

The national networks national policy statement: 2023 draft

Introduction

Thank you for responding to our consultation on the [2023 draft of the National Networks National Policy statement](#) [opens in a new window].

Closing date is 6 June 2023.

View all the questions

You can find a [list of all the questions we are asking in the consultation document on the GOV.UK consultation page](#) [opens in new window].

Print or save a copy of your response

At the end of this questionnaire, you have the chance to either print or save a copy of your response for your records. This option appears after you press 'Submit your response'.

Save and continue option

You have an option to 'save and continue' your response at any time. If you do that you will be sent a link via email to allow you to continue your response where you left off.

It's very important that you enter your correct email address if you choose to save and continue. If you make a mistake in the email address you won't receive the link you need to complete your response.

Accessibility statement

Read our [accessibility statement for SmartSurvey forms](#) [opens in a new window].

Confidentiality and data protection

The Department for Transport (DfT) is carrying out this consultation on the 2023 draft of the National Networks National Policy statement. [Our DfT online form and survey privacy notice](#) [opens in a new window] gives more information on how your personal data is processed in relation to this survey.

In addition to the information outlined in the privacy notice we are asking from organisations their name, for identification

Personal details

1. Your (used for contact purposes only):

name?

email?

2. Are you responding: *

- as an individual? (Go to 'Proposals')
- on behalf of an organisation?

Organisation details

3. Your organisations name is?

Proposals

The following questions focus on the contents of the draft national networks national policy statement (NNNPS) and the accompanying documents.

The NNNPS sets out the need for, and our policies to make, development of nationally significant infrastructure projects (NSIPs) on the national road and rail networks in England. The NNNPS includes:

- chapter 1: Introduction
- chapter 2: Importance of national networks
- chapter 3: Statement of Need
- chapter 4: General Principles and Considerations
- chapter 5: Generic Impacts

We are also consulting on the accompanying documents of the:

- Appraisal of sustainability which assesses the environmental, social and economic impacts of the NNNPS

- Habitats regulation assessment which examines the potential effects of the NNNPS on protected habitat sites which are part of the national site network (for example special areas of conservation and special protection areas)

You can find the [draft national networks policy statement and the supporting documents on the GOV.UK consultation page \[opens in a new window\]](#).

NNNPS process

The NNNPS sets out the need for, and our policies to make, development of nationally significant infrastructure projects (NSIPs) on the national road and rail networks in England.

We are asking whether the information within the revised NNNPS provides sufficient information to those involved in the NNNPS process to be able to make an informed decision on an application.

The:

- Strategic Road Network is comprised of motorways and major 'trunk' A-roads in England and is managed by National Highways
- Strategic Rail Network is comprised of all the rail lines and stations within England and is managed by Network Rail
- Strategic Rail Freight Interchanges are made up of large multi-purpose freight distribution centres connected to both our rail and strategic road network

4. In your view does the draft NNNPS provide suitable information to those engaged in the process of submitting, examining and determining applications for development consent for nationally significant infrastructure projects on the:

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
strategic road network?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
strategic rail network?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
strategic rail freight interchanges?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Explain why, referring to specific sections of the NNNPS in your response.

In respect of the Strategic Road Network (SRN), this is a further national document that talks about a 'vision' led approach (e.g., paragraph 3.44) but then fails to provide any pointers to alternative, coherent approaches. There is no coherent alternative assessment processes nor investment and delivery framework in place. The draft document is silent on how applicants should apply the approach in practice and how the relevant Examining Bodies and Secretaries of

State should assess how it has been applied and understand the validity of the outcomes in reaching their determinations on Development Control Orders.

In respect of Strategic Rail Freight Interchanges (SRFI), the document is not particularly helpful (and could be considered in places unrealistic) as exemplified by the statement at paragraph 5.276 "There may be circumstances where the implementation of travel plan measures alone would not be sufficient to reduce the traffic demand of a project to acceptable levels". SRFI are often relatively remote locations (paragraph 4.79 acknowledges that they may be in countryside locations) and generate a significant number of HGVs (i.e., inter-modal movements), its seems strange (at best) that the document should see a travel plan as being the starting point for mitigating the impacts of SRFI, or indeed that a travel plan alone would be capable of mitigating the transport impacts in entirety of a development of the scale and nature of SRFI. Experience of some ADEPT members is that substantial new highway infrastructure has been required/will be required to enable the delivery of SRFI.

Developing national networks

The NNNPS details the process and considerations for the development of national networks.

We are asking whether the information provided within the draft revised NNNPS is clear on the need for the development of national networks, and our policy for the need to develop national networks.

You can [view and download the draft NNNPS document on the GOV.UK consultation webpage](#) [opens in a new window].

5. Does the draft NNNPS adequately set out:

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
the need for developing national networks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
our policy for addressing the need for the development of national networks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Provide comments on improvements referring to specific sections of the NNNPS in your response.

ADEPT broadly welcome the changes proposed to the statement of need to reflect the wider challenges. This brings in a number of challenges facing the UK at a national level, and which are reflected at more local levels. The NPS recognises the difference that good transport networks can have on addressing these challenges, and it is important that the statement of need reflects this, moving away from the focus on congestion and network overcrowding.

However, ADEPT has identified a number of areas for improvement. These are discussed below.

Levelling Up the Economy.

It would be useful to consider whether one of the challenges is simply to 'support economic growth,' or whether this should be to support wider objectives around levelling up the economy across the country, and therefore reflect that the challenge is not just to support economic growth, but also to maintain economic activity in regions of the UK, and to attract economic investment into lower performing or disadvantaged areas.

Mitigation should not focus solely on assisting capacity issues.

Paragraph 5.274 sets out, under mitigation on transport networks, "*The applicant should provide evidence that the development improves the operation of the network and assists with capacity issues.*"

The evidence should not show simply that it assists with 'capacity' issues, but that it assists the wider challenges set out in the statement of need, i.e. that it assists with any or all of maintaining network performance and meeting customer needs (for example, delays, congestion and network reliability), supporting economic growth, ensuring resilience in networks (including adapting to climate change and technological changes), supporting the government's environment and net zero priorities, or maintaining and enhancing the safety of national networks.

The NNNPS must be clearer on the principles for further investment in the SRN.

In respect of the SRN, the document is attempting to grapple with enabling growth, whilst seeking to maintain an effectively functioning strategic road network and meeting net-zero requirements/targets. In ADEPT's view, it does not successfully tackle the complexity of these challenges and they are left unresolved.

This is perhaps best exemplified by paragraphs 3.28 to 3.30 and 3.31, with the former group of paragraphs setting out that under all future scenarios traffic on the SRN is set to grow, but with latter then suggesting that "*These projections are not definitive predictions of what will happen in the future and are not a predictor of the level of expansion required on the national road network*"... and "*They also do not reflect how transport demands may vary by mode.*"

It is unclear from these paragraphs what the absolute basis will be for driving the need for development of the SRN going forward, if not the DfT's own figures/evidence? This particularly the case given that (with the exception of rail and coaches) modal shift is likely to have very limited impact on 'long-distance' SRN trips.

The final version of the document should be much less ambiguous on the in principle basis for further public sector investment in the SRN and the scale of SRN required to fulfil future needs.

The NNNPS risks advocating a predict and provide approach.

Paragraphs 3.25 to 3.32 appear to be advocating a "predict and provide" approach based on long term traffic growth forecasts and reducing congestion. ADEPT believes that a "vision and validate" approach, as set out in the Transport Decarbonisation Plan and mentioned in 3.44 of the NNNPS, should instead be the core approach for deciding future schemes.

Wherever possible all SRN schemes should incorporate active and public transport modes as a core part of their scheme and recognise that some residual congestion is desirable to encourage the consideration of alternative modes of travel.

The NNNPS must align with housing and employment growth policies.

The experience of some ADEPT members is that National Highways does not always consider local growth. This in turn can have a negative impact on the delivery/ adoption of Local Plans. It is not clear from paragraphs 3.7 and 3.8 whether a change to this approach is proposed.

Some ADEPT members are now finding that in order to meet the needs of their local area's growing and changing population (for example in terms of homes and jobs) investment will be required in the SRN. Indications are that this can be of a scale beyond that which can be afforded by the private sector, and yet whilst the draft document talks about policy alignment in certain regards, (e.g., at paragraph 1.12) these are essentially transport related and the draft document says little or nothing with regard to practical policy alignment, say, with the Government's housing delivery targets. It would be beneficial if the final draft recognised more fully these wider policy alignments as drivers for developing the SRN (and rail network too where appropriate).

More widely, where applicants and decision makers are likely to be left in a quandary is in (potentially ever increasing) circumstances where evidence is provided that there are material impacts of growth on the SRN, but no prospect of a private sector fundable solution nor any planned, coordinated public investment. The current draft is silent on what decision makers should do in such circumstances. It should not be an acceptable consequent that lower order local roads and local communities suffer traffic impacts due to failures to improve the SRN to accommodate the impacts of growth.

The NNNPS should not deter passenger rail investment decisions.

With regard to rail, the impacts that the pandemic has had on the UK's rail sector and the cost to the public purse is recognised; however, this, and experiences with HS2, should not negatively impact considerations for future investment in the country's rail network, not least because of the decarbonisation benefits that rail can offer over road. However, statements such as that at 3.57 "*There will therefore be a need to reallocate network capacity and capability to meet this demand for rail freight, particularly given the need to accommodate this growth alongside changing passenger demand*" and at 3.75 "*Across rail, however, we are clear about the need for choices to be made – to maximise the benefits from our investments in rail, while supporting financial sustainability*" are suggestive that the impacts of the pandemic could continue to impact future rail investment decisions.

Whilst achieving value for money is important, the final version of the document should leave no such doubts as to the importance of investment in both capacity for passenger and freight capacity not least to support the country's 'green growth'.

The NNPS lacks detail on how an applicant or the relevant Secretaries of State can implement measures that support the transition to zero emission vehicles

The draft document makes many statements about supporting the transition to alternative fuels, e.g. "[For Strategic Rail Freight Interchanges] *mitigating measures should...ensure the infrastructure needed to support the transition to alternative fuels including electric vehicles are in place during construction and ahead of operation, and to mitigate transport impacts*", but no advice is given as to how an applicant or the relevant Secretaries of State should seek to secure this in practice, including where national grid capacity issues prevent this.

General policies and considerations

The General Policies and Considerations within the NNNPS chapter provides planning guidance for applications on the national road and rail networks.

We are asking whether the information provides sufficient clarity to applicants, which may be in the form of references to other policy documents or guidance.

You can [view and download the draft NNNPS document on the GOV.UK consultation webpage](#) [opens in a new window].

6. In your view, is there any information missing from the "General Principles and considerations" chapter?

- Yes
- No (Go to 'Supporting freight facilities')
- Don't know (Go to 'Supporting freight facilities')

Information missing from General Principles and considerations

7. Provide comments on missing information, referring to specific sections of the NNNPS in your response.

More information is needed to support decision makers in instances where improvements to the strategic network is needed to support growth, but such improvements are unaffordable by the private sector.

In relation to paragraph 4.9, and recognising the requirements as set out within the "CIL test", further information is needed on what decisions makers should do when evidence suggests that investment in the SRN is required to enable growth, but it is beyond that which an applicant can viably afford and/or be lawfully required to provide.

Of the back of this, the NNNPS should be used as an opportunity to review the business case process. In many instances it is known that future growth will impact the SRN (e.g., Local Plan allocations). However, often, it is not affordable for the private sector to deliver the improvements needed. The challenge is that the business case process only captures proposed developments with planning permission. It does not capture other growth proposals such as local plan allocations. The inclusion of these could improve the case for intervention / improvements to the SRN.

Include an expectation that demand and multi-modal transport models will be used.

ADEPT believes that there should be an expectation that Local Transport Models will have a demand and multi-modal element to understand the impact and benefits of a scheme to all modes, not just motor vehicles. This will enable decision makers to understand whether the scheme gives rise to additional travel demand or mode shift away from sustainable transport (e.g., makes travelling by car easier and more attractive).

Good design must be balance with local authority maintenance costs.

ADEPT welcomes the inclusion of a good design criteria, but notes that this can be subjective. It can also lead to the use of more expensive materials that require more frequent or costly maintenance. Where Local Authorities are adopting new highway or improvements are being made within the existing highway boundary, this could result in significant additional maintenance costs for Local Authorities.

8. Provide any supporting evidence of your view.

[Attach any additional document evidence to your response.]

Comments:

ADEPT has no further evidence to support this section.

Supporting freight facilities

9. Does the NNNPS support development of:

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
freight facilities on the strategic road network, including lorry parking facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
freight interchange infrastructure that encourages modal shift from road to rail?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Explain why, referring to specific sections of the NNNPS in your response.

The draft NNNPS is clear that decision makers should recognise the importance of providing adequate lorry parking facilities (paragraph 5.280). However, given the impact that inadequate lorry parking facilities can have on local communities it is important that the significance of this issue is captured in the draft NNNPS. It should be a requirement for applicants to demonstrate that there are adequate lorry parking facilities to serve any demand as a result of new development.

The NNNPS clearly articulates the Government's support for Strategic Rail Freight Interchanges (SRFI) (e.g. paragraphs 3.89 and 3.102).

Strategic Rail Freight Interchanges (SRFIs)

The Strategic Rail Freight Interchanges section (paragraphs 4.78 to 4.87) provides planning guidance relating to SRFIs. The revised NNNPS seeks to ensure that SRFIs are appropriately located, and that the operational rail connection elements are brought forwards in a timely manner.

We are asking whether the information within the revised NNNPS provides sufficient clarity to applicants, which may be in the form of references to other policy documents or guidance.

You can [view and download the draft NNNPS document on the GOV.UK consultation webpage](#) [opens in a new window].

10. In your view, are the changes to the SRFI section useful for the NNNPS?

Strongly agree

- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know (Go to 'Environmental ambitions')

Strategic Rail Freight Interchanges (SRFIs) reasoning

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

The draft NNNPS guidance on the location of SRFI (paragraphs 4.79 to 4.82) reads broadly the same as that provided in the existing 2015 NNNPS. As such minor changes in this section are not considered to be any more useful.

Changes to the guidance on scale and design may make the delivery of SRFI more feasible for developers. Equally, the changes to the guidance may slow the speed that a SRFI comes into full operation. In the short term this could result in an increase in HGV traffic as a result of new onsite warehousing that accompanies SRFI solely being served by HGVs. For example, the NNNPS SRFI guidance no longer requires an operational rail network at the initial stages of the development. Instead, this should be provided in a "timely" manor (paragraph 4.86). Albeit a planned timeframe for delivery is required from the developer.

Environmental ambitions

The current NNNPS was designated in 2015 [\[opens in a new window\]](#) – before the UK's legal commitment to net zero emissions by 2050 [\[opens in a new window\]](#), and implementation of the Environment Act 2021 [\[opens in a new window\]](#). The revised NNNPS has sought to reflect these changes to UK legislation which would be relevant when considering the development of the national road and rail networks.

We are asking whether the information within the revised NNNPS provides sufficient clarity to applicants, including in the form of references to other policy documents or guidance.

12. Does, in your view, the NNNPS adequately address:

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
carbon considerations in the development of national networks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
wider environmental targets in the development of national networks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Explain why, referring to specific sections in your response.

Changes to the Policy Context

The draft document successfully captures changes to the carbon policy context since the preparation of the current NNNPS and sets out initiatives that have been implemented to address this (e.g., paragraphs 2.18 to 2.30).

There is a lack of detail around how the national networks will support decarbonisation targets.

Throughout, the draft document also captures how the SRN, rail network and SRFI can support decarbonisation. This is primarily through mode shift and transition to electric vehicles. However, the draft document is less clear on the details by which this will be achieved. For example, in respect of the delivery of infrastructure for electric vehicles the draft document is very vague. Paragraph 5.269 states *“Mitigating measures should also look to reduce the need for any parking associated with the proposal, ensure the infrastructure needed to support the transition to alternative fuels including electric vehicles are in place during construction and ahead of operation, and to mitigate transport impacts”* (paragraph 5.269). The absence of detail and clarity around this matter could lead to different interpretations of what is needed and significantly impact the provision of electric vehicle charge points and influence the uptake and use of electric vehicles.

Demand Management

To achieve decarbonisation targets there is likely to be a need for demand management measures (i.e., making car travel less attractive). The draft document does not acknowledge the need for demand management. As such there is a risk that without demand management and a clear strategy on how behaviour change can be achieved, the amount people travel could increase, particularly if additional capacity is created on the SRN, and mode shift ambitions will not materialise. In the short term, this could have a negative impact on decarbonisation efforts.

Carbon Offsetting (paragraphs 5.31 and 5.32)

There is a risk that some operators may seek to sell the same offsetting capacity to several schemes, or that the proposed offsetting capacity is never delivered or not maintained. ADEPT recommends that the NNNPS should ensure that any required carbon offsetting is unique to the development being considered, that it is deliverable within the construction programme of the development and will be retained for the design life of the scheme, and that evidence of this should be provided to decision makers.

Generic impacts

The Generic Impacts of chapter 5 of the NNNPS provide guidance on impacts which are relevant to any national networks infrastructure development, and sets out how these impacts should be considered.

There have been updates made to the chapter to reflect to new policies relating to generic impacts relevant to national network infrastructure.

You can [view and download the draft NNNPS document on the GOV.UK consultation webpage](#) [opens in a new window].

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

- Yes
 No (Go to 'Appraisal of sustainability (AoS)')
 Don't know (Go to 'Appraisal of sustainability (AoS)')

Missing information for Generic impacts

14. Provide comments on missing information, referring to specific sections of the NNNPS in your response.

Air Quality

The transition of vehicle fleets Internal Combustion Engines (ICE) to Zero Emission will result in air quality improvements in the medium to long term. However, this trend should not be used to mitigate the short term air quality impacts of ICE vehicles.

Greenhouse Gases

As set out in our response to Question 12, it is important that applicants demonstrate that any carbon offsetting, particularly if provided remotely by a third party, is specific to their project, available now or before the construction of the scheme would be complete, that the capacity will be maintained for the expected life of the scheme. It is suggested that paragraphs 5.32 and 5.33 refer to this obligation.

It is suggested wording similar to the below should be added in Section 5.36 of the NNNPS:

"The Secretary of State should be satisfied that any carbon offsetting scheme that is used to mitigate the carbon impacts of a National Network scheme:

- a) is providing offsetting capacity that is unique to the proposed development;*
- b) is in place prior to construction, or will be delivered before completion of the National Network scheme; and*
- c) that the offsetting scheme has adequate funding to be maintained for at least the design life of the National Network scheme."*

To comply with Net Zero aspirations, it is recommended that negative weight should be given to schemes where the delivery and maintenance carbon mitigation measures cannot be guaranteed.

Land Use, including Open Space, Green Infrastructure and Green Belt

With regards to existing open space, ADEPT believes that Local Authorities must be consulted on the "needs" appraisal when being undertaken by an independent third party to ensure that any mitigation is adequate and suitable located in the community losing open spaces.

National Network Schemes should also avoid severance effects to local communities from their open spaces.

Socio Economic Impacts

It is important that the applicant considers the impact of their scheme in the context of the socio-economic policies published by Local Authorities.

Impacts on Transport Networks

Much of this section reads as a change towards a vision and validate approach, but the decision making section still refers to the classic predict and provide approach.

Commented [AC1]: Thought it was referred to as vision and validate? If not a generally accepted term however happy to go with what you have.

At paragraph 5.265 the applicant is given reign to introduce severance into communities where it is unsafe or unviable to address those issues. ADEPT believes that this could have significant local impacts on the movement of people by active travel modes, particularly by those who may not be able to travel via alternative routes (e.g., people with mobility impairments) or who have access to alternative modes of travel.

Commented [SE2]: amended

There must be a very strong case for applicants to worsen accessibility, particularly by active travel modes, and not provide mitigation. It is suggested that the wording of Paragraph 5.273 is strengthened so that only in exceptional circumstances can an applicant worsen accessibility by active travel modes and provide no mitigation.

Flood Risk and Climate Change

In relation to flood risk and climate change, the document does not identify the increased risk in frequency and intensity of extremes like heavy rainfall. To not acknowledge this risk in the development of national networks undermines the need to manage extreme rainfall events that could impede the use of the national networks while putting users in danger.

This also shows inconsistency between other policy statements of material consideration for this issue such as the Flood and Coastal Erosion Risk Management Policy Statement which on page 9 states "*As climate change leads to sea level rise and more extreme rainfall, the number of people at risk from flooding and coastal erosion continues to grow. The UK Climate Projections 2018 show an increased chance of milder, wetter winters and hotter, drier summers, together with an increase in the frequency and intensity of extremes, such as heavy rainfall.*"

The text in the proposed National Network NPS should be updated to reflect this risk to ensure it is both managed and consistent with other policy documents.

In paragraph 5.121, as reference to NPPF is made to facilitate the use of NPPF in support of the National Networks NPS, then it should also be better referenced that the PPG supporting information and guidance on the application of the Sequential and Exception Test should also be included. From the Lead Local Flood Authority (LLFA) perspective it is considered that there is more information in this paragraph about how to circumnavigate the policy than avoid this risk. This approach continues through the section on flood risk and is likely to perpetuate the stance of some infrastructure promoters that the management of flood risk from any source is not a concern they have to address. This needs to be addressed if national networks are to maintain viable transport system in times of natural hazards such is extreme wet weather. It would also be more consistent with the information given in paragraph 5.128 to 5.132 of the draft National Network NPS.

In paragraph 5.122 there is a lack of consideration of surface water flood risk in when to consider the need for a flood risk assessment. The current definition focuses on fluvial and coastal flood risk, however surface water flood risk (which is also mapped at a strategic level) is not mentioned. At present it is not consistent with the NPPF note 55 definition (which is also bias towards the Environment Agency). It is recommended that the text is amended to reflect the need for a flood risk assessment in areas of medium to high probability of surface water flooding (with the same update being applied to NPPF).

In paragraph 5.125 pre-application consultation with the Environment Agency is recommended. However, the paragraph goes on to say "*where relevant, other flood risk management bodies such as the lead local flood authorities, Internal Drainage Boards, sewerage undertakers, and highways authorities.*" This wording suggests the main focus is on the Environment Agency, however this undermines the value of early consultation with other risk management authorities who will be involved in the management of the surface water flood risk. The Environment Agency do not comment on the surface water management schemes. It is recommended that the text is

updated to equally reflect the need for pre-application consultation with all flood risk management authorities which would be consistent with the updated NPPF that requires consideration of all sources of flood risk.

In paragraph 5.133 the wording around the potential to include sustainable drainage systems is considerably weaker than that which is expected in the NPPF for major developments. This is therefore inconsistent and could infer that sustainable drainage schemes and good design practises are optional. The guidance in the NNNPS should at very least have the same strength of requirements than NPPF. Again, it is recommended that the text is updated to reflect this as nationally significant schemes should also be setting a best design practise example.

In section 5.136, it is clear the sustainable drainage hierarchy is not consistent with that in NPPF's supporting PPG. In paragraph 56 of the PPG, the discharge hierarchy clearly lists infiltrations as the primary option to be considered followed by discharge to a surface water body, then surface water sewer then a combined sewer. While in the NNNPS paragraph 5.136 states that "If there are no viable Sustainable Drainage Systems options available, it may be necessary to provide surface water storage and infiltration to limit and reduce both the peak rate of discharge from the site and the total volume discharged from the site."

In addition, in section 5.136, it states that "*There may be circumstances where it is appropriate for infiltration attenuation storage to be provided outside the project site, if necessary, through the use of a planning obligation.*" Promoters should be applying good design practises where they consider the spatial requirements of the scheme including supporting infrastructure such as sustainable drainage. The promoters of a scheme should have prepared a suitable infrastructure plan as they are developing the scheme. This approach could operate to permit promoters to avoid considering the needs of supporting infrastructure at an appropriate time potentially resulting in incomplete and poor quality considered schemes coming forward. It is recommended that this the wording is updated or possibly removed.

In section 5.140, the definition of the term sustainable drainage does not reference the four pillars of SuDS (water quantity, water quality, biodiversity and amenity). In all of the examples included in bullet points afterwards there is a focus on the management of water quantity but no mention of the other three pillars. This section should be updated to better reflect the definition of sustainable drainage systems including the four pillars and provide examples to illustrate the inclusion of the pillars.

In section 5.144, the wording is not clear in the final sentence and how it relates to the preceding sentences.

15. Provide any supporting evidence of your view.

[Attach any additional document evidence to your response.]

Comments:

ADEPT has no further evidence to support this section.

Appraisal of sustainability (AoS)

The Appraisal of Sustainability (AoS) examines the likely social, economic and environmental effects of the NNNPS.

The AoS identified:

- uncertain effects related to greenhouse gas and air quality emissions
- significant positive effects on the economic impacts, user experience and safety.

The report subsequently sets out:

- measures to mitigate and monitor the uncertain and significant effects
- enhancements for all effects stated

You can [view and download the draft NNNPS document and the supporting documents on the GOV.UK consultation webpage](#) [opens in a new window].

16. Do you agree or disagree with the findings of the AoS?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know (Go to 'Habitats regulation assessment (HRA)')

AoS findings

17. Explain why, referring to specific sections of the AoS in your response.

ADEPT has no view on the findings of the AoS.

Habitats regulation assessment (HRA)

The initial Habitats Regulation Assessment screening exercise plus the appropriate assessment and consideration of the alternatives, determined that there were no feasible alternative solutions to the NNNPS and adverse effects remained possible. It was therefore necessary to consider Imperative Reasons of Overriding Public Interest (IROPI) and compensatory measures.

The IROPI was of an economic and social nature, subsequently [regulation 107 of the Habitats Regulations](#) [opens in a new window], will apply to the NPS.

You can [view and download the draft NNNPS document and the supporting documents on the GOV.UK consultation webpage](#) [opens in a new window].

18. Do you agree or disagree with the findings of the HRA?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know (Go to 'Public Sector Equality Duty')

HRA findings

19. Explain why, referring to specific sections of the HRA in your response.

ADEPT has no view on the HRA findings.

Public Sector Equality Duty

The Public Sector Equality Duty (PSED) requires public bodies to consider the needs of people in relation to characteristics protected by the Equality Act 2010. Development applications must demonstrate due consideration for the PSED and wider obligations under the Act. The NNNPS supports applicants to consider this through its policies, including but not limited to accessibility, community severance and good design (paragraph 4.77).

You can [view and download the draft NNNPS document on the GOV.UK consultation webpage](#) [opens in a new window].

20. Do you think the NNNPS could further support the aims of the PSED, particularly relating to the characteristics protected by the Equality Act 2010?

- Yes
- No (Go to 'Final comments')
- Don't know (Go to 'Final comments')

Improving PSED support

21. Provide details of how the NNNPS could further support PSED aims, specifying the protected characteristic where possible and providing any supporting information you wish to be considered.

[Attach any additional document evidence to your response.]

Comments:

Severance can have a significant impact on the elderly, very young and those with mobility issues who may find themselves unable to access a facility when a scheme introduces new severance issues. It is important that severance issues are fully considered by the applicant as the part of the development of any National Networks Scheme.

The NNNPS should be amended to ensure that the applicant demonstrates that all options for reducing or eliminating severance are explored and the reasons for the unviability of alternatives or mitigation are clearly set out.

It is important that local accessibility is not overridden by the need to provide additional capacity for long distance journeys.

Final comments

22. Any other comments?

ADEPT has no further comments.