

Department for Transport consultation: Draft National Policy Statement for National Networks

Landscape Institute response, 26 October 2013

Background

The Landscape Institute is the Royal Chartered body for the landscape profession. As a professional organisation and educational charity, we work to protect, conserve and enhance the natural and built environment for the public benefit. We represent 6,000 landscape scientists, planners, architects and managers and champion multi-functional and sustainable landscapes of both town and country. We believe that through careful and appropriate planning, design and management, it is possible to deliver a wide range of environmental, social and economic benefits.

The Landscape Institute, in accordance with the European Landscape Convention, uses the term 'landscape' to refer to "*...an area, whether outstanding or degraded, whose character is the result of the action and interaction of natural and/or human factors.*" It is an all embracing term that covers a wide range of landscape types, including green spaces, civic squares, housing development, coastlines and agricultural land.

By their very nature, nationally significant infrastructure projects have a substantial impact on the landscape which will be felt for many years to come. It is therefore critical that these interventions are seen as opportunities to enhance and improve the landscape in order to deliver as many social, environmental and economic objectives as possible. As such, we suggest that scheme promoters should be required to investigate scope for positive landscape improvements in addition to mitigation measures, therefore requiring a proactive approach. We believe that a landscape-led approach to the development of nationally significant infrastructure projects is critical in achieving this. We therefore welcome the opportunity to comment on the Department for Transport's draft National Networks National Policy Statement (NN NPS).

Landscape Institute response

1. Does the draft NN NPS clearly establish the need for development of the national networks? If not, why not?

No response.

2. Does the draft NN NPS adequately explain the Government's policy for addressing the need set out in the NN NPS? If not, why not?

We strongly agree with the statement that '*...the need for development of national networks needs to be seen in the context of the Government's wider policies on the environment, safety, technology, sustainable transport and accessibility*'.

We also strongly support the statement in section paragraph 5.13 which explains that '*...the essential principle set out in this [Natural Environment White Paper] is that the value of nature and the range of services that ecosystems provide to society should be at the heart of any*

decision.' This statement is so important that it should also feature prominently in Chapter 3, perhaps in paragraph 3.6, which explores wider environmental policy related to national networks.

We suggest that Chapter 3 should also place greater emphasis on opportunities presented by the development of national transport networks to contribute positively to Government policy. Rather than merely expecting applicants to '*...mitigate environmental and social impacts*' (paragraph 3.6), they should also be expected to provide evidence that they will deliver environmental and social benefits as part of their scheme.

We support wider Government policy to '*...bring forward targeted works to address existing environmental problems on the strategic road network and improve the performance of the network*', including:

- Reconnecting habitats and ecosystems;
- Enhancing the settings of historic and cultural heritage features;
- Respecting and enhancing landscape quality;
- Improving water quality;
- Reducing flood risk;
- Reducing excessive noise; and
- Addressing areas of poor air quality.

We suggest that the guidance should be framed to make it clear to applicants that their scheme(s) must assess the current function and condition of all these various environmental assets, and must demonstrate and deliver benefits in terms of positive enhancement of environmental conditions on the strategic road and rail networks. It would be helpful to add that a formal Environmental Impact Assessment (EIA) will be required in most cases.

We support the role of the '*...national road network to meet needs of cyclists and walkers in the design of new schemes*'. Investment in strategic transport networks should be used to create and extend green infrastructure networks and wildlife corridors that provide opportunities for active recreation, healthy exercise and access to open space for local communities.

3. Do the Assessment Principles provide adequate guidance to the Secretary of State on how he should assess applications for developments of the national networks? If not why not?

No response.

4. Does the draft NN NPS give appropriate guidance to scheme promoters? If not, why not?

The draft NN NPS is clear and helpful in the way it sets out how the various potential impacts of national networks infrastructure should be considered, and provides useful signposts to the relevant legislation and other sources of guidance. However we suggest that Chapter 5 should be improved if it opened with a broad outline of the process of decision-making before advising how each individual category of impacts will be considered, for example:

Introduction

The draft would benefit from an introductory paragraph at this point that advises the applicant to agree in advance with the relevant authorities, the scope of the evidence required to support the scheme proposals.

Applicant's assessment

Where the project is likely to have significant environmental and social impacts (both on and off site), the applicant should undertake an assessment of all the potential impacts of the proposals as part of the Environmental Statement (ES). The applicant should provide environmental information proportionate to the infrastructure where an Environmental Impact Assessment is not required.

Decision-making

Where a project is likely to lead to a breach of relevant policies or thresholds, the applicant should work with the relevant authorities to secure appropriate mitigation measures to allow the proposal to proceed.

Mitigation

The Secretary of State will consider whether mitigation measures put forward by the applicant are acceptable. Where necessary, requirements and / or planning obligations will be used to ensure these proposals are delivered.

We believe that the draft NN NPS provides comprehensive and helpful guidance to scheme promoters. We commend the statement in paragraph 5.16 that '*...the applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests.*' We are also extremely pleased to see the wording in paragraph 5.26 which states that '*Development proposals potentially provide many opportunities for building-in beneficial biodiversity or geological features as part of good design. When considering proposals, the Secretary of State should consider whether the applicant has maximised such opportunities in and around developments.*' We consider that this approach, which requires the applicant to consider the contribution that the conservation and enhancement of environmental assets can make to sustainable communities, should be applied to the consideration of all potential impacts described in the guidance.

5. Does the draft NN NPS consider all of the significant potential impacts of national network development? If not, what other impacts should be included and why?

The Appraisal of Sustainability (AoS) uses assessment objectives that do not appear to have informed the draft NN NPS, namely:

- AoS14: To reduce accidents and incidents on national networks and reduce risk to the users of road and rail networks;
- AoS15: To contribute to the reduction of crime and fear of crime among vulnerable groups and transport user types;

- AoS16: To contribute towards the maximisation of user benefits on the national networks;
- AoS18: To contribute towards better strategic transport access to deprived areas and areas of high unemployment;
- AoS19: To contribute towards the improvement of accessibility to and from rural areas;
- AoS20: To contribute to reduced severance of transport routes and recreational areas as a result of national network development and operations;
- AoS21: To enhance access to national networks and the jobs, services and social networks they create, including for the most disadvantaged; and
- AoS22: To ensure the needs of different social groups are taken into account in national network planning and service delivery.

We believe that the social impacts of national road and rail networks are at least as important as environmental and economic criteria, particularly in the minds of many potential objectors, and that these objectives should be incorporated into the final NN NPS. Promoters should be made aware of the need for their scheme(s) to contribute towards sustainable development and that a key component of this is due consideration to social effects of development.

We suggest therefore that the requirement to provide green infrastructure as an integral part of any national transport network should be separated out from land use and Green Belt into a new impact for assessment and described in terms of environmental, social and economic objectives, with guidance on decision-making and mitigation as before. This would have the added benefit of enabling applicants to achieve many, if not most, of the social objectives set out above

6. Does the draft NN NPS give appropriate guidance on appropriate mitigation measures? If not why not?

Biodiversity and geological conservation (paragraphs 5.13 – 5.31)

We strongly support the statement that ‘...the essential principle set out in this [Natural Environment White Paper] is that the value of nature and the range of services that ecosystems provide to society should be at the heart of any decision’ (paragraph 5.13). We suggest that this is also placed in the introductory sections at Chapter 3.

We wish to draw attention to the fact that Natural England is restricted by the amount of any one habitat that is afforded protection as a Site of Special Scientific Interest. Consequently major infrastructure can destroy habitats that are of the same quality as an SSSI but might be designated a Site of Importance for Nature Conservation (SINC) through the local planning process. We strongly advise an additional clause is inserted that requires national road and rail network infrastructure to avoid damage or destruction of locally important semi-natural habitats such as those areas designated as SINCS.

With regards irreplaceable habitats including ancient woodland and veteran trees (paragraph 5.25), we feel it is important to point out that while there are successful examples of translocation of soil, with the seeds, fleshy plants and bulbs contained in the soil, and some of

the trees and shrubs growing in the soil, it is too early to tell whether or not these examples will remain successful in the longer term. This is because so much depends on aspect, microclimate and soil water regimes.

We also suggest that greater attention is paid to the scope for new habitats as part of NSIP development. In any project involving embankments and cuttings, both typical components of the major road and railway projects, scope exists for creating naturalistic habitats, for example open grasslands or woodland. This potential should be recognised and scheme promoters should be encouraged to approach this by thinking about the ways in which greater combinations of species can be integrated into landscape interventions associated with their development. This would help ensure a high standard of habitat protection and enhancement adjacent to new rail and road networks.

Landscape and visual impacts (paragraphs 5.131 – 5.147)

In the section on landscape and visual impacts we strongly suggest that the guidance should not only require applicants to consider the potential harm to the landscape, but that it should also explain that major infrastructure projects can often create impressive landscape features in their own right, e.g. bridges, cuttings, viaducts etc. Such structures will be present in the landscape for many decades and therefore must be designed to a very high standard, bearing in mind their future historic significance and potential scenic value.

As the guidance advises, adverse landscape and visual effects may be minimised through appropriate siting of infrastructure, design including choice of materials, and landscape treatment of schemes, depending on the size and type of the proposed project. However, we wish to stress that landscape must not be an afterthought, for example, ‘...filling in gaps in existing tree and hedge lines...’ (paragraph 5.147). Landscape is the starting point for any scheme, and the landscape architecture profession is experienced in working with engineers to maximise the environmental and design quality of nationally significant infrastructure projects.

Land use including open space, green infrastructure and Green Belt (paragraphs 5.148 – 5.170)

We welcome the support provided for green infrastructure by the draft NN NPS, including recognition of the environmental and economic benefits (paragraph 5.148), though we recommend that green infrastructure is separated from Green Belt and land use (see response to question 5). We also strongly urge the department to include a definition of green infrastructure in the revised NN NPS, given that it is a term that is regularly misunderstood. Often the term is used simply to describe green space in urban areas; however we use the term to explain how natural systems and processes can deliver a range of benefits at a range of scales and need to be planned, designed and managed in a way that is strategic. We encourage the department to consider inclusion of our definition of green infrastructure, which is taken from our 2013 position statement on the subject:

“Green infrastructure is the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect villages, towns and cities. Individually, these elements are

GI assets, and the roles that these assets play are green infrastructure functions. When appropriately planned, designed and managed, the assets and functions have the potential to deliver a wide range of benefits – from providing sustainable transport links to mitigating and adapting the effects of climate change”¹

The department may however feel more comfortable using the definition from the Government’s advisor on the natural environment, Natural England:

“Green Infrastructure is a network of high quality green and blue spaces and other environmental features. It needs to be planned and delivered at all spatial scales from national to neighbourhood levels. The greatest benefits will be gained when it is designed and managed as a multifunctional resource capable of delivering a wide range of environmental and quality of life benefits (ecosystem services) for local communities.” – Natural England

With regards mitigation, we welcome the statement in paragraph 5.166 which explains that applicants are expected to ensure the continued functionality and connectivity of the green infrastructure network.

We suggest however that the guidance should also advise that, although strategic transport routes may on occasions cause severance or fragmentation of existing links between communities, they often present new opportunities to create and extend green infrastructure networks. We suggest that applicants explain how they intend to make the most of these opportunities, particularly bearing in mind previous statements within the draft NN NPS which highlight that the value of nature and ecosystems services should be at the heart of any decision (paragraph 5.13).

7. Do you have any comments on the Appraisal of Sustainability of the NN NPS?

The comments that follow relate to the Non-Technical Summary, not to the full Appraisal of Sustainability (AoS). We commend the process of formulation of the draft NN NPS which, as described in Section 8 of the AoS, introduces measures relating to environmental mitigation which have not been fully articulated in previous UK transport policy. In particular, we welcome the commitment to implementing enhancement measures for both existing identified problems and for future schemes in the areas of flood risk, water quality, air quality, noise, heritage, landscape and biodiversity.

We particularly support the suggestion in section 10 to consider ‘...*enhancement of green infrastructure to manage climate change adaptation and increase resilience of the national networks to climate change*’. Green infrastructure is comprised of networks of multifunctional landscapes at a range of scales that can, in many locations, incorporate and supplement national transport networks and therefore make a significant contribution to environmental, economic and social sustainability, in addition to climate change adaptation

¹ Green infrastructure: An integrated approach to land use (2012), Landscape Institute.

8. Do you have any comments on the Appropriate Assessment on the draft NN NPS?

No response.

9. Please provide any further comments regarding any aspect of this consultation.

We suggest that the new imperative to embrace sustainability standards, both in the way we develop and the way we manage resources, raises questions about the statement '*Transport is an engine of growth.*' (page 7). This statement assumes that growth is a good thing when we ought to be questioning whether it is a sustainable aspiration. It also implies that growth is defined by moving masses around the landscape without exploring alternative models. We know for example that knowledge transfer is a driver of the economy and requires a different form of infrastructure. We also know that making it easy to move around goods reduces the motivation for local provision, indeed we could go further and say that by providing unrestricted access to transport infrastructure will encourage unsustainable life styles and unsustainable business development. A national commitment to sustainability should see a reversal of policies that actively encourage mobility with its dependence on fossil fuels. An energy efficient and sustainable system is not one that encourages mobility of people and goods. We also question the validity of the cost benefit analysis process that is unable to quantify in traditional terms a value to all aspects of sustainability as we, as a nation, have defined it.

In planning and design terms, road and rail infrastructure are distinctly linear features which traverse the landscape for many miles. Their linear form differs radically from most development forms which equate to that of 'islands' in an urban or rural context.

This results in a corridor of development affecting on the landscape over long distances. A landscape-led approach to this development is necessary in order to help integrate the features into the wider environment and to reduce specific impacts. For example, vegetation can help reduce air pollution, bunds and fences can help reduce noise and additional landscape interventions, such as tree planting, can reduce the negative impacts on local communities affected by development. Such interventions have additional benefits which relate to wider Government objectives such as establishing ecological corridors. A significant and unwanted effect of most new roads and railways is that of preventing natural movements of animal populations. Greater consideration should also be given to inclusion of wildlife underpasses and green bridges over new and existing motorways and major roads to aid movement of wildlife.

In order to achieve this however, consideration of the landscape must be given a priority. It is critical to ensure that space is made for landscape interventions that are commensurate in size and impact with that of the proposed development. It is suggested therefore that scheme promoters should be required to investigate scope for positive landscape improvements in addition to mitigation measures, therefore enabling a proactive approach to development which provides for improvements for landscape, wildlife habitats, public health and local economic conditions.

Finally, we feel it is important to note the importance of the views of landscapes afforded by national road and rail networks, and the significant role this plays in creating positive impressions for both residents and visitors.

With the exception of National Parks and AONBs, few of these landscapes are protected by any form of landscape designation. These views of our 'green and pleasant land' are the result of thousands of years of interaction between natural and human processes. However there is an

ever present pressure to develop along national networks. We believe that there is an unfortunate, yet understandable, tendency to designate land alongside national road and rail networks for less-desirable industry such as waste-processing, large-scale development and light industry. The landscape approach to accommodate such development is often minimal, with small numbers of trees planted and little 'on-site screening'. It is a cause for concern that the view of the nation's countryside regularly enjoyed from our national road and rail networks is being spoiled by the gradual creep of inappropriately-designed landscape interventions. This has the potential to be harmful to the nation's economy as well as beauty as experienced by the general public. Economic growth is not well-served by poor landscape; quite the opposite. We believe that good landscape is good for the economy. While outside of the scope of this consultation we would like to propose that the Government considers strengthening landscape design requirements alongside national road and rail networks and would welcome the opportunity to present our thinking on this in greater detail.