, and the role of ports NSIPs in helping to meet these targets should be reflected in the key issues and opportunities.	The Environment Act 2021 is referenced within the Policy Context sections also referenced within the AoS Framework.	N/A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
EA3	Question 1 - key issues	We welcome recognition of the importance of the use of nature-based solutions and green-blue infrastructure. Such measures will be critical to the role of ports in enabling measures that support climate adaptation and wider social outcomes, and therefore we advise the statement is strengthened to 'Ports should prioritise the use of nature-based solutions...'	Noted, the key issues for biodiversity and nature conservation have been updated to reflect this comment.	Appendix B, biodiversity and nature conservation under key issues and opportunities.
EA4	Question 1 - key issues	Blue spaces are an important element of networks of green-blue infrastructure, particularly in the context of coastal development like ports. We therefore suggest considering using the term 'green-blue infrastructure' rather than 'green infrastructure' throughout.	Noted, reference to green-blue infrastructure included within the AoS Framework.	See Chapter 4, Table 4-1.
EA5	Question 1 - key issues	The protection and enhancement of locally designated sites should be included as a key issue. In addition to nationally and internationally designated sites, there is an extensive network of locally designated sites (e.g. Local Wildlife Sites, County Wildlife Sites) which are recognised through national planning policy as being locally significant sites for biodiversity, and they are key sites for the development of Local Nature Recovery Strategies (LNRS) and Nature Recovery Networks (NRN).	Noted, key issues and opportunities have been updated to reflect this comment.	See Appendix A, biodiversity and nature conservation under key issues and opportunities.
EA6	Question 1 - key issues	We welcome reference to Local Nature Recovery Strategies when considering delivery of environmental net gains, and suggest reference is also made here to Green-Blue	Noted, reference to green-blue infrastructure	See Table 3-1, Table 4-1 and Appendix A.

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
		Infrastructure Strategies, along with stronger language to make clear that the key opportunity is that ports can be 'realizing' these plans rather than just 'connecting' with them. Considering the location of ports, reference should also be made to 'increased access to natural green and blue space'.	included within the AoS Framework and reference also made to increased access to natural and green and blue space.	
EA7	Question 1 - key issues	The mitigation hierarchy is a key issue for the NPS: impacts on biodiversity and nature should firstly be avoided, minimised, mitigated and as a last resort compensated. This applies in addition to BNG requirements	Noted, the mitigation hierarchy is now referred to in the AoS Framework.	See Chapter 4, Table 4-1.
EA8	Question 1 - key issues	We agree that biodiversity net gain (BNG) is a key issue, and there are additional references that could usefully build on what has been drafted: - Reference to prioritising the onsite delivery of BNG, in line with the Biodiversity Gain Hierarchy set out in Planning Practice Guidance - The inclusion of 'reporting' in addition to maintenance and monitoring	Noted, key issues and opportunities for biodiversity and nature conservation have been updated to reflect this comment.	See table 3-2 and Appendix A.
EA9	Question 1 - key issues	The risks of invasive non-native species in port environments and the importance of robust biosecurity considerations at the outset of port design and during	Noted, key issues and opportunities for biodiversity and	See table 3-2 and Appendix A.

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
		construction and operation should be recognised as a key issue.	nature conservation have been updated to reflect this comment.	
EA10	Question 1 - key issues	Environmental effects from port construction and ongoing operation can impact habitats and species, which needs reflecting as a key issue. Emissions to air and water, noise (including underwater noise), release of contaminants in sediments disturbed by dredging, etc.	Noted, the biodiversity and nature conservation objective in the AoS Framework seeks to protect, restore and enhance biodiversity.	N/A
EA11	Question 1 - key issues	Environmental conditions are a key determinant of health (see ' <u>The state of the environment: health, people and the environment</u> ', Environment Agency, 2020). Access to high quality natural green and blue spaces can deliver health benefits. This, and the need to protect and improve environmental conditions to safeguard and improve public health, including addressing health disparities, should be included in the final bullet referring to environmental effects.	Noted, key issues and opportunities for population and human health have been updated to reflect this comment.	See table 3-2 and Appendix A.
EA12	Question 1 - key issues	Biodiversity as a cross cutting theme should be recognised here as land use change and subsequent fragmentation of natural habitats are recognised as a threat to biodiversity on site, and to species ability to adapt to the changing climate	The cross-cutting nature of the land use, geology and soils topic with the	See Table 3-2.

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
		from the loss of habitat networks. This is relevant for all biodiversity and not just habitats and species on designated sites.	biodiversity and nature conservation topic is recognised in Table 3-2.	
EA13	Question 1 - key issues	Loss of soil through erosion is mentioned in the 7th bullet point, but the significant issue of the subsequent impacts on the receiving watercourses and habitats should also be considered.	The cross-cutting nature of the land use, geology and soils topic with the biodiversity and nature conservation and water resources topics are recognised in Table 3-2.	See Table 3-2.
EA14	Question 1 - key issues	The impact of changes in water temperature and sedimentation should be included in the bullets on climate change and pressures on waterbodies.	Noted, key issues and opportunities for water resources have been updated to reflect this comment.	See table 3-2 and Appendix A.
EA15	Question 1 - key issues	The 1 st bullet point regarding pressures on water resources should include reference to the impacts on biodiversity and availability for sustainable supplies.	Noted, key issues and opportunities for water resources have been updated	See table 3-2 and Appendix A.

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
			to reflect this comment.	
EA16	Question 1 - key issues	We strongly recommend that explicit reference is made to flood risk and coastal change as a key issue. Flood risk and coastal change are major risks to port infrastructure that will be exacerbated by climate change, but these are not specifically referred to as key issues.	Noted, key issues and opportunities for climate change have been updated to reflect this comment.	See table 3-2 and Appendix A.
EA17	Question 1 - key issues	The list of climate impacts is incomplete and should reflect a wider range of issues that ports will need to specifically plan for: • Rising average temperatures and more frequent/severe extreme heat events • Flooding, changes in wind patterns, higher wind speeds, changes in wave height/frequency, more extreme storms and storm surges, extreme high/low flows impacting navigability, potential for increased fog, proliferation of underwater plant growth impacting navigability, higher water temperatures. • Resilience of infrastructure that ports depend on, e.g. roads and railways that could flood or overheat. Planning for new port infrastructure should be aware	Noted, key issues and opportunities for climate have been updated to reflect this comment.	See table 3-2 and Appendix A.

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
		of the interdependencies with wider infrastructure resilience.		
EA18	Question 1 - key issues	These impacts have already been shown to be capable of significantly disrupting port operations, such as at the Port of Immingham during a tidal storm in 2013.	Noted, see response above.	N/A
EA19	Question 1 - key issues	Climate Change Reports by Harbour Authorities are key sources of evidence that should be digested and used in the baseline information: <u>Climate change adaptation reporting: third round reports - GOV.UK (www.gov.uk)</u>	Noted, these will inform and can be taken into account at the project level through individual proposals for development.	N/A
EA20	Question 1 - key issues	Climate impacts disproportionately impact those experiencing deprivation and can exacerbate existing inequalities. Ensuring climate change mitigation and adaptation measures enable a fair transition should be included as a key issue.	Noted, key issues and opportunities for climate change have been updated to reflect this comment.	See table 3-2 and Appendix A.
EA21	Question 1 - key issues	The move towards a circular economy should be reflected as a key issue.	Noted, key issues and opportunities for climate change have been updated	See table 3-2 and Appendix A.

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
			to reflect this comment.	
EA22	Question 1 - key issues	The final key issue listed recognises the importance of the shift to greener forms of transport. We suggest that specific reference is included to the role of port development in enabling the decarbonisation of freight and shipping. See decarbonising_ports-catalogue_of_innovative_solutions_f.pdf (europa.eu)	Noted, key issues and opportunities for traffic and transport have been updated to reflect this comment.	See table 3-2 and Appendix A.
EA23	Question 2 - baseline and policy context	The policy context should include reference to The British Standards Institution (BSI) document BS 42020:2013 - Biodiversity Code of practice for planning and development, which gives recommendations and provides guidance primarily for ensuring that actions and decisions taken at each stage of the planning process are informed by sufficient and appropriate ecological information.	The policy context has been updated to reflect this comment.	See Appendix A.
EA24	Question 2 - baseline and policy context	The policy context on Highly Protected Marine Areas should be updated to reflect the first ones were designated in 2023 (Highly Protected Marine Areas - GOV.UK (www.gov.uk)).	The policy context has been updated to reflect this comment.	See Appendix A.
EA25	Question 2 - baseline and policy context	The following regulations and plans provide important context that should be reflected in the policy context:	The policy context has been updated to reflect this comment.	See Appendix A.

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
		- The Environmental Targets (Biodiversity) (England) Regulations 2023, which establish statutory environmental targets to halt and reverse species decline and restore wildlife-rich habitats. <u>Great Britain Invasive Non-Native Species Strategy 2023-2030</u> (the report currently refers to the outdated 2015 version) <u>Chalk Stream Restoration Strategy (2021)</u> and its <u>Implementation Plan (2022)</u>, which includes a comprehensive, up-to-date analysis of the issues threatening chalk streams in England, of the ways in which ecological pressures are assessed and regulated. It includes multiple pragmatic recommendations to bring about the ecological recovery and good health of our chalk streams. <u>Green Infrastructure Framework</u>, which provides principles, standards, design guidance, case studies and mapping tools to support the planning and delivery of good green-blue infrastructure.		
EA26	Question 2 - baseline and policy context	The baseline information should include reference to the state of locally designated sites, such as Local Wildlife Sites (see <u>The Status of England's Local Wildlife Sites 2018</u> , The Wildlife Trusts). Any location-specific policies in the Ports NPS should be supported by more local information and	Noted. As stated in Chapter 3 of the Scoping Report, baseline information was considered at a	N/A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
		data such as that held in Local Nature Recovery Strategies and by local environmental records centres.	national level for England and Wales to reflect the scope and nature of the revised NPS.	
EA27	Question 2 - baseline and policy context	Ports are often located within estuaries that are important corridors for migratory fish. Port development can generate direct and indirect impacts on how fish are able to use these corridors. We advise that baseline information is included in the scoping report on this issue.	Noted, key issues and opportunities for biodiversity and nature conservation have been updated to reflect this comment.	See table 3-2 and Appendix A.
EA28	Question 2 - baseline and policy context	Relevant baseline information should be included from the English Indices of Deprivation (not just the Welsh indices of Multiple Deprivation), Office for National Statistics and Office for Health Improvement and Disparities to provide more specific context. The baseline currently provides national context but would be improved by providing more local context that identifies particular issues for port towns and cities. For example, the English Indices of Deprivation 2019 summary report indicates that there are concentrations of deprivation in urban, industrialised and coastal towns. Communities next to some of England's largest ports, such as in Liverpool, Southampton and London are amongst the most income deprived in the country.	Relevant baseline information is included from the English Indices of Deprivation. However, this has been updated to reflect this comment.	Appendix A, baseline information for population and human health

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
EA29	Question 2 - baseline and policy context	The baseline information could provide more context on environmental disparities. There are stark inequalities in environmental conditions across England's towns and cities. People in low-income neighbourhoods are often more likely to have a smaller share of environmental benefits, such as good quality green and blue infrastructure, and a larger share of environmental burdens, such as exposure to pollution, climate shocks and proximity to waste sites. People also experience environmental hazards in different ways, and some social groups are more vulnerable to their impacts. Without action these inequalities will be amplified by climate change.	Noted.	N/A
EA30	Question 2 - baseline and policy context	Physical Modification should be listed as a known key pressure affecting the water environment in England. As we have outlined in the <u>Physical Modification Pressure Narrative</u> , it is the most significant pressure affecting the status of England's waterbodies. Importantly, new port developments have the potential to increase the physical modification of coasts and estuaries, but may also present opportunities to deliver measures to remedy these pressures, for example through the use of nature-based solutions or as part of the delivery of biodiversity net gain obligations. <u>Estuary Edges</u> provides ecological design guidance for softening heavily modified estuary edges	Noted, physical modifications are referred to as a key issue and also referenced in the AoS Framework	See Table 3-2, Table 4-1 and Appendix A.

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
EA31	Question 2 - baseline and policy context	The description of policy context around Marine Plans is out of date. Marine Plans are now in place across all of England's coastline, and the Marine Management Organisation (MMO) has recently consulted on a draft Statement of Public Participation for a replacement East Marine Plan. It's likely other marine plans will be reviewed in the lifespan of the next National Policy Statement for Ports. It is worth referring to the duty in the Planning Act 2008 for the Secretary of State to have regard to the Marine Plans when determining Development Consent Orders. It would also be worth referring to the marine licensing regime, which may also apply to new port schemes and associated works. We advise seeking updated information on these matters from the MMO.	The policy context has been updated to reflect this comment.	See Appendix A.
EA32	Question 2 - baseline and policy context	The following regulations and plans provide important context that should be reflected in the policy context: • <u>Plan for Water: our integrated plan for delivering clean and plentiful water</u> (2023), which sets out a blueprint for how government will achieve its goal for clean and plentiful water. • <u>Meeting our future water needs: a national framework for water resources</u> (2020), which explores England's long term water needs, setting out the scale of action needed to ensure resilient supplies and an improved	The policy context has been updated to reflect this comment.	See Appendix A.

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
		water environment. A refresh of the framework is expected to be published in 2025. • <u>National Policy Statement for Water Resources Infrastructure</u> (2023) • Water Resources Management Plans and emerging regional water resources plans which are water company plans that set out their approach to managing water resources to meet long term demands, including non-household demand forecasting and efficiency (see https://www.gov.uk/government/publications/water-resources-planning-guideline)		
EA33	Question 2 - baseline and policy context	Baseline information is missing on shellfish protected areas, their status and economic importance.	The baseline information has been updated to reflect this comment.	See Appendix A.
EA34	Question 2 - baseline and policy context	Baseline information should be included about the use of, and emissions from, non-road mobile machinery (NRMM) and generators at ports. There are opportunities for reducing port-related non-shipping emissions for example by specifying a minimum emissions standard for NRMM, electrification of NRMM and electrification of generators.	Noted, the AoS Framework includes guide questions relating to the low carbon design in the construction and operation of port	N/A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
			development to minimise GHG emissions.	
EA35	Question 2 - baseline and policy context	There is a lack of recognition of the significance of coastal change alongside sea level rise and other impacts of climate change, and the particular vulnerability of ports to them. The scoping report identifies in generic terms the different impacts climate change will have on the UK, without recognising that some of these, particularly higher winds/storms – including storm surges (which are not mentioned at despite being a significant risk to ports), sea level change and increased coastal erosion, pose an especially high risk to ports. Climate change is expected to alter the physical form of many of our coasts and estuaries, as well as the processes which control their functioning. For example, elevated sea levels and the potential for increasingly frequent severe winter storms presents a heightened risk of erosion to many locations, whilst it is thought that sea level rise may also alter the tidal range of some estuaries (e.g. Haigh et al., 2019). Such changes to the physical form and functioning of coasts and estuaries have potentially significant implications for the movement of water, sediment and biota, and human activities including navigation and shipping.	Noted, the key issues have been updated to reflect this comment.	See Table 3-2, Table 4-1 and Appendix A.

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
EA36	Question 2 - baseline and policy context	Shoreline Management Plans (SMP) are a key part of the policy context on coastal flood risk and erosion currently missing from the Climate Change section of Appendix A. SMPs set out a planned approach to managing flood and coastal erosion risk around the entire coast of England throughout this century. There are therefore important planning documents when considering new and expanded port infrastructure. The <u>Shoreline Management Plan Explorer</u> is a digital tool that makes SMPs more accessible. National Coastal Erosion Risk Mapping data is being updated and expected to be available on SMP Explorer later in 2024.	The policy context has been updated to include Shoreline Management Plans.	See Appendix A.
EA37	Question 2 - baseline and policy context	The <u>Third National Adaptation Programme (NAP3)</u> has been published, so this should be referred to instead of NAP2.	References to NAP2 have been updated to reflect NAP3.	See Appendix A.
EA38	Question 2 - baseline and policy context	‘Areas of Outstanding Natural Beauty’ are now called ‘National Landscapes’ (see <u>Implementing the Landscapes Review: summary of responses</u> - GOV.UK (www.gov.uk)).	References to AONBs have been amended to ‘National Landscapes’.	See Appendix A.

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
EA39	Question 3 - AoS Framework	Specifying a minimum 10% biodiversity net gain in the guide question referring to BNG delivery would help align the AoS framework with the level of ambition established by the Environment Act 2021. This would be a useful benchmark for the AoS, ahead of a relevant Biodiversity Gain Statement being published.	The AoS Framework has been updated to reflect this comment.	See Table 4-2.
EA40	Question 3 - AoS Framework	The reference to outcomes envisaged through the Environment Act should be edited to refer to those legislated through the Act, to reflect that statutory environmental targets have now been set out in regulations.	The AoS Framework has been updated to reflect this comment.	See Table 4-2.
EA41	Question 3 - AoS Framework	A guide question should be included to test whether the NPS prioritises consideration of nature based solutions and green-blue infrastructure in scheme design.	The AoS Framework has been updated to reflect this comment.	See Table 4-1
EA42	Question 3 - AoS Framework	A guide question should be included to test whether the NPS will maintain the biodiversity mitigation hierarchy – which requires development to firstly seek to avoid impacts on habitats and species.	The AoS Framework has been updated to reflect this comment.	See Table 4-1

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
EA43	Question 3 - AoS Framework	A guide question should be included to test whether the NPS will ensure port schemes deliver improved local environment and infrastructure to those communities impacted by develop for local communities, including improved recreational access to high quality blue spaces.	The AoS Framework has been updated to reflect this comment.	See Table 4-1
EA44	Question 3 - AoS Framework	References to 'WFD' or 'WFD regulations' should be replaced by references to the 'Water Environment Regulations', to reflect that the UK has left the EU.	Noted, reference to WFD or WFD Regulations updated to 'Water Environment Regulations'	See Appendix A
EA45	Question 3 - AoS Framework	The guide question referring to contributing to achieving Water Environment Regulations Protected Areas objectives should be edited to 'Will the revised NPS for Ports support the achievement of Water Environment regulations objectives, including protected area objectives and mitigation measures in heavily modified waterbodies?' . This would reflect that port developments have a wider contribution to make to helping get to Good Status, not just for protected areas.	The AoS Framework has been updated to reflect this comment.	See Table 4-1
EA46	Question 3 - AoS Framework	A guide question should be included to refer to sustainable water supplies: 'Will the revised NPS for Ports protect and enhance the quantity of surface and groundwater?'	Noted, this is already included within an existing guide question.	N/A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
EA47	Question 3 - AoS Framework	The baseline information provided on climate change identifies the important legal and economic context of the UK moving towards a net zero economy. The AoS objective for climate change should reflect the role of ports in enabling this, as well as the need for adaptation to take into account the uncertainty around future climate impacts. We suggest the following amendments to the objective: • To minimise GHG emissions as a contribution to climate change and support the transition to a net zero economy, and ensure ports and associated places and infrastructure are resilient to the consequences of climate change, anticipating a range of future climate scenarios and impacts. • A guide question should be included to test whether the NPS will contribute to ensuring climate mitigation and adaptation measures support a fair transition to a net zero economy and climate resilient places. This is particularly important considering the socioeconomic context of many port towns and cities.	The objective and guide questions for Climate Change in the AoS Framework have been updated accordingly.	See Table 4-1
EA48	Question 3 - AoS Framework	The guide question on climate adaptation would provide a more complete way of testing the draft NPS against the AoS objective if it referred to 'promote climate change adaptation to the full range of climate impacts that will affect ports,	The AoS Framework has been updated to	See Table 4-1

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
		taking into account a range of climate scenarios (including rising average temperatures, more extreme weather events, sea level rise, wind, storm surges, coastal erosion, wave height/frequency, etc).	reflect this comment.	
EA49	Question 3 - AoS Framework	Two of guide questions on climate resilience appear to be effectively the same, and could possibly be combined: ‘increase resilience to the effects of climate change?’ and ‘promote climate change adaptation?’	The guide questions have been combined as suggested.	See Table 4-1
Historic England (HE)				
HE1	General comment	Further to the email and the attached NPS for Ports AoS Scoping Consultation document, received on 23rd January 2024, from Alastair Peattie (Technical Director, Assessment and Appraisal, WSP), we hereby offer the following response. As you might be aware, the Historic Buildings and Monuments Commission for England (HBMCE), known as Historic England, is the Government’s adviser on all aspects of the historic environment in England including historic buildings and areas, archaeology and historic landscape with a duty to promote public understanding and enjoyment. Historic England is an executive Non-Departmental Public body sponsored by the Department for Digital, Culture,	Noted	N/A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
		Media and Sport and we answer to Parliament through the Secretary of State for Digital, Culture, Media and Sport. Historic England's general powers under section 33 of the National Heritage Act 1983 were extended (via the National Heritage Act 2002) to modify our functions to include securing the preservation of monuments in, on, or under the seabed within the seaward limits of the UK Territorial Sea adjacent to England. We also provide our advice in reference to National Policy Statements and the objectives and policies of published Marine Plans for the English Inshore and Offshore areas, as defined by the Marine and Coastal Access Act 2009.		
HE2	Question 1 - key issues	We agree with the key issues identified and the inclusion of the historic environment i.e. Cultural Heritage, including architectural and archaeological heritage (as included in Tables 3-1 and 3-2). We also take this opportunity to highlight inclusion of the risk that port development projects could encounter presently unknown elements of the historic environment which could be of significant archaeological interest vis. heritage assets as defined by national policy.	Noted.	N/A
HE3	Question 2 - baseline and policy context	Sufficient information has been provided in this scoping report. However, we note the attention given to the UK Government 25 Year Environment Improvement Plan and indicator G2 (Natural Beauty, Heritage & Engagement):	Noted.	N/A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
		“Condition of heritage features including designated geological sites and scheduled monuments”. We therefore highlight the attention given to other elements of the historic environment in Table 4-1 (11. Cultural heritage), which includes consideration of non-designated heritage assets and historic buildings, places or spaces that contribute to local distinctiveness, character and appearances. Any subsequent AoS Report will need to give equal attention to these aspects in addition to the specific attention stated by Indicator G2 and nationally designated sites, places and areas.		
HE4	Question 3 - AoS Framework	We do not specifically identify objectives for amendment, but we recommend that referral, as relevant, is made to how the onshore and offshore historic environment is included within the energy related National Policy Statements (e.g. EN-1 and EN-3), published in November 2023, to support a consistent approach to consideration of the historic environment.	Noted.	N/A
Natural England				
NE 1	Question 3 - AoS Framework	Regarding the AoS, we have been taking soundings with colleagues dealing with the EIA reforms in Natural England and consider that the methodology used is perhaps a little too pre-emptive of the change of approach which has yet to be set out. We consider this unhelpful as there is a danger	Noted, we have removed the list of outcome indicators in the AoS Framework but	See Table 4-1

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
		of guessing the future when the targets are not fully known, and there are gaps so they are not as complete as the current approach. There is then a danger of challenge or creating further confusion. The issues around how they relate across topics and cumulative impacts are yet to be fully described. Other NPSs in development such as the EN-7 new nuclear NPS HYPERLINK "https://www.gov.uk/government/consultations/approach-to-siting-new-nuclear-power-stations-beyond-2025" Approach to siting new nuclear power stations beyond 2025 - GOV.UK (www.gov.uk) take a more comprehensive standard approach in line with the current system and is worth looking at – we are currently commenting on that one. It should be noted that there will be a transition period too and it is going to be some time before the new approach is adopted. So, the references in the Themes below are just not comprehensive enough and don't reflect the cross-cutting nature of the indicators. Just one example added in the water resources section	retained reference to helping deliver the outcomes envisaged through the Environment Act and the 25 Year Environment Plan.	
NE2	Question 3 - AoS Framework	HPMAs missing in in the guide questions for biodiversity and nature conservation.	The AoS Framework has been updated to	See Table 4-1

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
			reflect this comment.	
NE3	Question 3 - AoS Framework	- The topic title varies from one NPS to the next. - The AoS objective should be updated form 'To conserve and enhance soil and geology and contribute to the sustainable use of land.' to 'To conserve and enhance soil health and geology and contribute to the sustainable use of land.' - Guide questions – update 'soil quality' to 'soil health'. - The 25YEP recognise the synergies and dependencies on soil health such as use of natural flood management solutions, SUDS, climate change mitigation and adaptation. Similarly, the 25YEP aim that development is in the right places, avoiding our best agricultural land and in embedding the 'environmental net gain' principle reflects a natural capital approach in spatial planning which aims to minimise the impact of development on finite land and soil resources.	Noted, the AoS Framework has been updated to reflect this comment.	See Table 4-1
NE4	Question 3 - AoS Framework	Misses all the issues around impacts on protected sites and also that there are designated sensitive catchment areas dues to nutrient issues. https://www.gov.uk/government/publications/notice-of-designation-of-sensitive-catchment-areas-2024/notice-of-designation-of-sensitive-catchment-areas-2024	Noted, AoS framework has been updated to reflect this comment.	Table 4-1

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
NE5	Question 1 - key issues	As these would be coastal developments this section is light on impacts and issues that are specific to a coastal location. This includes impacts on habitats and species directly, coastal squeeze in conjunction with climate change effects, as well as coastal access.	Noted, the key issues have been updated to reflect this.	See Table 3-2 and Appendix A
NE6	Question 3 - AoS Framework	Multiple overlapping protected sites and also doesn't highlight the constrained nature of estuarine locations	Noted.	N/A
NE7	Question 1 - key issues	Should there be more emphasis here on protected species as well as habitats - as species are not well captured by BNG	Noted, key issues have been updated to reflect this comment.	See Table 3-2 and Appendix A
NE8	Question 1 - key issues	An issue to consider is the combined impact on biodiversity from development and climate change. This will be a particularly relevant on coastal locations where coastal squeeze is an issue	Noted	N/A
NE9	Question 1 - key issues	Strengthen the wording to 'contribute' and/or 'deliver' multi-functional GI and NBS. Given the landscape scale of these projects similarly ambitious mitigation / enhancement should be used.	Noted, key issues have been updated to reflect this comment.	See Table 3-2 and Appendix A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
NE10	Question 1 - key issues	Add and resilience to the key issue relating to delivery of NBS and climate change adaptation.	Noted, key issues have been updated to reflect this comment.	See Table 3-2 and Appendix A
NE11	Question 1 - key issues	This is more of a policy ambition? Shouldn't the approach here to be setting opportunities for protection or maximising benefits for biodiversity - rather than setting the need for 'balance' from the outset of NPS prep?	Noted, ultimately this will be for the decision-maker to decide based on the revised NPS and wider evidence and policy.	N/A
NE12	Question 1 - key issues	Wording to highlight general principle of impacts on protected habs/species from construction and operation of ports needed	Noted, key issues have been updated to reflect this comment.	See Table 3-2 and Appendix A
NE13	Question 1 - key issues	Possible additional considerations: * Protect, maintain and where possible enhance natural habitat networks and green infrastructure, to avoid fragmentation and isolation of networks; * Protect and enhance endangered or important species and habitats, including those considered irreplaceable such as Ancient Woodland and Ancient and Veteran trees;	Noted, updates have been made to the key issues.	See Table 3-2 and Appendix A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
		• Contribute to the delivery of biodiversity strategies and plans inc 30 by 30 • Contribute to the achievement of Environment Net Gain		
NE14	Question 1 - key issues	Additional point should bring in access to nature, including protecting National Trails and the King Charles III England Coastal Path	Noted, updates have been made to the key issues.	See Table 3-2 and Appendix A
NE15	Question 1 - key issues	Should also reference the ambition for Green in 15 -see https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx https://www.gov.uk/government/news/natural-england-unveils-new-green-infrastructure-framework	Noted	N/A
NE16	Question 1 - key issues	Pg 31 'it is not expected that previously developed land will be able to fully deliver the UK's future needs'. Has a land use assessment [been] undertaken to confirm this? As per other NPSs, the Ports NPS should promote development on Brownfield site, away from agricultural land (particularly BMV). Pg 31 'much of the land in the UK is low grade, rendering it unusable for farming' This statement is incorrect. The total utilised agricultural area in England accounts for 68% of the total England area.	A land use assessment has not been undertaken to confirm this. The AoS Framework includes a guide question relating to the efficient use of land. Key issue relating to low grade agricultural land has been deleted.	See Table 3-2 and Appendix A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
		Agricultural land use in England at 1 June 2023 - GOV.UK (www.gov.uk) Within England 42.2% of agricultural land is estimated to be 'best and most versatile land' (ALC Grades 1-3a) (Estimates based on soil and site data obtained from the National Soil Inventory which describes soil characteristics at 5 km intervals across England and Wales. (see Revised Statistics for the Proportions of ALC Grades. Unpublished work for MAFF undertaken by ADAS under the 1993/4 MOU) The ALC grades are: Grade 1 - excellent quality agricultural land; Grade 2 - very good quality agricultural land; Grade 3 - good to moderate quality agricultural land (Sub-grade 3a - good quality agricultural land and Sub-grade 3b - moderate quality agricultural land); Grade 4 - poor quality agricultural land; and Grade 5 - very poor quality agricultural land		
NE17	Question 1 - key issues	Soils and geology could be separate topics to enable each to be dealt with more fully.	Noted	N/A
NE18	Question 1 - key issues	Does this reference BMV? Also, lower grade soils can be used for agriculture.	Key issue now deleted as per response above.	See Table 3-2 and Appendix A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
NE19	Question 1 - key issues	Pg32. Future infrastructure growth will also put more pressure on agricultural land, including our best and most versatile (BMV) agricultural land. soil is a non-renewable resource and is also vulnerable to sealing. Soil sealing reduces the area of land able to water to infiltrate. This links back to the statement in the 25YEP highlighting the need to recognise the synergies and dependencies on soil health such as use of natural flood management solutions, SUDS, climate change mitigation and adaptation [25YEP]. Similarly, the 25YEP aim that development is in the right places, avoiding our best agricultural land and in embedding the 'environmental net gain' principle reflects a natural capital approach in spatial planning which aims to minimise the impact of development on finite land and soil resources. The sustainable management and use of soils and sediments	Noted, key issues updated to reflect this comment.	See Table 3-2 and Appendix A
NE20	Question 1 - key issues	Are micro-plastics also considered?	Not at this stage.	N/A
NE21	Question 1 - key issues	Opportunity for soils to help mitigate and adapt to climate change through improved soil health (inc increases in organic carbon). This would increase their resilience to changes and improve ecosystem service delivery	Noted.	N/A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
NE22	Question 1 - key issues	This section is missing information on coastal geology. Geodiversity & Coastal processes are important issues for port planning. Coastal squeeze etc. This could also cover: • Protection of sites designated for geodiversity importance. • Improve access to sites of geodiversity interest. • Maintenance of natural shoreline processes / management of shorelines.	Noted, key issues updated to reflect this comment.	See Table 3-2 and Appendix A
NE23	Question 1 - key issues	Should the importance of protecting peat be included here?	Noted, peat soils are referenced in the key issues.	N/A
NE24	Question 1 - key issues	Opportunity: healthy soils are more resilient, and contribute to natural flood management solutions, SUDS, climate change mitigation and adaptation [25YEP]. Therefore, soils need to be sustainable used and managed	Noted, key issues updated to reflect this comment.	See Table 3-2 and Appendix A
NE25	Question 1 - key issues	Worth noting the issues around nutrients and the designation of sensitive catchments and rivers - see below. There could be increased pressure on sewage systems in these catchments and increased shipping activity too could contribute to impacts on protected sites	Noted, key issues updated to reflect this comment.	See Table 3-2 and Appendix A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
		https://www.gov.uk/government/publications/nutrient-pollution-reducing-the-impact-on-protected-sites/nutrient-pollution-reducing-the-impact-on-protected-sites https://www.gov.uk/government/publications/notice-of-designation-of-sensitive-catchment-areas-2024/notice-of-designation-of-sensitive-catchment-areas-2024		
NE26	Question 1 - key issues	This section is not identifying the issues and opportunities as for others - such as the impact of poor air quality on habitats. Is this sufficiently clear that new ports will lead to increased road travel by HDV - a principal source of air pollution	Noted, air quality interacts with a number of other AoS Topics and this is covered under the biodiversity and nature conservation topic. The AoS Framework includes guide questions relating to minimising traffic volumes and encouraging alternative means of transporting freight, waste and minerals.	N/A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
NE27	Question 1 - key issues	I can't see reference to lighting - this could be impactful for protected sites and species? On top of the noise impacts referenced here	Light pollution is referred to under landscape, townscape and seascape.	N/A
NE28	Question 1 - key issues	Additional issues could include: * The carbon storage of existing sites, e.g. peat and woodland (mitigation) * Nature-based solutions to help adapt to changes in climate, including sea level rise. * Need to plan for worst case scenarios for sea level rise including the impacts on the natural environment.	Noted, key issues updated to reflect this comment.	See Table 3-2 and Appendix A
NE29	Question 1 - key issues	When developing the appraisal framework having separate objectives for mitigation and adaptation will make the identification of impacts in the AoS easier, as the measures needed to address these two issues are assessment are quite distinct.	Noted.	N/A
NE30	Question 1 - key issues	Add Objective 4 - land use, geology and soils to the AoS objective link column for climate change.	NE's suggested objective has been included.	See Table 3-2

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
NE31	Question 1 - key issues	There is no reference here to increased levels of marine transport - shipping/general vessel movements and numbers of berths which may result from port development? How emissions from that sector can be made more sustainable? Greener fuels? Use of inland waterways?	Noted, the key issues have been updated to reflect this comment.	See Table 3-2 and Appendix A
NE32	Question 1 - key issues	Other matters to consider: * the importance of considering maritime heritage * Increase awareness of buried archaeology / unknown heritage – and recognition that some historic assets can be offshore	Noted, the key issues have been updated to reflect this comment.	See Table 3-2 and Appendix A
NE33	Temporal scope	Impacts at construction stages can be irreversible permanent, not short term or temporary. For example, loss of soils, habitats etc. Therefore, it will be necessary to consider full impacts at construction stages and how these can be minimised. This may include consideration of the larger area of land that may be required at construction vs. operational size of devt.	Noted.	N/A
NE34	Question 3 - AoS Framework	Should reference HPMAs- Highly Protected Marine Areas	Reference to HPMAs has been added to the AoS Framework.	See Table 4-1

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
NE35	Question 3 - AoS Framework	and/or environmental gain might be better here? As biodiversity net gain can be read as specific for BNG when currently there is no equivalent for the marine environment. The term environmental net gain is a broader fit	The AoS Framework has been updated to reflect this comment.	See Table 4-1
NE36	Question 3 - AoS Framework	Revise the guide question relating to providing opportunities to deliver biodiversity net gain, to also include environmental net gain.	The AoS Framework has been updated to reflect this comment.	See Table 4-1
NE37	Question 3 - AoS Framework	Others to consider: * affect access to the coast and the route of the KCIIIECP? * help deliver green infrastructure and opportunities for access to nature?	The AoS Framework has been updated to reflect this comment.	See Table 4-1
NE38	Question 3 - AoS Framework	Suggest 'soil health' included in AoS objective for land use, geology and soils.	The AoS Framework has been updated to reflect this comment.	See Table 4-1
NE39	Question 3 - AoS Framework	See comments on pg 6	Please refer to previous response on this matter.	N/A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
		<i>“The topic title varies from one NPS to the next.</i> <i>-The AoS objective should be updated form ‘To conserve and enhance soil and geology and contribute to the sustainable use of land.’ to ‘To conserve and enhance soil health and geology and contribute to the sustainable use of land.’</i> <i>Guide questions – update ‘soil quality’ to ‘soil health’.</i> <i>25YEP recognise the synergies and dependencies on soil health such as use of natural flood management solutions, SUDS, climate change mitigation and adaptation. Similarly, the 25YEP aim that development is in the right places, avoiding our best agricultural land and in embedding the ‘environmental net gain’ principle reflects a natural capital approach in spatial planning which aims to minimise the impact of development on finite land and soil resources.”</i>		
NE40	Question 3 - AoS Framework	Others to consider for soil: * protect BMV land, protect peat and carbon store, manage the long-term value of soil For geology: * impact on coastal processes and the effect this will have on coastal habitats, including consideration of coastal squeeze	The AoS Framework has been updated to reflect this comment.	See Table 4-1

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
NE41	Question 3 - AoS Framework	Others to consider: * protect habitats from adverse air quality impacts including eutrophication, direct toxicity, acidification and accumulation	The AoS Framework has been updated to reflect this comment.	See Table 4-1
NE42	Question 3 - AoS Framework	Lighting impacts too	See response to NE27.	N/A
NE43	Question 3 - AoS Framework	Impacts on wildlife including protected species and lighting should be considered	See response to NE27.	N/A
NE44	Question 3 - AoS Framework	Other considerations: * coastal process and sea level rise; * help deliver NBS and GI to allow adaptation to climate change * consider carbon storage potential of existing sites including woodlands and peat, seagrass and saltmarsh and other coastal margin habitats "Carbon Storage and Sequestration by Habitat 2021 (NERR094)	The AoS Framework has been updated to reflect this comment.	See Table 4-1

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
NE45	Question 3 - AoS Framework	As comments earlier highlighted this should apply to shipping/vessel movements as well e.g. greener shipping options, movement of freight through inland water ways.	The AoS Framework includes guide questions relating to minimising traffic volumes and encouraging alternative means of transporting freight, waste and minerals.	N/A
NE46	Question 3 - AoS Framework	Other considerations: * importance of off-shore archaeology designated and non-designated.	The AoS Framework has been updated to reflect this comment.	See Table 4-1
NE47	Significance key	Not sure if this is worded correct as it implies that beneficial and negative effects can be balanced out. Where negative effects are identified a negative effect should be recorded.	Noted, description of the neutral effect amended.	Table 4-3
NE48	Cumulative effects	When considering cumulative effects will the cumulative or in-combination effects with other plans and strategies be considered. For example the allocations in Local Plans, NSIP projects the other NPS (for example the emerging new NPS for nuclear power siting).	The cumulative effects of the revised NPS with other plans, programmes and	N/A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
			projects will be considered.	
NE49	Question 2 - baseline and policy context	Worth checking the Nuclear AoS to check there is consistency across the broad policies that apply specifically to the Ports Sector	Noted.	N/A
NE50	Question 2 - baseline and policy context	What about the broad principle within the Harbours Act 1964: Harbours Act 1964: Section 48A Duty to exercise their functions with regard to nature conservation & related environmental considerations.	Noted, this will be a consideration for the port industry when preparing and submitting an application for port related development.	N/A
NE51	Question 2 - baseline and policy context	Plus the offshore regulations: The Conservation of Offshore Marine Habitats and Species Regulations 2017	Noted, policy context updated for biodiversity and nature conservation to reflect this comment.	Appendix A
NE52	Question 2 - baseline and policy context	Also mention HPMAAs in policy context.	Noted, policy context updated for biodiversity and	Appendix A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
			nature conservation to reflect this comment.	
NE53	Question 2 - baseline and policy context	MPAs is a generic term, but includes internationally designated sites- so confusing here when offshore sites are also in the section above- perhaps move to the section above as helpful to highlight the designations in marine space but under misleading title for the section.	Noted, section moved.	Appendix A
NE54	Question 2 - baseline and policy context	mentioned here so should be in earlier tables	Noted.	N/A
NE55	Question 2 - baseline and policy context	Additional policies to consider The Town and Country Planning and Infrastructure Planning (Environmental Impact Assessment) (Amendment) Regulations 2018. These new regulations set out the procedures to be followed in relation to environmental impact assessment linked to nationally significant infrastructure projects in England and Wales. The objective is to provide a high level of protection of the environment and to help integrate environmental considerations into the preparation of proposals for development to reduce their impact on the environment.	Noted, this will be relevant for any nationally significant port infrastructure that comes forward.	N/A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
NE56	Question 2 - baseline and policy context	NPPF updated para reference is 180. Also include ref to para 180, b) b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland. And ref to footnote 62: Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development	Noted, policy context updated to reflect this comment.	Appendix A
NE57	Question 2 - baseline and policy context	Ref should be updated to 2019. Explains key issues in implementing policy to protect and enhance the natural environment, including local requirements covering: • Agricultural land, soil and brownfield land of environmental value. A local planning authority must consult Natural England before granting planning permission for large-scale non-agricultural development on best and most versatile land that is not in accord with the development plan. Natural	Noted, policy context updated to reflect this comment.	Appendix A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
		England has published guidance on development on agricultural land.		
NE58	Question 2 - baseline and policy context	including the appropriate restoration to agriculture	Noted, policy context updated to reflect this comment.	Appendix A
NE59	Question 2 - baseline and policy context	soil mapping should also form part of the baseline. Natural England would promote the use of the NATMAP soils data given its increased detail. This will also identify peat soil (noted that peat soils have been discussed in the context of Wales, but not England, despite the presence of upland and lowland peat in England)	Noted, maps/ figures have not been provided to align with the scope and nature of the revised NPS, which does not set a quantum nor identify location for development.	Appendix page 35
NE60	Question 1 - key issues	this is incorrect, 'Much of the land in the UK is low grade, rendering it unusable for farming..	Noted, this has been removed.	Appendix A
NE61	Question 2 - baseline and policy context	Water resources and Quality- this should also reference pollution prevention policies for shipping/ports sector: Merchant Shipping (OPRC): Oil Spill Plan and any other associated legislation	Noted, the plans and programmes included in the policy context	N/A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
			sections in Appendix A are considered proportionate/ appropriate at this stage.	
NatureScot				
NS1	General comment	Thank you for your consultation on the above Scoping Report received in the Scottish Government SEA Gateway on 31 January 2024. We note that this is a revision of the 2012 National Policy Statement for Ports and that it relates to ports and port infrastructure in England and Wales only. It sets out the Government's conclusions on the need for new port infrastructure and the considerations that are needed to ensure that future development is fully sustainable.	Noted	N/A
NS2	General comment	We also note that the Policy is non-spatial but that in terms of reasonable alternatives, consideration could be given to site-specific revised NPSP. It will be interesting to see how this is developed through the AoS.	Noted	N/A
NS3	General comment	We acknowledge that it is considered that transboundary effects are unlikely and accordingly have no further	Noted	N/A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
		comments at this stage. Please note that Scottish Natural Heritage is now known as NatureScot. I hope these comments prove useful and please do not hesitate to contact me if you require further clarification – sea_gateway@nature.scot		
Scottish Environment Protection Agency (SEPA)				
SEPA1	General comment	Thank you for your Scoping consultation submitted under the above Act. This was received by SEPA via the Scottish Government SEA Gateway on 31 January 2024 in relation to the above application. We have reviewed the scoping report in our role as a Consultation Authority under the above Regulations. It is noted that the geographical scope of the revised NPS for Ports will cover all suitable locations for port developments in England and reserved trust ports in Wales. It is therefore considered that transboundary effects are unlikely due to the nature and scope of the plan. We agree with this assessment and have no further comments to make. If you have queries relating to this letter, please contact us via our SEA Gateway at sea.gateway@sepa.org.uk including our reference number.	Noted	N/A
CADW				

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
CADW 1	Question 3 - AoS Framework	In general, Cadw are happy with the document but in our opinion the relevant outcome indicators from the 25 year environmental plan in section 11 Cultural Heritage in Table NTS1 should specifically mention listed buildings, as these are likely to be the most numerous designated historic assets that will be affected by changes to a port and their condition is regularly reported in surveys by Cadw and Historic England.	Noted, reference to specific outcome indicators have been removed in response to Natural England. Designated heritage assets, included listed buildings, are considered through the AoS Framework.	See Table 4-1
Natural Resource Wales (NRW)				
NRW 1	General comment	Thank you for consulting us on the Scoping Report for the Appraisal of Sustainability (AoS) of the revised National Policy Statement (NPS) for Ports, which we received on 23 January 2024. We note that the Scoping Report has been prepared for consultation with the statutory Strategic Environmental Assessment consultation bodies, as required by regulation 4 of the Environmental Assessment of Plans and Programmes Regulations 2004. We also recognise the purpose of the Scoping Report is to provide sufficient information to	Noted.	N/A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
		consultees in England and Wales to enable them to comment on the proposed scope of the AoS.		
NRW 2	General comment	We welcome the opportunity to provide comments on the scoping report. While we recognise that the draft Scoping Report has relevancy to the position in Wales, we found that there are several areas of omission or out-of-date information: • A number of plans, policies and programmes, which provide a Wales context should be included to inform the AoS and consequently the revised NPS. • Notably the 25-year Environment Plan and its revision support the indicators for outcomes in the AoS framework. However this Plan only applies to England, and relevant indicators must be provided in a Wales context. • The assessment methodology should ensure the development of policy aspirations which are specific to Wales e.g. ecosystem resilience, and net benefit for biodiversity (terrestrially) and for the marine environment. We recommend that the AoS should address these issues or explain why you consider these matters are not relevant to the AoS.	Noted, please see responses below.	See below.

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
NRW 3	General comment	We note that the draft Scoping Report has been produced and is attached for review and comment with the statutory bodies in England and Wales, under the Environmental Assessment of Plans and Programmes Regulations 2004 and that the NPS for Ports provides planning policy guidance against which a development consent order (DCO) application for any nationally significant new port infrastructure in England or at a reserved trust port in Wales are examined. It also applies, wherever relevant, to associated development, such as road and rail links, for which consent is sought alongside that for the principal development. We note that responses are sought to the following questions: • Do you agree with the key issues identified within the topic areas? If not, what issues should be removed from the scope of the appraisal and which relevant issues should be included in the proposed scope of the appraisal? • Do you think the AoS Scoping Report sets out sufficient information to establish the context for the appraisal? If not, which areas do you think have been missed and where is information on these topics available from?	Noted	N/A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
		Do you agree that the AoS objectives and guide questions cover the breadth of issues appropriate for appraising the effects of the draft Revised NPS? If not, which objectives should be amended and which other objectives do you believe should be included?		
NRW 4	Question 2 - baseline and policy context	The 25 Year Environment Plan (2018) and its first revision the Environmental Improvement Plan (2023) are only relevant in England. We recommend that you refer to the Well-Being of Future Generations Act 2015, Environment (Wales) Act 2016, the Welsh Government Natural Resource Policy, NRW's State of Natural Resources Report and Area Statements so that the NPS for Ports is informed by and recognises Welsh Government legislation, aspirations and policies.	Noted, the scoping information has been updated to reflect this comment.	See Table 4-1 and Appendix A
NRW 5	General comment	We note that a Habitats Regulations Assessment is being undertaken in parallel to the AoS and NRW must be consulted as the relevant Statutory Nature Conservation Body. Please submit your consultation to: EPP.Planning@cyfoethnaturiolcymru.gov.uk	Noted	N/A
NRW 6	General comment	The AoS Scoping Report correctly states that the NPS currently only relates to a reserved trust port in Wales at Milford Haven. However, the potential establishment of further trust ports in Wales in the future cannot be ruled out,	Noted	N/A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
		and also the NPS could apply to applications for activities within ports in England, which may have the potential to incur a significant effect on environmental features in Wales. Our comments are made on this basis.		
NRW 7	Question 2 - baseline and policy context	We recommend the consideration of sectoral plans that are important in a Welsh ports context. These include The Crown Estate's 'Round 5' Plans for offshore wind in the Celtic Sea, UK Government Oil and Gas Storage Plans, UK and Welsh Hydrogen Strategies.	Noted, the review of plans and programmes is considered appropriate at this stage given the scope and nature of the revised NPS.	N/A
NRW 8	Question 1 - key issues	Biodiversity Net Gain (second bullet) is a concept and process that is relevant only to England (and currently only through their terrestrial planning system, down to Mean Low Water, although policy development around Marine Net Gain is underway). In Wales, it would be more appropriate to refer to the need to "maintain and enhance" ecosystem resilience as part of the objective to secure sustainable management of natural resources (SMNR) in accordance with Section 6 Environment Wales Act 2016 and relate these to the relevant policy e.g. for marine, the Welsh National Marine Plan (WNMP) includes policy ENV_01: Resilient marine	Noted, the key issues have been updated to reflect this comment.	See Table 3-2

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
		ecosystems, that requires x and encourages proposals that contribute to the protection restoration and enhancement of marine ecosystems. Through Planning Policy Wales (PPW) there is the requirement for Net Benefit for Biodiversity, and this is relevant at the coast to mean low water. This part of PPW has recently been updated, we refer you to section 6.4.5 .		
NRW 9	Question 1 - key issues	Regarding the sixth bullet under the column key issues and opportunities, we recommend that additional wording (as shown in bold is included), <i>“Where ports intersect with or are adjacent to or otherwise likely to affect designated sites including those with significant geodiversity, protected habitats (including irreplaceable habitats) and species, there is a need to balance infrastructure needs with protection and enhancement of those sites. In addition, there is a need for effective protection measures to be in place for the soils that support these designated and protected sites.”</i>	Noted, key issues updated to reflect this comment.	See Table 3-2 and Appendix A.
NRW 10	Question 1 - key issues	Under the column AoS objective links, links between Topic 1 for Biodiversity and Nature Conservation and Topic 5 for Water Resources are identified. However no direct links, key issues and opportunities are identified, and this should be addressed in the AoS.	Noted, amendments made to the key issues to reflect this comment.	See Table 3-2 and Appendix A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
NRW 11	Question 1 - key issues	We refer you to the seventh bullet which states “Over 50% of land in England is designated as a Nitrate Vulnerable Zone.” And in Appendix A it states, “In Wales, NVZs have historically accounted for around 2.3% of total land, however these were revoked in 2021 due to changing of the regulations as the Water Resources (Control of Agricultural Pollution) (Wales) Regulations were introduced.” We recommend that these sections clarify that the designated Nitrate Vulnerable Zone applies to all holdings in Wales.	Noted, a clarification added to address this comment.	See Appendix A
NRW 12	Question 1 - key issues	Regarding key issues and opportunities we recommend the inclusion of potential issues with water availability for construction works and the need for efficient use of water from design stage.	Noted, an additional key issue has been added to address this comment.	See Table 3-2 and Appendix A
NRW 13	Question 1 - key issues	We recommend that clarity is provided that demonstrates how the identified key issues and opportunities inform Objectives 5 Water Resources, and Objective 6 Water Quality.	Noted, there is only one objective relating to the water environment so assume the reference to Objective 6 relates to the air quality topic. The baseline and policy context informed the	N/A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
			identification of the key issues, which then informed the development of the AoS Objectives.	
NRW 14	Question 1 - key issues	We recommend that clarity is provided that demonstrates how the identified key issues and opportunities inform Objective 5 Water Resources and Objective 9 Materials and Waste.	Noted, the baseline and policy context informed the identification of the key issues, which then informed the development of the AoS Objectives.	N/A
NRW 15	Question 1 - key issues	We refer you to the fourth bullet point, <i>“Changes in temperature and rainfall patterns, along with more frequent extreme weather events creates the situation where a greater degree of resilience will have been incorporated into plans and proposals.”</i> We seek clarity on what is meant by <i>“...creates the situation where a greater degree of resilience will have been incorporated into plans and proposals.” This is something that needs to be done as plans and proposals do not have this built in already. Adaptation should be included explicitly</i>	Noted, key issues updated to reflect this comment.	See Table 3-2 and Appendix A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
		<i>here as it is too vague to state “a greater degree of resilience.”</i> We recommend changes in wording i.e. <i>“adaptation actions can lead to a greater degree of resilience and must be incorporated into plans and proposals.”</i>		
NRW 16	Question 1 - key issues	We refer you to the fifth bullet point, <i>“The UK’s Climate Projections (UKCP18) show that the UK as a whole is likely to experience hotter, drier summers, warmer, wetter winters and rising sea levels, range of environmental conditions.”</i> While changes in weather and sea level rise are acknowledged, we recommend that there is also a reference to flood risk and how flood risk is expected to increase as a result of climate change.	Noted, key issues updated to reflect this comment.	See Table 3-2 and Appendix A
NRW 17	Question 3 - AoS Framework	We refer you to earlier comments made in our response about Net Benefit for Biodiversity (refer to page 29, Table 3.2, Topic 1 Biodiversity and Nature Conservation of the scoping report). We recommend that you update the guide questions to include Net Benefit for Biodiversity (as set out in PPW (Edition 12, Chapter 6). We also recommend that the AoS Framework should include guide questions and outcome indicators for ecosystem resilience as part of the Environment (Wales) Act	Noted, the AoS Framework has been updated to reflect this comment.	See Table 4-1

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
		2016 Section 6 Duty and the objective to secure SMNR and make suitable reference to the policies in the WNMP.		
NRW 18	Question 3 - AoS Framework	We recommend an additional guide question and outcome indicator is included: protecting and enhancing the resilience of water resources from the risk of flooding and drought.	Noted, the AoS Framework has been updated to reflect this comment.	See Table 4-1
NRW 19	Question 3 - AoS Framework	The third guide question asks, <i>‘will the revised NPS for Ports promote climate change adaptation (including for rising temperatures, more extreme weather events and sea level rise)?’</i> To ensure active consideration in the design of schemes, we recommend that the guide question is amended as follows: embed adaptation to climate change in development projects to increase resilience to rising temperatures, more extreme weather events and sea level rise.	Noted, the AoS Framework has been updated to reflect this comment.	See Table 4-1
NRW 20	Question 3 - AoS Framework	We recommend that the fourth guide question is amended as follows: help to reduce flood risk and consequence, help to mitigate and adapt to climate change, thereby build resilience into development proposals?	Noted, the AoS Framework has been updated to reflect this comment.	See Table 4-1

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
NRW 21	General comment	The AoS Scoping Report comments that the location, timing, delivery, detailed design and future changes for port infrastructure is uncertain, however this report identifies the location of reserved trust ports in Wales. i.e. the port at present at Milford Haven and therefore some of the uncertainties should be identifiable.	Noted.	N/A
NRW 22	Question 2 - baseline and policy context	Please refer to earlier comments i.e. Section 1.3.3 page 17. The section on policy context for the United Kingdom lists the Environment Act (2021), the Green Future: Our 25 Year Plan to Improve the Environment (2018) and the Environmental Improvement Plan (2023). Please note that these are applicable to England only. We recommend that you refer to the Well-Being of Future Generations Act 2015, Environment (Wales) Act 2016, the Welsh Government Natural Resource Policy, NRW State of Natural Resources Report and Area Statements so that the NPS for Ports is informed by and recognises Welsh Government legislation, aspirations and policies.	Noted, some of these plans and programmes were already referenced but the policy context has been updated where necessary.	Appendix A
NRW 23	Question 2 - baseline and policy context	The AoS should refer to the 12th edition of PPW and note the updated policy in relation to: Special Sites of Scientific Interest, irreplaceable habitat, and the stepwise approach (we refer you to PPW and section 6.4.5).	Noted, the policy context has been updated to reflect this comment where necessary.	Appendix A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
		The AoS should also refer to the Welsh Government's <u>Natural Resources Policy</u>. The AoS should refer to <u>Future Wales</u> The National Plan 2040, and in particular Policy 9 - Resilient Ecological Networks and Green Infrastructure. We recommend that the AoS also considers: • <u>the Welsh National Marine Plan</u>. This sets out Welsh Government's policy for the next 20 years for the sustainable use of Welsh seas. • <u>Nature Recovery Action Plan</u> GOV.WALES • <u>Biodiversity deep dive: recommendations</u> [HTML] GOV.WALES • <u>The Environmental Strategy for Wales</u> (2006)		
NRW 26	Question 2 - baseline and policy context	We refer you to the State of <u>Natural Resources Report</u> for Wales as a source of information.	Noted.	N/A
NRW 27	Question 2 - baseline and policy context	We refer you to the baseline information for Designated Sites and Special Areas of Conservation (SACs). It is unclear whether the information is referring to marine or terrestrial SACs or both. We recommend that consideration is given to the spatial extent of SACs relative to the size of	Noted, this will be considered further at the next stages of the AoS.	N/A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
		country. (The section on Marine Protected Areas and Marine Conservation Zones includes relevant information)		
NRW 28	Question 2 - baseline and policy context	We recommend that you amend the AoS Scoping Report so that Marine Protected Areas are recognised in the section for internationally designated sites.	Noted, the scoping information has been amended to reflect this comment.	Appendix A
NRW 29	Question 2 - baseline and policy context	As already commented, Biodiversity Net Gain is a concept and process that is relevant only to England. Net Benefit for Biodiversity applies in Wales (Biodiversity (relevant at the coast to mean low water). In Wales, it would be more appropriate to refer to the need to “maintain and enhance” ecosystem resilience as part of the objective to secure SMNR in accordance with Section 6 Environment Wales Act 2016 and relate these to the relevant policy e.g. for marine, the WNMP includes policy ENV_01: Resilient marine ecosystems, that requires x and encourages proposals that contribute to the protection restoration and enhancement of marine ecosystems.	Noted, amendments have been made to the key issues and AoS Framework to reflect this comment.	See Table 3-2, Table 4-1 and Appendix A.
NRW 30	Question 2 - baseline and policy context	Please be advised that the Welsh Government, with support from NRW and the Joint Nature Conservation Committee, are currently working with a task and finish group of marine stakeholders to identify a small number of possible Marine	Noted.	N/A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
		Conservation Zones (MCZs), in addition to the existing Skomer MCZ within Welsh waters.		
NRW 31	Question 1 - key issues	We refer you to the section on key issues and opportunities: Ports should explore the use of nature-based solutions and green infrastructure, to deliver climate change adaptation and other environmental and social outcomes, such as encouraging greater active travel for employees. There does not appear to be any incentives, or encouragement to include nature-based solutions and green infrastructure. Developers can just “explore” the options and choose not to implement. Nature based solutions and green infrastructure should be mandatory unless deemed not feasible (e.g. technically not developed).	Noted, this is a matter for plan-making and wider Government policy.	N/A
NRW 32	Question 1 - key issues	We refer you to the section on key issues and opportunities: Where ports intersect with designated sites, including those with significant geodiversity, protected habitats (including irreplaceable habitats) and species, there is a need to balance infrastructure needs with protection and enhancement of those sites. In addition, there is a need for effective protection measures to be in place for the soils that support these designated and protected sites.	Noted, this is an issue for plan-making and ultimately a judgment for the decision-maker based on available evidence, the revised NPS and wider policy.	N/A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
		We recommend that you provide clarity on the following: - What matrix is used to balance between needs and protection measures, and - What rule is followed that ensures one does not supersede the other without valid reasons.		
NRW 33	Question 2 - baseline and policy context	The reference to PPW should be updated as edition 12 has been published (February 2024). The policy context for Wales should include the WNMP, which has social policies focused on “<i>ensuring a strong, healthy and just society</i>,” e.g. well-being of coastal communities, access to the marine environment, heritage, and coastal change and flooding. Consideration should also be given to the Public Health (Wales) Act 2015 and priorities set out in the Welsh Government’s document ‘Building Better Places’ (2020).	Noted, the scoping information has been updated to reflect this comment.	Appendix A
NRW 34	Question 1 - key issues	We refer you to the section on key issues and opportunities: • Environmental effects from port development (e.g. emissions to air, noise and visual disturbance) can reduce the quality of living environments of local communities. We recommend that section includes the environmental impact on water quality from port development and its use	Noted, the key issues have been updated to reflect this comment.	Table 3-2 and Appendix A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
		<i>e.g.</i> emissions from sea vessels, dredging activities, surface water runoff from hard surfaces including roads and car parks.		
NRW 35	Question 2 - baseline and policy context	The AoS should refer to the extent and purpose of Geological Conservation Review Sites in Wales. The AoS should be amended to recognise that Geoparks in Wales are UNESCO Global Geoparks. UNESCO consider these areas to be of international importance for geological heritage that should be safeguarded and sustainably managed and include strong local involvement. In Appendix A, references to ‘Parc Cenedlaethol’ should be amended to refer to ‘Parc Cenedlaethol Eryri.’ While we support the reference to Regionally Important Geodiversity Sites (RIGS) (section Key issues and opportunities) it would be useful to explain what RIGS are, their importance for education, and the number of RIGS in Wales.	Noted, the baseline information has been updated to reference UNESCO in relation to Global Geoparks.	Appendix A
NRW 36	Question 1 - key issues	We refer you to the section on key issues and opportunities: • Much of the land in the UK is low grade, rendering it unusable for farming. This issue considers the land from a monetary perspective only, which is in contradiction to achieving the enhancement and Net Gain for Biodiversity and tackling Climate Change,	Noted.	N/A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
		and its consequences through the ecosystem services these areas may provide. Our view is that undeveloped land should be seen as a biodiversity haven with a significant monetary, social and environmental value.		
NRW 37	Question 2 - baseline and policy context	While the policy context for the UK refers to the Flood and Water Management Act 2010 and for England the National Planning Policy Framework (2023) there is nothing specific to flood risk management and this omission should be addressed. We recommend that you consider other sources applicable for Wales including Technical Advice Note 15 Development and Flood Risk (2004) and the national Flood and Coastal Erosion Risk Management strategies.	Flood risk and these plans and programmes are considered under the climate change section.	N/A
NRW 38	Question 2 - baseline and policy context	The Catchment Abstraction Management Plans have not been updated since 2015. NRW will determine an application for proposed water abstraction for port development. The applicant will need to submit water availability assessments and assess the likely impacts to the environment. Water efficiency should be built in at the design stage and meet Building Regulations 2018 Part G.	Noted.	N/A
NRW 39	Question 2 - baseline and policy context	The reference to the WNMP states that it is currently being developed. This is incorrect as the WNMP was published in 2019.	Noted, the policy context has been	Appendix A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
			updated to reflect this comment.	
NRW 40	Question 1 - key issues	The third bullet point, should also explain the likelihood of sea level rise and the likely increase of flood risk from all sources.	Noted, key issues have been updated to reflect this comment.	Table 3-2 and Appendix A
NRW 41	Question 1 - key issues	The third bullet point notes climate change is likely to have a significant impact. However reference should also be made to sea level rise and the likely increase in flood risk from all sources. Consideration of the increase of intense storms inundating freshwater resources as another risk.	Noted, key issues have been updated to reflect this comment.	Table 3-2 and Appendix A
NRW 42	Question 1 - key issues	We recommend that this section refers to opportunities to reduce pressures on water resources e.g. sustainable drainage schemes that includes rainwater harvesting and water recycling. There is also no mention that an increase in population and traffic that will require an increase in infrastructure to support the growth, which in effect will increase pressure on water resources. We recommend that opportunities are identified to reduce potential water resource pressures.	Noted the key issues already identify the potential for increased pressure on water resources. They have been updated to include a reference to encouraging the efficient use of water.	Table 3-2 and Appendix A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
NRW 43	Question 1 - key issues	We recommend that you consider the impact of noise from port development and its operation on terrestrial and marine ecosystems and environmental receptors.	Noted	N/A
NRW 44	Question 2 - baseline and policy context	The reference to the Welsh Assembly Government should be amended to read the Welsh Government. We recommend that the policy context for Wales refers to Chapter 6 in PPW (Edition 12) and explains the inter-relationship between the need to protect, maintain and enhance the resilience of ecosystems and their ability to adapt to challenges presented by the climate change emergency. The policy context should include Prosperity for All: A Climate Conscious Wales (Prosperity for All: A Climate Conscious Wales (gov.wales)). This is a climate change adaptation plan for Wales. Please be aware that this Plan is being reviewed in 2024 and likely to be called the 'Resilience Strategy'. The reference to Climate Change Strategy for Wales is out of date and should be replaced with Climate Conscious Wales and the Net Zero Strategic Plan. Information in 'Part 2 of the Environment (Wales) Act...', and 'Low Carbon Wales (2019)' sections are out of date.	Noted and amended.	Appendix A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
NRW 45	Question 2 - baseline and policy context	The topic heading is Climate Change (Mitigation and Adaptation) and whilst there is a section on mitigation very little attention is given to adaptation (planning, implementing etc), which should be addressed in the AoS.	Noted.	N/A
NRW 46	Question 2 - baseline and policy context	We refer to the weather trends set out in the baseline information. There narrative is about changes in weather patterns, but only Storm Eunice is referenced. We recommend that you consider other significant flood events over the past decade, which has led to wide-spread flooding across Wales.	Noted.	N/A
NRW 47	Question 1 - key issues	We refer you to the section on key issues and opportunities for the topic on Climate Change (Mitigation and Adaption): Fossil fuel dependency remains high and is likely to continue. We recommend that you consider opportunities to generate location appropriate renewable energy on site during both development and its operation as a port. We also recommend that you consider opportunities to encourage the use of Electric Vehicle technology for port operation.	Noted.	N/A
NRW 48	Question 1 - key issues	The AoS notes: Changes in temperature and rainfall patterns, along with more frequent extreme weather events creates	Noted, updates have been made to the key issues.	Table 3-2 and Appendix A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
		the situation where a greater degree of resilience needs to be incorporated into plans and proposals. We advise that greater resilience would include thermally efficient buildings that would require minimal heating or cooling, which will reduce energy use and reduce greenhouse gas emissions. There is no mention of green infrastructure (except the initial mention of “explore” green infrastructure. Ensuring buildings and other supporting infrastructures (e.g. roads and car parks) are green will likely increase, or at least support biodiversity and should be highlighted through the AoS to inform the NPS.		
NRW 49	Question 1 - key issues	We recommend that the opportunity for adaptation and resilience measures is identified in the AoS.	Noted, updates have been made to the key issues.	Table 3-2 and Appendix A
NRW 50	Question 1 - key issues	We note: There is a need for investment in transportation infrastructure to meet future demand and support economic growth. We recommend including an opportunity for new transport infrastructure being green where feasible.	Noted.	N/A

Ref	Consultation Question	Consultation Response	Commentary/ Action Taken	Location of changes in the AoS Report
NRW 51	Question 1 - key issues	We note: There is a need to reduce the need to travel and facilitate a shift towards more sustainable modes of transport. Port and traffic infrastructure has to be built with sustainable transport in mind at the outset and before seeking a shift towards A&ST. Biodiversity enhancement and climate change mitigation and adaptation and A&ST must be included at the earliest design phase.	Noted.	N/A



AoS Report consultation

Table B-2 – Comments received on the AoS Report and how they have been taken into account

Organisation Name	Consultation Question	Consultation Response	Commentary/ Action Taken
Natural England	Question 19: has the baseline analysis in the AoS missed or misrepresented any environmental, social or economic data?	Natural England advise that the baseline data for environmental designations should be updated to reflect the most up to date statistics at time of finalisation of the NPSP and the AoS. We note that there are missing plans in Table 5.2 such as River Basin Management Plans; Landscape plans/strategies; Site Management Plans; Air Quality Strategies; LNRS (subject to ongoing publication). Whilst these may be referenced elsewhere within the AoS, clear demonstration that the interactions of these with the draft revised NPSP should be made.	Noted, these plans have been reference within Section 3 of this PAS. However, they do not change the nature or significance of the inter-plan cumulative effects identified, described and evaluated in the AoS Report (Table 5-3).
Natural England	Question 20: are there any additional key sustainability issues relevant to the NPSP that need to be considered in the AoS?	We are content that the broad AoS topics identified are appropriate, however would welcome emphasis on connectivity of habitats and species, and opportunities to deliver enhancements at a landscape scale. Opportunities to support strategic solutions for mitigating/compensating impacts would also be welcomed. [Table 3-2] <i>“Sensitive ecosystems are likely to come under increasing pressure as a result of climate change.”</i> This statement suggests that not all ecosystems will be pressured, yet all	Noted, this comment has been reflected in Section 2 of this PAS. This comment does not change the nature or significance of effects identified within the AoS Report.

		ecosystems will, whether currently perceived as sensitive or not. This section could mention the increasing risk of tipping points as climate change accelerates, including for habitats and species populations.	
Natural England	Question 21: are the AoS objectives and sub-objectives as set out in the AoS framework appropriate?	We note that the objectives are generally appropriate, but the sub-objectives could be refined to better reflect current policy instruments like the EIP. Drawing out specific relevant Environmental Regulation Targets could help provide further steer for monitoring opportunities. We encourage further consideration of connectivity for habitats and species particularly at a landscape scale and opportunities to explore this within the AoS. This can support identification of additional areas for strengthening the NPSP focusing on opportunities for ports to deliver environmental opportunities at a strategic landscape scale.	Noted, this comment has been reflected in Section 2 of this PAS. This comment does not change the nature or significance of effects identified within the AoS Report.
Natural England	Question 22: are there any incompatibilities between the main NPSP objectives and the AoS objectives which have not been identified in the AoS?	The AoS does not fully explore potential tensions between infrastructure development and the legal protections for designated sites. For example, the statement on balancing infrastructure needs with environmental protection (page 99) should clarify that this is a matter for the Secretary of State, who must uphold legal obligations.	Noted, as required through the SEA Regulations and extant guidance the AoS has identified and evaluated the likely significant effects of the revised NPS and reasonable alternatives. This comment does not change the nature or significance of effects

			identified within the AoS Report.
Natural England	Question 23: to what extent do you think the alternatives covered are appropriate? Are there any additional alternatives that should be included?	Whilst the alternatives considered are consistent across the AoS and HRA, we query whether this is appropriate given that alternatives are deemed unrealistic in the AoS and therefore do not require assessment within the HRA.	Noted, Section 2.4 in the AoS Report sets out how reasonable alternatives were identified for the purposes of the AoS. The HRA does undertake an analysis of the reasonable alternative identified through the AoS process.
Natural England	Question 24: to what extent do you think the approach taken in the AoS to the assessment of alternatives is suitable?	The approach lacks transparency in how alternatives were selected or screened out. The rationale for excluding certain options (e.g., enhanced environmental requirements) is not sufficiently robust.	Noted, the rationale for rejecting alternatives in Section 2.4 of the AoS Report is considered robust and in line with the SEA Regulations.
Natural England	Question 25: do you agree with the results of the assessment of alternatives?	Due to the limited scope of alternatives assessed, it is difficult to fully agree with the conclusions. We advise a more balanced and transparent assessment is needed.	Noted, the identification and assessment of reasonable alternatives through the SEA process is considered to be robust and in line with regulatory requirements and extant guidance.
Natural England	Question 26: to what extent do you think the assessment correctly identifies the sustainability effects of the draft NPS?	We draw your attention to our comments under other questions in this consultation for you to consider where further topics may need consideration. Further justification is needed to explain how the NPSP will have a long term minor positive effect on biodiversity and nature	Noted, the HRA informed the AoS alongside wider consideration of delivery of BNG and mitigation. The HRA concludes that, " <i>Whilst IROPI are considered to</i>

		conservation. This statement contradicts conclusions of the HRA that identified the potential adverse impacts on habitat sites resulting from developments put forwards under the NPSP. Requirements for enhancing biodiversity should be seen as standard rather than “where possible”. Ensuring that consideration to effects on landscape scale ecological networks as well as recognition to the uncertainty of the effects on climate adaptation should be made within the appraisal.	<i>apply to the revised Ports NPS, individual NSIPs must still seek to avoid adverse effects on the integrity of Habitats Sites. It is possible that no NSIPs brought forward under the revised Ports NPS in future would trigger adverse effects on integrity, including after consideration of mitigation. If an individual NSIP cannot avoid adverse effects on integrity of one or more Habitats Sites, project-specific consideration of alternative solutions, IROPI, and compensatory measures would be required.”</i>
Natural England	Question 27: have any key findings from the AoS report not been taken account of properly in the NPS?	While some findings are reflected, others appear to be insufficiently integrated into the draft NPS. The need for early and effective engagement with statutory bodies (Section 3.8) should be more strongly emphasised. The potential for significant biodiversity net gain from port infrastructure (Sections 3.2.3–3.2.6) should be more clearly highlighted for decision-makers.	Noted. The revised NPS makes clear both the importance of early engagement and the applicability of biodiversity net gain requirements above mean low water springs. The Department intends to engage further with NPS users to help

			promote understanding, including of these points..
Natural England	Question 28: to what extent do you think the approach to monitoring is sufficient to monitor the sustainability effects of the NPS?	We recommend that the potential monitoring measures (Table 6-1) should further utilise targets from the Environmental Target Regulations in respect to the relevant topics.	A reference to the Environmental Target Regulations has been included in Section 6 of this PAS. The monitoring measures outlined will demonstrate progress towards the targets.
Portsmouth International Port	Q22 - are there any incompatibilities between the main NPSP objectives and the AoS objectives which have not been identified in the AoS?	Para 3.10.7 of the NPSP identified the need for certain port authorities to provide climate adaption reporting under the climate change act, although this is not taken into consideration in AoS. This provision may need to be reviewed as this reporting is to become mandatory in the future.	Noted, the need for climate change reporting does not affect the nature and significance of effects identified within the AoS Report.
Logistics UK	Q31 - Are there any impacts of producing a national policy statement that have not been considered?	Yes. "Access to waterways and wharves can be compromised as land is lost to housing... exposing logistics activities to local opposition."	Noted, this issue can be explored in more detail and given further consideration through subsequent development proposals as part of the preparation of lower-tier plans and project level applications.

LDA Design	Q31 - Are there any impacts of producing a national policy statement that have not been considered?	"The location of existing ports and inter-relationships with the economies and communities... should be recognised."	Noted, the AoS framework includes objectives relating to the economy and communities. No further assessment or changes required to the AoS Report.
Cruising Association	WF Q36- Has the baseline analysis in the AoS missed any or misinterpreted any environmental data, social data or economic data? If yes, what data and why?	missed social and economic data as no account taken of the direct and indirect benefits of leisure maritime activities, particularly for the small ports and harbours and their communities.	Noted, omission of data relating to the direct and indirect benefits of leisure activities in the baseline does not change the nature or significance of the effects identified, described and evaluated in the AoS Report. These issues and additional data can be explored in more detail through subsequent development proposals as part of the preparation of lower-tier plans and project level applications.
Cruising Association	WF Q37 and 38- Do you agree or disagree that the AoS objectives as set out in the framework are appropriate? Why not?	disagree - no mention in the AoS objectives of any reference to the social benefits to the social benefits marine leisure business and activities can bring.	Noted, the AoS framework includes an objective relating to population and human health. The objective seeks minimise disturbance to local communities, maximise positive social impacts and protect and enhance the

			health, safety and wellbeing of workers and communities. The social benefits marine leisure business and activities can bring can be explored in more detail through subsequent development proposals as part of the preparation of lower-tier plans and project level applications.
Unite the Union	Q18 - To what extent do you think the methodology used to assess the sustainability of the draft revised NPSP is appropriate?	1. appraisal needs to consider the entire cargo and ongoing infrastructure already in place and not just the impact on the local community; a ship will only discharge its cargo in one port and ideally collect its cargo during the same time. Developments in shipping need to be considered in AoS and NPSP. 2. environmental obligations on freeports/greenports are in several cases no more than token gestures. The focus is not always on the most sustainable options. 3. To make ports more sustainable there needs to be wholesale electrification of activities onshore, this depends on national grid delivery improvements.	Noted, these comments are not related specifically to the AoS methodology. The proposed comments do not change the nature or significance of the effects identified, described and evaluated in the AoS Report. No changes needed to the AoS Report. These issues can be explored in more detail through subsequent development proposals as part of the preparation of lower-tier plans and project level applications.

Unite the Union	Q27 - Have any key findings from the AoS report not been taken account of properly in the NPS?	challenges correctly identified but the delivery of these is dependent on energy extraction and delivery from the wider economy; solar panels should be installed with battery capacity.	Noted, no changes required to the AoS Report.
Unite the Union	Q28 - to what extent do you think the approach to monitoring is sufficient to monitor the sustainability effects of the NPS?	Combination of diesel engine emissions and discharges needs to be monitored far more frequently than is currently the case. Diesel engines are pumping out particulars and these need to be kept in check.	Noted, the proposed monitoring framework includes the monitoring of emissions of greenhouse gases. No changes required to the AoS Report.
Unite the Union	Q31 - Are there any impacts of producing a national policy statement that have not been considered?	need to consider impact: on traffic volumes of refined fuels if the trend continues in closure of oil refineries such as Grangemouth. Need to consider reduced trade if these refineries start production of sustainable fuels like sustainable aviation fuel, sustainable maritime fuel and sustainable road fuel.	Noted, the AoS framework includes an objective relating to traffic and transport. No changes to the AoS Report or its findings are required.
UK Major Ports Group	Q18 - To what extent do you think the methodology used to assess the sustainability of the draft revised NPSP is appropriate?	UKMPG calls for: Greater transparency on sector-specific impacts. Better balance between strategic infrastructure benefits and local environmental effects.	Noted, no changes required to the AoS Report.

UK Major Ports Group	Q19 - Has the baseline analysis in the AoS missed or misinterpreted any environmental, social, or economic data?	UKMPG - Grid constraints and cruise sector contributions are underrepresented. Ports' enabling role in net zero should be system-wide, not project-specific.	Noted, these comments do not change the nature or significance of the effects identified, described and evaluated in the AoS Report. No changes needed to the AoS Report.
UK Major Ports Group	Q26- To what extent do you think the assessment correctly identifies the sustainability effects of the draft NPSP?	UKMPG notes: Modal shift, future fuels, and job creation are undervalued. Delayed dredging increases emissions and inefficiencies.	Noted, these comments do not change the nature or significance of the effects identified, described and evaluated in the AoS Report. No changes needed to the AoS Report.
University of Manchester	Q35. To what extent do you think the methodology used to assess the sustainability of the draft revised NPSP is appropriate?	Disagree	Noted.
University of Manchester	Q36 - Has the baseline analysis in the AoS missed or misinterpreted any environmental, social, or economic data?	While the baseline analysis in the Appraisal of Sustainability (AoS) provides a broadly useful national-level overview of environmental, social, and economic conditions, it lacks sufficient depth and place-based sensitivity to fully support a robust and meaningful sustainability assessment of port infrastructure development.	Noted, the level of detail presented within the baseline reflects and is proportionate to the strategic nature of the revised NPS, which is a national level plan. Further locally specific information and data can be taken into

		Recommendation To support sound, place-based decision-making, the AoS baseline should be strengthened in the following ways: • Incorporate spatially disaggregated environmental and marine ecological data, Include local health, deprivation, and equalities indicators for port-adjacent communities • Provide regional economic profiles, including employment data and port reliance • Address cumulative and cross-sector environmental pressures • Reflect future trends and systemic risks that may affect long-term sustainability	account and explored in detail through subsequent development proposals as part of the preparation of lower-tier plans and project level applications.
University of Manchester	Q37. Do you agree or disagree that the AoS objectives as set out in the AoS framework are appropriate?	While the AoS objectives are broadly appropriate and relevant, some refinement is needed, particularly to strengthen social inclusion, marine biodiversity, and cumulative impact considerations. This would ensure the framework better captures the full sustainability profile of port development.	Noted, the proposed refinements to the framework are not considered likely to affect the nature and significance of the effects identified in the AoS Report.
University of Manchester	Q39. What, if any, incompatibilities exist between the main NPSP objectives and the AoS objectives that have not been identified in the AoS?	The AoS provides a useful appraisal of overall alignment, but it underrepresents several critical incompatibilities between key NPSP and sustainability objectives, particularly regarding: Growth vs. biodiversity, Market-driven planning vs. social equity, Decarbonisation ambition vs. infrastructure	The AoS has identified and evaluated the likely significant effects of the revised NPS, which does not set a requirement for the quantum or location of growth to be delivered. The precise location, scale and nature of development

		readiness, Streamlined planning vs. rigorous alternative assessment. These tensions should be more clearly articulated in the final AoS to support transparent, balanced decision-making and ensure the NPSP supports both national infrastructure priorities and the UK's long-term sustainability goals.	that could come forward is not known at this stage and will be considered in detail through subsequent development proposals and assessments as part of the preparation of lower-tier plans and project level applications.
University of Manchester	Q40. To what extent do you think the alternatives covered in the AoS are appropriate or inappropriate?	The AoS alternatives are too narrow to test whether the draft NPSP is the most sustainable or balanced option. Future iterations should assess a wider range of realistic, policy-relevant alternatives that reflect different levels of ambition, delivery models, and regional contexts.	Noted, the identification and assessment of alternatives outlined in Section of 2.4 and Section 5.2 of the AoS Report are considered robust and in line with legislative requirements and extant guidance and reflect the strategic nature of the plan.
University of Manchester	Q43. What additional alternatives do you think should be included?	The AoS should consider a broader range of alternatives to ensure the draft NPSP is truly the most sustainable option. In particular, the following alternatives would provide a more comprehensive assessment: 1. A Stronger Environmental Protection Alternative: A policy variant with stricter safeguards for biodiversity, marine habitats, and emissions, especially relevant for projects involving capital dredging or coastal works, such as at Port of Aberdeen's South Harbour, where marine mammal impacts had to be	Noted, the identification and assessment of alternatives outlined in Section of 2.4 and Section 5.2 of the AoS report are considered robust and in line with legislative requirements and extant guidance and reflect the strategic nature of the plan.

		closely managed. 2. A Social Inclusion and Community Benefit Alternative: A version of the NPSP that embeds local job creation, training, and community impact mitigation, highly relevant for Port of Tyne, which is actively promoting green jobs and workforce development linked to its clean energy hub. 3. A Spatially Targeted or Plan-Led Approach: An alternative that encourages development in areas with lower environmental sensitivity and stronger infrastructure links. For instance, Port of Dover, located in a highly constrained and sensitive area, might benefit from policy that steers high-impact freight growth elsewhere in the network. Conclusion: Including these alternatives would test different policy approaches and ensure that the final NPSP supports sustainable, inclusive, and regionally balanced port development.	
University of Manchester	Q44. To what extent do you think the approach taken in the AoS to the assessment of alternatives is suitable or unsuitable?	The approach taken in the Appraisal of Sustainability (AoS) to assessing alternatives is only partly suitable. While it satisfies the basic legal requirement to compare the revised NPSP with a “do nothing” scenario, it is too limited in scope to support a genuinely strategic sustainability appraisal.	Section 2.4 of the AoS Report identifies that a ‘do nothing’ scenario is not a reasonable or realistic alternative and it is therefore not taken forward for appraisal through the AoS. Following the application of the reasonableness test in compliance with Regulation

			12 (2) of the SEA Regulations, one alternative to the revised NPS was identified as reasonable and taken forward for appraisal as part of this AoS. This is an alternative NPS that is more explicit in terms of the quantum of growth required to meet forecasted demand.
University of Manchester	Q46. Do you agree or disagree with the results of the assessment of alternatives?	I partly agree with the results of the assessment of alternatives. The AoS rightly concludes that updating the NPSP is preferable to retaining the outdated 2012 version. However, the assessment is too limited, as it fails to explore other realistic policy options such as stronger environmental safeguards, social inclusion measures, or spatial planning approaches. Conclusion: The preferred option may be valid, but the narrow range of alternatives assessed limits the strength of the conclusion.	Noted, the identification of reasonable alternatives is set out in Section 2.4 of the AoS Report. The consideration of reasonable alternatives is considered robust and in line with legislative requirements and extant guidance and reflects the strategic nature of the plan.
University of Manchester	Q48. To what extent do you think the assessment correctly or incorrectly identifies the sustainability effects of the draft NPS?	While generally accurate, the assessment would benefit from a more detailed and balanced analysis of social and cumulative sustainability effects.	Noted, the AoS approach and methodology reflects and is proportionate to the strategic nature of the revised NPS.

University of Manchester	Q50. Have any vital findings from the AoS report not been appropriately taken into account in the NPS?	The NPSP reflects some AoS findings but misses opportunities to strengthen policy in areas of social equity, environmental safeguards, and cumulative impact management.	Noted, Section 3 in this PAS sets out how the findings of the AoS have been taken into account.
University of Manchester	Q52. To what extent do you think the approach to monitoring the sustainability effects of the NPS is sufficient or insufficient?	The approach to monitoring the sustainability effects of the NPSP is currently insufficient. While the draft recognises the need for monitoring, it lacks: • Specific indicators or metrics to track environmental, social, and economic impacts. • A clear responsibility framework, which will collect the data, how often, and how it will inform future policy updates. • Port-level or regional sensitivity, which is essential for locations like Port of Aberdeen (marine ecology), Port of Dover (community and congestion impacts), and Port of Tyne (green energy transition) Conclusion: A more structured and transparent monitoring approach is needed to ensure the NPSP delivers on its sustainability objectives and responds effectively to emerging impacts over time.	Noted, the proposed monitoring measures reflect the strategic nature of the plan and reflect that the precise locations, scale and nature of future development that might come forward is not known.
Pembrokeshire County Council	WF Q36 - Has the baseline analysis in the AoS missed any or misinterpreted any environmental data,	In the context of Milford Haven Port, consideration should be given to the NRW's recently published marine SAC condition report. DNR re specific data missed or misinterpreted.	Noted, any recently published or future data/ information will be considered in detail through subsequent development

	social data or economic data? If yes, what data and why?		proposals and assessments as part of the preparation of lower-tier plans and project level applications.
Pembrokeshire County Council	WF Q44 and 45 - To what extent do you think the approach taken in the AoS to the assessment of alternatives is suitable or unsuitable?	Neither suitable nor unsuitable. HRA involved as assessment of likely significant effect and where necessary appropriate assessment and then if required mitigation/derogation aspects.	Noted, no changes required to the AoS Report.
Pembrokeshire County Council	WF Q52 and 53 - To what extent do you think the approach to monitoring the sustainability effects of the NPS is sufficient or insufficient?	Neither sufficient nor insufficient; HRA involves an assessment of likely significant effect and where necessary Appropriate Assessment and then if required mitigation / derogation aspects.	Noted, no changes required to the AoS Report.
Marine Management Organisation	WF Q36- Has the baseline analysis in the AoS missed any or misinterpreted any environmental data, social data or economic data? If yes, what data and why?	The AoS demonstrates a thorough methodology at a strategic policy level. Explicit consideration and justification for inclusion or exclusion of alternatives and detailed appraisal and improvement recommendation indicate a robust approach.	Noted, no changes to the AoS Report required.

Marine Management Organisation	WF Q39 - What, if any, incompatibilities exist between the main NPSP objectives and the AoS objectives that have not been identified in the AoS?	The methodology and outputs indicate that any potential incompatibilities are managed by existing policy or guidance or are areas where NPSP contribution is neutral, which recommendations are made.	Noted, no changes to the AoS Report required.
Marine Management Organisation	WFQ 40, 41, 42, 43 - To what extent to you think the alternatives covered in the AoS are appropriate or inappropriate? Why? Are there any additional alternatives that you think should be included? What additional alternatives do you think should be included?	Neither appropriate nor inappropriate; The AoS demonstrates a thorough methodology at a strategic policy level. Explicit consideration and justification for inclusion or exclusion of alternatives and detailed appraisal and improvement recommendation indicate a robust approach. No alternatives.	Noted, no changes to the AoS Report required.
Marine Management Organisation	WF Q44 and 45- To what extent do you think the approach taken in the AoS to the assessment of alternatives is suitable or unsuitable? Why?	Somewhat suitable - The NPSP does not clarify if AoS findings must be translated into Harbour Order guidance or thresholds, particularly regarding air quality, biodiversity net gain, or cumulative impacts. This omission risks weakening the objectives of the environmental improvement plan and Marine Net Gain policies. The process outlined appears to have thoroughly	Noted, no changes to the AoS Report required.

		explored the "reasonable alternatives" options within it strategic remit.	
Marine Management Organisation	WF Q52 and 53 - To what extent do you think the approach to monitoring the sustainability effects of the NPS is sufficient or insufficient? Why?	Partially suitable - The approach to monitoring is sufficiently justified within the high-level policy context, however its inherent limitations mean that a significant portion of detailed impact identification, mitigation and monitoring responsibility is deferred to future project-level Environmental Impact Assessments and Habitat Regulation Assessments. The framework for monitoring is sufficient for this context but the effectiveness will rely on the application of these principles at project level and monitoring for unforeseen effects.	Noted, no changes to the AoS Report required.



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