



# National Infrastructure

**Embedding sustainable development  
in decision making**

## **Acknowledgements**

### **Drafting team**

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## Executive Summary

The planning regime has often been criticised for lacking a joined-up and coherent approach to delivering much needed nationally significant infrastructure projects. These qualities need to be essential elements of a regime that the Department of Energy and Climate Change has tasked with delivering £200 billion of investment in energy infrastructure alone by 2020. At this time of economic challenge, the UK's current and future population deserves to maximise the economic, environmental and social benefits from such investment. For this to happen, the reforms of the Planning Act 2008 and outlined in the Localism Bill, National Infrastructure Work Plan and the much anticipated "simple and consolidated national planning framework covering all forms of development" need to be joined up with a view to delivering *sustainable* development, not just development.

This report sets out recommendations to Government that will help rectify some key issues with the reforms and help the planning system deliver holistically on its primary stated aim of sustainable development. These recommendations are supported by a series of tests to assess the sustainability of nationally significant infrastructure projects. The tests relate to managing impacts and ensuring long term resilience, both critical to ensure our long term future.

## Recommendations

- The SDC endorses the recommendation of the Energy and Climate Change Committee that **"the Government has set out on important, but potentially disruptive or even conflicting, reforms of the planning system in relative isolation from each other....The various changes to the planning system should be complementary. We therefore recommend that the development of the National Planning Framework and the National Infrastructure Plan, and the enactment of the Localism Bill, should be coordinated."**<sup>1</sup>
- The **SDC supports the recommendation taken by the Energy and Climate Change Committee that Government should, as a minimum, publish a list of criteria against which a decision contrary to the advice of the IPC or MIPU could be taken by a Secretary of State.**<sup>2</sup> Furthermore, the reasons underlying a specific decision should also be clearly set out.
- In addition to the Committee's recommendation for the "Secretary of State being aware of the volume and kind of capacity already consented and under construction", we recommend that **Government sets out a clear process for monitoring and reporting the cumulative impacts of the totality of all the infrastructure projects.**
- The SDC has devised a series of tests to assess the sustainability of infrastructure projects. We recommend that **these tests be used to question or challenge the sustainability of future NSIP applications and that the IPC, and its successor, ensures this approach is adopted.**

## Introduction

National infrastructure is a central part of the lives of each and every one of the UK's 60 million citizens. Whether it be for energy, clean water, management of waste or transport, every person within the UK is to a greater or lesser extent dependent on the services our national infrastructure provides. The UK's infrastructure is central to the nation's social progress and economic prosperity and the manner in which it is provided has the potential to greatly influence the natural and historic environment and in turn our ability to live within environmental limits. Whilst a new planning regime for nationally significant infrastructure has been established through the Planning Act 2008 and subsequent restructurings by the Coalition Government, it still falls short of being a regime that will deliver sustainable development according to its stated intention. The lack of spatial planning incorporated into the current system together with the reliance on the market to determine the distribution and phasing of projects means that it is unlikely that new national infrastructure will deliver the maximum benefit for England's population now and in the future.

## The Policy Framework for Nationally Significant Infrastructure Projects

In recent decades, the country's strategic infrastructure has suffered from a lack of investment<sup>3</sup> and strategic planning. In addition, an all too common problem has been the length of time taken to process infrastructure planning applications and the considerable associated cost. One of the major reasons for such delays in the delivery of infrastructure projects was an absence of 'joined up' government policy which creates uncertainty for developers and inhibited the delivery of projects.<sup>4</sup> In an attempt to overcome this problem, the previous Government established a new policy regime, aiming to make the planning process for Nationally Significant Infrastructure Projects (NSIPs) less costly, quicker, more certain and more sustainable.

This was enshrined within the Planning Act 2008 which established:

- A suite of National Policy Statements (NPSs)<sup>5</sup> setting out government policy relating to new energy, water, waste, waste water and transport infrastructure
- A single planning regime under which applications for new infrastructure could be made
- A new duty placed on developers to ensure they achieve stronger community engagement prior to submission of an application
- A new independent body, the Infrastructure Planning Commission (IPC) to assess proposals

The Planning Act 2008 provides a policy regime for national infrastructure that sets out to deliver sustainable development. In order to achieve this, the projects need to work towards fostering a strong, healthy and just society within environmental limits. However, with the exception of the Nuclear NPS and Waste Water NPS, the NPSs have been designed such that the delivery of nationally significant infrastructure is shaped predominantly by the market. The market certainly has an important role to play in delivery however the regulatory framework within which it is operating needs to be robust enough to ensure that environmental and social impacts are not subverted in the decision making processes. Such an issue could manifest itself if, for example, the Imperative Reasons of Overriding Public Interest (IROPI) test was successfully reached in relation to impacts under the Habitats Directive. It is not yet clear whether the current policy regime and accompanying regulation is robust enough to deliver new strategic infrastructure that places economic, environmental and social impacts and benefits as equally important considerations.

The National Infrastructure Plan published in October 2010 and the new National Planning Framework expected in 2012 will provide an important context for nationally significant infrastructure delivery. Whilst it is the NPSs that will govern NSIPs, it is crucial that the policy set

out within them is integrated with the reforms to the planning regime outlined in the Localism Bill and the new National Planning Framework. In the absence of such integration, it is less likely that government policy will combine to form a comprehensive, joined-up planning regime for all types of development. If this is the case, the new system could well create an environment that is no more certain for developers than the previous planning regime. The need to deal with this issue was also outlined by the Energy and Climate Change Committee and **we endorse their recommendation that “the Government has set out on important, but potentially disruptive or even conflicting, reforms of the planning system in relative isolation from each other....The various changes to the planning system should be complementary. We therefore recommend that the development of the National Planning Framework and the National Infrastructure Plan, and the enactment of the Localism Bill, should be coordinated.”**<sup>6</sup>

This is currently not the case, and indeed the Coalition Government is instituting some new changes to the Planning Act 2008. The major proposed changes to the current regime are the requirement for NPSs to be discussed in Parliament and a decision to abolish the IPC and establish a Major Infrastructure Planning Unit (MIPU) in the Planning Inspectorate within the Department of Communities and Local Government (CLG). This latter decision means that the final sign off for each project will now sit with the Secretary of State for the relevant departments as follows:

- Energy applications - Secretary of State for the Department of Energy and Climate Change
- Transport applications - Secretary of State for Transport
- Hazardous waste applications - Secretary of State for Communities and Local Government
- Water supply and waste water applications - Secretaries of State for Communities and Local Government and Environment, Food and Rural Affairs

The legislative framework for these changes is included within the Localism Bill which was published in December 2010. Prior to these changes, the IPC was required to assess applications against NPSs put in place by the Government. The new requirement for the NPSs to be placed before Parliament is an important step forward and ensures that the NPSs have democratic accountability. That said, the additional change meaning the relevant Secretary of State now determines individual applications raises a concern. Rather than an independent body (the IPC) determining applications against democratically agreed NPSs, Secretaries of State could now be in a position whereby they are required to exercise independent judgement on infrastructure projects that directly relate to their political agenda for example fossil fuel fired power station. Whilst it is noted that the Major Infrastructure planning reform work plan<sup>7</sup> sets out that the decisions should be taken in line with the relevant NPS, it is not clear in what circumstances the Secretary of State is permitted to take a decision contrary to the advice of the IPC or MIPU or whether such a decision can be challenged.

**To ensure this process is transparent, the SDC supports the recommendation taken by the Energy and Climate Change Committee that Government should, as a minimum, publish a list of criteria against which a decision contrary to the advice of the IPC or MIPU could be taken by a Secretary of State.<sup>8</sup> Furthermore, the reasons underlying a specific decision should also be clearly set out.**

## The Sustainable Development Commission view on the sustainability of the current regime

Sustainable development has been underlined as the intended outcome of projects coming forward under the NPSs. In our response to the consultation on the 2007 Planning White Paper, the Sustainable Development Commission (SDC) set out that sustainable infrastructure would need to meet the following principal criteria:

- The topics (types of infrastructure) covered need to **be integrated together** to achieve a consistent spatial approach. Effective horizontal integration of policy, based on sustainable development principles, is critical to overcome the potential of 'silo' delivery
- Their primary focus must be to deliver whole policy solutions, which would include both the **reduction of demand** and the supply of infrastructure for national needs
- They must **meet other EU and national policy objectives** such as those within the Water Framework Directive, Habitats Directive etc
- They must **address the national carbon reduction target**
- They should be **subject to Strategic Environmental Assessment**, both individually and as an integrated whole to assess their cumulative impact, and unintended chain effects – to include a 'climate proofing' test.
- They must be subject to **full consultation, and genuine engagement and debate**, at all levels and with all stakeholders throughout the various stages of their development, in compliance with the Aarhus Convention.<sup>9</sup>

It is the SDC's view that the current regime still fails to meet these criteria and therefore the SDC, has been critical of the approach taken in NPS development. The three principal concerns are:

- The weakness of the Appraisals of Sustainability, particularly as regards the appraisal of alternatives policy options within the NPSs
- That, with the exception of the Nuclear NPS, they are not spatial plans
- That, whilst required to pay regard to the cumulative impacts of individual applications, neither the IPC nor its successor is explicitly required to assess the potentially significant damaging *cumulative* impacts of all nationally significant infrastructure projects over time.

In relation to this final point, it is noted that "The IPC should ensure it takes account of any longer-term adverse impacts that have been identified and any cumulative adverse impacts." And: "If the IPC is satisfied that the adverse impacts identified (including any cumulative adverse impacts) outweigh the benefits of the proposed development (taking into account measures to avoid, reduce or compensate for those adverse impacts) consent should be refused."<sup>10</sup> It is also noted that the NPSs also direct that the Environmental Impact Assessment (EIA) accompanying an application should provide information on cumulative impacts, in particular how the applicant's proposal would combine and interact with the effects of other development.

The EIA is therefore a critical process to capturing the cumulative impacts of proposals within decision making because it has the potential to pick up important cumulative impacts of individual and multiple project. That said, to do so effectively would require impacts to be assessed at the appropriate spatial scales, which may be local, catchment or national. In each case, engagement with the relevant communities will be an important step in assessing impacts.

The SDC welcomes the Government's recognition of the need to assess cumulative impacts of all major infrastructure projects. However, an effective means of tracking cumulative impacts of infrastructure projects is important if the planning regime is to fulfil the key sustainable development principle of remaining within environmental limits. If such an outcome is to be achieved, information on the cumulative impacts of national infrastructure needs to be collected and monitored and the assessment of need for infrastructure adjusted to ensure that environmental limits are not breached. It is therefore important that the policy regime, including the NPSs, is reviewed using this data as part of an iterative process that enables transparent changes to be made to the regime that reflect sound science. It is noted that the Government has stated that it would "be watching both the flow of applications for consent to the IPC and the outcome of those cases to determine whether they are in line with the expectations about future infrastructure development on which the NPS policies were based".<sup>11</sup>

In our view, this is a relatively weak statement insofar as putting in place a robust and iterative process for tracking cumulative impacts of NSIPs. The SDC again welcomes the Energy and Climate Change Committee's recommendation to government that "the Secretary of State must take into account the volume and kind of capacity already consented or under consent"<sup>12</sup> when considering energy infrastructure applications. Such a requirement should help mitigate the potential of missing the UK's renewable energy and greenhouse gas emissions reduction targets. The SDC does however believe that the Committee's recommendation could go further for two principal reasons. Firstly, the recommendation is purely climate change focused. The UK's greenhouse gas reduction targets are an attempt not to breach environmental limits for greenhouse gases but there are also critical environmental limits relating to water, land use, biodiversity, air quality, soils, noise and light.<sup>13</sup>

**These limits could equally be affected by NSIPs and the SDC recommends that they should be subject to the same scrutiny. Secondly, in addition to the Committee's recommendation that the Secretary of State should be "aware of the volume and kind of capacity already consented and under construction",<sup>14</sup> the SDC recommends that government must go further and set out a clear process for monitoring and reporting cumulative impacts. In relation to greenhouse gas emissions, this could be carried out through either the Annual Energy Statement or an alternative mechanism. The central tenet should however ensure that the process in place enables the needs case for infrastructure within the NPSs to be updated to reflect sound scientific assessment of cumulative impacts of all NSIPs. It is particularly important due to the fact that different Secretary of States hold responsibility for different types of infrastructure. Different types of infrastructure being developed will combine to create impacts and therefore it is essential that an overarching view assessment is made to ensure that the needs case in all NPSs can be updated when necessary.**

The SDC has repeatedly called for a national spatial plan to co-ordinate land use planning decisions and the delivery of nationally significant infrastructure should be an important part of such a plan. In our view a degree of central planning should be applied in order to ensure that nationally significant projects provide the maximum benefit to society and to enable their impacts to be managed, including those that are cumulative in nature. We are pleased to note that the Energy and Climate Change Committee has also advocated the need for a greater level of spatial planning, stating that "a mechanism is needed for more strategic spatial guidance in the development of nationally significant infrastructure....New capacity must be able to link up with sufficient transmission networks and both must be developed in a coherent manner which integrates environmental, social and economic concerns".<sup>15</sup>

To some extent the Government has acknowledged the need for some central planning through the publication of revised NPSs. However, in their current state, the NPSs rely on the market to determine the spatial distribution of infrastructure projects without any overview of how these various elements of infrastructure fit together operationally. In this era of austerity, this Government must ensure the amount of capital likely to be invested in infrastructure delivers the maximum benefit to society in both the present and future times whilst planning for the unavoidable impacts of climate change. It is doubtful that the current market determined approach will achieve this as developers are more likely to pursue projects with the least risk and greatest financial advantage than those which are in the national interest.

As the Government's independent adviser on sustainable development, and as a prescribed consultee under the regulations to the Planning Act 2008 on all proposed applications for NSIPs, we have developed a series of tests which, when combined, represents a high-level approach to assessing whether or not infrastructure projects coming forward demonstrate a sustainable development approach. In future this role will have to be undertaken by others such as NGOs, consultees, applicants and decision-makers. **We recommend that these tests be used to question or challenge the sustainability of future NSIP applications and that the IPC, and its successor, ensures this approach is adopted.**

## Tests for assessing the sustainability of infrastructure projects

Planning policy is currently undergoing a major review, with the National Planning Policy Framework, which needs to set the context for the NPSs, due to be operational by April 2012. DCLG have made a clear statement that this will be a simple and consolidated framework that covers all forms of development and sets out national economic, environmental and social priorities. It has also been made clear that this

will represent the full extent of planning guidance issued by central government. In the intervening period there is some detailed guidance relating to land use planning issues such as climate change adaptation that is currently available to Local Planning Authorities.

Many of the most notable statutory consultees under the Planning Act 2008, including the Environment Agency, Natural England, Forestry Commission and English Heritage are currently undergoing major restructuring. At this stage it is unclear as to the role and capacity of these organisations to scrutinise individual applications. With regard to NPSs it has been indicated that the Government intends Parliament to have a more prominent scrutiny role over the planning process itself through the debate on the NPSs.

The following series of tests represents an indicative approach to formulating a framework that could be used to assess how far applications for nationally significant infrastructure deliver on the five principles of sustainable development. It sets out two key tests for each principle together with an indication of the criteria that a sustainable infrastructure project should fulfil based on current best practice – these are split between managing impacts and ensuring long term resilience. Both are critically important given the scale of the projects and the length of the time they will be in situ.



## Living within environmental limits

*Does the proposal respect the limits of the UK's environment, resources and biodiversity?  
Does the proposal improve the environment and manage the natural resources needed for life sustainably such that they are unimpaired and remain so for future generations?*

### **A proposal that manages relevant impacts would:**

- Meet or exceed national and local policy requirements for protecting the environment and responding to climate change
- Demonstrate clear and positive action on how any impacts arising are being managed. This should be done in relation to environmental limits including: greenhouse gases; biodiversity and habitats; the historic environment; heritage assets; air quality; water resources; status of soils; land use allocation
- Demonstrate that the project supports relevant sustainable transport objectives and supports a decarbonised transport infrastructure set out in relevant local and national policy. This should demonstrate how the application has considered the four stages of the SDC's transport hierarchy. This sets out that a sequential approach of demand reduction, modal shift, efficiency improvements and finally capacity increases in order to structure thinking in generating and prioritising solutions<sup>16</sup>
- Meet or exceed relevant best practice guidance on the sustainable procurement of materials e.g. FSC accredited timber, low CO<sub>2</sub> emissions concrete, materials with a high recycled content
- Adopt an effective waste management strategy that is based on the waste hierarchy
- Achieve a high rating in a relevant professional assessment of the project e.g. CEEQUAL.

### **A proposal that factored in long-term resilience would:**

- Demonstrate that decision making has taken account of the potential impacts of climate change using the latest UK Climate Projections available at the time. Ensure the Environmental Statement was prepared to ensure they have identified appropriate mitigation or adaptation measures that cover the estimated lifetime of the new infrastructure
- Factor in a level of risk that demonstrates the precautionary principle has been applied in decisions that relate to environmental impacts.

## Ensuring a strong healthy and just society

*Does the proposal contribute to meeting the diverse needs of all people in existing and future communities?*

*Does the proposal promote personal well-being, social cohesion and inclusion, and equal opportunities?*

### **A proposal that manages relevant impacts would:**

- Base decisions on a full assessment of the nature of the directly affected community in relation to its composition and the different implications it will have on them – looking at age, gender, ethnicity etc
- Include a clear action plan to engage with all parts of the community, including those that are the most vulnerable
- Identify opportunities to contribute to communities through employment, health and safety and associated infrastructure. Incorporate actions that demonstrate sufficient weight is being placed on the prosperity of communities in decision making and opportunities are being maximised
- Sign up to the *Considerate Constructors Scheme* or equivalent.

### **A proposal that factored in long-term resilience would:**

- Identify immediate and longer term risks of the project to the local community and develop a plan with the local community to manage risks into the future.

## Achieving a sustainable local economy

*Does the proposal support building a strong, stable and sustainable economy which provides prosperity and opportunities for all?*

*Does the proposal make efficient use of resources and do any environmental and social costs fall on those who impose them (polluter pays)?*

### **A proposal that manages relevant impacts would:**

- Include actions that contribute to local economic strategy objectives including supporting new and existing businesses, SMEs and social enterprises
- Be funded in such a way that it minimises current or future pressures on public finances
- Accurately assess wider costs and benefits (environmental and social) and ensure these are taken into account in the Value for Money assessment of the proposal
- Clearly identify actions that demonstrate the “Polluter Pays” principle is being applied within project planning and implementation.

### **A proposal that factored in long-term resilience would:**

- Incorporate actions that improve the local resilience of the economy by implementing long term training and capacity building programmes or where possible, include provision in tenders that create opportunities for local SMEs.

## Promoting good governance

*Does the proposal actively promoting effective, participative systems of governance in all levels of society?*

*Does engagement with the local community create opportunities for people's energy and diversity to influence and improve decisions relating to the proposal?*

### **A proposal that manages relevant impacts would:**

- Set out an engagement strategy that includes a high level of on-going community participation within the planning process
- Demonstrate clear actions that have been taken to engage all groups within the local community in the planning process e.g. different forms of consultation and engagement used to respond to the needs of different stakeholders in the development (to include the Local Authority, community groups, NGOs, age groups, ethnic groups and vulnerable people).

### **A proposal that factored in long-term resilience would:**

- Adopt an engagement strategy that includes arrangements for stakeholder involvement post planning permission e.g. with the Local Authority, business, community groups, NGOs and the community
- Include a management plan for projects that impact the public. This should cover long term maintenance, ownership and legacy issues.
- Be operated by an organisation that acts as a responsible corporate citizen within the local community. Actions that deliver this outcome should be included within an appropriate action plan e.g. corporate responsibility strategy.

## Using sound science responsibly

*Are decisions relating to the proposal developed and implemented on the basis of strong scientific evidence and public attitudes and values?*

*Does the proposal take account of scientific uncertainty and does it reflect the precautionary principle?*

### **A proposal that manages relevant impacts would:**

- Demonstrate that decisions are based on an evidence base of high quality and direct relevance. This should reflect current scientific knowledge and understanding at national, regional and local levels e.g. of climate change
- Adopt a risk management strategy that provides a framework to identify and manage economic, environmental and social risks. This should include protocols and procedures that ensure that risk management is an iterative process.

### **A proposal that factored in long-term resilience would:**

- Have clearly identifiable actions that demonstrate the evidence base for decision making has been sensitivity tested for future and different scenarios i.e. the "what if"
- Be able to provide evidence of how an appropriate level of risk has been applied to the evidence base and scenario testing to clearly demonstrate the precautionary principle has been factored into decision making.

## References

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- <sup>2</sup> Energy and Climate Change Committee (2011) Energy and Climate Change - Third Report. The revised draft National Policy Statements on energy available at <http://www.publications.parliament.uk/pa/cm201011/cmselect/cmenergy/648/64802.htm>
- <sup>3</sup> HM Treasury (2010) National Infrastructure Plan 2010 p3
- <sup>4</sup> Sustainable Development Commission (2007) Planning for a Sustainable Future: SDC Consultation Response
- <sup>5</sup> Available at [www.nationalpolicystatements.org.uk](http://www.nationalpolicystatements.org.uk)
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- <sup>16</sup> The SDC first proposed an overarching hierarchical approach to transport policy in our consultation response to the Department for Transport's *Delivering a Sustainable Transport System* consultation (2009). We used the hierarchy again to inform our approach in our *Smarter Moves* report (2010). It is included in the upcoming SDC report, *Fairness in a Car Dependent Society* (2011)



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