Community Planning Alliance

NATIONAL INFRASTRUCTURE PLANNING REFORM PROGRAMME CONSULTATION

10 December 2021

NSIPS

We are grateful for the opportunity to submit comments on the important topic of Nationally Significant Infrastructure Projects. Our response covers all the questions and we set it out below, with general points followed by practical suggestions.

We are concerned that the consultation focuses on speed. Instead, we would wish to see a system that:

- Involves communities through genuine engagement (a seat at the table, not just documentation review – communities should be asked to consider the problem, not just the solution)
- Results in the right outcome (right solution, right for the public purse, right for the environment)
- Prioritises the climate and biodiversity emergency.

The current system is too reliant on infrastructure projects that are proposed at a stage at which alternatives (that may be better for communities, the planet and the public purse) are not able to be considered.

The passing of the Environment Act provides the ideal opportunity to take a new approach. We must start by defining the problem, and then enable all stakeholders to discuss the full range of solutions.

First principles should be:

- Have all stakeholders (including impacted communities) been involved in an open discussion from the earliest stages?
- Have all options presented by stakeholders (including those proposed by communities) been subject to a full and detailed evaluation?
- Do the options tick all the important boxes: particularly sustainability; value for money; good outcomes for all?
    - Have vulnerable communities been considered and are there checks and balances in place to ensure that they are not impacted. For example, if a new road is built,

who will be most exposed to the noise, air and light pollution? Do inequities increase, are poorer communities left more disadvantaged as a consequence of the initiative?

- Road proposals should be the exception, with robust justification (including a clear and comprehensive understanding of the carbon implications of such a development (including the carbon impacts of changes to land use),
- Have all the genuine alternatives been considered, do they include a range of sustainable options? For example:
  - prior to any investment of public money in road programmes, alternatives such as investment in public transport and sustainable freight options should be prioritised to reduce traffic volumes;
  - for solar projects proposed for best and most versatile agricultural land, alternative locations should be prioritised (such as brownfield sites, public buildings, new homes and commercial premises);
  - the cumulative impact of the loss of such farmland and associated habitats should be specifically considered
- Is the business case proven, especially given the years remaining to achieve the net zero target? Have the externalities been costed for each alternative? For example, public transport will bring many benefits and few problems, while roads will bring few benefits and many problems (including the possibility of legal expenses). Those problems will also create a drain on the public purse in the form of poor health and poor life outcomes.
- Is the Climate Emergency/the Environment Act at the heart of decision-making?

PRACTICAL SUGGESTIONS

	Suggestion	*Example*
1.	Cumulative impact must be taken into account	Solar schemes on greenfield are proliferating. Yet there is no national data on the early stages, nor on the sub NSIP schemes. There needs to be national data, publicly accessible. And there needs to be scrutiny of the cumulative loss of best & most versatile farmland and farmland habitat for wildlife.
2.	All options on the table – and allow	There are many situations when communities are unable to propose alternatives that may result in better outcomes:

Suggestion	*Example*
community alternatives	• Carrington Moss –In this location there has been no consideration of public transport options or sustainable freight solutions (despite the proximity of the Manchester Ship Canal and a former railway line) – there is no forum for the community to propose alternatives despite many repeated requests; • A12 north Essex – six extra lanes of A12 to be built. No means to assess alternatives. No formal means to recommend that four of those become a rewilded country park; • A133-A120 link road – campaigners have produced a Green Cordon alternative that would save lives, save money, save the environment but there is no way under the current system of ensuring that it is considered.
3. Increase digital transparency	Ensure that data is searchable, with headings, and technical summaries. It must show data (national picture) and include maps (plus 3-d mapping) Basic metrics and key information should be available for each NSIP scheme (including, for example, comprehensive carbon emissions implications) These metrics should also clearly set out the implications for the climate and biodiversity emergency (for example, any particular impacts on specific species) Communities should have online access to clear and simple guidance about the process that clearly shows the milestones, who is representing them on the project and how and when they can influence its outcome
4. Hold an early-stage pre-examination	It would be helpful if stakeholders could meet with an independent examiner early in the process, to ensure that all alternatives are on the table and that the process is fair.
5. Ensure that feedback in consultations is taken into account.	Gunning principles must be followed, and tested at examination

	Suggestion	*Example*
6.	More support for communities	Communities are at a disadvantage from the outset. They do not understand the process. They have limited time to learn about it. There needs to be active community support to ensure that all are reached and that all understand the project proposed, particularly as it reaches the more technical stages closer to examination. It would be helpful to have a PINS community officer assigned to each case. (CPA members have found Programme Officers to be helpful with relation to Local Plans, and the role could be extended to include active community support). Video training might be helpful.
7.	Fair time to digest information	Late submission of data or changes to submissions by applicants make life extremely difficult for community respondents. Many of these have full-time jobs or other commitments. This should be taken into account and a fair amount of time granted to absorb information.
8.	Clear explanations & standardisation	Plain English and simple explanations are required, particularly with regards to permits and licences. Metrics must be standardised, easily comparable and visual. This is particularly important for climate-based statistics. Stakeholders must be able to use statistics to make judgements and comparisons.
9.	Run a pilot	We believe that early engagement can lead to a quicker (and less contentious) planning system. We would suggest that a pilot is arranged, taking a different approach to community engagement. Instead of presenting a pre-decided project, gather stakeholders together with a mediator. Present a problem (over-congested & polluted road) and seek alternatives for consideration.
10.	Take into account declared climate emergencies	Many councils have now declared a climate emergency. This should be a material factor in NSIP decision-making

As a final point, we do not believe that NSIPs should be widened to include further housing or new towns, as mooted in 2020. The place for housing is the Local Plan system, where issues can be properly addressed. Fast-track new towns are not the solution to any problems.

We would very much like to be involved in any future discussions and to provide further practical feedback from our supporters.

Rosie Pearson
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ABOUT THE COMMUNITY PLANNING ALLIANCE

The Community Planning Alliance was founded in March 2021, with an interactive map[1], on which over 550 groups & individuals campaigning against inappropriate development across the UK have now self-listed. The map has been viewed 205,000 times and we have 2,000 members of our Facebook group. In July we were formally constituted as an unincorporated association. Our aims are:

1. SUPPORT groups in their campaigns and level the playing field;

2. LOBBY for a better planning system which protects nature, involves communities in decision-making and delivers the right homes & infrastructure[2].

Interim website: https://grassrootscampaigns.weebly.com/

[1] Community Planning Alliance: grassroots map - Google My Maps
[2] Homes, in the right numbers, in the right places, which are green, affordable, and accessible by sustainable transport.