

**THE NATIONAL POLICY  
STATEMENT FOR NATIONAL  
NETWORKS**

**POST ADOPTION  
STATEMENT**

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## Post-Adoption Statement

### 1. INTRODUCTION

#### 1.1 National Policy Statement for National Networks

1.1.1 The National Networks National Policy Statement (NN NPS) sets out the need for and Government's policies for development of nationally significant infrastructure projects on the national road and rail networks. It provides planning guidance for promoters of nationally significant infrastructure projects on the road and rail networks, and the basis for the examination by the Examining Authority and decisions by the Secretary of State. The thresholds for nationally significant road, rail and strategic rail freight infrastructure projects are defined in the Planning Act 2008 ("the Planning Act") as amended (for highway and railway projects) by The Highway and Railway (Nationally Significant Infrastructure Project) Order 2013 ("the Threshold Order").

1.1.2 The Secretary of State will use the NN NPS as the primary basis for making decisions on development consent applications for national networks NSIPs in England.<sup>1</sup> Under Section 104 of the Planning Act the Secretary of State must decide an application for a national networks NSIP in accordance with the NN NPS unless it is satisfied that to do so would:

- Lead to the UK being in breach of its international obligations;
- Be unlawful;
- Lead to the Secretary of State being in breach of any duty imposed by or under any legislation;
- Result in adverse impacts of the development outweighing its benefits; and
- Be contrary to regulations about how the decisions are to be taken.<sup>2</sup>

1.1.3 The NN NPS does not cover High Speed Two (HS2). The High Speed Two Hybrid Bill will seek the necessary legal powers to enable the construction and operation of Phase 1 of HS2, including the powers to acquire the necessary land and undertake the works required. A Hybrid Bill process will also be used for Phase 2 of HS2. The NN NPS sets out the Government's policy for development on the national road and rail networks and SRFIs, taking into account the capacity and connectivity that will be delivered through HS2.

1.1.4 The NN NPS has been laid for designation for the purposes of the Planning Act 2008 and adopted for the purposes of the SEA Directive in Autumn 2014. Copies of the NN NPS and the accompanying documents are available free of charge at [www.gov.uk](http://www.gov.uk).

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<sup>1</sup> In Scotland, Wales and Northern Ireland, the authorisation of all national networks projects are devolved to the Scottish Government, Welsh Government and Northern Ireland Assembly.

<sup>2</sup> Planning Act 2008 Section 104 - Decisions in cases where national policy statement has effect.

## **1.2 Appraisal of Sustainability (AoS)**

- 1.2.1 The Planning Act 2008 requires Government Departments to assess the social, economic and environmental sustainability of a policy stated within an NPS through the production of an Appraisal of Sustainability (AoS)<sup>3</sup>. The Secretary of State must exercise functions relating to the designation of national policy statements with the objective of contributing to the achievement of sustainable development, in particular having regard to mitigating and adapting to climate change and achieving good design.
- 1.2.2 The Strategic Environmental Assessment (SEA) Directive (2001/42/EC), and the transposed SEA Regulations, require that before a plan or programme, which establishes the framework for development consent is adopted, it should be subject to consultation alongside an Environmental Report which identifies, describes and evaluates the significant effects, which its implementation is likely to have on the environment. The objective of the SEA Directive is to provide for a high level of protection of the environment and for environmental considerations to be integrated into the preparation and adoption of plans and programmes, with a view to promoting sustainable development.
- 1.2.3 The AoS Report<sup>4</sup>, which was published with the draft NN NPS for consultation in December 2013, combines the functions of an AoS under the Planning Act 2008 and an Environmental Report under the SEA Directive. The AoS Report examines the likely environmental, social and economic effects of the draft NN NPS, considers and compares reasonable alternatives to the policies contained within the NN NPS, identifies any potential significant adverse effects the NN NPS may have at a strategic level, and puts forward guidance for avoiding or mitigating any such effects when the NN NPS is applied at a project level.
- 1.2.4 The AoS for the NN NPS was undertaken at the same time as the drafting of the NN NPS. This ensured that findings from the AoS were taken into account and influenced the draft NN NPS, where practicable, prior to the public consultation stage.
- 1.2.5 All individual applications for projects which are likely to have a significant effect on the environment will also need to be accompanied by an Environmental Statement (ES) in accordance with the European Environmental Impact Assessment Directive<sup>5</sup>. The ES for an application will include a more detailed assessment of potential environmental impacts likely to result from the development of new national networks infrastructure at a particular location.

## **1.3 Habitats Regulations Assessment**

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<sup>3</sup> The 2008 Planning Act Part 2 Section 5(3)

<sup>4</sup> The draft National Policy Statement for National Networks Appraisal of Sustainability, Ramboll, 2013

<sup>5</sup> Council Directive 85/337/EEC on the Assessment of the Effects of Certain Public and Private Projects on the Environment, amended by Directives 97/11/EC and 2003/35/EC.

- 1.3.1 Under the Habitats Directive<sup>6</sup>, and the Habitats Regulations, a step by step process of considering the potential impacts of a plan or project on a European site is set out. This is the Habitats Regulation Assessment (HRA) Process. A HRA examines the potential effects of a plan or project, being undertaken by or authorised by a ‘competent authority’ on nature conservation sites that are designated to be of European importance. These sites are referred to as Natura 2000 sites or European Sites. . A ‘competent authority’ is any public body or individual holding public office, and therefore includes Government Departments preparing NPS. The HRA assesses the effects of the policy in the NN NPS.
- 1.3.2 Like the AoS, the HRA is a strategic-level stage in the process of ensuring that the potential impacts of new national networks infrastructure are properly considered. The Government has taken into account the findings of the AoS, the HRA, and the public consultation before designating the NN NPS.
- 1.3.3 Whilst a HRA has been carried out at the plan level, under the Habitats Directive and national transposing regulations, any application where a significant effect on European sites is likely, will require an appropriate assessment. Each application will first require a HRA screening and, if deemed necessary, the subsequent stages of the HRA.

#### **1.4 Consultation**

- 1.4.1 Statutory Consultees have been consulted throughout the AoS process, which commenced in 2008 with the first drafting of the NN NPS and initiation of the AoS Scoping process. The AoS Report was also subject to public consultation from 4<sup>th</sup> December 2013 until 26<sup>th</sup> February 2014.
- 1.4.2 These consultations have provided an opportunity for a wide audience to provide comments on the NN NPS and AoS. Where appropriate, comments from consultees have been taken into account (see Section 4 of this Statement). A summary of the relevant processes and consultations is given in Section 2).

#### **1.5 Purpose of this Post-Adoption Statement**

- 1.5.1 Article 9(1)(b) of the SEA Directive<sup>7</sup> requires that when a plan or programme is adopted, there should also be made available a statement summarising:
- How environmental considerations have been integrated into the plan or programme;
  - How the Environmental Report has been taken into account;
  - How opinions expressed in response to public consultations on the draft plan or programme and the environmental report have been taken into account; and
  - The reasons for choosing the plan or programme as adopted, in light of other reasonable alternatives dealt with.

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<sup>6</sup> Directive 92/43/EEC on the Conservation of Natural Habitat and of Wild Fauna and Flora (EC Habitats Directive) implemented through The Conservation of Habitats and Species Regulations 2010

<sup>7</sup> The Strategic Environmental Assessment (SEA) Directive (2001/42/EC), see also Regulation 16(4) of the Environmental Assessment of Plans and Programmes Regulations 2004.

1.5.2 This Statement is designed to fulfil these requirements, and therefore is formatted as follows:

- Section 2: How environmental considerations have been integrated into the National Networks National Policy Statement;
- Section 3: AoS Report, and how its recommendations have been taken into account in the designated National Networks NPS;
- Section 4: How comments received at consultation have been taken into account; and
- Section 5: Reasons for choosing the National Networks NPS as designated, in light of reasonable alternatives.

1.5.3 An additional requirement of the SEA Directive is to make available the details of the measures that are to be taken to monitor significant environmental effects of the implementation of the plan or programme. No significant environmental effects were identified during the AoS process and therefore no monitoring has been proposed. However, appropriate monitoring and evaluation of network level and scheme level impacts already takes place. At a network level the Highways Agency and Network Rail already monitor environmental and other impacts of the networks. For individual schemes appropriate evaluation takes place, for example the Highways Agency has an established process of Post Opening Project Evaluation (POPE) covering a wide range of economic, environmental and social impacts to understand whether the scheme has brought the benefits anticipated and whether the other impacts of the scheme were as predicted.

## **2. HOW ENVIRONMENTAL CONSIDERATIONS HAVE BEEN INTEGRATED INTO THE NATIONAL POLICY STATEMENT FOR NATIONAL NETWORKS**

### **2.1 Introduction**

2.1.1 The Department for Transport (DfT) support sustainable development, and recognises that for development of the national road and rail networks to be sustainable it should be designed to minimise social and environmental impacts and improve quality of life. The NN NPS brings together a range of social, environmental and economic policies with the objective of contributing to the achievement of sustainable development. The strategic objectives of the NN NPS contain objectives with economic, environmental, and social focus. The NN NPS strategic objectives are as follows:

- Networks with the capacity and connectivity and resilience to support national and local economic activity and facilitate growth and create jobs;
- Networks which support and improve journey quality, reliability and safety;
- Networks which support the delivery of environmental goals and the move to a low carbon economy; and
- Networks which join up our communities and link effectively to each other.

2.1.2 Much of the NN NPS consists of a discussion of how applications for new national networks schemes should be determined to ensure sustainability. Particular reference is given to the mitigation of environmental and social impacts, and sustainability considerations have been integral to the development on the NN NPS.

2.1.3 The AoS provides assurance that the NN NPS includes the high standards of environmental protection referred to in the SEA Directive, and the concern for sustainable development referred to in the Planning Act 2008. Annex I of the SEA Directive requires that assessments should include information on the “likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage and landscape.” In order to ensure that relevant aspects of the current state of the environment, and the likely evolution thereof, were addressed as part of the AoS, the initial Scoping stage of the SEA included a review of relevant existing policies, plans and programmes (PPPs) and a baseline data review to help identify any relevant environmental protection objectives and key sustainability issues that would need to be taken into account during the preparation of the NN NPS.

2.1.4 A framework for undertaking the appraisal was then developed. This framework determined how the appraisal would be undertaken and what objectives (the AoS objectives) the NN NPS and alternatives would be assessed against. The AoS objectives are set out in Table 1 below.

**Table 1: AoS Objectives**

AoS Objective
AoS1: To contribute towards the reduction of noise levels from road and rail national networks
AoS2: To contribute towards improving local air quality
AoS3: To contribute towards the reduction of greenhouse gas emissions
AoS4: To protect and enhance landscape quality, townscape quality and to enhance visual amenity
AoS5: To protect and preserve heritage assets in a manner appropriate to their significance
AoS6: To preserve, protect and enhance biodiversity
AoS7: To encourage the protection of water resources (quantity)
AoS8: To encourage the protection of water quality
AoS9: To contribute towards increased resilience on national networks
AoS10: To minimise the impact on soil and land resources including contamination and loss
AoS11: To minimise the use of previously undeveloped land
AoS12: To encourage the use of recycled materials in the construction of infrastructure, whilst reducing, re-using or recycling the waste generated from construction
AoS13: To contribute towards reducing the risk of flooding in the hinterland
AoS14: To reduce accidents and incidents on national networks and reduce risk to the users of road and rail network
AoS15: To contribute to the reduction of crime and fear of crime among vulnerable groups and transport user types
AoS16: To contribute towards the maximisation of user benefits on the national networks
AoS17: To contribute towards the improvement of levels of congestion and reliability on the National Networks
AoS18: To contribute towards better strategic transport access to deprived areas and areas of high unemployment
AoS19: To contribute towards the improvement of accessibility to and from rural areas
AoS20: To contribute to reduced severance of transport routes and recreational areas as a result of national network development and operations
AoS21: To enhance access to national networks and the jobs, services and social networks they create, including for the most disadvantaged
AoS22: To ensure the needs of different social groups are taken into account in national network planning and service delivery
AoS23: To contribute towards improving health and public health

2.1.5 The AoS Report and the NN NPS were developed alongside each other in an iterative way. As emerging issues were identified during the appraisal, they were discussed with the team preparing the draft NN NPS. This process resulted in a number of suggestions and recommendations by the AoS team that were incorporated into the NN NPS at an early stage.

## 2.2 Engagement with Stakeholders

2.2.1 Consultation has been integral to the AoS process, as engagement with stakeholders has helped to enrich the consideration given to environmental and sustainability issues during the formulation of the NN NPS. The formal statutory consultation exercise with the Statutory Consultation Bodies has been supported throughout by informal engagement across government departments, and with key stakeholder specialists and agencies, including wide engagement through the public consultation period. The stages that formed the AoS process, including key consultation periods, is summarised in Table 2 below.

**Table 2: Summary of AoS Process and Key Consultation Stages**

<b>AoS Development and Consultation</b>	<b>Date</b>	<b>Purpose</b>
Preparation of AoS Scoping Report	Published March 2009	To set the policy context and objectives, establishing the baseline and deciding on scope and appraisal methodology in consultation with statutory consultees
Consultation on AoS Scoping Report (including workshops with SEBs)	3 Dec 2008 7 May 2009 1 Oct 2009 13 Sept 2011 18 Sept 2013 19 Sept 2013	To allow the statutory consultees to provide comment on the review of PPPs, the baseline data, the key sustainability issues, and the proposed methodology and framework for the appraisal.
Preparation of draft AoS Report (alongside preparation of draft NN NPS)	June 2013 to November 2013	To appraise the potential impacts of the National Networks NPS and its alternatives, and make recommendations for future monitoring where necessary.
Consultation on draft NN NPS and AoS Report	4 December 2013 to 26 February 2014	To identify whether the draft NN NPS was fit for purpose i.e. provided a suitable framework for the IPC to make decisions on applications for the development of national networks schemes. To identify whether the AoS covered all likely sustainability impacts, identified reasonable alternatives, adequately described impacts and cumulative impacts, identified suitable mitigation, and made suitable proposals for monitoring.
Preparation of final NN NPS	March 2014 final publication	To take on board, as appropriate, comments made during consultation.
Laying of final NN NPS and designation	Late 2014	To formally publish the agreed framework for decisions on national networks NSIPs.
Issue of Post Adoption Statement	Late 2014	Following consultation on the draft NN NPS and the AoS Report, this Post Adoption Statement sets out how the consultation and the appraisal have

AoS Development and Consultation	Date	Purpose
		been taken into account in deciding the final NN NPS to be designated.

### **3. HOW THE RECOMMENDATIONS OF THE AOS REPORT HAVE BEEN TAKEN INTO ACCOUNT IN THE DESIGNATED NATIONAL POLICY STATEMENT FOR NATIONAL NETWORKS**

3.0.1 The changes to the NN NPS as a result of the AoS process are described in the AoS report, but mainly revolved around the inclusion of environmental mitigation measures.

3.0.2 The SEA Directive states that in addition to the appraisal of the plan or programme, the appraisal must be carried out on “reasonable” alternatives. DfT identified two alternatives involving different emphasis on road and rail travel relative to the NN NPS policy. Alternative 1 tested an approach that seeks to shift demand from road to rail through increased rail provision and sustainable transport measures and an increase in the cost of motoring. It involved a smaller roads infrastructure package than in the NPS, targeted at making best use of the existing national road network. Alternative 2 tested an expanded infrastructure package on the national road network, accompanied by reductions in rail provision and a “do minimum” approach to environmental standards and policies.

3.0.3 It was identified that Alternative 1 showed a similar commitment to environmental mitigation than the NN NPS which meant that Alternative 1 scored broadly the same as the NN NPS against the environmental objectives. However, due to the limited scale of the infrastructure works in Alternative 1 and the mitigation measures put forward, the scores were closer to neutral than the NN NPS.

3.0.4 The NN NPS team considered the environmental mitigation measures contained within Alternative 1, and identified where elements of this mitigation could be incorporated into the NN NPS. The NN NPS policy was amended and then the Impact Assessment Tables were rescored for the amended NN NPS. It is considered that the NN NPS is now introducing measures relating to environmental mitigation which up until now have not been fully articulated or set out in transport policy in the UK. The measures that are now part of the NN NPS as a result of the AoS process are as follows:

- Targeted measures to reduce pollution in areas of poor air quality, including the opportunity to use speed management on Smart Motorways to reduce emissions;
- Use of measures to address biodiversity fragmentation as a result of existing road and rail infrastructure;
- Proactive commitment to addressing existing noise issues on the networks through the implementation of mitigation measures, rather than a policy of primarily addressing noise problems opportunistically as part of measures implemented for other reasons, such as safety; and
- Commitment to implementing enhancement measures for both existing identified problems and for future schemes in the areas of flood risk, water quality, air quality, noise, heritage, landscape and biodiversity.

#### 4 HOW OPINIONS EXPRESSED DURING PUBLIC CONSULTATION HAVE BEEN TAKEN INTO ACCOUNT

4.0.1 The consultation on the draft National Networks NPS was undertaken between 4<sup>th</sup> December 2013 and 26<sup>th</sup> February 2014.

4.0.2 Following consideration of the responses to this consultation, and the outputs of the Parliamentary scrutiny process, the Government has made changes to the draft NN NPS and AoS. A Government Response to that consultation has been published, which identifies the comments received and the responses from DfT to the consultation on the draft NN NPS and AoS. Where the comments received were specifically about the appraisals in the AoS Report, these are summarised in this Post Adoption Statement. The comments have been grouped together by common theme or issue for ease of presentation and are presented in Table 3 below, along with an outline of the specific comments received against each theme and our responses.

**Table 3: Consultation comments on AoS Report and relevant responses**

Issue / Theme	Comment	Response
Alternatives	<p>Alternatives do not seem broad enough or sufficiently different.</p> <p>No consideration of “business as usual”.</p> <p>Alternatives should be described and evaluated in same manner as the proposed option.</p> <p>No consideration of demand management measures.</p> <p>Too little consideration of sustainable transport measures and smarter choices.</p>	<p>For the purposes of the SEA Directive, a reasonable alternative to a plan or programme, can, in broad terms, be defined as a different way of fulfilling the objectives of the plan or programme. Policies which would not achieve those objectives are therefore not included in the AoS. The alternatives, do, however, cover different policies that could be pursued in pursuit of the given objectives.</p> <p>“Business as usual” was not considered an appropriate alternative to appraise. As mentioned above, the alternatives selected need to be alternative policy options that would meet the strategic objectives of the Plan, and it is not considered that maintaining “Business as Usual” would be able to meet those objectives. For this reason, this was not considered as an alternative.</p> <p>Because of the large number of policies in the AoS, and its strategic nature, it is considered that the highly strategic approach that was taken to selecting alternatives is the most appropriate one. Illustrations of the kinds of policies (“interventions”) that would be involved in the alternatives are given in the AoS. All the alternatives were defined in ways which makes it clear how they differ from the plan in strategic</p>

Issue / Theme	Comment	Response
		<p>terms. Alternatives were “ruled out” early on in the process due to them being considered unreasonable. The appraisal has been undertaken in the same manner for both the NN NPS and the two alternatives. There is no difference of approach in the way the impacts of reasonable alternatives and the plan were evaluated.</p> <p>Consideration was given to demand management under Alternative 1 through the inclusion of an intervention which moderately increases the cost of motoring.</p> <p>In terms of smarter choices and alternative travel solutions, it is acknowledged that the alternatives presented in the draft AoS did not contain extensive details regarding the smarter choices interventions that were included in each alternative. However, the approach taken was not intended to consider and estimate the impact of every single policy intervention that could be adopted within an alternative. In practice there will be many variations of policies that could be included within a particular alternative but it is not necessary to consider all these for the purpose of a strategic level appraisal. The approach taken was designed to highlight differences in the impacts of the strategic variations in policy between the NN NPS, Alternative 1 and Alternative 2. This approach has been clarified in the revised AoS Report.</p>
Cumulative Impacts	<p>Cumulative impacts not assessed adequately.</p> <p>The impacts of extra traffic generated by NN NPS developments on local networks need consideration (i.e. underestimation of induced traffic).</p> <p>Types of cumulative impacts reported, but no assessment as to what impacts are identified or the potential significance of cumulative impacts.</p>	<p>Additional clarifications as to how cumulative impacts were addressed have been added to the AoS Report.</p> <p>The level of induced traffic reported in the NN NPS (1%) is based on modelling work carried out using the National Transport Model (NTM) and is not based on evidence from the POPE studies. The modelled result was achieved by comparing the forecast traffic levels of the baseline scenario and the ‘illustrative’ NN NPS investment scenario for the entire SRN in the year 2040. The figure for induced traffic covering all roads in England is 0.45%.</p> <p>As regards the compliance of the AoS Report with the requirements of the SEA Directive, see</p>

Issue / Theme	Comment	Response
	Compliance with SEA Directive questioned.	Table 1 and Appendix A to the AoS Report.
Framing of Objectives	<p>Wording of objectives is weakened by inclusion of “where possible” and similar phrases.</p> <p>Impact assessment tables do not refer to key considerations from AoS Framework.</p>	<p>The sustainability objectives were agreed by the Statutory Environmental Assessment Consultation Bodies at the AoS Scoping stage, and further refined during consultation with these bodies during workshops and correspondence during the drafting of the NN NPS and AoS.</p> <p>The Impact Assessment (IA) tables within the AoS do take into account the key considerations (table 2 of the AoS) but it is acknowledged that the linkage is not made explicit. Additional references to these key considerations have been added to the IA tables in the updated AoS Report.</p>
Scoring of impacts / judgements	<p>Imbalance between social, economic and environmental objectives.</p> <p>Disagreement with scoring of air quality impacts.</p> <p>Underestimation of landscape impacts and environmental impacts in general, especially due to off-setting impacts through non-NSIP policies.</p> <p>Concern regarding wording of summary text for environmental impacts of the NN NPS. Requested revised wording to identify that overall, impacts will be negative in terms of the delivery of the environmental objectives, but that no significant effects have been identified.</p>	<p>It is acknowledged that the weighting of social, economic and environmental objectives seems to be imbalanced. However, the NN NPS was selected on the basis that it provides the best overall sustainability performance compared to the alternatives.</p> <p>The scoring of air quality impacts is evidence based. Specifically, reference has been made to POPE analysis, NTM modelling and the mitigation measures contained within the NN NPS.</p> <p>We consider that the evaluation of landscape impacts is correct. No clarification was provided in the relevant comment as to why this was considered an underestimation, and therefore it is not possible to specifically address this comment. However, the NN NPS includes wider national networks policy that goes beyond just nationally significant infrastructure projects (NSIP) schemes. The NN NPS sets out the policy for the future development of NSIPs on the road and rail networks. As well as covering policy around the development of NSIPs, it also covers the Government’s broader policies relating to the national networks, in particular improvements and enhancements below the NSIP thresholds and environmental and sustainable transport policies. These broader policies are an integral part of the Government’s overall approach to developing NSIPs.</p>

Issue / Theme	Comment	Response
	<p>Assumption of neutral impact on air quality is based on falling background levels due to improving technology, etc. Assumptions should be treated conservatively.</p> <p>Adverse localised air quality impacts need to be given due weight and not overshadowed by only considering the cumulative impact on national air quality and noise climates.</p>	<p>We acknowledge the wording relating to overall environmental impacts of the NN NPS could be clarified and therefore this section of the AoS Report has been revised as requested.</p> <p>It is acknowledged that the prediction of falling background emissions from transport is based on assumptions about the future. However, the impact assessment and appraisal has been undertaken on a precautionary basis on the policy against the future baseline, and therefore it is considered that we have indeed treated assumptions conservatively as requested.</p> <p>The NN NPS states that the Secretary of State should refuse consent where, after taking into account mitigation, the air quality impacts of the scheme will result in a zone/agglomeration, which is currently reported as being compliant with the Air Quality Directive becoming non-compliant; or affect the ability of a non-compliant area to achieve compliance within the most recent timescales reported to the European Commission at the time of the decision.</p>
Monitoring and evaluation	Monitoring of the conclusions of the AoS should be undertaken and include indicators for all significant effects.	The NN NPS was not found to significantly detract from any of the AoS objectives and therefore no monitoring is required under the SEA Directive. However, appropriate monitoring and evaluation of network level and scheme level impacts takes place. At a network level the Highways Agency and Network Rail already monitor environmental and other impacts of the networks. For individual schemes appropriate evaluation takes place, for example the Highways Agency has an established process of Post Opening Project Evaluation (POPE) covering a wide range of economic, environmental and social impacts to understand whether the scheme has brought the benefits anticipated and whether the other impacts of the scheme were as predicted.
Opportunities for improvement	Biodiversity off-setting is at the bottom of the mitigation hierarchy and should be used as a last resort.	We acknowledge that biodiversity off-setting is not always appropriate and consider that solutions higher up the mitigation hierarchy should be investigated first. However, given the spatial constraints to development on the national networks, it is considered that there may be situations where off-setting is

Issue / Theme	Comment	Response
		appropriate, with the caveat that compensation measures should only be sought as a last resort where significant harm cannot be avoided or mitigated (i.e. in line with the mitigation hierarchy).

## **5 REASONS FOR CHOOSING THE NPS FOR NATIONAL NETWORKS AS ADOPTED IN THE LIGHT OF OTHER REASONABLE ALTERNATIVES**

### **5.1 Introduction**

5.1.1 As required by the SEA Directive, Section 7 of the AoS includes an assessment of reasonable alternatives to the policies set out in the National Networks NPS.

### **5.2 Process of Identifying Reasonable Alternatives**

5.2.1 The development of the NN NPS and reasonable alternatives was an iterative process, based on the SEA guidance, which states that “only reasonable, realistic and relevant” alternatives need to be put forward, and that it is helpful if they are sufficiently distinct to enable meaningful comparisons to be made of the environmental implications of each.

### **5.3 Reasonable Alternatives Considered for the National Networks NPS**

5.3.1 The development of key strategic policy alternatives to the NN NPS was guided by DfT. In developing the alternatives DfT focused on the key strategic choices the Government has in setting policy on development of the national networks to achieve the strategic objectives of the NN NPS. The key strategic choices in setting the policy in the NN NPS are:

- Approach to infrastructure provision – the level and nature of infrastructure provision, including choices around different approaches/technologies for delivering capacity increases and journey time savings e.g. on the road network using smart motorways rather than conventional widening;
- Modal shift/split – the balance between road and rail infrastructure provision including measures to encourage greater use of sustainable transport modes;
- Demand management – fiscal and non-fiscal measures to influence travel demand, for example changes in the cost of motoring and “softer” measures such as improvements in travel information; and
- Approach to environmental standards – different approaches to environmental standards, for example “do legal minimum” versus more interventionist approaches.

5.3.2 In developing alternatives, DfT considered variations in the strategic approach to each of the choices set out above.<sup>8</sup> As the scope of the NN NPS is largely confined to the development of the national rail network and the SRN and strategic rail freight interchanges, the alternatives focused on these networks, rather than for example, strategic choices available on urban

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<sup>8</sup> Consideration of the key strategic choices is consistent with how the constituent policies in the NN NPS have developed over time. The consideration of high level strategic choices such as options to manage demand and alternative modal solutions is consistent with the European Commission’s SEA Transport Manual.

roads that are the responsibility of local authorities.<sup>9</sup>

5.3.3 DfT identified two alternatives involving different emphasis on road and rail travel relative to the NN NPS policy. The objective of this was to test the sustainability of alternative options for achieving the Government's objectives for the NN NPS.

5.3.4 In considering each alternative and the NN NPS it was recognised that the resources available for delivery would need to be consistent with a plausible national networks budget. This precludes alternatives that involve significantly greater levels of funding than announced in the 2013 Spending Round as these would not represent feasible alternatives.<sup>10</sup>

5.3.5 In developing alternatives, some options were considered and dismissed on the basis that they were not consistent with the Government's objectives or were not viable:

- An alternative that sought to do less than current government policy on improving and enhancing both the road and rail networks was ruled out on the basis that it wouldn't achieve the Government's objectives to support economic growth and deliver improvements in journey quality and reliability. For the same reason "do nothing" and "business as usual" alternatives were rejected. However, the impacts of the policy set out in the NN NPS and Alternative 1 and Alternative 2 were measured against a "do nothing"/"business as usual" baseline.<sup>11</sup>
- Fiscal demand management measures – whilst Alternative 1 considers measures to reduce the demand for road travel via an increase in the cost of motoring, national road pricing was not considered in Alternative 1 as the Government has been very clear that it will not introduce or consider introducing national road pricing on the SRN. Successive Governments have ruled out national road pricing on deliverability grounds, including public acceptability and costs of implementation. On rail, using rail fares as a demand management tool was ruled out as existing research has found that very large differentials in fares (40%) are required to achieve only moderate reductions in peak demand (3%).<sup>12</sup>

5.3.6 The policy in the NN NPS is at a strategic level. In order to undertake an AoS on the NN NPS and the reasonable alternatives, the policy in the NN NPS and alternatives was exemplified by a series of "interventions". The approach taken was not intended to consider and estimate the impact of every single policy intervention that could be adopted within an alternative. In practice there will be many variations of policies that could be included within a particular alternative but it is not necessary to consider all these for the purpose of a strategic level appraisal. The approach taken was designed to highlight differences in the impacts of the strategic variations in policy between the NN NPS, Alternative 1 and Alternative 2. The appraisal is transparent around the impacts of each of the key interventions within the NN

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<sup>9</sup> Note that whilst it is possible that a local road may be designated as a nationally significant infrastructure project under section 35 of the Planning Act 2008 these are likely to be a small minority of schemes.

<sup>10</sup> Limiting alternatives to **feasible** options for meeting the strategic objectives set out in the NN NPS is consistent with the guidance in the European Commission's SEA Transport Manual and OPDM's A practical guide to the Strategic Environmental Assessment Directive.

<sup>11</sup> A full description of the baseline against which the NN NPS policy and alternatives were compared is set out in Annex C of the AoS Report.

<sup>12</sup> See <http://www.rail-reg.gov.uk/upload/pdf/rvfm-sdg-fares-280211.pdf>

NPS and alternatives.

5.3.7 Section 7 of the AoS Report gives more detail of the analysis, but in summary, the alternatives considered in the AoS were as follows:

5.3.8 Alternative 1: this alternative tests an approach that seeks to shift demand from road to rail through increased rail provision and sustainable transport measures and an increase in the cost of motoring. This package would involve a smaller roads infrastructure package than in the NN NPS, targeted at making best use of the existing national road network.

5.3.9 Alternative 2: this alternative tests an expanded infrastructure package on the national road network, accompanied by reductions in rail provision and a “do minimum” approach to environmental standards and policies.

#### **5.4 Preferred Option for the National Networks NPS**

5.4.1 The assessment set out in Section 7 of the AoS Report concluded that when the policies of the NN NPS are compared against the two strategic alternatives, it is considered that the NN NPS gives the most balanced sustainable performance against the AoS objectives. Generally, Alternative 1 performs less well than the NN NPS on the economic and social objectives, and Alternative 2 performs less well environmentally than the NN NPS. Therefore the NN NPS has been chosen as the preferred policy.

5.4.2 Nothing in the responses to the consultations has led the Secretary of State to conclude that any of the alternatives would be preferable and therefore, the NN NPS has been selected as the preferred policy.