

## National Networks National Policy Statement

### A CPRE briefing for the House of Commons designation debate - January 2015

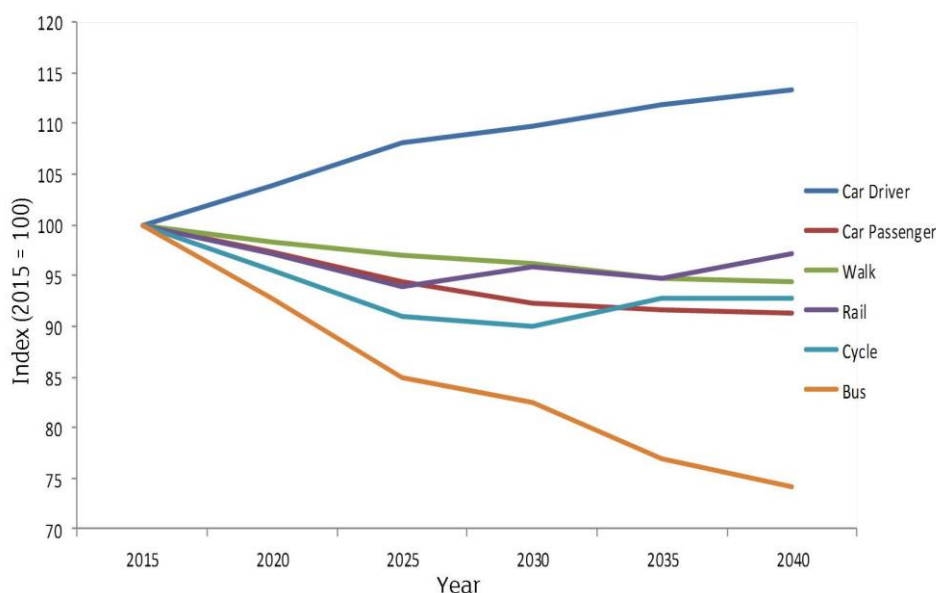
1. The National Networks National Policy Statement ('the NPS') is the first long-term planning document for the Strategic Road Network, railways and Rail Freight Interchanges. The Campaign to Protect Rural England (CPRE) welcomes the creation of this NPS, which was originally due to be finalised in 2010, because putting planning policy for major road and rail schemes into one document makes the planning system more efficient and accessible.
2. Unfortunately the content of the NPS remains of concern and, although there have been a number of changes, these are unlikely to mean many differences in practice to the draft NPS that was published in December 2013. The draft NPS was criticised by a wide range of professional bodies and the Transport Committee as well as securing a record 5,800 consultation responses, 4,000 of which were generated in just two weeks through a CPRE campaign. This set a new record for this type of technical planning consultation and shows the depth and breadth of public concerns.
3. In particular the NPS:
  - would through its policies result in a 121% increase in congestion by 2040 (graphically shown in the maps contained in annex A), in sharp contrast to the Department for Transport's (DfT) vision in the Road Investment Strategy (RIS) of a 'free-flow core network, with mile a minute speeds increasingly typical';
  - fails to contain any spatial or locational policy to guide decision makers for important matters, such as the development of expressways that form a central part of the RIS, or for high speed rail, whether in relation to connecting HS2 better to the existing rail network or the development of HS3;
  - is out-of-date on rail freight, with a ten year old evidence base, and would leave out large parts of England cut off from the strategic rail freight network, including most of the south west (annex C);
  - fails to integrate with the core planning principle in the National Planning Policy Framework (NPPF) to plan for the 'fullest possible use' of sustainable forms of travel;
  - would generally prevent the public from being able to require planning inspectors to consider sustainable alternatives to major transport schemes.
4. In the circumstances, we believe that there are so many fundamental problems with the NPS that it is currently unfit for purpose. We therefore request that MPs should press ministers for further changes to deal with these matters and that they do not vote for it to be designated until these changes are made.
5. It might be argued that such a vote could delay Nationally Significant Infrastructure Projects that are essential for the economy. According to a recent [Planning Inspectorate infographic](#), however, all such schemes that have been considered since the Planning Act 2008 came into force have met strict statutory time scales. A third of the schemes considered by the Inspectorate were transport schemes and all have been approved.

6. At a time when there is a significant uplift in investment in transport infrastructure, which is forecast to increase to as much as a quarter of the Government's capital spending, it is imperative that there is sound policy underpinning such investment. Otherwise there is a risk not just of damaging our countryside through building the wrong infrastructure in the wrong places, but also damaging our economy.

### Modal shift and alternatives

7. Whether we want to seek to rebalance the transport system so that people and businesses are not so dependent on cars and lorries is key to deciding what policy should be in the NPS. CPRE and others argue that the NPS should, in line with existing Government policy in the NPPF, plan for the 'fullest possible use' of sustainable travel. The Government's response to those is that 'it is not realistic for public transport, walking or cycling to represent a viable alternative to the private car for all journeys, particularly in rural areas' (page 14). Yet no one is suggesting that journeys should never be made by car, rather that with a growing population in an already densely populated country, we should seek to plan for car travel to make up a lower share of travel.
8. The DfT's National Transport Model forecasts the opposite happening - although the amount of rail travel is predicted to increase along with population, the average distance travelled by rail per person is predicted to decrease. The share of journeys made by car will increase significantly, as the chart below shows<sup>1</sup>, and this is largely due to the cost of driving being predicted to drop by as much as 30% due to more fuel efficient vehicles. The drop in walking, cycling and in particular bus use would be greater, even more so in rural areas than the chart below shows, once trends in cities such as London are stripped out. In other words the policy in the NPS risks locking ever more people outside big cities into car dependency.

Journeys by type, 2015-2040



<sup>1</sup> Department for Transport trip forecasts by mode; provided by Robert Goodwill MP in response to a written question, 21 Nov 2014, <http://www.parliament.uk/business/publications/written-questions-answers-statements/written-question/Commons/2014-11-18/214853/>

9. A further concern is that the NPS effectively precludes assessment of alternative options in the planning process. Paragraph 4.27 states 'For national road and rail schemes, proportionate option consideration of alternatives will have been undertaken as part of the investment decision making process. It is not necessary for the Examining Authority and the decision maker to reconsider this process, but they should be satisfied that this assessment has been undertaken.' Besides the lack of public engagement in the investment process, road schemes are considered by the Highways Agency from a roads specific budget and this means that in practice alternative options will not be considered. This has been a concern across many of the feasibility studies and route strategies that the Agency has commissioned, with many not even showing in their maps the railways that run parallel to road corridors being studied.
10. Not all alternatives need involve other forms of infrastructure. The *Creating growth: cutting carbon* Transport White Paper published in 2010 highlighted the success of the Highways Agency's Influencing Travel Behaviour programme, which promoted measures such as lift sharing, cycling and commuter buses. This 'achieve[d] high value for money, with benefits outweighing costs by up to 13:1', including 'reduced journey times of 5-6% across the surrounding local and strategic road networks' (paragraph 7.26 of the White Paper). The DfT has wrongly ignored its own evidence, which CPRE highlighted in our consultation response, ruling out such measures on the basis of older studies, which in fact focused on travel within towns.

## Rail

11. Environmental Information Requests made by CPRE revealed that the DfT has not updated its rail freight evidence base since 2003. Officials justified this on the basis that little has changed. In light of the growth of internet shopping and the shift from out-of-town shopping to smaller format stores, this approach seems somewhat surprising. The NPS favours very large Strategic Rail Freight Interchanges, which not only risk damaging the countryside, through requiring huge sites often in Green Belt, but also mean larger lorries travelling longer distances to make deliveries. Besides the road safety risks to pedestrians and cyclists, this risks smaller towns being clogged up by HGVs making last-leg deliveries.
12. The West Country (beyond Bristol/Southampton), Norfolk and the South Coast between Dover and Southampton are left out of the strategic rail freight network (annex C). These areas are also where road building proposals are being fast-tracked through nationally designated landscapes: namely through the feasibility studies for the A303, the A47 and the A27. CPRE believes that there should be much greater emphasis in extending the reach of the rail network, particularly in rural areas, and a bigger network of smaller rail freight interchanges.

## Environmental mitigation

13. There are certainly some improvements regarding environmental policies in NPS compared to the draft, for example on biodiversity (where the policy in the Natural Environment White Paper is incorporated) and landscape (incorporating Defra guidance against major development in nationally designated landscapes). Avoiding environmental impacts should always be the primary aim, with mitigation coming second, however. The focus on increasing capacity for motor traffic and the limitation on consideration of alternatives at the planning stage means the NPS still poses an unacceptable risk to our most precious countryside.
14. In relation to carbon emissions, there were good grounds to believe that the consultation draft of the NPS was unlawful in that it sought to prevent decision makers considering such emissions. The NPS now says that emissions may only be

considered insofar as emissions from any particular scheme might put at risk the achievement of carbon targets. No single scheme is likely to be assessed as running this risk, but the cumulative impact of the biggest road building programme since the 1970s would make achieving the radical reductions in emissions needed more difficult. This is all the more so for the transport sector, due to the difficulty of decarbonising aviation and shipping.

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