



**Consultation on a Draft National Policy Statement for the National Road and Rail Networks
(December 2013)**

Response on behalf of National Parks England

Submitted February 2014

Background

National Parks England welcomes the opportunity to be able to comment on the “*Consultation on a Draft National Policy Statement for the National Road and Rail Networks*”. National Parks England collectively represents the views of the nine English National Park Authorities and the Broads Authority. The existing national road and rail network provides links to and from the English National Parks and the Broads, facilitating access for visitors to these areas. In addition goods travel to and from the National Parks via the national networks and residents of these areas utilise the Networks for travel to urban areas for employment, education and services.

National Parks England recognise the importance of ensuring the efficient operation of the national road and rail networks, both for encouraging economic growth and quality of life. However, we would hope that the concerns and suggestions raised within this response, and the economic value of the English National Parks themselves are taken into account when producing the final version of the National Policy Statement for the National Road and Rail Networks.

All of the English National Parks have elements of the national transport network contained within their boundary, with the exception of Exmoor. In addition, all of the National Parks also have elements of the national road or rail network passing in close proximity to their boundaries. Table 1 provides a breakdown of the English National Parks and those roads and railways within the national network that pass through or close to these National Parks.

Table 1 – English National Parks with elements of the national road or rail network within or near to their boundaries

National Park	National Road Network (Outside Park Boundary)	National Rail Network (Outside Park Boundary)
Broads Authority	A47	Norwich to Great Yarmouth, The Bittern Line - Norwich to Sheringham
Dartmoor	A30, A38	Exeter to Plymouth
Exmoor	(M5)	(Tarka Line - Exeter to Barnstaple)
Lake District	A66, A590, M6	Windermere Branch Line, Cumbrian Coast Line, (West Coast Mainline)
New Forest	M27, A31, A36	South Western Mainline
Northumberland	(A1)	Tyne Valley Line - Carlisle to Newcastle, (East Coast Mainline)
North York Moors	(A1M)	Esk Valley Railway - Middlesbrough to Whitby (East Coast Mainline)
Peak District	A616, A628, (A57, M67, M1, M62, M60)	Hope Valley Line - Sheffield to Manchester (Derwent Valley Line, Derby to Matlock), (Buxton to Manchester), (Glossop to Manchester), (Midland Mainline), (Crewe to Derby Line)
South Downs	M3, A3M, A3, A26, A27, A23	London to Brighton Mainline, London to Portsmouth
Yorkshire Dales	(M6, A1M, A66,)	Settle to Carlisle, (East Coast Mainline), (West Coast Mainline)

The English National Parks collectively attract large numbers of visitors, which amounts to approximately 125.4 million tourist days¹ per year and visitor spend of £3,380 million per annum².

In responding to this consultation, National Parks England will focus on those areas that are particularly pertinent to National Parks and National Park Authorities, or those areas where we are best able to provide an input.

General Comments

In general the document goes to some length to ensure that regard is paid to the need to protect those sites with European designations (Special Protected Areas etc), national designations (National Parks and AONBs etc) and rare habitats etc. The document also emphasises the great weight that should be taken in weighing the impacts on such sites against the benefit of new national network infrastructure, and we see this as a positive approach. For National Parks, there has long been a presumption against the development of National Networks (in particular roads), dating back to the Department Of Environment Circular 4/76 which stated that: -

“It is now the policy of Government that investment in trunk roads should be directed to developing routes for long distance traffic which avoid National Parks; and that no new road for long distance traffic should be constructed through a National Park, or existing road upgraded, unless it has been demonstrated that there is a compelling need which would not be met by any reasonable alternative means”.

This approach was re-emphasised in the recent UK Government Vision and Circular for National Parks and the Broads 2010, 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”.

Considering the longstanding nature of this presumption, and its recent re-emphasis within the Vision and Circular, we would welcome the inclusion of such a presumption within the final version of the National Policy Statement for the National Road and Rail Networks.

The draft National Policy Statement for the National Road and Rail Networks makes reference to the need to weigh economic benefit when taking decisions in relation to new network infrastructure. We would strongly recommend that the whole value of designated sites and landscapes both for the visitor economy and wider ecosystem services is included within this assessment when taking such decisions.

Specific Comments

Chapter 2 – The need for development of the national networks and Government’s policy

- 1) The Government’s vision and strategic objectives for the national networks are provided at the beginning of Chapter 2 of the Draft Policy Statement. The third of these objectives is “*Networks which support the delivery of environmental goals and the move to a low carbon economy*”. It is reassuring to see that this aspiration is given high priority within the vision for the national networks, and is supported by National Parks England.
- 2) Predicted traffic growth is given as one of the main drivers of need for development of the national road network. 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. These include the Transport Planning Society in 2012, calling for an urgent review of the

¹ A visitor day is a visit by a person to a National Park for 3 or more hours.

² <http://www.nationalparks.gov.uk/press/factsandfigures.htm>

official traffic forecasts³. This was on the grounds that there were have been large differences between the predicted growth in traffic and actual numbers of vehicles, suggesting that the modelling does not take account of significant changes, such as the current evidence that many younger people are choosing not to attain a driving licence. Similarly, analysis provided to the Transport Committee Inquiry on the Strategic Roads Network by the Campaign for Better Transport, would suggest a trend of over-forecasting traffic growth⁴ over a number of years.

We feel that in some cases new roads will be created that drive demand rather than respond to it; this is of particular concern in and around National Parks where the impact of traffic can have major impacts on the special qualities of those National Parks.

- 3) Paragraph 2.8 refers to the decrease in traffic volumes in urban areas and that this is linked to increased investment in public transport. There is also reference to the growth in car use in rural areas; which may be connected to the reduction in spending on public transport in rural areas over recent years. We would welcome an increase in investment in public transport in rural areas, particularly within National Parks. National Park Authorities have a proven track record in delivering innovative approaches to public transport, including the 'New Forest Tours' and the 'Moors Bus'. Enjoyable leisure experiences of public transport are also likely to encourage more utility travel by public transport. Targeted investment in public transport in national parks could offset some of the growth in car use, particularly for visitors to, and residents of National Parks.
- 4) Paragraph 2.24 refers to the possibility of enhancement to the national road network in order to "*enhance the environment and improve accessibility for pedestrians and cyclists*". On the face of it, this would appear to be a positive approach, but this would be entirely dependent upon location, scale and potential impact of any such scheme. It is important that measures leading to the improvement of one environment, is not achieved through detriment to another, particularly when the negatively affected environment is within a national park. In these cases, Section 62 of the Environment Act (1995) provides a clear steer. We would welcome further clarification on this approach.
- 5) It is perhaps worth noting that national network corridors often also act as corridors for other national infrastructure including power lines and pipelines. Enhancement of the national network may pose threats to these, incurring costs for mitigation.

Chapter 3 – Wider Government policy on the national networks

- 6) Paragraph 3.14 refers to the Government's commitment to sustainable travel and to investment in developing a high-quality cycling and walking environment. National Park Authorities and partners have recently benefitted from such investment and this commitment and resourcing is welcomed. We also welcome the requirement for applicants bringing forward new schemes to address the needs of walkers and cyclists, although where possible we would suggest that provision for horse riders also be considered. We welcome the suggestion that the resolution of historic issues of severance also be addressed including the retrofitting of solutions. However, National Parks England would recommend that such solutions be funded as part of a rolling programme of mitigation on 'worst-first' basis, rather than only being addressed when new infrastructure is introduced.
- 7) Paragraph 3.17 states that the Government expects applicants to look for opportunities to improve access for all on and around the national networks; again this is welcomed.

³ <http://www.tps.org.uk/main/news/id/424/>

⁴ http://www.bettertransport.org.uk/files/CfBT_Transport_Committee_SRN_Oct2013.pdf

Chapter 4 Assessment principles

- 8) Paragraph 4.20 refers to the ability of applicants to apply for derogation from the Habitats Directive on the basis of three tests relating to feasibility, public interest and adequate compensation measures. All of the English National Parks and the Broads contain areas with European designation that are subject to the Habitats Directive. Therefore it is of some concern that despite the very high level of designation accorded to such sites, that development may be considered acceptable in such locations. We feel that the high designation of European sites should ensure that consent for development should be withheld except in cases where the development is overwhelmingly in the National Interest. We would recommend that there should be a presumption that no development will take place in such areas unless there are truly exceptional circumstances.

Paragraph 4.21 refers to use of demand forecasts to ascribe the national economic benefits of developing the national network in those areas covered by European designation. In order for a balanced approach to be taken we would recommend that a valuation of the European site also be undertaken including its relationship to the visitor economy and the wider ecosystem services offered. This would enable a true analysis to be undertaken of the proposal.

- 9) Paragraph 4.82 refers to Strategic Rail Freight Interchanges; we welcome the suggestion that National Parks and AONBs might not be appropriate locations for such development owing to the impact of noise and movements. We would, however, welcome a presumption against such development in National Parks and AONBs.

Chapter 5 – Generic impacts

- 10) Air quality and emissions paragraphs 5.8 refers to the need to have consideration regarding impacts on Natura 2000 sites, this requirement is welcomed.
- 11) Paragraph 5.18 refers to biodiversity offsetting, where the impacts of a scheme cannot be sufficiently mitigated. Where such offsetting is required because of the impacts of a scheme in close proximity to a national park, it might be appropriate for the offsetting to be undertaken within that particular national park, thus providing enhancement.
- 12) Biodiversity and geological conservation – we welcome the reference in paragraph 5.19 to the requirement for the Secretary of State to ensure appropriate weight is attached to designated sites of international, national and local importance. However, we would like to request clarification as to what values are ascribed to these sites when taking such decisions, and to request that an appraisal of the full economic value of such sites be undertaken to fully inform the decision process.
- 13) Sites of Special Scientific Interest – again we welcome the presumption within paragraph 5.22 against development on or affecting Sites of Special Scientific Interest.
- 14) Irreplaceable habitats – we welcome the presumption against development in ancient woodland, but would again question how the value of such habitat will be balanced against developments to the national networks.
- 15) Paragraph 5.80 refers to the need to minimise and mitigate against detrimental impact on amenity including light pollution. National Parks are amongst the few areas in England where it is still possible to enjoy dark skies⁵. Therefore it is important that in considering new networks, that thought is given to this impact in and around National Parks.

⁵ Exmoor is an International Dark Sky Reserve, Northumberland lies within Europe's largest Dark Sky Park and the Lake District, North York Moors and Peak District all have Dark Sky Discovery Sites.

- 16) Development within nationally designated areas – there has been a long tradition of avoiding major transport development within UK national parks dating back to the DoE Circular 4/76, which made a presumption against the development of new trunk roads within national parks. More recently this was re-emphasised within the UK Government Vision and Circular for National Parks and the Broads 2010, 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”*. As stated previously, we would welcome the inclusion of such a presumption within the final version of the National Policy Statement for the National Road and Rail Networks.

Whilst we recognise the national importance of ‘National Networks’, National Parks are also of national importance and enhancements to the former may be of detriment to the latter. Where there is a compelling case for enhancement to the national networks within national parks, then we feel that it is important that every attempt is made to mitigate those impacts, even if this increases the cost of the scheme.

Paragraph 5.136 emphasises the weight that should be placed on conserving the landscape and scenic beauty of nationally designated areas, and this is welcomed. However, the reference within paragraph 5.137 to the weight that should be given to the local economy when considering developments in nationally designated areas is of particular concern. National Parks are designated because of their special qualities including landscape, wildlife, cultural heritage and tranquillity. National Parks are places that bring economic value in their own right, both from the visitor economy and the ecosystem services that they offer including water provision and carbon storage. Therefore it seems inappropriate that these areas of national importance should be compromised to provide local economic benefit.

- 17) Land use including open space etc – paragraph 5.166 refers to a requirement, where green infrastructure is affected to ensure the continued functionality and connectivity of the green infrastructure network. This is welcomed, along with the requirement to mitigate and where appropriate enhance the network and other areas of open space.
- 18) Noise and vibration – paragraphs 5.172-3 refer to the potential impacts of noise and vibration on wildlife and biodiversity, along with the potential impact on locations such as National Parks and AONBs. This recognition is welcomed; however, it is also important to recognise that in such locations, the measures that may be undertaken to mitigate noise impacts might also have a negative impact on the landscape. Therefore it is important that the wider impact on such areas be given great weight when taking a decision on whether the infrastructure should be permitted. It is also important that in making such assessments that the scheme promoter should work closely with the respective National Park Authority or AONB Partnership.
- 19) Impacts on transport networks – we welcome the references in paragraphs 5.192-3 with regard to the need to undertake travel planning for all major developments, and the need for mitigation when accessibility, particularly for pedestrians and cyclists is worsened by a development. We would recommend that consideration is also given to horse riders under this requirement.
- 20) Appraisal of Sustainability – it is of some concern that the National Policy Statement detracts from the following AoS Objectives: -
- AoS4: To protect and enhance landscape quality, townscape quality and to enhance visual amenity.
 - AoS5: To protect and conserve heritage assets in a manner appropriate to their significance
 - AoS6: To preserve and enhance biodiversity

- AoS10: To minimise the impact on soil and land resources including contamination and loss
- AoS11: To minimise the use of previously undeveloped land

All of the above have the potential to impact significantly on National Parks, unless sufficient checks are incorporated within the National Policy Statement to protect National Parks.

In summary, National Parks England recognise the importance of ensuring the efficient operation of the national road and rail networks, both for encouraging economic growth and quality of life. However, we would hope that the concerns and suggestions raised over the previous pages, and the economic value of the English National Parks themselves are taken into account when producing the final version of the National Policy Statement for the National Road and Rail Networks.

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