



Department for Transport
Planning Policy Team
3rd Floor, Great Minster House
33 Horseferry Road
London, SW1P 4DR

By Email: planningcircularconsultation@dft.gov.uk

13 September 2022

Dear Sir/Madam

Department for Transport Consultation to update the Strategic road network and the delivery of sustainable development (circular 02/2013)

Response on behalf of National Parks England

Introductory text

National Parks England exists to support policy and practice by coordinating the views of the 10 English National Park Authorities (NPAs). We do this by:

- Providing a collective voice for the views of the English NPAs
- Raising the profile of the work of the authorities to policy makers, Parliamentarians and other decision makers
- Facilitating discussions amongst NPAs on issues of common concern
- Supporting the development and capacity of the NPAs to effect change
- Working in partnership with other bodies where this adds value.

The work of National Park Authorities is directed towards the fulfilment of two statutory purposes as set out in the National Parks and access to the countryside act (1949) and restated in the Environment Act (1995); these are: -

- i) To seek the conservation and enhancement of the landscape, wildlife and cultural heritage of the National Park, and
- ii) To promote opportunities for the enjoyment and understanding of the special qualities of the National Park

National Park Authorities also have a statutory duty to seek to foster the economic and social well-being of local communities within the National Park.

The following response has been brought together by Officers of the National Parks England Transport Group and focuses on the questions provided within the consultation document.

Please reply to: National Parks England

National Parks England is a not for profit company limited by guarantee. Company number 06521048.
Registered at: CAN Mezzanine, 7-14 Great Dover Street, Southwark, London SE1 4YR

Tel: 020 3096 7979

Email: enquiries@nationalparksengland.org.uk

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Introduction

Q1. Do you agree or disagree with the changes proposed in the introduction section?

The changes make sense in the context of the change in emphasis since 2013 towards decarbonising transport, working towards reducing the need to travel, and encouraging active travel for shorter journeys. Design also has a key role to play in encouraging non-motorised connectivity by making such journeys safe and pleasant.

New connections and capacity enhancements

Q2. Do you agree or disagree with the changes proposed in the new connections and capacity enhancements section?

The changes appear to take a sensible approach in ensuring the safe and efficient operation of the high-speed sections of the SRN. It is reasonable for developers to focus access onto this part of the network via existing junctions, rather than via new connections to the SRN.

Engagement with plan-making

Q3. Do you agree or disagree with the changes proposed in the engagement with plan-making section?

The changes proposed are sensible and seek to ensure that planners and developers do not focus on car-borne solutions to enabling access to, from and within new developments. However, it is important that consultations between local planning authorities and National Highways is a 2-way process.

Engagement with planning decision-taking

Q4. Do you agree or disagree with the changes proposed in the engagement with decision-taking section?

The changes proposed in the engagement with decision-taking section are appropriate and should ensure that National Highways are fully informed about any development with the potential to impact the SRN. This approach also allows for the management of impact, where it can be accommodated.

Special types of development

Q5. Do you agree or disagree with the changes proposed in the special types of development section?

The changes proposed provide updated provision on special types of development adjacent to the SRN. The changes are aimed at ensuring that developments with the potential to distract road users or lead to damage to the road network are located sufficiently distant from the carriageway. This approach is supported.

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Roadside facilities

Q6. Do you agree or disagree with the changes proposed in the roadside facilities section?

Overall, the changes and the requirement for the changes is recognised. However, where motorways or trunk roads pass through National Parks, the requirement for new facilities to meet the suggested minimum distances should be balanced against the impact of the development of such facilities on the landscape and other special qualities of the National Park. Where the delivery of such facilities is likely to negatively impact on a National Park or its setting consideration of the balance of statutory National Park purposes and duties (Sections 61 and 62 Environment Act 1995) may be required.

Q7. Do you agree or disagree with the changes proposed for annex A?

The proposed changes are all appropriate to ensure that motorway facilities cater for a diverse range of users and provide secure parking facilities, with minimum basic amenities. The delivery of wider wi-fi and charging connectivity is welcomed.

Q8. When should the new requirements in annex A apply from?

For the purposes of equity, the following should be given priority: -

- all roadside facilities to provide at least one changing places toilet and one for people with disabilities
- motorway service areas and all truck stops to provide separate shower and washing facilities for male and female HGV drivers

However, the other requirements are also important and should be progressed in a timely manner.

Q9A. Are the facilities and parking currently required by the circular sufficient or not sufficient to enable utilisation of longer and heavier vehicles?

Q9B. Please explain your answer.

The use of longer and heavier vehicles may negatively affect the operation and efficiency of existing motorway services. For example, there are some motorway service slip roads with short egress lengths and tight turning geometries. This could compromise safety where other vehicles are required to slow more quickly to allow longer and heavier HGVs to access services.

Equally, depending on the existing capacity of HGV parking, use by larger vehicles may reduce overall space. Whilst trialling the effectiveness of longer and heavier HGVs, it is likely that this will be less of an issue. However, should such vehicles become the norm, parking facilities for HGVs may need to be updated / upgraded to allow for such use.

Q10. What additional facilities and/or parking could be required to enable utilisation of longer and heavier vehicles? Please explain your answer.

If longer and heavier vehicles are going to be able to use existing service areas, consideration may need to be given to layout and turning sweep to enable such vehicles to safely use the facilities. This may need that entrance, exit and connecting roads need to be reconfigured to allow easy passage. It will also be important to ensure that other users are aware of the movement of such vehicles through the service area.

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Space for HGV parking may need to be revised to allow for the safe parking of longer and heavier HGVs. Measures may also need to be taken to allow for manoeuvring of such vehicles in and around the parking area. Where possible HGV parking should be drive in and drive out to reduce reversing manoeuvres.

Yours faithfully



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