

Response from the Campaign for National Parks to the DfT Consultation on a Draft National Policy Statement for the National Road and Rail Networks

Introduction

The Campaign for National Parks is the independent national voice for the 13 National Parks in England and Wales. Our mission is to inspire everyone to enjoy and look after National Parks – the nation’s green treasures.

National Parks are our finest landscapes with the highest level of protection. Their statutory purposes are to conserve and enhance wildlife, cultural heritage and natural beauty, and to promote opportunities for public enjoyment and understanding of their special qualities. For over 75 years the Campaign for National Parks has been working to ensure that our National Parks are beautiful, inspirational places that are relevant, valued and protected for all.

National Parks contribute significantly to the well-being of the nation, by providing safe, attractive, healthy places for recreation. They also play a vital role in sustainable development through protection of the landscape, wildlife and key environmental resources and services, like water provision and carbon storage in peat soils and forests, which can mitigate the effects of climate change. As well as being inspiring places for people to enjoy and improve their health and well-being, National Parks make a significant contribution to the economy through tourism, farming, and other related businesses. The English National Parks currently attract 90 million visitors a year, who spend more than £4 billion and support 68,000 full time equivalent tourism related jobs¹.

We have chosen to focus our response to this consultation on those questions which are of most relevance to National Parks. All of the English National Parks are affected to some extent by the national road and rail networks and several have significant lengths of these networks within or close to their boundaries.

We welcome the fact that the draft National Policy Statement (NPS) emphasises that National Parks and AONBs have the highest status of protection and that it also makes some positive references to the need to take particular account of this, for example the reference in para 5.173 to the proximity to National Parks being a factor to consider when determining the likely noise impact of a scheme. However, we are concerned that if implemented the policy set out in the draft NPS would lead to the approval of schemes, particularly road schemes, which would be very damaging for National Parks and put at risk the significant economic benefits that these areas provide. This is of particular concern given that the feasibility studies currently being undertaken by DfT include several which could lead to new road proposals in National Parks.

¹ http://www.nationalparksengland.org.uk/__data/assets/pdf_file/0006/338361/Valuing-Englands-National-Parks-Final-Report-10-5-13.pdf

Response to selected questions

- 1. Does the draft NN NPS clearly establish the need for development of the national networks? If not why not?**
- 2. Does the draft NN NPS adequately explain the Government's policy for addressing the need set out in the NN NPS? If not why not?**

The following answer addresses both these questions since they are so closely related.

The draft NN NPS does not clearly establish the need for development of the national networks. Chapter 2 uses figures from the National Transport Model (NTM) to show a significant increase in road traffic on the strategic road network (SRN) between 2010 and 2040. However, the accuracy of these forecasts and the extent to which they can be relied on has now been questioned by a number of leading transport experts. In March 2012, the Transport Planning Society called for an urgent review of the official traffic forecasts² on the grounds that there were such large differences between the predictions and the reality and that the modelling fails to take account of significant changes, such as falling licence holding among younger people. In addition, analysis of traffic forecasts since 1989 by Professor Phil Goodwin which was published in *Local Transport Today* showed that these forecasts have consistently predicted a far higher growth in traffic than has taken place.

National Travel Survey data shows changes in individuals' patterns of travel which highlight the need to look again at whether the assumptions used in the NTM are still appropriate. For example, the number of trips per person and the annual average distance travelled by car have both been declining in recent years so it is no longer appropriate to assume that travel levels will rise as the population increases.

Furthermore the Government's policy for addressing anticipated future demand for travel does not take sufficient account of the options available to reduce the demand for new infrastructure, such as road pricing and encouraging greater use of alternative modes and the use of communications technology to avoid the need to travel.

It is also essential that the need for new infrastructure on the SRN is based on an accurate understanding of the demand for long-distance travel. Where a significant proportion of the demand is generated by those using the SRN for relatively short distances then greater attention should be paid to considering the opportunities offered by alternative modes before new infrastructure is considered.

- 3. Do the Assessment Principles provide adequate guidance to the Secretary of State on how he should assess applications for developments of the national networks? If not why not?**

We welcome the reference in paragraph 4.82 that National Parks might not be appropriate locations for Strategic Rail Freight Interchanges owing to the impact of

² <http://www.tps.org.uk/main/news/id/424/>

noise and improvements. However, we would like to see this paragraph amended to include a presumption against such developments in protected landscapes.

4. Does the draft NN NPS give appropriate guidance to scheme promoters? If not why not?

Whilst we welcome the reference in para 5.136 to the great weight that should be given to conserving landscape and scenic beauty in nationally designated areas, we are very concerned that the following paragraph sets out a much weaker position with regard to the presumption against development consent being granted for new road schemes than is currently the case.

The current policy on presumption against development is set out in the UK Government Vision and Circular for English National Parks and the Broads 2010³ which states that ‘there is a strong presumption against any significant road widening or the building of new roads through a Park, unless it can be shown there are compelling reasons for the new or enhanced capacity and with any benefits outweighing the costs **very significantly**. Any investment in trunk roads should be directed to developing routes for long distance traffic **which avoid the Parks.**’ (our emphasis)

Whilst para 5.137 lists a number of factors that should be included in assessing whether any application in a designated landscape would be granted consent, there is no reference to the need to consider whether the benefits outweigh the costs very significantly as is currently the case. In addition, the emphasis on focusing investment on routes which avoid the National Parks is also missing. We would like to see changes to the NPS to address both these points.

We are also very concerned at the statement in footnote 114 (at the bottom of page 70) that ‘National considerations should be understood to include the national need for the infrastructure as set out in Chapter 2 and the contribution of the infrastructure to the national economy’. As set out in our response to questions 1 and 2, we do not accept the need for infrastructure presented in Chapter 2 as it is based on inaccurate traffic forecasts. We believe that Chapter 2 should be changed to present a more accurate picture of future travel demands and a clearer vision of how those demands can be met in ways which do not necessarily require significant new infrastructure. If Chapter 2 remains unchanged it will be very difficult to challenge any scheme that can be shown to increase capacity on the network so the reference to ‘exceptional circumstances’ in paragraph 5.137 will effectively be meaningless. In addition, this footnote should be amended to make it clear that ‘national considerations’ also includes national policy on National Parks.

7. Do you have any comments on the Appraisal of Sustainability of the NN NPS?

The Appraisal of Sustainability clearly shows that the proposed NPS would deliver a negative outcome for a number of environmental objectives, including the enhancement and conservation of landscape quality. We are very concerned about the implications of this for National Parks and believe that the Government has failed in its statutory duty to have regard to National Park purposes by proposing to introduce a policy which so clearly detracts from objectives which make a significant

³ <https://www.gov.uk/government/publications/english-national-parks-and-the-broads-uk-government-vision-and-circular-2010>

contribution to those purposes. In undertaking this assessment the Government should also have considered a further alternative approach with even less road building which would not produce such a negative impact.

We trust that these comments will be helpful in the future development of the NPS. We would be pleased to continue working with the Department for Transport and other partners to ensure that the final policy takes full account of the added protection afforded National Parks.

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