



RTPI response to Department for Transport consultation 'Draft national networks national policy statement consultation document'

June 2023

The Royal Town Planning Institute (RTPI) champions the power of planning in creating sustainable, prosperous places and vibrant communities. We have over 27,000 members in the private, public, academic and voluntary sectors. Using our expertise and research we bring evidence and thought leadership to shape planning policies and thinking, putting the profession at the heart of society's big debates. We set the standards of planning education and professional behaviour that give our members, wherever they work in the world, a unique ability to meet complex economic, social environmental and cultural challenges.

Notes for readers on questions and answers

For the multiple choice questions below the RTPI's preference is indicated by it being underlined.

Questions 1 to 3 of the consultation concern respondents' contact details.

Questions and answers

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:

- strategic road network?
 - Strongly agree
 - Agree
 - Neither agree nor disagree
 - Disagree
 - Strongly disagree
 - Don't know
- strategic rail network?
 - Strongly agree
 - Agree
 - Neither agree nor disagree
 - Disagree
 - Strongly disagree
 - Don't know



- **strategic rail freight interchanges?**
 - **Strongly agree**
 - **Agree**
 - **Neither agree nor disagree**
 - **Disagree**
 - **Strongly disagree**
 - **Don't know**

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

The RTPI believes that the draft NNNPS provides mostly sufficient guidance to those involved in the NSIP process. The updated NPS reframes the policy direction with the goal of Net Zero emissions in mind whilst outlining the existing and future demands that will need to be met.

However, whilst the NNNPS clearly outlines what infrastructure will be required in the future it does not go further and offer guidance in providing direction on where it should go. By providing spatial guidance, the NNNPS could help create even greater security for developers whilst having positive effects in unlocking new areas for development that could be delivered in tandem with national networks. The RTPI has long supported the NNNPS having a spatial element because it would increase the speed, reliability and quality of new projects.

5. Does the draft NNNPS adequately set out:

- **the need for developing national networks?**
 - **Strongly agree**
 - **Agree**
 - **Neither agree nor disagree**
 - **Disagree**
 - **Strongly disagree**
 - **Don't know**
- **our policy for addressing the need for the development of national networks?**
 - **Strongly agree**
 - **Agree**
 - **Neither agree nor disagree**
 - **Disagree**
 - **Strongly disagree**
 - **Don't know**

Provide comments on improvements referring to specific sections of the NNNPS in your response.

Whilst the NNNPS correctly understands the increasing demand and subsequent need for national networks, the RTPI believes that the NPS does somewhat misunderstand the need. Whilst it is clear that we will need to continue to develop our national networks, the NPS does not fully recognise the scale of need for a modal shift away from private car use towards lower carbon methods of transport such as public transport.



We know from various studies that building more roads does not reduce congestion; instead through ‘induced traffic’, the more road capacity we create, the more traffic uses it. [Research from WSP](#) published via the government has highlighted that increasing road capacity has the impact of incentivising private car travel, thereby not reducing congestion and having the adverse effect of increasing emissions. Because of this and the clear need to decarbonise our surface transport systems, the NNNPS should identify that there is a significant need for lower carbon national networks. Whilst we have historically invested in road projects, there is a clear need to rethink how we plan our national networks and help shape our communities for the future.

6. In your view, is there any information missing from the “General principles and considerations” chapter?

- Yes
- No
- Don’t know

7. If yes, provide comments on missing information, referring to specific sections of the NNNPS in your response.

As previously outlined in our response to Question 4, we believe that the NNNPS does not provide enough guidance in regards to where projects should be developed. National Networks cannot be developed anywhere and consequently the NNNPS should go further in detailing where projects should be delivered in order to provide certainty to investors and developers.

8. If yes, there is an option to provide any supporting evidence of your view (using file upload function)

No comment.

9. Does the NNNPS support development of:

- freight facilities on the strategic road network, including lorry parking facilities?
 - Strongly agree
 - Agree
 - Neither agree nor disagree
 - Disagree
 - Strongly disagree
 - Don’t know
- freight interchange infrastructure that encourages modal shift from road to rail?
 - Strongly agree
 - Agree



- **Neither agree nor disagree**
- **Disagree**
- **Strongly disagree**
- **Don't know**

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

As detailed in our response to question 4, we believe that the NNNPS provides sufficient information on the need and plan for freight infrastructure. Consequently, we also believe that the NNNPS supports the development of these critical elements of infrastructure. Whilst freight facilities may not always be popular in the public eye, they are much needed elements of our national networks contributing £127 billion in economic benefits annual.

The government's [Future of Freight](#) strategy highlights the importance of planning in mitigating any negative effects whilst ensuring that they are strategically placed to maximise their benefits. Effective strategic planning is instrumental in ensuring that freight can be decarbonised, connected to existing transport networks, and limited in its impact on communities.

Following on from our answer to question 5, we believe that the NNNPS could better support the development of freight infrastructure by providing spatial guidance. This would in turn create greater security for developers and ensure a timely and high-quality delivery of this infrastructure.

10. In your view, are the changes to the strategic rail freight interchanges section useful for the NNNPS?

- **Strongly agree**
- **Agree**
- **Neither agree nor disagree**
- **Disagree**
- **Strongly disagree**
- **Don't know**

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

The RTPI welcomes the changes to the strategic rail freight interchanges section and in particular the acknowledgement that a modal shift is much needed for freight. The understanding of the social and economic benefits of moving freight to rail is clear and well detailed within Table 1 in the draft NPS.

Whilst the NNNPS recognises the need for SRFIs to be located near major urban centres we would welcome clearer guidance on where SRFIs would be best positioned given their unique requirements. The strategic element of their location is clear and should be reflected in spatial guidance in the NPS to maximise the benefits of these projects. Moreover, this spatial guidance should include strong and progressive community engagement to build trust with local stakeholders and mitigate any negative effects.

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

- carbon considerations in the development of national networks?
 - Strongly agree
 - Agree
 - Neither agree nor disagree
 - Disagree
 - Strongly disagree
 - Don't know

- wider environmental targets in the development of national networks?
 - Strongly agree
 - Agree
 - Neither agree nor disagree
 - Disagree
 - Strongly disagree
 - Don't know

Explain why, referring to specific sections in your response.

The RTPI supports the NNNPS's consideration of carbon and the wider environmental targets in the development of national networks. With regards to carbon, we support the interlinked understanding of indirect impacts upon air quality, water and land quality and encourage this holistic understanding of carbon emissions and the wider environment.

The two subheadings of 'climate change adaptation' and 'pollution control' and other environmental regulatory regimes' detail the considerations that must be made throughout a project's lifecycle across carbon and environmental considerations. These two sections are comprehensive and provide sufficient detail for all of those involved in the process.

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

- Yes
- No
- Don't know

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

No comment.



15. If yes, there is an option to provide any supporting evidence of your view (using file upload function).

No comment.

16. Do you agree with the findings of the appraisal of sustainability?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

17. Explain why, referring to specific sections of the appraisals of sustainability in your response.

The appraisals of sustainability do not provide any alternatives to the road-focussed development that we have previously discussed. The issue of sustainability should be central to conversations about transport and connectivity. Consequently, the appraisals of sustainability should utilise the NPS to orchestrate a greater modal shift to rail than the central alternative.

A modal shift is central to sustainable transport both now and in the future and any appraisal of sustainability within the NPS should be focused upon how we can move away from private vehicle use.

18. Do you agree with the findings of the habitats regulations assessment?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

19. Explain why, referring to specific sections of the HRA in your response.

No comment.

20. The Public Sector Equality Duty (PSED) requires public bodies to consider the needs of people in relation to characteristics protected by the Equality Act 2010. Development applications must demonstrate due consideration for the PSED and wider obligations under the Act. The NNNPS supports applicants to consider this



through its policies, including but not limited to accessibility, community severance and good design (paragraph 4.77).

Do you think the NNNPS could further support the aims of the PSED, particularly relating to the characteristics protected by the Equality Act 2010?

- Yes
- No
- Don't know

Importance of accessibility to stations.

21. If yes, please provide details of how the NNNPS could further support PSED aims, specifying the protected characteristic where possible and providing any supporting information you wish to be considered.

No comment.

22. Any other comments?

No comment.