

Submitted by email to: RIS3Consultation@dft.gov.uk

**Response to consultation on shaping the future of England's strategic roads (RIS3)
July 2023**

1. Campaign for National Parks is the only national charity campaigning to protect and improve the 13 National Parks in England and Wales. We want thriving National Parks, brimming with nature, resilient to climate change and where everyone, no matter their background, has the opportunity to visit and improve their health and wellbeing. For almost 90 years, we've been successfully campaigning to create and strengthen the National Parks. We work with an umbrella of more than forty environmental and amenity groups, representing over four million people who share our passion for Protected Landscapes.
2. National Parks are our finest landscapes with the highest level of protection. They contribute significantly to the well-being of the nation, by providing safe, attractive, healthy places for recreation. They also deliver 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 millions of visitors who are attracted to our National Parks each year spend billions of pounds and support thousands of jobs.
3. All of the English National Parks are affected to some extent by the strategic road network (SRN) and several have significant lengths of this network within or close to their boundaries. In recent years, we have become increasingly concerned by National Highways' failure to take proper account of the additional protection afforded National Parks and the low level of awareness within the organisation about the specific responsibilities which apply when it carries out activities that affect these areas. Examples of where this failure has led to damaging and inappropriate road proposals being pursued in, or close to National Parks, include the A57 Links Roads on the edge of the Peak District, the A66 Northern Trans-Pennine Dualling project which, if approved, would lead to increased pressure for roadbuilding in the Lake District and the A27 Arundel Bypass in the South Downs.
4. It is therefore essential that much greater account is taken of the additional planning protection that applies in National Parks when developing plans for RIS3, to avoid proposing any further road schemes which could be extremely damaging for National Parks, and thus undermining their special qualities and putting at risk the significant economic benefits that these areas provide. There is evidence that road schemes justified on the basis of reduced journey times fail to deliver the promised economic

benefits¹ and such schemes are particularly damaging in areas such as National Parks where the economy is heavily dependent on a high-quality environment.

5. There is a long-established presumption against significant road widening or the building of new roads in National Parks². This was retained in the revised National Policy Statement (NPS) for National Networks which DfT consulted on earlier this year and which also highlights the need for applicants to comply with the additional duties which apply in National Parks and AONBs (in para 5.155). However, as demonstrated by the examples referred to in paragraph 3 above there is a growing body of evidence that the existing 'duties of regard' as they are known are too weak. In its response to the Glover Landscapes Review³, the Government acknowledged that these duties are too weak and have allowed damaging practices to occur and proposed that they should be strengthened. Unfortunately, this legislative change has not yet happened and in the meantime, approval has been granted for the A57 Link Roads, yet another highly damaging road scheme where National Highways has been too easily able to claim compliance with this weak duty. RIS3 should include a clear commitment that there will no more new roads within National Parks and AONBs and their settings.
6. In addition, to demonstrate the Government's commitment to strengthening the protections for National Parks, RIS3 should be used to require National Highways to demonstrate how its activities will further the statutory purposes of National Parks and AONBs. High volumes of traffic already have a negative impact on the tranquillity and natural environment in some parts of our National Parks. Instead of proposing projects which would increase these negative impacts, National Highways should be demonstrating how it has fulfilled this duty by placing a much stronger emphasis in RIS3 on measures to reduce the negative impacts of the SRN on National Parks. This should include, for example, a commitment to prioritise these areas for measures which reduce noise and light pollution such as low impact lighting and noise-reducing road surfacing. Tranquillity and dark skies are two of the special qualities for which many areas of National Parks are particularly valued.
7. We are also deeply concerned about the extent of biodiversity loss on the SRN estate and the fact that National Highways does not have a robust plan in place to achieve its target of no net loss in biodiversity by 2025⁴. Given the scale of the nature and climate crisis, it is essential that RIS3 excludes any development that impacts adversely on internationally and nationally important habitats and species. We cannot

¹<https://www.cpre.org.uk/resources/transport/roads/item/4542-the-impact-of-road-projects-in-england>

² This is clearly set out in paragraph 5.152 of the *National Policy Statement for National Networks* published in 2014: <https://www.gov.uk/government/publications/national-policy-statement-for-national-networks>

³ <https://www.gov.uk/government/publications/landscapes-review-national-parks-and-aonbs-government-response/landscapes-review-national-parks-and-aonbs-government-response>

⁴ <https://www.orr.gov.uk/monitoring-and-regulation/roads-monitoring/annual-assessment-national-highways/2022>

afford further decline in irreplaceable habitats, such as ancient woodland, veteran trees, and peat, so any scheme which would cause further damage to such habitats should automatically be ruled out of consideration. There are no exceptional circumstances in which such damage would be acceptable. National Highways must show leadership in this area and should aim to deliver at least 20% biodiversity net gain.

8. National Highways should also be demonstrating that it takes its responsibilities towards National Parks seriously by actively managing demand for road capacity on sections of the SRN which pass through National Parks and instead encouraging the use of routes which avoid these protected areas; and placing a much stronger emphasis on investment, and promotion of, public transport as an alternative to roadbuilding.
9. The consultation document states that one of the strategic objectives of RIS3 is “improved environmental outcomes”. For this to be achieved, not only will National Highways need to take its responsibilities towards National Parks far more seriously but there will also need to be a much stronger emphasis on delivering positive environmental outcomes in other key parts of the decision-making on new road infrastructure. For example, the draft revised NPS for National Networks referred to in paragraph 5 above, is far too weak on the need to address the carbon emissions associated with major new infrastructure and adopts a completely unrealistic approach to addressing climate change which relies too heavily on reductions in emissions as a result of other transport policies.
10. If the UK Government is serious about developing national network infrastructure which supports environment and net zero priorities, it should adopt an approach similar to that of the Welsh Government which has committed to only considering investment in roads which meet a series of tests including supporting modal shift and reducing carbon emissions. This is something which the Climate Change Committee (CCC) has called for too in their most recent progress report to Parliament⁵ which states categorically that the Government has made no progress on earlier recommendations by the CCC to ensure that roadbuilding decisions are aligned with net zero commitments and calls on DfT to conduct a systematic review of current and future roadbuilding projects to assess their consistency with the Government's environmental goals. As the CCC report states such a review “should ensure that decisions do not lock in unsustainable levels of traffic growth and develop conditions (which can be included in the Roads Investment Strategy 3 process and beyond) that permit schemes to be taken forward only if they meaningfully support cost-effective delivery of Net Zero and climate adaptation.” (Recommendation R2023-148)

For further information about any aspect of this response, please contact Ruth Bradshaw, Policy and Research Manager (email:ruthb@cnp.org.uk).

⁵ <https://www.theccc.org.uk/publication/2023-progress-report-to-parliament/#downloads>