



Chartered Institution of Highways and Transportation

Department for Transport Consultation

Draft National Policy Statement for National Networks

June 2023

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Executive Summary

CIHT welcomes the publication of the draft National Network National Policy Statement (NPS). We support the objective of the wider National Infrastructure Planning regime to improve clarity and certainty for sponsors of Nationally Significant Infrastructure Projects and all stakeholders affected by these developments.

We are, however, concerned that the draft NPS misses several opportunities to meet this objective. Specifically, we encourage the government to ensure that the final version:

- **Strengthens the commitment to move away from *Predict & Provide* as a guiding principle for network development.** The current draft recognises that the Transport Decarbonisation Plan and other documents include a commitment to take a vision-led, *Decide & Provide* approach to developing our network. Unfortunately, parts of the draft, notably the section on *network performance and meeting user needs* rely heavily on DfT's National Road Traffic Projections and place particular emphasis on a core scenario that projects a 22% increase in traffic between 2025 and 2060. This is used to justify a conclusion that “absolute traffic growth is likely under all scenarios, and therefore enhancements on the national road network will be necessary in order to ensure the national road network operates effectively in the face of growing demand.” (Section 3.31). This could be read as return to *Predict & Provide* and this ambiguity in the overall approach is unhelpful.
- **Responds to the Climate Change Committee's advice that government needs to act on its acknowledgement of the need to limit traffic growth.** We note that this contrasts negatively with the approach taken by the Welsh and Scottish governments. The discussion of the draft Appraisal for Sustainability of the NPS also reinforces our concern that the NPS will be interpreted as prioritising the accommodation of projected traffic growth. Clarity and confidence will be much improved if the final draft is able to demonstrate consistency between the NPS, the overarching legal requirement to achieve Net Zero, and the emissions reduction goals set out in the Transport Decarbonisation Plan.

We believe that these issues highlight the wider problems caused by the absence of a National Transport Strategy for England. In the absence of a clear vision and prioritised, high-level objectives for the transport system, policy can very easily become disjointed, generating additional complexity and uncertainty for all stakeholders.

CIHT is only responding to questions in the current NNNPS relevant to CIHT's activities. For multiple choice questions, our answer is **in bold**.

Developing national networks

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	Do not know
Strategic road network?				x		
Strategic rail network?						x
Strategic Rail Freight Interchanges ?						x

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

The NPS does include some positive changes, including an acknowledgment of the importance of roads in achieving broader, non-economic objectives, and also a recognition of the importance of active travel and public transport. Unfortunately, on this latter point the document does not include any detailed projection of the needs of public transport users, or active travel in England over the coming years.

In terms of applications for development consent, we are not convinced that the current NNNPS provides sufficiently clear guidelines to help prioritise investment choices or identify what type of solutions road projects should provide (for example, where maintenance, enhancement, reconfiguration of road space for modal share, smart technologies or other solution is preferable to capacity enhancement).

In this context we ask the government to consider addressing the issues below in the final version of the NPS.

Location

We welcome reference to the importance of spatial planning in the NNNPS draft. This is a topic that CIHT has highlighted in its recent report [Better Planning, Better Transport, Better Places](#) and [Fixing a Failing Planning and Transport System](#).

Overall, we would like to see greater emphasis on the importance of ensuring that the location of developments enables accessibility to public transport and active travel networks as a priority, as well as easy access to local services through these sustainable modes.

We would also like to see a more specific and extensive consideration of different locations (urban, peri-urban, rural, coastal) and the realistic transport solutions that can be implemented.

Maintaining network performance and meeting customer needs

CIHT believes that measuring network performance primarily by congestion and unexpected delays is a too narrow view (points 3.4., 3.5., 3.25). Safety, pavement conditions and maintenance also greatly influence network's performance and users' experience.

The recent CIHT survey '[What are CIHT members priorities for Road Investment Strategy 3?](#)' shows that safety and maintenance are priorities amongst professionals in relation to assessing network performance.

Specifically, our members recognised the need to:

- Improve safety for all: ensure safer designs, better quality of roads surfaces, better management of roadworks and incidents and improve road user's education around safety.
- Improve network performance: safer and smoother journeys, protect the environment, include new technologies and low emission processes.

Moreover, when asked to prioritise budget allocation, respondents identified *strategic roads maintenance* as the top priority. They also highlighted the need to concretely address climate change impacts: not only through decarbonisation, but also through infrastructure adaptation.

We are concerned that by using journey time as the primary measure of network performance, the NPS will bias the option selection process towards network enhancements and road construction. This is inconsistent with the NPSs professed commitment to move away from a Predict & Provide approach towards a vision or objective led, Decide & Provide model.

Supporting economic growth

CIHT believes policy should reflect a more nuanced understanding of the role of transport as a driver of economic growth via supporting the movement of people and goods (point 3.7). [Evidence shows](#) that investments in either motorways or local roads in different locations will deliver different returns. Specifically, for underdeveloped regions, investment in secondary roads yields higher returns and unlocks greater economic opportunities. The new NPS appears to prioritise network enhancements but without providing guidelines on investment choices and ways to determine the effects of new roads on local economies.

The dangers of this approach are highlighted in the government's [Levelling up White Paper](#):

'The ... pattern is observed in some deprived areas. Stocks of human and physical capital are low, as is often social and institutional capital. This generates a circular process through which skilled people and innovative businesses move out, causing the quantity and quality of jobs and skills to fall, alongside health measures, locking some places into a low-income, low well-being equilibrium. Local geographies are often distinctive, with different blends of strength and weaknesses across the six capitals.'

Exposing smaller local economies to bigger regional ones through new transport links only favours the local economy if competitive advantages and specialization are present. In the opposite case, new infrastructure developments allow resources to gravitate towards bigger economies, leaving road links unused and local economies impoverished.

Moreover, point 3.8 mentions sustainable economic development: 'Fully consider the role (infrastructure) can play in delivering sustainable growth' – which is a generic phrase that does not indicate any clear path. We would like to see a clearer definition of what sustainable growth means and the role of transport in how it should be achieved.

Overall, [as the Road Investment Scrutiny Panel](#) has observed, the process of submitting, examining, and determining applications for the strategic road network requires robustness that can be achieved through:

- testing of investment decisions against a wide range of plausible scenarios (including reductions in traffic volumes and step changes in sustainable and active travel).
- greater openness about the work that has been done to test options for their robustness against future scenarios and a willingness to revisit this assessment at critical stages of scheme development.
- evidence of portfolios of smaller interventions with a lower risk profile being given serious consideration (including those aimed at reducing travel demand).

Environmental ambitions

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

	Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Do not know
Carbon considerations in the development of national networks?				x		
Wider environmental targets in the development of national networks?						x

Explain why, referring to specific sections in your response.

Carbon Considerations

CIHT is not wholly convinced by the argument (point 5.37) that, ‘given the range of non-planning policies aimed at decarbonising the transport system, the government has determined that a net increase in operational greenhouse gas emissions is not, of itself, a reason to prohibit the consenting of national network projects or to impose more restrictions in the planning policy framework.’

This appears to imply that this set of policies is complete and is being implemented. The Climate Change Committee’s most recent progress report to Parliament¹, however, identifies several areas where more action is required. Importantly, in relation to the NPS, this includes limiting traffic growth, where the CCC advises that ‘the Government has made the significant step of acknowledging the need to limit traffic growth and has provided significant funding to some key areas, but it has not set a specific ambition or used all its available levers.’

¹ Climate Change Committee (2022) *Progress in Reducing Emissions – 2022 Report to Parliament*

The draft NPS appears to disregard this advice and, drawing on the Department for Transport's National Road Traffic Projection, states (point 3.31) that 'absolute traffic growth is likely under all scenarios, and therefore enhancements on the national road network will be necessary to ensure the national road network operates effectively in the face of growing demand.' This suggests that despite references elsewhere in the NPS to embracing a vision-led approach (*decide and provide, vision and validate, etc.*) to network development, the NPS will reinforce a *predict and provide* model that seeks to accommodate traffic growth which is considered inevitable. This contrasts negatively with the approach taken by the Welsh and Scottish governments, who in line with the CCC's advice, are seeking to implement policies to bare down on traffic growth in the interests of meeting emissions reduction objectives.

More broadly, CIHT finds the discussion of the findings of the Appraisal of Sustainability of the NPS in relation to Greenhouse Gas Emissions confusing. Point 1.20 states that the appraisal found no adverse effects on the policy set out in the NPS. The appraisal document, however, identifies *uncertain effects* on road users' greenhouse gas emissions, arising from investment in road infrastructure. Under the appraisal's own definition of the precautionary principle, *uncertain effects* should be treated as significant negative effects.

Nevertheless, CIHT welcomes the proposed mitigation measures to deal with the risk. We agree that a whole-life carbon assessment should be carried out at every stage of the development of a proposal and that the developer should submit a carbon management plan as part of the submission for a Development Consent Order.

In relation to the Carbon Management Plan, we note, however, that the draft NPS states (point 5.31) that 'while the developer can estimate the likely emissions from road traffic, it is not solely responsible for controlling them.' While this is true in many circumstances, it reinforces the unfortunate impression discussed above that meeting the government's own decarbonisation pathway is a secondary priority after accommodating projected traffic growth.

One way of strengthening this aspect of the NPS would be to adopt a proposal in a recent report by a group of eight of the UK's leading academic experts on roads, working together as the Roads Investment Scrutiny Panel². The Panel argued that confidence in decision-making around emission reduction could be improved by introducing demonstratable consistency between the overarching legal requirement for

² Roads Investment Scrutiny Panel (2023) *Key Questions for Roads Investment and Spending*

decarbonisation of the whole economy, the Transport Decarbonisation Plan, the NPS, and decisions on individual development proposals.

To achieve this outcome, the Panel proposed that government consider:

- publishing a projection of the change in vehicle miles by carbon-emitting vehicles necessary or prudent to stay within an acceptable carbon reduction trajectory (recognising that this will have to be carried out against an uncertain cross-sectoral backdrop).
- indicating with sufficient confidence how such change can be achieved in practice in the required timescale (recognising that time is getting very short for fresh measures to be developed and implemented).
- making this analysis available as the basis for decisions on individual capacity-increasing road schemes.

CIHT urges the government to consider adding a test of this nature to the greenhouse gas emission mitigation measures identified in the NPS draft. This will require the government to publish additional analysis on the change in vehicle mileage required to stay within its transport decarbonisation trajectory.

Generic impacts

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

- Yes
- No
- Don't know

Missing information for Generic impacts

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

CIHT agrees with point 5.254 'The project should identify opportunities and secure measures to protect and improve water quality and resources through green and blue infrastructure, sustainable drainage and environmental and biodiversity net gain. This will help to achieve 25 Year Environment Plan objectives and potentially provide greater capacity to support infrastructure needs.'

However, we believe that for this to be actioned, the transport industry needs more information and guidance on what green and blue infrastructure is, and how to implement it.

15. Provide any supporting evidence of your view.

CIHT's recent report [*Green and Blue Infrastructure \(GBI\): A Transport Sector Perspective*](#) argues that many benefits that GBI can bring to an area too often go unrealized. This stems from a lack of planning, integrating and maintenance of GBI featured that leads to:

- A lack of variety in GBI featured being used
- GBI featured not being used in optimal locations
- GBI features being seen as a 'decorative add on' rather than a way of creating climate resilient roads that can reduce whole life costs of these assets, whilst providing environmental, social, economic and health benefits to a local area and its residents.

To remedy this, the CIHT recommends that more is done to establish an end-to-end process for projects on our streets/roads/highways and developments to include GBI features.

This should include:

- Establishing formalized systems to include GBI within existing highway networks and planned improvements, especially at the crucial stages of:
 - Planning
 - Design and delivery
 - Adoption
 - Maintenance

- Setting GBI guidelines for Local Authorities to follow, such as:
 - Model street design and adoption standards
 - National underground design code that considers planting of green infrastructure
 - Guidelines on risk and liability
 - How to effectively maintain GBI

- Creating a performance framework for GBI to measure success and assign responsibility for targets.

Examples of GBI that can enhance our roads, and so, should be the focus of these actions are (including but not limited to):

- Green roofs and walls
- Green corridors
- Street trees, hedges, and verges
- Pocket parks
- Parklets
- SuDs such as rain gardens, permeable pavements/driveways, and swales