



Gatwick Airport Northern Runway Project

The Applicant's Response to the Examining Authority's Written Questions – General and Cross-Topic – Appendix A – Airports National Policy Statement and National Networks National Policy Statement Comparison Table

Book 10

VERSION: 1.0

DATE: APRIL 2024

Application Document Ref: 10.16

PINS Reference Number: TR020005

1 Airports National Policy Statement and National Networks National Policy Statement Comparison Table

1.1. Introduction

1.2. This document comprises a National Planning Policy Comparison Table in respect of the Airports National Policy Statement ('ANPS') and the National Networks National Policy Statement ('NNNPS'). It sets out the national policies that are of relevance to the Northern Runway Project ('NRP') and assesses the extent to which the policy tests to be applied under each policy framework differ from each other. It draws out not only any policy differences between the ANPS and the NNNPS designated in 2015 but also shows differences with the revised version of the NNNPS, which was designated in 2024.

| Topic | ANPS Policy ref | ANPS Policy | 2015 NNNPS Policy ref | 2015 NNNPS Policy | 2024 NNNPS Policy ref | 2024 NNNPS Policy | Comparison between policy test to be applied between ANPS, 2015 NNNPS and 2024 NNNPS |
|---|-----------------|--|-----------------------|--|-----------------------|--|--|
| Assessment Principles | | | | | | | |
| General principles of assessment | | | | | | | |
| Statutory framework | 4.1 | The statutory framework for deciding applications for development consent is contained in the Planning Act 2008. This chapter of the Airports NPS sets out general policies in accordance with which applications relating to a Northwest Runway at Heathrow Airport are to be decided. This chapter is specific to assessments necessary for the Heathrow Northwest Runway scheme, but is not exhaustive as to the assessments that may be applicable to that scheme. | 4.1 | The statutory framework for deciding applications for development consent under the Planning Act 2008 is set out in paragraph 1.2 of this NPS. This part of the NPS sets out general policies in accordance with which applications relating to national networks infrastructure are to be decided. | 4.1 | This chapter sets out general policies in accordance with which applications relating to national networks infrastructure are to be decided. | The ANPS sets out policies against which applications relating to a Northwest Runway at Heathrow Airport are to be decided. The 2015 NNNPS and 2024 NNNPS sets out general policies in accordance with which applications relating to national networks infrastructure are to be decided. |
| Need for new development | 4.2 | The Airports NPS covering the Heathrow Northwest Runway scheme establishes the needs case for that proposed development, provided it adheres to the detailed policies and protections set out in the Airports NPS, and the legal constraints contained within the Planning Act 2008. The statutory framework for deciding nationally significant infrastructure project applications where there is a | 4.2 | Subject to the detailed policies and protections in this NPS, and the legal constraints set out in the Planning Act, there is a presumption in favour of granting development consent for national networks NSIPs that fall within the need for infrastructure established in this NPS. The statutory framework for deciding NSIP applications where there is a relevant | 4.2 | There is a presumption in favour of granting development consent for national networks Nationally Significant Infrastructure Projects (NSIPs) that fall within the need for infrastructure established in this National Policy Statement (NPS) and which comply with the policies in this NPS. | The 2015 and 2024 NNNPS state that there is a presumption in favour of granting development consent for national networks NSIPs. |

| | | | | | | | |
|---|-----|---|-----|--|-----|-----------------------------------|---|
| | | relevant designated NPS is set out in section 104 of the Planning Act 2008. | | designated NPS is set out in Section 104 of the Planning Act. | | | |
| New airport infrastructure | 4.3 | The Airports NPS applies to schemes at Heathrow Airport (in the area shown, for this purpose, illustratively, within the scheme boundary map at Annex A) that include a runway of at least 3,500m in length and that are capable of delivering additional capacity of at least 260,000 air transport movements per annum, and associated infrastructure and surface access facilities. In particular, it also applies to the reconfiguration of and provision of new terminal capacity to be located between the two existing runways at Heathrow Airport. The Secretary of State's policy in relation to other airport infrastructure in the South East of England is set out at paragraph 1.41 above. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A – no relevant equivalent provision in the 2015 and 2024 NNNPS. |
| Weighing benefits against adverse effects | 4.4 | In considering any proposed development, and in particular when weighing its adverse impacts against its benefits, the Examining Authority and the Secretary of State will take into account: <ul style="list-style-type: none"> • Its potential benefits, including the facilitation of economic development (including job creation) and environmental | 4.3 | In considering any proposed development, and in particular, when weighing its adverse impacts against its benefits, the Examining Authority and the Secretary of State should take into account: <ul style="list-style-type: none"> • Its potential benefits, including the facilitation of economic development, including job creation, housing and environmental | N/A | No relevant equivalent provision. | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|--|-----|--|-----|---|-----|-----------------------------------|--|
| | | <p>improvement, and any long term or wider benefits; and</p> <ul style="list-style-type: none"> • Its potential adverse impacts (including any longer term and cumulative adverse impacts) as well as any measures to avoid, reduce or compensate for any adverse impacts. | | <p>improvement, and any long-term or wider benefits;</p> <ul style="list-style-type: none"> • Its potential adverse impacts, including any longer-term and cumulative adverse impacts, as well as any measures to avoid, reduce or compensate for any adverse impacts. | | | |
| Consideration of environmental, safety, social and economic benefits and adverse impacts | 4.5 | In this context, environmental, safety, social and economic benefits and adverse impacts should be considered at national, regional and local levels. These may be identified in the Airports NPS, or elsewhere. The Secretary of State will also have regard to the manner in which such benefits are secured, and the level of confidence in their delivery. | 4.4 | In this context, environmental, safety, social and economic benefits and adverse impacts, should be considered at national, regional and local levels. These may be identified in this NPS, or elsewhere. | N/A | No relevant equivalent provision. | The ANPS suggests that the Secretary of State will also have regard to the manner in which benefits are secured. |
| National Networks National Policy Statement | 4.6 | The National Networks NPS sets out the Government's policies to deliver development of nationally significant infrastructure projects on the national road and rail networks and strategic rail freight interchanges. It provides planning guidance for promoters of nationally significant infrastructure projects on the road and rail networks, and the basis for the examination by the Examining Authority and decisions by the Secretary of State. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A – no relevant equivalent provision in the 2015 and 2024 NNNPS. |

| | | | | | | | |
|---|-----|---|-----|-----------------------------------|-----|-----------------------------------|--|
| Relationship between ANPS and NNNPS in relation to surface assess | 4.7 | Where the applicant’s proposals in relation to surface access meet the thresholds to qualify as nationally significant infrastructure projects under the Planning Act 2008, or is associated development under section 115 of the Planning Act 2008, the Secretary of State will consider those aspects by reference to both the National Networks NPS and the Airports NPS, as appropriate. To the extent that discrete aspects of the surface access proposals do not qualify as nationally significant and cannot be included in a development consent application as associated development (for example), the applicant will be expected to pursue or secure necessary consent(s) through the most appropriate alternative consenting regime. This might include, for example, the Town and Country Planning Act 1990, the Highways Act 1980, or the Transport and Works Act 1992, promoted by a third party if need be. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A – no relevant equivalent provision in the 2015 and 2024 NNNPS. |
| Relationship between ANPS and NNNPS in relation to surface assess | 4.8 | The Secretary of State will consider any relevant nationally significant road and rail elements of the applicant’s proposals in accordance with the National Networks NPS and with the Airports NPS. If there is conflict between the Airports NPS and other NPSs, the | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A – no relevant equivalent provision in the 2015 and 2024 NNNPS. |

| | | | | | | | |
|------------------|-----|---|-----|---|------|--|--|
| | | <p>conflict should be resolved in favour of the NPS that has been most recently designated. The Airports NPS and the National Networks NPS may also be a material consideration in decision making on applications for road and rail schemes associated with or related to the preferred scheme that fall under the Town and Country Planning Act 1990, the Transport and Works Act 1992, or other legislation relating to planning. Whether, and to what extent, the Airports NPS and the National Networks NPS are a material consideration will be judged on a case by case basis by the relevant decision makers.</p> | | | | | |
| DCO requirements | 4.9 | <p>The Examining Authority should only recommend, and the Secretary of State will only impose, requirements in relation to a development consent, that are necessary, relevant to planning, relevant to the development to be consented, enforceable, precise, and reasonable in all other respects. The need for requirements in respect of the phasing of the scheme is likely to be an important consideration, so that effects of construction and operational phases are properly mitigated, as well as any changes in the operations of the airport that may occur in line</p> | 4.9 | <p>The Examining Authority should only recommend, and the Secretary of State should only impose, requirements in relation to a development consent, that are necessary, relevant to planning, relevant to the development to be consented, enforceable, precise, and reasonable in all other respects. Guidance on the use of planning conditions or any successor to it, should be taken into account where requirements are proposed.</p> | 4.11 | <p>The Examining Authority should only recommend, and the Secretary of State should only impose, requirements in relation to a development consent, that are necessary, relevant to planning, relevant to the development to be consented, enforceable, precise, and reasonable in all other respects. Development consent obligations should only be sought where they are necessary to make the development acceptable in planning terms, directly related to the proposed development and fairly and reasonably</p> | <p>The ANPS suggests that requirements may be necessary in relation to phasing.</p> <p>The 2024 NNNPS notes that the Community Infrastructure Levy may also be payable on NSIP applications.</p> |

| | | | | | | | | |
|------------------|-----|--|-----|-----------------------------------|-----|--|---|--|
| | | with the phasing of physical works and commencement of operations. Guidance on the use of planning conditions or any successor to it should be taken into account where requirements are proposed. | | | | | related in scale and kind to the development. Community Infrastructure Levy (or any successor to it) may also be payable on NSIP applications. | |
| DCO requirements | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 4.4 | | Should the Secretary of State decide to grant development consent for an application where details are still to be finalised, this will need to be reflected in appropriate requirements in the Development Consent Order. If development consent is granted for a proposal and at a later stage the applicant wishes, for technical or commercial reasons, to construct it in such a way that it is outside the terms of what has been consented (for example because its extent will be greater than has been provided for in terms of the consent), it will be necessary to apply for a change to be made to the Development Consent Order. The application to change the consent should be in line with the government's guidance on the procedures for making a change to a Development Consent Order for NSIPs and may need to be accompanied by environmental information to supplement that which was | N/A – no relevant equivalent provision in the ANPS and 2015 NNNPS. |

| | | | | | | | |
|-----------------|------|--|------|--|----------------------|---|---|
| | | | | | | included in the original environmental assessment | |
| DCO obligations | 4.10 | Obligations under section 106 of the Town and Country Planning Act 1990 should only be sought where they are necessary to make the development acceptable in planning terms, (including where necessary to ensure compliance with the Airports NPS), directly related to the proposed development, and fairly and reasonably related in scale and kind to the development. | 4.10 | Planning obligations should only be sought where they are necessary to make the development acceptable in planning terms, directly related to the proposed development and fairly and reasonably related in scale and kind to the development. | Refer to policy 4.11 | Refer to policy 4.11 above. | No significant distinction derives from marginally different wording. |
| Business case | N/A | No relevant equivalent provision. | 4.5 | Applications for road and rail projects (with the exception of those for SRFIs, for which the position is covered in paragraph 4.8 below) will normally be supported by a business case prepared in accordance with Treasury Green Book principles. This business case provides the basis for investment decisions on road and rail projects. The business case will normally be developed based on the Department's Transport Business Case guidance and WebTAG guidance. The economic case prepared for a transport business case will assess the economic, environmental and social impacts of a development. The information | 4.6 | Applications for road and rail projects (with the exception of those for strategic rail freight interchanges, for which the position is covered in paragraph 4.10 below) will normally be supported by a business case prepared in accordance with Treasury Green Book principles, and the Department's Transport Business Case guidance and Transport Analysis Guidance. Transport Appraisal Process assesses the costs, benefits and risks of alternative ways to meet government objectives. It helps decision makers to understand the potential effects, tradeoffs and overall impact of options by providing an objective evidence base for | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|---------------|-----|-----------------------------------|---------------------|--|-----|--|---|
| | | | | <p>provided will be proportionate to the development. This information will be important for the Examining Authority and the Secretary of State's consideration of the adverse impacts and benefits of a proposed development. It is expected that NSIP schemes brought forward through the development consent order process by virtue of Section 35 of the Planning Act 2008, should also meet this requirement.</p> | | <p>decision making. The purpose of the economic dimension of the business case is to identify the proposal that delivers best public value to society, including wider social and environmental benefits. The business case provides the basis for investment decisions, and the economic, environmental and social impacts of a development that underpin it will also be important for the consideration by the Examining Authority or the Secretary of State of the impacts and benefits of a proposal. However, the purpose of the business case is not to ascribe a monetary value to every factor in the planning balance. It should also be noted that the economic case is one of five cases that comprise the business case, and government decisions on funding are based on all five.</p> | |
| Business case | N/A | No relevant equivalent provision. | Refer to policy 4.5 | Refer to policy 4.5. | 4.7 | <p>The information provided on the economic, environmental and social impacts of a development that underpins the business case will be proportionate to the development. This information will be important for the Examining Authority and the Secretary of State's consideration of the benefits and impacts of a proposed development. It is expected</p> | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|--|-----|-----------------------------------|-----|--|-----|--|---|
| | | | | | | that schemes brought forward through the Development Consent Order process by virtue of section 35 of the Planning Act 2008, should also meet this requirement. | |
| The Department's Transport Analysis Guidance | N/A | No relevant equivalent provision. | 4.7 | The Department's WebTAG guidance is updated regularly. This is to allow the evidence used to inform decision-making to be up-to-date. Where updates are made during the course of preparing analytical work, the updated guidance is only expected to be used where it would be material to the investment decision and in proportion to the scale of the investment and its impacts. | 4.8 | The Department's Transport Analysis Guidance is updated regularly. This is to allow the evidence used to inform decision-making to be up to date. Where updates are made during the course of preparing analytical work, the updated guidance is only expected to be used where it would be material to the investment decision and in proportion to the scale of the investment and its impacts. | No significant distinction derives from marginally different wording. |
| Local Transport Model | N/A | No relevant equivalent provision. | 4.6 | Applications for road and rail projects should usually be supported by a local transport model to provide sufficiently accurate detail of the impacts of a project. The modelling will usually include national level factors around the key drivers of transport demand such as economic growth, demographic change, travel costs and labour market participation, as well as local factors. The Examining Authority and the Secretary of State do not need to be concerned with the national methodology and national assumptions around the key drivers of transport demand. We | 4.9 | Applications for road and rail projects should be supported by a local transport model to provide sufficiently accurate detail of the impacts of a project. The modelling will usually include national level factors around the key drivers of transport demand such as economic growth, demographic change, travel costs and labour market participation, as well as local factors. The Examining Authority and the Secretary of State do not need to be concerned with the national methodology and national assumptions around the key | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|----------------------------|------|--|-----|--|-----|---|--|
| | | | | do encourage an assessment of the benefits and costs of schemes under high and low growth scenarios, in addition to the core case. The modelling should be proportionate to the scale of the scheme and include appropriate sensitivity analysis to consider the impact of uncertainty on project impacts. | | drivers of transport demand. An assessment of the benefits and costs of schemes under a range of scenarios should reflect future uncertainty, in addition to the core case. The modelling should be proportionate to the scale of the scheme and include appropriate sensitivity analysis to consider the effects of uncertainty on project impacts | |
| Pre-application engagement | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 4.5 | Early engagement both before and at the formal pre-application stage between the applicant and key stakeholders, and those likely to have an interest in the proposed application, is strongly encouraged in line with the government's preapplication guidance. | N/A – no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Scheme variation | | | | | | | |
| Scheme variation | 4.11 | While the Government has decided that a Northwest Runway at Heathrow Airport is its preferred scheme to deliver additional airport capacity (an illustrative masterplan is at Annex B of the Airports NPS), this does not limit variations resulting in the final scheme for which development consent is sought. To benefit from the full support of policy within the Airports NPS, any application(s) | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A – no relevant equivalent provision in the 2015 and 2024 NNNPS. |

| | | | | | | | |
|--|------|---|------|---|-----|-----------------------------------|---|
| | | will have to fall within the boundaries and parameters set out in the Airports NPS. However, the form of a development for which an application is made is a matter for the applicant. The Airports NPS does not prejudice the viability or merits of any particular application, detailed scheme or applicant. It governs the location, limits and nature of such schemes. It will be for an Examining Authority, and ultimately the Secretary of State, to determine whether any future application is compliant with the Airports NPS, meets the need for additional capacity, and is of benefit to the UK, whilst minimising any harm caused. | | | | | |
| Environmental Impact Assessment | | | | | | | |
| Assessing environmental effects | 4.12 | All proposals for projects that are subject to the European Union’s Environmental Impact Assessment Directive, and are likely to have significant effects on the environment, must be accompanied by an environmental statement, describing the aspects of the environment likely to be significantly affected by the project. The Directive specifically requires an Environmental Impact Assessment to identify, describe and assess effects on | 4.15 | All proposals for projects that are subject to the European Union’s Environmental Impact Assessment Directive and are likely to have significant effects on the environment, must be accompanied by an environmental statement (ES), describing the aspects of the environment likely to be significantly affected by the project. The Directive specifically requires an environmental impact assessment to identify, describe and assess effects on human | N/A | No relevant equivalent provision. | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|--|--|---|--|---|--|--|--|
| | | <p>human beings, fauna and flora, soil, water, air, climate, the landscape, material assets and cultural heritage, and the interaction between them. Schedule 4 to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 sets out the information that should be included in the environmental statement. This includes a description of the likely significant effects of the proposed project on the environment, covering the direct effects and any indirect, secondary, cumulative, short-, medium- and long-term, permanent and temporary, positive and negative effects of the project, and also the measures envisaged for avoiding or mitigating significant adverse effects.</p> | | <p>beings, fauna and flora, soil, water, air, climate, the landscape, material assets and cultural heritage, and the interaction between them. Schedule 4 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 sets out the information that should be included in the environmental statement including a description of the likely significant effects of the proposed project on the environment, covering the direct effects and any indirect, secondary, cumulative, short-, medium and long-term, permanent and temporary, positive and negative effects of the project, and also the measures envisaged for avoiding or mitigating significant adverse effects.</p> <p>Further guidance can be found in the online planning portal. When examining a proposal, the Examining Authority should ensure that likely significant effects at all stages of the project have been adequately assessed. Any requests for environmental information not included in the original environmental statement should be proportionate and focus only on significant effects. In this NPS, the terms ‘effects’, ‘impacts’ or ‘benefits’ should accordingly be understood to</p> | | | |
|--|--|---|--|---|--|--|--|

| | | | | | | | |
|---------------------------------|------|--|----------------------|---|------|--|--|
| | | | | mean likely significant effects, impacts or benefits. | | | |
| Assessing environmental effects | 4.13 | When examining a proposal to which the Airports NPS applies, the Examining Authority should ensure that likely significant effects at all stages of the project have been adequately assessed. The effects of any changes in operations, including the number of air traffic movements, during the construction and operational phases must be properly assessed and appropriate mitigation secured for any significant effects. Any requests for environmental information not included in the original environmental statement should be proportionate and focus only on likely significant effects. In the Airports NPS, the terms 'effects', 'impacts' or 'benefits' should accordingly be understood to mean likely significant effects, impacts or benefits. | Refer to policy 4.15 | Refer to policy 4.15 | N/A | No relevant equivalent provision. | The ANPS is more explicit in its expectation that environmental effects throughout the project timeline will be assessed. However assessing the effects of all stages of a project is necessary in any event under the EIA Regulations that the NNNPS is summarising in paragraph 4.15 |
| Cumulative effects | 4.14 | When considering significant cumulative effects, any environmental statement should provide information on how the effects of an applicant's proposal would combine and interact with the effects of other development (including projects for which consent has been granted, as well as those | 4.16 | When considering significant cumulative effects, any environmental statement should provide information on how the effects of the applicant's proposal would combine and interact with the effects of other development (including projects for which consent has been granted, as well as those already in existence). The | 4.12 | A key part of environmental assessment is the consideration of cumulative effects. The applicant should provide information on how the effects of the proposal would combine and interact with the effects of other development, where relevant. For most practical purposes this means that the applicant should consider the | The 2024 NNNPS recognises that there is no single or agreed approach to assessing the cumulative impacts of environmental effects and that some effects such as the impact on climate change may not be geographically limited. |

| | | | | | | | |
|--|--|--|--|---|--|--|--|
| | | <p>already in existence if they are not part of the baseline).</p> | | <p>Examining Authority may also have other evidence before it, for example from a Transport Business Case, appraisals of sustainability of relevant NPSs or development plans, on such effects and potential interactions. Any such information may assist the Secretary of State in reaching decisions on proposals and on mitigation measures that may be required.</p> | | <p>impact of other existing and committed developments within an appropriate geographical area and assess the additional impact of their own development. Other evidence for example, from a Transport Business Case, appraisals of sustainability of relevant NPSs or strategic environmental assessment or plan level Habitats Regulation Assessment of development plans, may assist the Secretary of State in reaching decisions on proposals and on mitigation measures that may be required.</p> <p>There is no single or agreed approach to assessing the cumulative impacts of environmental effects due to some effects being limited to a specific geographical boundary but others, such as the impact and effect of carbon emissions on climate change, not being geographically limited. For this reason, it may be necessary for different approaches to be taken to assess the cumulative impact of different environmental effects.</p> <p>The Secretary of State should consider how the accumulation of, and interrelationship between, effects identified in the environmental assessment might affect the environment, economy, or community as a whole, even though they may be</p> | |
|--|--|--|--|---|--|--|--|

| | | | | | | | |
|---------------------------|------|---|------|--|---------------------------------|--|---|
| | | | | | | acceptable when considered on an individual basis with mitigation measures in place. | |
| Cumulative effects | 4.15 | The Examining Authority should consider how significant cumulative effects, and the interrelationship between effects, might as a whole affect the environment, even though they may be acceptable when considered on an individual basis or with mitigation measures in place. | 4.17 | The Examining Authority should consider how significant cumulative effects and the interrelationship between effects might as a whole affect the environment, even though they may be acceptable when considered on an individual basis with mitigation measures in place. | Refer to policy reference above | Refer to Policy 4.12 | No significant distinction derives from marginally different wording. |
| Finalising scheme details | 4.16 | In some instances it may not be possible at the time of the application for development consent for all aspects of the proposal to have been settled in precise detail. Where this is the case, the applicant should explain in its application which elements of the proposal have yet to be finalised, and the reasons why this is the case | 4.18 | In some instances it may not be possible at the time of the application for development consent for all aspects of the proposal to have been settled in precise detail. Where this is the case, the applicant should explain in its application which elements of the proposal have yet to be finalised, and the reasons why this is the case. | 4.13 | In some instances, it may not be possible at the time of the application for development consent for all aspects of the proposal to have been settled in precise detail. Where this is the case, the applicant should explain in their application which elements of the proposal have yet to be finalised, and the reasons why this is the case. Where some details are still to be finalised, applicants should set out, to the best of their knowledge, what the worst case scenario of the proposed development may be (for example in terms of site area) and assess the potential adverse effects which the project could have to ensure that the impacts of the project as it may be constructed have been properly assessed. | No significant distinction derives from marginally different wording. The 2024 NNNPS is more explicit about the need to assess worst case effects from matters which are not detailed in the application. |

| | | | | | | | |
|--|------|--|------|--|---------------------------------|-----------------------------------|--|
| Finalising scheme details | 4.17 | Effort should be made to refine the detail of the proposed development. However, where details are still to be finalised, such as in respect of the phasing of the development and operational changes at the airport, the applicant is advised to set out in the environmental statement the relevant design parameters used for the assessment. The environmental statement should explain, with reference to the parameters, what the maximum extent of the proposed development may be (for example in terms of site area) or the extent of change in respect of operational impacts, and assess the potential adverse effects which the project could have, to ensure that the impacts of the project as it may be constructed have been properly assessed. | 4.19 | Where some details are still to be finalised, applicants are advised to set out in the environmental statement, to the best of their knowledge, what the maximum extent of the proposed development may be (for example in terms of site area) and assess the potential adverse effects which the project could have to ensure that the impacts of the project as it may be constructed have been properly assessed. | Refer to policy reference above | Refer to policy 4.13 | <p>The ANPS sets out that where some details are still to be finalised, such as in respect of the phasing of the development and operational changes at the airport, the applicant should set out in the environmental statement the relevant design parameters used for the assessment.</p> <p>.Both the ANPS and the NNNPS recognise that details of the proposed development may still need to be finalised and advise that the maximum extent of the development is identified so that the impact of the project has been properly assessed. The 2024 NNNPS is to the same effect, albeit that it confirms that this approach allows for worst case impacts to be assessed.</p> <p>The 2024 NNPS states that the application should set out what the worst case scenario of the proposed development may be.</p> |
| Granting consent where details are still to be finalised | 4.18 | Should the Secretary of State decide to grant development consent for an application where details are still to be finalised, this will need to be reflected in appropriate development consent requirements in the development consent order. It may be the case that development consent is granted for a proposal and, at a later stage, the applicant wishes (for technical or commercial reasons) to construct it in such | 4.20 | Should the Secretary of State decide to grant development consent for an application where details are still to be finalised, this will need to be reflected in appropriate development consent requirements in the development consent order. If development consent is granted for a proposal and at a later stage the applicant wishes for technical or commercial reasons to construct it in such a way that it is outside the terms of what has been consented, for | N/A | No relevant equivalent provision. | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|--|------|--|------|--|------|--|--|
| | | a way that it is outside the terms of what has been consented, for example because its extent will be greater than has been provided for in terms of the consent. In this situation, it will be necessary for the applicant to apply for a change to be made to the development consent provided under the Planning Act 2008. | | example because its extent will be greater than has been provided for in terms of the consent, it will be necessary to apply for a change to be made to the development consent. The application to change the consent may need to be accompanied by environmental information to supplement that which was included in the original environmental statement. | | | |
| EIA | N/A | No relevant equivalent provision. | 4.21 | In cases where the EIA Directive does not apply to a project, and an environmental statement is not therefore required, the applicant should instead provide information proportionate to the project on the likely environmental, social and economic effects. | N/A | No relevant equivalent provision. | N/A – no relevant equivalent provision in the ANPS and 2024 NNNPS. |
| Habitats Regulations Assessment | | | | | | | |
| Impact on protected sites | 4.19 | Prior to granting development consent, the Secretary of State as competent authority must comply with the duties under the Conservation of Habitats and Species Regulations 2017. Under these regulations, if the competent authority considers that the proposed development is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and is not connected with or | 4.22 | Prior to granting a Development Consent Order, the Secretary of State must, under the Habitats Regulations, consider whether it is possible that the project could have a significant effect on the objectives of a European site, or on any site to which the same protection is applied as a matter of policy, either alone or in combination with other plans or projects. Applicants should also refer to paragraphs 5.20 to 5.38 of this national policy statement on biodiversity and geological | 4.14 | Under the Habitats Regulations, the relevant competent authority, in this case the Secretary of State, must consider whether it is possible that a plan or project could likely have a significant effect, (either alone or in combination with other plans or projects) on a protected site which forms part of the UK National Site Network (Special Areas of Conservation and Special Protection Areas), or on any site to which the same protection is applied as a matter | The ANPS and 2045 NNNPS require the Secretary of State to consider whether the proposed development will have significant effect on a European site. The 2024 NNNPS requires the Secretary of State to consider whether the proposed development will have a significant effect on a protected site which forms part of the UK National Site Network. There is no substantive difference between the NPSs - the 2024 NNNPS simply reflects the change in |

| | | | | | | | |
|---|------|--|------|--|------|---|---|
| | | necessary to the management of that site, it must make an Appropriate Assessment of the implications for the site in view of the site's conservation objectives. The applicant should also refer to the Airports NPS sections on biodiversity, land use, and air quality. The competent authority must consult Natural England to ensure that impacts on European sites are adequately considered. | | conservation and to paragraphs 5.3 to 5.15 on air quality. The applicant should seek the advice of Natural England and, where appropriate, for cross-boundary impacts, Natural Resources Wales and Scottish Natural Heritage to ensure that impacts on European sites in Wales and Scotland are adequately considered. | | of policy (i.e. listed or proposed Ramsar sites, potential Special Protection Areas, possible Special Areas of Conservation and sites used to compensate for adverse effects on habitats sites). The term 'habitats site' is used to refer collectively to such sites throughout this NPS. Such an assessment should be made with due regard to the conservation objectives of any relevant habitats site(s). | nomenclature applied to designated sites following the departure of the UK from the European Union. |
| Habitats Regulations assessments | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 4.15 | Where appropriate, assessments under the Habitats Regulations should be coordinated with other assessments. | N/A – no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Statutory Nature Conservation Body advice | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 4.16 | The applicant should seek the early advice of the appropriate Statutory Nature Conservation Body and provide the Secretary of State with such information as the Secretary of State may reasonably require, to determine whether or not the plan or project should proceed to the Appropriate Assessment stage of Habitats Regulation Assessment. | N/A – no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Appropriate Assessment | 4.20 | The applicant is required to provide sufficient information with their applications for development consent to enable the Secretary of State to carry out an Appropriate Assessment if required. This information | 4.23 | Applicants are required to provide sufficient information with their applications for development consent to enable the Secretary of State to carry out an Appropriate Assessment if required. This information | 4.17 | Where a proposed plan or project is considered likely to have a significant effect on a habitats site, the applicant must provide sufficient information with the application to enable the competent authority to | The 2024 NNNPS sets out that where an appropriate assessment is required, the Statutory Nature Conservation Body must be formally consulted and the applicant should also consider agreeing an Evidence Plan. |

| | | | | | | | |
|------------------------------------|------|--|------|--|------|--|---|
| | | should include details of any measures that are proposed to minimise or avoid any likely significant effects on a European site. The information provided may also assist the Secretary of State in concluding that an Appropriate Assessment is not required because significant effects on European sites are sufficiently unlikely that they can be excluded. If it is concluded there is likely to be a significant effect, or such effects cannot be ruled out (alone or in combination), an Appropriate Assessment is required. | | should include details of any measures that are proposed to minimise or avoid any likely significant effects on a European site. The information provided may also assist the Secretary of State in concluding that an appropriate assessment is not required because significant effects on European sites are sufficiently unlikely that they can be excluded. | | make an appropriate assessment of these likely effects in view of the site's conservation objectives. The assessment may consider the effect of any mitigation measures and the Statutory Nature Conservation Body must be formally consulted on the assessment and its advice considered. The applicant should also consider agreeing an Evidence Plan with the Statutory Nature Conservation Body to help determine the information required. | This reference to consultation confirmed a requirement that already applied to the preparation of an Appropriate Assessment under the Habitats Regulations, including any that would be prepared in relation to a project covered by the ANPS and NNNP. |
| Adverse effects on protected sites | 4.21 | If an Appropriate Assessment for a proposed airport development concludes that it is not possible to rule out an adverse effect on the integrity of a European site, the Habitats Directive permits a derogation, subject to the proposal meeting three tests. These tests are (a) that there are no less damaging alternative solutions, (b) that there are imperative reasons of overriding public interest for the proposal going ahead, and (c) that adequate and timely compensation measures will be put in place to ensure the overall coherence of the network of protected sites is maintained. At detailed design stage, and in so far as it may be necessary, the matters set out in the Airports NPS will be relevant to | 4.24 | If a proposed national network development makes it impossible to rule out an adverse effect on the integrity of a European site, it is possible to apply for derogation from the Habitats Directive, subject to the proposal meeting three tests. These tests are that no feasible, less-damaging alternatives should exist, that there are imperative reasons of overriding public interest for the proposal going ahead, and that adequate and timely compensation measures will be put in place to ensure the overall coherence of the network of protected sites is maintained. | 4.18 | Such plans or projects may only proceed if the assessment concludes they will not adversely affect the integrity of the site or, in the case of a negative assessment, there are no alternative solutions, and they must proceed for imperative reasons of overriding public interest. The applicant must demonstrate that they have sought advice from the Statutory Nature Conservation Body on whether any proposed compensation is appropriate to maintain the overall coherence of the National Sites Network. They must also show that the compensation is secured or provide an indication as to how it can be secured to maintain the overall coherence of the | The 2024 NNNPS sets out that in the case of a negative assessment, the applicant must demonstrate that they have sought advice from the Statutory Nature Conservation Body on whether any proposed compensation is appropriate to maintain the overall coherence of the National Sites Network. Plus see above. |

| | | | | | | | |
|---------------------------------------|------|---|------|--|-----|--|---|
| | | determining whether there are alternative solutions and imperative reasons of overriding public interest, provided that the design remains consistent with the objectives of the Airports NPS. | | | | National Sites Network. Provision of such information will not be taken as an acceptance of adverse effects on integrity and if an applicant disputes the likelihood of adverse effects, it can provide this information without prejudice to the Secretary of State's final decision on the effects of the potential development on the habitats site. If, in these circumstances, an applicant does not supply information required for the assessment of a potential derogation, there will be no expectation that the Secretary of State will allow the applicant the opportunity to provide such information following the examination. | |
| Reasons of overriding public interest | 4.22 | Where a development may negatively affect any priority natural habitat type or priority species, any imperative reasons of overriding public interest case would need to be established solely on one or more of the grounds relating to human health, public safety or beneficial consequences of primary importance to the environment. The competent authority may only rely on other (i.e. social or economic) imperative reasons of overriding public interest if it has first | 4.25 | Where a development may negatively affect any priority habitat or species on a site for which they are a protected feature, any Imperative Reasons of Overriding Public Interest (IROPI) case would need to be established solely on one or more of the grounds relating to human health, public safety or beneficial consequences of primary importance to the environment. | N/A | No relevant equivalent provision. | The ANPS sets out that the competent authority may only rely on other (i.e. social or economic) imperative reasons of overriding public interest if it has first obtained an opinion from the European Commission. This reflects provisions of the Habitats Regulations which would apply in any event to the consideration of proposals under the ANPS or NNNPS. |

| | | | | | | | | |
|--|------|--|-----|-----------------------------------|------|--|--|--|
| | | obtained an opinion from the European Commission. | | | | | | |
| Derogation under the Habitats Regulations. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 4.19 | During the pre-application stage, and without prejudice to the formal Habitats Regulations Assessment of the submitted plan or project, if the Statutory Nature Conservation Body gives an early indication that, irrespective of any anticipated mitigation measures, the proposed development is highly likely to lead to adverse effects on the integrity of one or more habitats sites, the applicant must include with their application such information required to assess a potential derogation under the Habitats Regulations. | N/A – no relevant equivalent provision in the ANPS and 2015 NNNPS. | |
| Equalities | | | | | | | | |
| Equality Impact Assessment | 4.23 | The Airports Commission’s stated objective on equalities was “to reduce or avoid disproportionate impacts on any social group”. At consultation stage, the Airports Commission carried out a high level Equality Impact Assessment. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A – no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. | |
| Equality Impact Assessment | 4.24 | The Appraisal of Sustainability to the Airports NPS sets out an assessment of equalities impacts, informed by the work of the Airports Commission. The Airports Commission was clear that its assessment was based upon current scheme design, | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A – no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. | |

| | | | | | | | |
|----------------------------|------|---|-----|-----------------------------------|-----|-----------------------------------|--|
| | | and that a more detailed Equality Impact Assessment would likely be necessary as design, supporting measures and operational plans were developed. | | | | | |
| Equality Impact Assessment | 4.25 | The Airports Commission's assessment identified different types of equalities impacts for each of its shortlisted schemes, but no substantial difference in the overall extent of equalities impacts. The Airports Commission's assessment, and the assessment carried out for the Appraisal of Sustainability that informs the Airports NPS, both concluded that negative equalities impacts could be well mitigated through good design and operation, and supporting measures and plans. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A – no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |
| Equality Impact Assessment | 4.26 | The Department for Transport has reviewed the Airports Commission's work, informed by the Equality Assessment carried out as part of the Appraisal of Sustainability. The Government is satisfied that the scope of the Airports Commission's work was appropriate at this stage of scheme development, that the Airports Commission's approach was consistent with the Equality Act 2010, and that its conclusion is consistent with the evidence produced. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A – no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |

| | | | | | | | |
|----------------------------|------|---|------|--|------|--|--|
| Equality Impact Assessment | 4.27 | For any application to be considered compliant with the Airports NPS, it must be accompanied by a project level Equality Impact Assessment examining the potential impact of that project on groups of people with protected characteristics. In order to benefit from the support of the Airports NPS, the results of that project level Equality Impact Assessment must be within the legal limits and parameters of acceptability outlined in the Appraisal of Sustainability that informs the Airports NPS. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A – no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |
| Alternatives | | | | | | | |
| Assessing alternatives | 4.28 | <p>The applicant should comply with all legal obligations and policy set out in the Airports NPS on the assessment of alternatives. In particular:</p> <ul style="list-style-type: none"> The Environmental Impact Assessment Directive requires projects with significant environmental effects to include a description of the reasonable alternatives studied by the applicant which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the significant effects of the | 4.26 | <p>Applicants should comply with all legal requirements and any policy requirements set out in this NPS on the assessment of alternatives. In particular:</p> <ul style="list-style-type: none"> The EIA Directive requires projects with significant environmental effects to include an outline of the main alternatives studied by the applicant and an indication of the main reasons for the applicant's choice, taking into account the environmental effects. There may also be other specific legal requirements for the consideration of alternatives, for example, | 4.20 | <p>Applicants should comply with all legal requirements, and any policy requirements set out in this NPS, on the assessment of alternatives. For example, current requirements include:</p> <ul style="list-style-type: none"> The Infrastructure Planning (Environmental Impact Assessment) 2017 Regulations requires projects with significant environmental effects to include an outline of the main alternatives studied by the applicant and an indication of the main reasons for the applicant's choice, taking into account the environmental effects. | The 2015 NNPS and the 2024 NNNPS identify the policy requirement to consider the assessment of alternatives for developments in National Parks, the Boards and Areas of Outstanding Natural Beauty. However, the ANPS already provides that where development is proposed in national parks, consideration of such applications should include an assessment of the cost of, and scope for, developing elsewhere, outside the designated area, or meeting the need for it in some other way (paragraph 5.220). |

| | | | | | | | |
|-------------------|-----|--|------|--|------|--|---|
| | | <p>project on the environmental effects;</p> <ul style="list-style-type: none"> There may also be other specific legal obligations requiring the consideration of alternatives, for example, under the Habitats and Water Framework Directives; and <p>There may be policies in the Airports NPS requiring consideration of alternatives, for example the flood risk sequential test.</p> | | <p>under the Habitats and Water Framework Directives.</p> <p>There may also be policy requirements in this NPS, for example the flood risk sequential test and the assessment of alternatives for developments in National Parks, the Broads and Areas of Outstanding Natural Beauty (AONB).</p> | | <ul style="list-style-type: none"> There may also be other specific legal requirements for the consideration of alternatives, for example, under the Conservation of Habitats and Species Regulations 2017 (as amended) and Water Environment (Water Framework Directive) (England and Wales) Regulations 2017. <p>There may also be policy requirements in this NPS, for example the flood risk sequential test and the assessment of alternatives for developments in National Parks, the Broads and Areas of Outstanding Natural Beauty (AONB) - where there is a policy or legal requirement to consider alternatives, the applicant should describe the alternatives considered in compliance with these requirements and in a proportionate manner.</p> | |
| Options appraisal | N/A | No relevant equivalent provision. | 4.27 | All projects should be subject to an options appraisal. The appraisal should consider viable modal alternatives and may also consider other options (in light of the paragraphs 3.23 to 3.27 of this NPS). Where projects have been subject to full options appraisal in achieving their status within Road or Rail Investment Strategies or other appropriate policies or | 4.21 | National road or rail schemes that have been identified in relevant Road or Rail Investment Strategies will have been subject to an options appraisal process where relevant in line with existing Transport Appraisal Guidance, and proportionate consideration of alternatives will have been undertaken as part of the investment decision making | No significant distinction derives from marginally different wording in the versions of the NNNPS but the specific requirement for an options appraisal in respect of national network proposals does not appear in the ANPS. |

| | | | | | | | |
|------------------------------|-----|-----------------------------------|-----|---|------|--|--|
| | | | | <p>investment plans, option testing need not be considered by the examining authority or the decision maker. For national road and rail schemes, proportionate option consideration of alternatives will have been undertaken as part of the investment decision making process.</p> <p>It is not necessary for the Examining Authority and the decision maker to reconsider this process, but they should be satisfied that this assessment has been undertaken.</p> | | <p>process. The options appraisal may include other viable options for achieving the objectives of the project, including (where appropriate) other modes of travel, regulation, or other ways of influencing behaviour in line with Department for Transport guidance.</p> <p>The Examining Authority and the Secretary of State should satisfy themselves that the options appraisal process has been undertaken.</p> | |
| Options appraisal | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 4.22 | Where an options appraisal process has been undertaken, it should not be necessary to consider alternatives except where paragraph 4.20 applies or where the “exceptional circumstances” test set out in case law is met. In those exceptional circumstances where alternatives might be relevant, consideration of them should be proportionate. Where alternative schemes proposed are vague or inchoate, or have no real possibility of coming about, they are either irrelevant, or where relevant, will be given little or no weight, and the extent to which they are considered should be determined accordingly. | N/A – no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Biodiversity Net Gain | | | | | | | |

| | | | | | | | |
|-----------------------------------|-----|-----------------------------------|-----|-----------------------------------|------|--|--|
| Biodiversity net gain | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 4.23 | Biodiversity net gain delivers measurable improvements for biodiversity by creating, enhancing, maintaining and monitoring habitats in association with developments. Biodiversity net gain should be applied in conjunction with the mitigation hierarchy and does not change or replace existing environmental obligations. In addition to providing net gains for biodiversity, applicants should also identify and deliver appropriate opportunities for nature recovery and wider environmental enhancements. | N/A – no relevant equivalent BNG provision in the ANPS and 2015 NNNPS. |
| Biodiversity metric | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 4.24 | Applicants are encouraged to use the latest version of the biodiversity metric to calculate their biodiversity baseline and inform their biodiversity net gain outcomes, and should present this data as part of their application. | N/A – no relevant equivalent BNG provision in the ANPS and 2015 NNNPS. |
| Onsite and off-site contributions | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 4.25 | Biodiversity net gain can be delivered onsite or wholly or partially off-site and should also be set out within the application for development consent. When delivering biodiversity net gain off-site, developments should do this in a manner that best contributes to the achievement of relevant wider strategic outcomes, for example by increasing habitat connectivity or enhancing other ecosystem service outcomes. | N/A – no relevant equivalent BNG provision in the ANPS and 2015 NNNPS. |

| | | | | | | | |
|-------------------------------------|------|---|------|--|------|--|---|
| | | | | | | Reference should be made to any local nature recovery strategies (which should be the primary reference point for those delivering biodiversity net gain off-site) and other relevant national or local plans and strategies, such as green infrastructure strategies, used to inform biodiversity net gain delivery. | |
| Biodiversity net gain requirement | | | | | 4.26 | The Environment Act 2021 contains provisions for a mandatory biodiversity net gain requirement for NSIPs. A government Biodiversity Gain Statement will set out the concept and policy requirements for biodiversity net gain for Nationally Significant Infrastructure Projects (NSIPs). When these provisions are commenced, the Secretary of State will need to be satisfied that the biodiversity gain objective in any relevant Biodiversity Gain Statement has been met. | N/A – no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Criteria for good design | | | | | | | |
| Design as an integral consideration | 4.29 | The applicant should include design as an integral consideration from the outset of a proposal. | 4.28 | Applicants should include design as an integral consideration from the outset of a proposal. | 4.27 | Applicants should include design as an integral consideration from the outset of a proposal. Applying good design to national network projects should not be limited to general aesthetics. High quality and inclusive design extends far beyond aesthetic | The 2024 NNNPS sets out four design principles that applicants should consider. |

| | | | | | |
|--|--|--|--|--|--|
| | | | | | <p>considerations. The National Infrastructure Commission have developed four Design Principles:</p> <ul style="list-style-type: none"> • Climate – mitigate carbon emissions and adapt to climate change. It includes opportunities to enable decarbonisation, incorporates flexibility, and builds resilience against climate change. The functionality of projects, including fitness for purpose, resilience and sustainability, is equally important. • People – helping to improve the quality of life for local communities. It promotes inclusion, cohesion and increases accessibility. It creates safe spaces with clean air that improve health and wellbeing. • Places – well-designed infrastructure gives places a strong sense of identity, and through that forms part of our national cultural heritage. Creating a sense of place, connecting communities, addressing community severance and integrating into its surroundings. It makes a positive contribution to local landscapes within and beyond the project boundary. Good design |
|--|--|--|--|--|--|

| | | | | | | | |
|-------------------|------|---|------|---|-----|---|---|
| | | | | | | <p>enhances local culture and character and supports local ecology, delivering net biodiversity gain, while protecting wildlife corridors and irreplaceable natural assets and habitats.</p> <ul style="list-style-type: none"> Value - adding value by defining issues clearly from the outset. Good design also finds opportunities to add value beyond the main purpose of the infrastructure to consider the wider benefits savings on cost, the environment, materials and space. It is efficient in the use of natural resources, sustainable materials and energy used in construction. | |
| Visual appearance | 4.30 | Visual appearance should be an important factor in considering the scheme design, as well as functionality, fitness for purpose, sustainability and cost. Applying 'good design' to airports projects should therefore produce sustainable infrastructure sensitive to place, efficient in the use of natural resources and energy used in their construction, and matched by an appearance that demonstrates good aesthetics as far as possible. | 4.29 | Visual appearance should be a key factor in considering the design of new infrastructure, as well as functionality, fitness for purpose, sustainability and cost. Applying "good design" to national network projects should therefore produce sustainable infrastructure sensitive to place, efficient in the use of natural resources and energy used in their construction, matched by an appearance that demonstrates good aesthetics as far as possible. | N/A | No relevant equivalent provision. | No significant distinction derives from marginally different wording. |
| Visual appearance | N/A | No relevant equivalent provision. | 4.30 | It is acknowledged however, that given the nature of much national network infrastructure | N/A | No relevant equivalent provision. | N/A – no relevant equivalent provision in the ANPS and 2024 NNNPS. |

| | | | | | | | |
|----------------------------|------|--|------|---|------|---|--|
| | | | | development, particularly SRFIs, there may be a limit on the extent to which it can contribute to the enhancement of the quality of the area. | | | |
| Good design | 4.31 | A good design should meet the principal objectives of the scheme by eliminating or substantially mitigating the adverse impacts of the development, for example by improving operational conditions. It should also mitigate any existing adverse impacts wherever possible, for example in relation to safety or the environment. A good design will also be one that sustains the improvements to operational efficiency for as many years as is practicable, taking into account capital cost, economics and environmental impacts. | 4.31 | A good design should meet the principal objectives of the scheme by eliminating or substantially mitigating the identified problems by improving operational conditions and simultaneously minimising adverse impacts. It should also mitigate any existing adverse impacts wherever possible, for example, in relation to safety or the environment. A good design will also be one that sustains the improvements to operational efficiency for as many years as is practicable, taking into account capital cost, economics and environmental impacts. | 4.28 | A good design should meet the principal objectives of the scheme by applying the mitigation hierarchy to avoid, mitigate, or as a last resort compensate for the identified problems and existing adverse impacts, by improving operational conditions, simultaneously minimising adverse impacts and contributing to the conservation and enhancement of the natural, built and historic environment. A good design will also be one that sustains the improvements to operational efficiency for as many years as is practicable, taking into account economic, social and environmental impacts. | The 2024 NNNPS sets out that good design should as a last resort compensate for identified problems and existing adverse impacts and contribute to the conservation and enhancement of the natural, built and historic environment. |
| Design and decision making | 4.32 | Scheme design will be an important and relevant consideration in decision making. The Secretary of State will need to be satisfied that projects are sustainable and as aesthetically sensitive, durable, adaptable and resilient as they can reasonably be, having regard to regulatory and other constraints and including accounting for natural hazards such as flooding. The Secretary | 4.32 | Scheme design will be a material consideration in decision making. The Secretary of State needs to be satisfied that national networks infrastructure projects are sustainable and as aesthetically sensitive, durable, adaptable and resilient as they can reasonably be (having regard to regulatory and other constraints and including accounting for | 4.29 | In light of this, scheme design will be a material consideration in decision making. The Secretary of State needs to be satisfied that national networks infrastructure projects are sustainable, having regard to appropriate industry good design guidance, and that the applicant has considered, as far as possible, both functionality (including fitness for purpose and sustainability) and | The ANPS notes that the Secretary of State will need to be satisfied that extant security, customs and immigration measures are maintained or re-provided. The 2015 NNNPS states that the Secretary of State needs to be satisfied that national networks infrastructure has had regard to appropriate industry good design guidance. |

| | | | | | | | |
|-----------------|------|--|------|--|----------------------------------|--|---|
| | | of State will also need to be satisfied that extant security, customs and immigration measures are maintained or re-provided. | | natural hazards such as flooding). | | aesthetics (including the scheme's contribution to the quality of the area in which it would be located). | |
| Scheme design | 4.33 | The scheme should take into account, as far as possible, both functionality, including fitness for purpose and sustainability, and aesthetics, including the scheme's contribution to the quality of the area in which it would be located. The applicant will want to consider the role of technology in delivering new airports projects. Professional, independent advice on the design aspects of a proposal should be undertaken to ensure good design principles are embedded into infrastructure proposals. | 4.33 | The applicant should therefore take into account, as far as possible, both functionality (including fitness for purpose and sustainability) and aesthetics (including the scheme's contribution to the quality of the area in which it would be located). Applicants will want to consider the role of technology in delivering new national networks projects. The use of professional, independent advice on the design aspects of a proposal should be considered, to ensure good design principles are embedded into infrastructure proposals. | Refer to policy reference above. | Refer to policy 4.29. | No significant distinction derives from marginally different wording. |
| Design guidance | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 4.30 | Applicants should have regard to appropriate guidance and plans such as: local nature recovery strategies, Local Air Quality Action Plans, the Green Infrastructure Design Guide, the purposes and Management Plans of National Parks, National Landscapes, the Broads and any local design codes. For road schemes, the Design Manual for Roads and Bridges contains design standards for motorway and all-purpose trunk road projects. | N/A – no relevant equivalent provision in the ANPS and 2015 NNNPS. |

| | | | | | | | |
|---------------------------|------|---|------|--|------|---|---|
| Design process | 4.35 | The applicant should be able to demonstrate in its application how the design process was conducted and how the proposed design evolved. Where a number of different designs were considered, the applicant should set out the reasons why the favoured choice has been selected. The Examining Authority and Secretary of State will take into account the ultimate purpose of the infrastructure and bear in mind the operational, safety and security standards which the design has to satisfy. | 4.35 | Applicants should be able to demonstrate in their application how the design process was conducted and how the proposed design evolved. Where a number of different designs were considered, applicants should set out the reasons why the favoured choice has been selected. The Examining Authority and Secretary of State should take into account the ultimate purpose of the infrastructure and bear in mind the operational, safety and security requirements which the design has to satisfy. | 4.31 | In their application, applicants should be able to demonstrate how the design process was conducted, effective engagement with communities and stakeholders and how the proposed design evolved to maximise design outcomes. Where a number of different designs were considered, applicants should set out the reasons why the favoured choice has been selected with a clear articulation of its benefits. The Examining Authority and Secretary of State should consider the ultimate purpose of the infrastructure and the operational, safety and security requirements which the design must satisfy. | The 2024 NNNPS requires applicants to demonstrate how the design process involved effective engagement with communities and stakeholders. |
| Demonstrating good design | 4.34 | There may be opportunities for the applicant to demonstrate good design in terms of siting and design measures relative to existing landscape and historical character and function, landscape permeability, landform, and vegetation. | 4.34 | Whilst the applicant may only have limited choice in the physical appearance of some national networks infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting and design measures relative to existing landscape and historical character and function, landscape permeability, landform and vegetation. | N/A | No relevant equivalent provision. | No significant distinction derives from marginally different wording. |
| Advice on design | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 4.32 | Applicants should consider taking independent professional advice on the design aspects of a proposal, from the earliest design stage. A project board | N/A – no relevant equivalent provision in the ANPS and 2015 NNNPS. |

| | | | | | | | | |
|------------------------|------|---|-----|-----------------------------------|-----|-----------------------------------|---|--|
| | | | | | | | level design champion could be appointed, and a representative design panel used to maximise the value provided by the infrastructure. Applicants should also commission an independent design review of their proposal prior to planning. The Design Council can provide or signpost recommendations for this service. | |
| Costs | | | | | | | | |
| Compulsory acquisition | 4.36 | The relationship between cost and affordability for a scheme is governed by the regulated funding of the airport and funding from other sources, and the need to comply with the Government’s guidance on compulsory acquisition of land under the Planning Act 2008. This guidance is relevant to any scheme that will require the compulsory acquisition of land, which is expected in relation to any scheme to which this NPS applies which would include any application for development consent for a Northwest Runway at Heathrow Airport. That guidance sets out what a promoter must demonstrate if it is to be granted powers of compulsory acquisition - including in relation to impediments to a scheme and financial resources. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A – no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. | |

| | | | | | | | |
|---------------------|------|---|-----|-----------------------------------|-----|-----------------------------------|--|
| Economic regulation | 4.37 | <p>Heathrow Airport is subject to economic regulation by the Civil Aviation Authority (CAA) under the Civil Aviation Act 2012. As part of the CAA’s discharge of its duty under the Civil Aviation Act 2012 to further the interests of users of air transport services (passengers and cargo owners), the CAA has granted an economic licence to the operator of Heathrow Airport to levy airport charges. This licence sets a maximum yield per passenger that can be recovered by the operator of Heathrow Airport through airport charges (the “maximum yield”). This maximum yield is set by the CAA having conducted a process that scrutinises, among other things, the business plan submitted by the licence holder and developed through constructive engagement with the airlines, as well as other submissions from airlines and stakeholders. This process of scrutiny of costs will include benchmarking exercises from industry professionals and assessments by an Independent Fund Surveyor as well as by the CAA. Expansion will also be subject to specific gateway reviews by airlines and stakeholders. The final business plan will include details of the future capital</p> | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A – no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |
|---------------------|------|---|-----|-----------------------------------|-----|-----------------------------------|--|

| | | | | | | | | |
|-----------------|------|---|-----|-----------------------------------|-----|-----------------------------------|--|--|
| | | expenditure that the licensee proposes to incur. | | | | | | |
| Maximum yield | 4.38 | <p>For the development of new capacity at Heathrow, the CAA will set the maximum yield having regard to the matters required by the Civil Aviation Act 2012. The CAA will consider, among other things:</p> <ul style="list-style-type: none"> the need to secure that the licence holder is able to finance its provision of airport operation services; and the economy and efficiency of the proposals set out in any business plan (including such capital expenditure proposals as are contained in it), as part of its process of setting the maximum yield per passenger in the period covered by the price control. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A – no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. | |
| Cost efficiency | 4.39 | The applicant should demonstrate in its application for development consent that its scheme is cost-efficient and sustainable, and seeks to minimise costs to airlines, passengers and freight owners over its lifetime. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A – no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. | |
| Business plan | 4.40 | Detailed scrutiny of any business plan put forward by the licence holder will fall under the CAA's regulatory process under the Civil Aviation Act 2012, and the detailed matters | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A – no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. | |

| | | | | | | | |
|---|------|--|------|--|------|---|---|
| | | considered under that process are not expected to be scrutinised in the same way during the examination and determination of an application for development consent. The CAA is a statutory consultee for all proposed applications relating to airports or which are likely to affect an airport or its current or future operation. The applicant is expected to provide the CAA with the information it needs to enable it to assist the Examining Authority in considering whether any impediments to the applicant's development proposals, insofar as they relate to the CAA's economic regulatory and other functions, are capable of being properly managed. | | | | | |
| Climate change adaptation | | | | | | | |
| Mitigating and adapting to climate change | 4.41 | The Planning Act 2008 requires the Secretary of State to have regard to the desirability of mitigating, and adapting to, climate change in designating an NPS. | 4.36 | Section 10(3)(a) of the Planning Act requires the Secretary of State to have regard to the desirability of mitigating, and adapting to, climate change in designating an NPS. | 4.33 | Section 10(3)(a) of the Planning Act 2008 requires the Secretary of State to have regard to the desirability of mitigating, and adapting to, climate change in designating an NPS. | No significant distinction derives from marginally different wording. |
| Taking into account the effects of climate change | 4.42 | This section sets out how the Airports NPS puts Government policy on climate change adaptation into practice, and in particular how the applicant and the Secretary of State will take into account the effects of climate change when developing and considering | 4.37 | This section sets out how the NPS puts Government policy on climate change adaptation into practice, and in particular how applicants and the Secretary of State should take the effects of climate change into account when developing and consenting infrastructure. | 4.34 | This section sets out how applicants and the Secretary of State should take the effects of climate change into account when developing and considering infrastructure applications. As referenced in chapter 2 of this NPS, while climate change mitigation is essential in minimising the most | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|----------------------------|------|---|------|---|------|---|---|
| | | airports infrastructure applications. Climate change mitigation is essential to minimise the most dangerous impacts of climate change, as previous global greenhouse gas emissions will already mean some degree of continued climate change for at least the next 30 years. Climate change is likely to mean that the UK will experience on average hotter, drier summers and warmer, wetter winters. There is potentially an increased risk of flooding, drought, heatwaves, intense rainfall events and other extreme events such as storms and wildfires, as well as rising sea levels. | | Climate change mitigation is essential to minimise the most dangerous impacts of climate change, as previous global greenhouse gas emissions have already committed us to some degree of continued climate change for at least the next 30 years. Climate change is likely to mean that the UK will experience hotter, drier summers and warmer, wetter winters. There is an increased risk of flooding, drought, heatwaves, intense rainfall events and other extreme events such as storms and wildfires, as well as rising sea levels. | | dangerous impacts of climate change, previous global carbon emissions have already committed us to continued climate change in the future. | |
| Climate change adaptation | 4.43 | Adaptation is therefore necessary to deal with the potential impacts of these changes that are already happening. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the provision of green infrastructure. | 4.38 | Adaptation is therefore necessary to deal with the potential impacts of these changes that are already happening. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the provision of green infrastructure. | 4.35 | Article 7 of the Paris Agreement establishes a global goal on adaptation – of enhancing adaptive capacity, strengthening resilience and reducing vulnerability to climate change in the context of the temperature goal of the Agreement. It aims to significantly strengthen national adaptation efforts, including through support and international cooperation. | The 2024 NNNPS frames climate change adaptation through the measures set out in Article 7 of the Paris Agreement. |
| UK Climate Projections and | 4.44 | The Government has published a set of UK Climate Projections, | 4.39 | The Government has published a set of UK Climate Projections | 4.36 | To support planning decisions, the government produces a set | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|---|------|---|------|--|------|---|--|
| UK Climate Change Risk Assessment and National Adaptation Programme | | and every five years prepares a statutory UK Climate Change Risk Assessment and National Adaptation Programme. In addition, the Climate Change Act 2008 adaptation reporting power has been used by Government to invite reporting authorities (a defined list of public bodies and statutory undertakers, including airports) to consider the impact on them of current and predicted climate change, and to report on progress implementing adaptation actions. Successive strategies for adaptation reporting will be laid alongside five yearly updates to the National Adaptation Programme. | | and has developed a statutory National Adaptation Programme. In addition, the Government's Adaptation Reporting Power will invite reporting authorities (a defined list of public bodies and statutory undertakers, including Highways Agency, Network Rail and the Office of Rail Regulation) to build on their climate change risk assessments and report on progress implementing adaptation actions. | | of UK Climate Projections and has developed a statutory National Adaptation Programme. In addition, the government's Adaptation Reporting Power invites authorities (a defined list of public bodies and statutory undertakers, including National Highways, Network Rail and the Office for Rail and Road) to assess the risks presented by a changing climate, include policies and actions to address climate risk, and set out progress made. | |
| Adaptation measures and additional impacts | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 4.37 | In certain circumstances, measures implemented to ensure a scheme can adapt to climate change may give rise to additional impacts. For example, as a result of protecting against flood risk, there may be consequential impacts on coastal change (see paragraphs 5.101 to 5.116). If this happens, the Secretary of State should consider the impact of the latter in relation to the application as a whole and the impacts guidance set out in chapter 5 of this NPS. | N/A – no relevant equivalent provision in the ANPS and 2024 NNNPS. |
| Impacts of climate change on scheme | 4.45 | New airports infrastructure will typically be a long-term investment which will need to remain operational over many | 4.40 | New national networks infrastructure will be typically long-term investments which will need to remain operational | 4.39 | New national networks infrastructure will typically be a long-term investment and will need to remain operational over | The 2024 NNNPS makes more specific reference to the direct and indirect impacts of climate change. |

| | | | | | | | |
|---|------|---|------|--|------|--|--|
| development and operation. | | decades, in the face of a changing climate. Consequently, the applicant must consider the impacts of climate change when planning design, build and operation. Any accompanying environmental statement should set out how the proposal will take account of the projected impacts of climate change. | | over many decades, in the face of a changing climate. Consequently, applicants must consider the impacts of climate change when planning location, design, build and operation. Any accompanying environment statement should set out how the proposal will take account of the projected impacts of climate change. | | many decades, in the face of a changing climate. Consequently, applicants must consider the direct (e.g., flooding of road or rail infrastructure) and indirect (e.g., flooding of other parts of the road or rail network) impacts of climate change when planning the location, design, build, operation and maintenance. The Secretary of State will need information on how the proposal will take account of the projected impacts of climate change and remain resilient. | Both the 2015 and 2024 NNNPS identify the need to consider the impacts of climate change when planning the location of the development. |
| Nature based adaptation solutions | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 4.38 | In preparing measures to support climate change adaptation, applicants should consider whether nature-based solutions could provide a basis for such adaptation. In addition to avoiding further carbon emissions when compared with some more traditional adaptation approaches, nature-based solutions can also result in biodiversity benefits as well as increasing absorption of carbon dioxide from the atmosphere (see also paragraphs 5.179 to 5.203 on the role of green infrastructure). | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| UK Climate Projections and probability levels | 4.47 | Where transport infrastructure has safety-critical elements, and the design life of the asset is 60 years or greater, the applicant should apply the latest available UK Climate Projections, considering at least a scenario that reflects a high level of greenhouse gas | 4.41 | Where transport infrastructure has safety-critical elements and the design life of the asset is 60 years or greater, the applicant should apply the UK Climate Projections 2009 (UKCP09) high emissions scenario (high impact, low likelihood) against | N/A | No relevant equivalent provision. | The 2015 NNNPS requires the applicant to apply the UK Climate Projections high emissions scenario against the 2080 projections at the 50% probability level. The ANPS requires the assessment at the 10%, 50% and 90% probability levels. |

| | | | | | | | |
|------------------------|------|---|------|--|------|--|--|
| | | emissions at the 10%, 50% and 90% probability levels, to assess the impacts of climate change over the lifetime of the development. | | the 2080 projections at the 50% probability level. | | | |
| UK Climate Projections | 4.46 | Detailed consideration must be given to the range of potential impacts of climate change using the latest UK Climate Projections available at the time, and to ensuring any environmental statement that is prepared identifies appropriate mitigation or adaptation measures. This should cover the estimated lifetime of the new infrastructure. Should a new set of UK Climate Projections become available after the preparation of any environmental statement, the Examining Authority should consider whether it needs to request additional information from the applicant. | 4.42 | The applicant should take into account the potential impacts of climate change using the latest UK Climate Projections available at the time and ensure any environment statement that is prepared identifies appropriate mitigation or adaptation measures. This should cover the estimated lifetime of the new infrastructure. Should a new set of UK Climate Projections become available after the preparation of any environment statement, the Examining Authority should consider whether they need to request additional information from the applicant. | 4.40 | The Secretary of State should be satisfied that applications for new national networks infrastructure have taken into account the potential direct and indirect impacts of climate change. This should include using the latest UK Climate Projections and associated research and expert guidance (such as the Environment Agency's Climate Change Allowances for Flood Risk Assessments) applicable at the time the environmental assessment was prepared as part of their Development Consent Order application, to ensure they have identified mitigation or adaptation measures. This should cover the estimated lifetime of the new infrastructure, with a high level of climate resilience built-in from the outset. The applicant should also be able to demonstrate how proposals can be adapted over their predicted lifetimes to remain resilient to a credible maximum climate change scenario. Should a revised set of UK Climate Projections or associated research be applicable after the preparation of the environmental assessment, the Examining Authority should consider | The 2024 NNNPS requires applicants to take account of potential direct and indirect impacts of climate change by using the latest UK Climate Projections and associated research and expert guidance. The 2024 NNNPS also requires applicants to demonstrate how proposals can be adapted over their predicted lifetimes to remain resilient to a credible maximum climate change scenario. |

| | | | | | | | |
|---|------|---|------|---|--|--|---|
| | | | | | whether they need to request further information from the applicant. | | |
| Critical features and radical climate changes | 4.48 | The applicant should demonstrate that there are no critical features of infrastructure design which may be seriously affected by more radical changes to the climate beyond those projected in the latest set of UK Climate Projections. Any potential critical features should be assessed, taking account of the latest credible scientific evidence on, for example, sea level rise, and on the basis that necessary action can be taken to ensure the operation of the infrastructure over its estimated lifetime through potential further mitigation or adaptation. | 4.43 | The applicant should demonstrate that there are no critical features of the design of new national networks infrastructure which may be seriously affected by more radical changes to the climate beyond that projected in the latest set of UK climate projections. Any potential critical features should be assessed taking account of the latest credible scientific evidence on, for example, sea level rise (e.g. by referring to additional maximum credible scenarios such as from the Intergovernmental Panel on Climate Change or Environment Agency) and on the basis that necessary action can be taken to ensure the operation of the infrastructure over its estimated lifetime through potential further mitigation or adaptation. | 4.41 | The Secretary of State should be satisfied that there are no features of the design of new national networks infrastructure critical to its safety or operation which may be seriously affected by more radical changes to the climate. Beyond that projected in the latest set of UK climate projections and taking account of the latest credible scientific evidence on, for example, sea level rise. The Secretary of State should also be satisfied that necessary action can be taken to ensure the operation of the infrastructure over its estimated lifetime. | No significant distinction derives from marginally different wording. |
| Adaptation measures | 4.49 | Any adaptation measures should be based on the latest set of UK Climate Projections, the most recent UK Climate Change Risk Assessment, consultation with statutory consultation bodies, and any other appropriate climate projection data. Any adaptation measures must themselves also be assessed as part of any Environmental Impact | 4.44 | Any adaptation measures should be based on the latest set of UK Climate Projections, the Government's national Climate Change Risk Assessment and consultation with statutory consultation bodies. Any adaptation measures must themselves also be assessed as part of any environmental impact assessment and included in the | 4.42 | Any adaptation measures should be based on the latest set of UK Climate Projections, the government's latest UK Climate Change Risk Assessment, when available and in consultation with the Environment Agency's Climate Change Allowances for Flood Risk Assessments. Any adaptation measures must themselves also be assessed | The 2024 NNNPS requires adaptation measures to be based in consultation with the Environment Agency's Climate Change Allowances for Flood Risk Assessments. |

| | | | | | | | |
|---|------|---|------|--|------|---|---|
| | | Assessment and included in the environmental statement, which should set out how and where such measures are proposed to be secured. | | environment statement, which should set out how and where such measures are proposed to be secured. | | as part of any environmental assessment, which should set out how and where such measures are proposed to be secured. | |
| Adaptation measures and consequential impacts | 4.50 | If any proposed adaptation measures themselves give rise to consequential impacts, the Secretary of State will consider the impact in relation to the application as a whole and the assessment principles set out in the Airports NPS. | 4.45 | If any proposed adaptation measures themselves give rise to consequential impacts the Secretary of State should consider the impact in relation to the application as a whole and the impacts guidance set out in this part of this NPS (e.g. on flooding, water resources, biodiversity, landscape and coastal change). | N/A | No relevant equivalent provision. | No significant distinction derives from marginally different wording. |
| Implementation of adaptation measures at the time of construction | 4.51 | Adaptation measures can be required to be implemented at the time of construction where necessary and appropriate to do so. | 4.46 | Adaptation measures can be required to be implemented at the time of construction where necessary and appropriate to do so. | 4.43 | Adaptation measures should be required to be implemented at the time of construction where necessary and appropriate to do so. However, where they are necessary to deal with the impact of climate change, and that measure would have an adverse effect on other aspects of the project and/or surrounding environment (for example coastal processes), the Secretary of State may consider requiring the applicant to ensure that the adaptation measure could be implemented should the need arise, rather than at the outset of the development (for example reserving land for future extension or increasing height of existing, or requiring new, sea walls). In these circumstances, | No significant distinction derives from marginally different wording in relation to implementing adaptation measures at the time of construction. The 2024 NNNPS includes additional policy requirements if the adaptation measures would have an adverse effect on other aspects of the project which are covered in separate policies in the ANPS and 2015 NNNPS (see below for comparison). |

| | | | | | | | |
|---|------|--|------|--|---------------------------------|--|--|
| | | | | | | the applicant should make a case to justify implementing adaptation measures later, set out clearly how the design could be adapted and have mechanisms in place (such as Development Consent Order requirements) for monitoring and implementation of these future adaptation measures. | |
| Implementation of adaptation measures should the need arise | 4.52 | Where adaptation measures are necessary to deal with the impact of climate change, and that measure would have an adverse effect on other aspects of the project or the surrounding environment, the Secretary of State may consider requiring the applicant to ensure that the adaptation measure could be implemented should the need arise, rather than at the outset of the development. | 4.47 | Where adaptation measures are necessary to deal with the impact of climate change, and that measure would have an adverse effect on other aspects of the project and/or surrounding environment (e.g. coastal processes), the Secretary of State may consider requiring the applicant to ensure that the adaptation measure could be implemented should the need arise, rather than at the outset of the development (e.g. reserving land for future extension, increasing the height of an existing sea wall, or requiring a new sea wall). | Refer to policy reference above | Refer to policy 4.43. | The 2024 NNNPS requires applicants to make a case to justify implementing adaptation measures later if the need arises rather than at the outset of construction and include details for how future adaptation measures will be monitored. |
| Pollution control and other environmental protection regimes | | | | | | | |
| Pollution control regimes | 4.53 | Issues relating to discharges or emissions from a proposed project which affect air quality, water quality, land quality or the marine environment, or which include noise, may be subject to separate regulation under the pollution control framework or other consenting and licensing | 4.48 | Issues relating to discharges or emissions from a proposed project which affect air quality, water quality, land quality and the marine environment, or which include noise and vibration, may be subject to separate regulation under the pollution control framework or | 4.46 | Issues relating to discharges, emissions or abstractions from a proposed project which lead to other direct and indirect impacts on air quality, water quality and land quality, or which include noise, light and vibration, may be subject to separate regulation under the pollution | The 2024 NNNPS includes reference to both direct and indirect impacts. However, the ANPS and 2015 NNNPS refer generally to discharges or emissions affecting the environment. |

| | | | | | | | |
|--|-----|--|------|--|------|--|---|
| | | regimes. Relevant permissions will need to be obtained for any activities within the development that are regulated under those regimes before the activities can be operated. | | other consenting and licensing regimes. Relevant permissions will need to be obtained for any activities within the development that are regulated under those regimes before the activities can be operated. | | control framework or other consenting and licensing regimes. Relevant permissions will need to be obtained for any activities within the development that are regulated under those regimes before the activities can be operated. | |
| Planning and pollution control systems | N/A | No relevant equivalent provision. | 4.49 | The planning and pollution control systems are separate but complementary. The planning system controls the development and use of land in the public interest. It plays a key role in protecting and improving the natural environment, public health and safety, and amenity, for example by attaching requirements to allow developments which would otherwise not be environmentally acceptable to proceed, and preventing harmful development which cannot be made acceptable even through requirements. Pollution control is concerned with preventing pollution through the use of measures to prohibit or limit the releases of substances to the environment from different sources to the lowest practicable level. It also ensures that ambient air and water quality meet standards that guard against impacts to the environment or human health. Environmental Permits cannot control impacts from | 4.45 | The planning and pollution control systems are separate but complementary. The planning system controls the development and use of land in the public interest. It plays a key role in protecting and improving the natural environment, public health and safety, and amenity, for example by attaching conditions to allow developments, which would otherwise not be environmentally acceptable to proceed, and preventing harmful development which cannot be made acceptable even through requirements. Pollution control is concerned with preventing pollution through measures which prohibit or limit the release of substances to the environment from different sources to the lowest practicable level. It also ensures that ambient air, water and land quality meet standards that guard against impacts to the environment or human health. | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|--------------------------------------|-----|-----------------------------------|-----|--|------|--|--|
| | | | | sources outside the facility's boundary. | | | |
| Environmental Permitting Regulations | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 4.47 | Pollution from some facilities, such as industrial installations or waste management sites, is controlled through the Environmental Permitting (England and Wales) Regulations 2016 (the Environmental Permitting Regulations). Some projects covered by this NPS may be subject to the Environmental Permitting Regulations regime. When an applicant applies for an Environmental Permit, the relevant regulator (usually the Environment Agency but sometimes the local authority) requires that the application demonstrates that processes are in place to meet all relevant Environmental Permit requirements. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Environmental Permitting Regulations | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 4.48 | The Environmental Permitting Regulations regime requires industrial facilities to have an Environmental Permit and to meet the requirements of that permit to operate. These requirements include limits on allowable emissions to air, land and water, Best Available Techniques where available, and other requirements such as monitoring. In considering the impacts of the project, including residual impacts, the Secretary of State may wish to consult the | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |

| | | | | | | | |
|--------------------------------|-----|-----------------------------------|------|--|------|--|---|
| | | | | | | regulator on any management plans that would be included in an Environmental Permit application. Applicants are encouraged to begin pre-application discussions with relevant regulators, such as the Environment Agency and the Marine Management Organisation, as early as possible. This is especially the case where applicants wish to parallel track Development Consent Order and Environmental Permit applications. This will help ensure that applications take account of all relevant environmental considerations and that the relevant regulators are able to provide timely advice and assurance to the Examining Authority. | |
| Marine Management Organisation | N/A | No relevant equivalent provision. | 4.52 | There is a statutory duty on applicants to consult the Marine Management Organisation (MMO) on nationally significant projects which would affect, or would be likely to affect, any relevant marine areas as defined in the Planning Act (as amended by section 23 of the Marine and Coastal Access Act 2009). The Secretary of State's consent may include a deemed marine licence and the MMO will advise on what conditions should apply to the deemed marine licence. Where appropriate, the MMO should | 4.49 | Applicants must consult the Marine Management Organisation on national network NSIPs which could affect any relevant marine areas as defined in the Planning Act 2008 (as amended by section 23 of the Marine and Coastal Access Act 2009). Applicants are encouraged to consider the relevant marine plans in advance of consulting the Marine Management Organisation. The Secretary of State's consent may include a deemed marine licence and the Marine Management | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|--|------|--|------|--|------|---|---|
| | | | | actively participate in examinations, and Examining Authorities engage with such matters, to help ensure that nationally significant infrastructure projects are licensed in accordance with environmental legislation, including European directives. | | Organisation will advise on what conditions should apply to the deemed marine licence. The Secretary of State, the Examining Authority and the Marine Management Organisation should co-operate closely to ensure that national network NSIPs are licensed in accordance with legislation. | |
| Deciding whether an application is an acceptable use of the land | 4.54 | In deciding an application, the Secretary of State should focus on whether the development is an acceptable use of the land, and on the impacts of that use, rather than the control of processes, emissions or discharges themselves. The Secretary of State should assess the potential impacts of processes, emissions or discharges to inform decision making, but should work on the assumption that, in terms of the control and enforcement, the relevant pollution control regime will be properly applied and enforced. Decisions under the Planning Act 2008 should complement but not duplicate those taken under the relevant pollution control regime | 4.50 | In deciding an application, the Examining Authority and the Secretary of State should focus on whether the development itself is an acceptable use of the land, and on the impacts of that use, rather than the control of processes, emissions or discharges themselves. They should assess the potential impacts of processes, emissions or discharges to inform decision making, but should work on the assumption that in terms of the control and enforcement, the relevant pollution control regime will be properly applied and enforced. Decisions under the Planning Act should complement but not duplicate those taken under the relevant pollution control regime. | 4.50 | In considering an application for development consent, the Examining Authority and the Secretary of State should consider whether the development itself is an acceptable use of the land, and on the impacts of that use, rather than the control of processes, emissions or discharges themselves. The Secretary of State will assume that the relevant pollution control regime and other environmental regulatory regimes, including those on land drainage, water abstraction and biodiversity, will be properly applied and enforced by the relevant regulator. The Secretary of State should act to complement but not seek to duplicate them. | No significant distinction drives form marginally different wording. |
| Pollution control regimes | 4.55 | These considerations apply in an analogous way to other environmental regulatory regimes, including those on | 4.51 | These considerations apply in an analogous way to other environmental regulatory regimes, including those on land | N/A | No relevant equivalent provision. | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|-----------------------------------|------|--|------|---|------|---|---|
| | | land drainage, flood defence, and biodiversity. | | drainage and flood defence and biodiversity. | | | |
| Potentially polluting development | 4.58 | <p>The Secretary of State will be satisfied that development consent can be granted taking full account of environmental impacts. This will require close cooperation with the Environment Agency, the local planning authority and pollution control authority, and other relevant bodies, such as Natural England, Drainage Boards, and water and sewerage undertakers, to ensure that, in the case of potentially polluting developments:</p> <ul style="list-style-type: none"> The relevant pollution control authority is satisfied that potential releases can be adequately regulated under the pollution control framework; and The effects of existing sources of pollution in and around the project are not such that the cumulative effects of pollution when the proposed development is added would make that development unacceptable, particularly in relation to statutory environmental quality limits. | 4.55 | <p>The Secretary of State should be satisfied that development consent can be granted taking full account of environmental impacts. This will require close cooperation with the Environment Agency and/or the pollution control authority, and other relevant bodies, such as the MMO, Natural England, Drainage Boards, and water and sewerage undertakers, to ensure that in the case of potentially polluting developments:</p> <ul style="list-style-type: none"> The relevant pollution control authority is satisfied that potential releases can be adequately regulated under the pollution control framework; and The effects of existing sources of pollution in and around the project are not such that the cumulative effects of pollution when the proposed development is added would make that development unacceptable, particularly in relation to statutory environmental quality limits. | 4.51 | <p>The Secretary of State should be satisfied that development consent can be granted taking full account of environmental impacts. This will require close cooperation with the Environment Agency and/or the pollution control authority, and other relevant bodies, such as the Marine Management Organisation, the Statutory Nature Conservation Bodies, Drainage Boards, and water and sewerage undertakers, before consenting any potentially polluting developments, to ensure that:</p> <ul style="list-style-type: none"> the relevant regulator is satisfied that potential releases can be adequately regulated under the regulatory framework. the effects of existing sources of pollution in and around the site are not such that the cumulative effects of pollution when the proposed development is added would make that development unacceptable, particularly in relation to statutory environmental quality limits. | No significant distinction derives from marginally different wording. |
| Environmental permits | 4.56 | When an applicant applies for an environmental permit, the relevant regulator (in this case the Environment Agency) | 4.53 | When an applicant applies for an Environmental Permit, the relevant regulator (the Environment Agency) requires | N/A | No relevant equivalent provision. | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|------------------------------------|------|---|------|--|-----|-----------------------------------|---|
| | | requires that processes are in place that are sufficient for the grant of the permit and to ensure compliance with conditions attached to any permit. In examining the impacts of the project, the Examining Authority may wish to seek the views of the regulator on the scope of the permit or consent and any management plans (such as any produced for noise) that would be included in an environmental permit application. | | that the application demonstrates that processes are in place to meet all relevant Environmental Permit requirements. In examining the impacts of the project, the Examining Authority may wish to seek the views of the regulator on the scope of the permit or consent and any management plans (such as any produced for noise) that would be included in an Environmental Permit application. | | | |
| Engagement with Environment Agency | 4.57 | The applicant should begin pre-application discussions with the Environment Agency as early as possible. It is expected, however, that an applicant will have first considered what the Environment Agency is likely to require as a starting point for discussion. Some consents require a significant amount of preparation: as an example, the Environment Agency strongly recommends the applicant should start work towards submitting the permit application at least six months prior to the submission of a development consent order application, where it wishes to parallel track the applications. This will help ensure that applications take account of all relevant environmental considerations and that the | 4.54 | Applicants are encouraged to begin pre-application discussions with the Environment Agency as early as possible. It is however expected that an applicant will have first thought through the requirements as a starting point for discussion. Some consents require a significant amount of preparation; as an example, the Environment Agency suggests that applicants should start work towards submitting the permit application at least 6 months prior to the submission of an application for a Development Consent Order, where they wish to parallel track the applications. This will help ensure that applications take account of all relevant environmental considerations and that the relevant regulators are able to | N/A | No relevant equivalent provision. | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|---|-----------------|--|----------------------|--|------|---|---|
| | | relevant regulators are able to provide timely advice and assurance to the Examining Authority and the Secretary of State. | | provide timely advice and assurance to the Examining Authority. | | | |
| Consenting projects with regulated impacts | 4.59 | The Secretary of State should not refuse consent on the basis of regulated impacts unless there is good reason to believe that any relevant necessary operational pollution control permits or licences or other consents will not subsequently be granted. | 4.56 | The Secretary of State should not refuse consent on the basis of regulated impacts unless there is good reason to believe that any relevant necessary operational pollution control permits or licences or other consents will not subsequently be granted. | 4.52 | The Secretary of State should not refuse consent because of pollution impacts unless there is good reason to believe that any relevant necessary operational pollution control permits or licences, or other consents would not be granted. | No significant distinction derives from marginally different wording. |
| Common law nuisance and statutory nuisance | | | | | | | |
| Defence of statutory authority for nuisance | 4.60 | Section 158 of the Planning Act 2008 provides a defence of statutory authority in civil or criminal proceedings for nuisance. Such a defence is also available in respect of anything else authorised by an order granting development consent. The defence does not extinguish the local authority's duties under Part III of the Environmental Protection Act 1990 to inspect its area and take reasonable steps to investigate complaints of statutory nuisance and to serve an abatement notice where satisfied of its existence, likely occurrence or recurrence. | 4.57 | Section 158 of the Planning Act provides a defence of statutory authority in civil or criminal proceedings for nuisance. Such a defence is also available in respect of anything else authorised by an order granting development consent. The defence does not extinguish the local authority's duties under Part III of the Environmental Protection Act 1990 ("the 1990 Act") to inspect its area and take reasonable steps to investigate complaints of statutory nuisance and to serve an abatement notice where satisfied of its existence, likely occurrence or recurrence. | 4.53 | Section 158 of the Planning Act 2008 provides a defence of statutory authority in civil or criminal proceedings for nuisance. Such a defence is also available in respect of anything else authorised by an order granting development consent. This would include a defence for proceedings for nuisance under Part III of the Environmental Protection Act 1990 ("the 1990 Act") (statutory nuisance) but only to the extent that the nuisance is the inevitable consequence of what has been authorised. | The 2024 NNNPS sets out that the Planning Act 2008 provides a defence of statutory authority in civil or criminal proceedings for nuisance, including defence for proceedings for nuisance under Part III of the Environmental Protection Act. However, the statutory provision of section 158 applies to all orders granting development consents, including those where the ANPS and 2015 NNNPS are relevant. |
| Defence of statutory | Refer to policy | Refer to policy 4.60. | Refer to policy 4.57 | Refer to policy 4.57. | 4.54 | The defence does not extinguish the local authority's duties under Part III of the 1990 | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|--------------------------------|-----------------|--|------|--|------|--|--|
| authority for nuisance | reference above | | | | | Act to inspect its area and take reasonable steps to investigate complaints of statutory nuisance, and to serve an abatement notice where satisfied of its existence, likely occurrence or recurrence. | |
| Sources of nuisance | 4.61 | During the examination of an application for development consent for infrastructure covered under the Airports NPS, possible sources of nuisance under section 79(1) of the Environmental Protection Act 1990 and under sections 76 and 77 of the Civil Aviation Act 1982 should be considered by the Examining Authority. The Examining Authority should also consider how those sources of nuisance might be mitigated or limited so they can recommend appropriate requirements that the Secretary of State might include in any subsequent order granting development consent. | 4.58 | It is very important that during the examination of a nationally significant infrastructure project, possible sources of nuisance under section 79(1) of the 1990 Act, and how they may be mitigated or limited are considered by the Examining Authority so they can recommend appropriate requirements that the Secretary of State might include in any subsequent order granting development consent. More information on the consideration of possible sources of nuisance is at paragraphs 5.81-5.89. | 4.55 | It is very important that, during the examination of a nationally significant infrastructure project, possible sources of nuisance under section 79(1) of the 1990 Act, and how they may be mitigated or limited, are considered by the Examining Authority so they can recommend appropriate requirements that the Secretary of State might include in any subsequent order granting development consent. More information on the consideration of possible sources of nuisance is at paragraphs 5.117 to 5.125 | The ANPS requires possible sources of nuisance under sections 76 and 77 of the Civil Aviation Act 1982 to be considered. |
| Defence of statutory authority | 4.62 | The defence of statutory authority is subject to any contrary provision made by the Secretary of State in any particular case by an order granting development consent. | 4.59 | The defence of statutory authority is subject to any contrary provision made by the Secretary of State in any particular case by an order granting development consent (section 158(3) of the Planning Act). | N/A | No relevant equivalent provision. | No significant distinction derives from marginally different wording. |
| Exceptions to the defence | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 4.56 | When considering whether to include exceptions to the defence in an order granting development consent (section | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |

| | | | | | | | |
|--|------|--|------|--|------|--|---|
| | | | | | | 158(3) of the Planning Act 2008), the Secretary of State should have regard to whether any nuisance is an inevitable consequence of the development. | |
| Security and safety considerations | | | | | | | |
| Vulnerability from national security threats | 4.63 | National security considerations apply across all national infrastructure sectors. The Department for Transport acts as the sector sponsor department for the aviation sector, and in this capacity has lead responsibility for security matters and for directing the security approach to be taken, working with the Civil Aviation Authority. The Department for Transport works closely with Government agencies, including the Centre for the Protection of National Infrastructure, to reduce the vulnerability of the aviation sector to terrorism and other national security threats. | 4.74 | National security considerations apply across all national infrastructure sectors. The Department for Transport acts as the Sector Sponsor Department for the national networks and in this capacity has lead responsibility for security matters in that sector and for directing the security approach to be taken. The Department works closely with Government agencies including the Centre for the Protection of National Infrastructure (CPNI) to reduce the vulnerability of the most 'critical' infrastructure assets in the sector to terrorism and other national security threats. | N/A | No relevant equivalent provision. | No significant distinction derives from marginally different wording. |
| Safety improvements | N/A | No relevant equivalent provision. | 4.60 | New highways developments provide an opportunity to make significant safety improvements. Some developments may have safety as a key objective, but even where safety is not the main driver of a development the opportunity should be taken to improve safety, including introducing the most modern and effective safety measures | 4.57 | Highways developments provide an opportunity to make significant safety improvements and significant incident reduction benefits when they are well designed. Some developments may have safety as a key objective, but even where safety is not the main aim of a development, the opportunity should be taken to | The 2024 NNNPS recognises that new highways developments should provide opportunities to expand active travel and create safe walking and cycling environments. |

| | | | | | | | |
|--|-----|-----------------------------------|------|--|------|---|---|
| | | | | where proportionate. Highway developments can potentially generate significant accident reduction benefits when they are well designed. | | improve safety, including introducing the most modern and effective safety measures where proportionate. Consideration should also be given to wider transport objectives, including expanding active travel, and creating safe and pleasant walking, wheeling and cycling environments. In developing roads schemes the applicant should have due regard to the needs of drivers and riders and the imperative to ensure road user safety. Schemes should be developed with a mindset that accounts for the need for motorists to rest, particularly Heavy Goods Vehicle drivers who need safe and secure roadside facilities that also cater for their welfare needs including the appropriate provision of high-quality washrooms, a catering offer and access to alternative fuel and digital infrastructure. | |
| | N/A | No relevant equivalent provision. | 4.61 | The applicant should undertake an objective assessment of the impact of the proposed development on safety including the impact of any mitigation measures. This should use the methodology outlined in the guidance from DfT (WebTAG) and from the Highways Agency. | 4.58 | The applicant should undertake an objective assessment of the impact of the proposed development on safety including the impact of any mitigation measures. This should use the methodology outlined in the guidance from Department for Transport's Transport Analysis Guidance and from National Highways. They should also put in place arrangements for undertaking the road safety | No significant distinction derives from marginally different wording. Please also refer to policy 4.62 of the 2015 NNNPS. |

| | | | | | | | | |
|--------------------------------------|-----|-----------------------------------|------|---|----------------------|--|--|--|
| | | | | | | | audit process and ensuring their implementation. Road safety audits are a mandatory requirement for highway improvement schemes in the UK (including motorways). Road safety audits are intended to ensure that operational road safety experience is applied during the design and construction process so that the number and severity of collisions is as low as is reasonably practicable. | |
| Road safety audits | N/A | No relevant equivalent provision. | 4.62 | They should also put in place arrangements for undertaking the road safety audit process. Road safety audits are a mandatory requirement for all trunk road highway improvement schemes in the UK (including motorways). | Refer to policy 4.58 | Refer to policy 4.58. | No significant distinction derives from marginally different wording. | |
| Road safety audits | N/A | No relevant equivalent provision. | 4.63 | Road safety audits are intended to ensure that operational road safety experience is applied during the design and construction process so that the number and severity of collisions is as low as is reasonably practicable. | Refer to policy 4.58 | Refer to policy 4.58. | No significant distinction derives from marginally different wording. | |
| Demonstrating compliance with policy | N/A | No relevant equivalent provision. | 4.64 | The applicant should be able to demonstrate that their scheme is consistent with the Highways Agency's Safety Framework for the Strategic Road Network and with the national Strategic Framework for Road Safety. Applicants will wish to show that | 4.59 | The applicant should be able to demonstrate that their scheme is consistent with government Road Safety policy and with the National Highways Safety Framework for the Strategic Road Network. Applicants must show that they have taken all | No significant distinction derives from marginally different wording. | |

| | | | | | | | |
|---|-----|-----------------------------------|------|--|------|---|---|
| | | | | <p>they have taken all steps that are reasonably required to:</p> <ul style="list-style-type: none"> • minimise the risk of death and injury arising from their development; • contribute to an overall reduction in road casualties; • contribute to an overall reduction in the number of unplanned incidents; and • contribute to improvements in road safety for walkers and cyclists. | | <p>steps that are reasonably required to minimise the risk of death and injury arising from their development, including:</p> <ul style="list-style-type: none"> • contributing to an overall reduction in road casualties. • contributing to an overall reduction in the number of unplanned incidents. • contributing to improvements in road safety for pedestrians and cyclists. | |
| Consideration of safety implications | N/A | No relevant equivalent provision. | 4.65 | <p>They will also wish to demonstrate that:</p> <ul style="list-style-type: none"> • they have considered the safety implications of their project from the outset; and • they are putting in place rigorous processes for monitoring and evaluating safety. | 4.60 | <p>The applicant must also demonstrate that:</p> <ul style="list-style-type: none"> • they have considered the safety implications of their project from the outset. • they are putting in place rigorous processes for monitoring and evaluating safety. | No significant distinction derives from marginally different wording. |
| Conditions for granting development consent | N/A | No relevant equivalent provision. | 4.66 | <p>The Secretary of State should not grant development consent unless satisfied that all reasonable steps have been taken and will be taken to:</p> <ul style="list-style-type: none"> • minimise the risk of road casualties arising from the scheme; and • contribute to an overall improvement in the safety of the Strategic Road Network. | 4.61 | <p>The Secretary of State should not grant development consent unless satisfied that all reasonable steps have been taken and will be taken to:</p> <ul style="list-style-type: none"> • minimise the risk of road casualties arising from the scheme • contribute to improvements in the safety of the strategic road network | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|--------------------------------|------|--|------|--|------|--|---|
| Protective security measures | 4.64 | Government policy is to ensure that, where possible, proportionate protective security measures are designed into new infrastructure projects at an early stage in the project development. The nature of the aviation sector as a target for terrorism means that security considerations will likely apply in the case of the infrastructure project for which development consent may be sought under the Airports NPS. | 4.75 | Government policy is to ensure that, where possible, proportionate protective security measures are designed into new infrastructure projects at an early stage in the project development. Where applications for development consent for infrastructure covered by this NPS relate to potentially 'critical' infrastructure, there may be national security considerations. | N/A | No relevant equivalent provision. | No significant distinction derives from marginally different wording. |
| National security implications | 4.65 | Where national security implications have been identified, the applicant should consult with relevant security experts from the Centre for the Protection of National Infrastructure and the Department for Transport to ensure that physical, procedural and personnel security measures have been adequately considered in the design process, and that adequate consideration has been given to the management of security risks. If the Department for Transport, taking advice from the Civil Aviation Authority, Centre for the Protection of National Infrastructure and others it considers appropriate, forms the opinion that it is satisfied that current and potential future security needs are adequately addressed in the project and | 4.76 | Where national security implications have been identified, the applicant should consult with relevant security experts from CPNI and the Department for Transport, to ensure that physical, procedural and personnel security measures have been adequately considered in the design process and that adequate consideration has been given to the management of security risks. If CPNI and the Department for Transport (as appropriate) are satisfied that security issues have been adequately addressed in the project when the application is submitted, they will provide confirmation of this to the Secretary of State, and the Examining Authority should not need to give any further consideration to the details of | 4.68 | Where national security implications have been identified, the applicant should consult with the Department for Transport, and where necessary the National Protective Security Agency, to ensure that security measures have been adequately considered in the design process and that adequate consideration has been given to the management of security risks. For some, this is a legal requirement as per section 119 of the Railways Act 1993. If the Department for Transport, or where appropriate the National Protective Security Authority, are satisfied that security issues have been adequately addressed in the project when the application is submitted to the Secretary of State, the relevant body will provide confirmation of this to the | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|---|------|---|------|---|------|--|--|
| | | that relevant guidance on these matters has been appropriately taken into account in the application, it will provide confirmation of this to the Secretary of State, and the Examining Authority should not need to give any further consideration to the details of the security measures during the examination. | | the security measures during the examination. | | Secretary of State. The Secretary of State should not need to give any further consideration to the details of the security measures in its examination. | |
| Security-related information | 4.66 | The applicant should only include such security-related information in the application as is necessary to enable the Examining Authority to examine the development consent issues and make a properly informed recommendation on the application. | 4.77 | The applicant should only include such information in the application as is necessary to enable the Examining Authority to examine the development consent issues and make a properly informed recommendation on the application. | 4.69 | The applicant should only include sufficient information in the application as is necessary to enable the Examining Authority and the Secretary of State to examine the development consent issues and make a properly informed recommendation on the application. | No significant distinction derives from marginally different wording. |
| Public disclosure of information about defence or national security | 4.67 | In exceptional cases where examination of an application would involve public disclosure of information about defence or national security which would not be in the national interest, the Secretary of State can intervene and may appoint an examiner to consider evidence in closed session. | 4.78 | In exceptional cases, where examination of an application would involve public disclosure of information about defence or national security which would not be in the national interest, the Secretary of State can intervene and may appoint an examiner to consider evidence in closed session. | N/A | No relevant equivalent provision. | No significant distinction derives from marginally different wording. |
| Aviation security | 4.68 | Air transport is one of the safest forms of travel, and the UK is a world leader in aviation safety. Maintaining and improving that record, while ensuring that | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |

| | | | | | | | |
|-------------------|------|---|-----|-----------------------------------|-----|-----------------------------------|--|
| | | regulation is proportionate and cost-effective, remains of primary importance to the UK. Since 2003, rules and standards for aviation safety in Europe have increasingly been set by the European Aviation Safety Agency. The UK will continue to work closely with the European Aviation Safety Agency to ensure that a high and uniform level of civil aviation safety is maintained across Europe. The preferred scheme at Heathrow must comply with the UK's civil aviation safety regime, regulated by the Civil Aviation Authority. | | | | | |
| Aviation security | 4.69 | There remains a considerable threat to aviation security from terrorism. The UK meets this threat with a multi-layered aviation security regime built on intelligence, effective risk management and robust, proportionate measures, brought together under the National Aviation Security Programme. The regulations governing aviation security in the UK have their basis in UK and European law, and are enforced by the Civil Aviation Authority on behalf of the Secretary of State. The design and operation of the Heathrow Northwest Runway scheme, to which the Airports NPS relates, must comply with aviation | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |

| | | | | | | | |
|------------------------------------|------|--|------|---|----------------------|---|--|
| | | security regulations and guidance in the same way as existing airports. There may also be other security considerations linked to any application for development consent under the Airports NPS. | | | | | |
| Health | | | | | | | |
| Direct and indirect health impacts | 4.70 | The construction and use of airports infrastructure has the potential to affect people's health, wellbeing and quality of life. Infrastructure can have direct impacts on health because of traffic, noise, vibration, air quality and emissions, light pollution, community severance, dust, odour, polluting water, hazardous waste and pests. | 4.79 | National road and rail networks and strategic rail freight interchanges have the potential to affect the health, well-being and quality of life of the population. They can have direct impacts on health because of traffic, noise, vibration, air quality and emissions, light pollution, community severance, dust, odour, polluting water, hazardous waste and pests. | 4.71 | National road and rail networks and strategic rail freight interchanges have the potential to affect the health, well-being and quality of life of the population. New or enhanced national network infrastructure may have direct impacts on health because of traffic, noise, vibration, air quality and emissions, light pollution, community severance, dust, odour, polluting water, hazardous waste and pests. They may also have indirect health impacts: for example, if they affect access to key public services, local transport, opportunities for walking, cycling and wheeling, or the use of open space for recreation and physical activity | No significant distinction derives from marginally different wording. Also see ANPS policy 4.71 and 2015 NNNPS policy 4.80 for comparison. |
| Direct and indirect health impacts | 4.71 | New or enhanced airports infrastructure may also have indirect health impacts, for example if they affect access to key public services, local transport, opportunities for cycling and walking, or the use | 4.80 | New or enhanced national network infrastructure may have indirect health impacts; for example if they affect access to key public services, local transport, opportunities for cycling and walking or the use of | Refer to policy 4.71 | Refer to policy 4.71 | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|------------------------|------|---|------|--|----------------------|--|---|
| | | of open space for recreation and physical activity. It should also be noted, however, that the increased employment stemming from airport expansion may have indirect positive health impacts. | | open space for recreation and physical activity. | | | |
| Adverse health impacts | 4.72 | As described elsewhere in the Airports NPS, where the proposed project has likely significant environmental impacts that would have an effect on human beings, any environmental statement should identify and set out the assessment of any likely significant health impacts. | 4.81 | As described in the relevant sections of this NPS, where the proposed project has likely significant environmental impacts that would have an effect on human beings, any environmental statement should identify and set out the assessment of any likely significant adverse health impacts. | 4.72 | As described in the relevant sections of this NPS, where the proposed project has an effect on human beings, the applicant should assess these effects, identifying any potential adverse health impacts, and identify measures to avoid, mitigate or as a last resort compensate for adverse health impacts as appropriate. Enhancement opportunities should be identified by promoting local improvements for active travel and horse riders driven by the principles of good design to create safe and attractive routes to encourage health and wellbeing; this includes potential impacts on vulnerable groups within society, i.e. those groups within society which may be differentially impacted by a development compared to wider society as a whole. | The 2024 NNNPS requires enhancement opportunities to be identified for promoting active travel. |
| Adverse health impacts | 4.73 | The applicant should identify measures to avoid, reduce or compensate for adverse health impacts as appropriate. These impacts may affect people simultaneously, so the applicant, the Examining | 4.82 | The applicant should identify measures to avoid, reduce or compensate for adverse health impacts as appropriate. These impacts may affect people simultaneously, so the applicant, and the Secretary of | Refer to policy 4.72 | Refer to policy 4.72. | The policy in the 2024 NNNPS does not mention the need to consider cumulative impact on health. |

| | | | | | | | |
|--|------|---|-----|--|------|--|--|
| | | Authority and the Secretary of State (in determining an application for development consent) should consider the cumulative impact on health. | | State (in determining an application for development consent) should consider the cumulative impact on health. | | | |
| Accessibility | | | | | | | |
| Creating a more accessible and inclusive transport network | 4.74 | The Government is committed to creating a more accessible and inclusive transport network that provides a range of opportunities and choices for all people to connect with jobs, services and leisure opportunities. This commitment extends to all the users of new airports infrastructure, and to the associated surface access facilities. | N/A | No relevant equivalent provision. | 4.73 | The government is committed to creating a more accessible and inclusive transport network that provides a range of opportunities and choices for people to connect with jobs, services and friends and family. | No significant distinction derives from marginally different wording. |
| Achieving access for disabled people | 4.75 | In 2008, the Department for Transport published Access to Air Travel for Disabled Persons and Persons with Reduced Mobility – Code of Practice, which sets out the legal framework and gives advice and information. Since then, the Equality Act 2010 has updated and extended the legal framework for accessibility. | N/A | No relevant equivalent provision. | 4.74 | The government's strategy for achieving equal access for disabled people is set out in the Inclusive Transport Strategy. The government expects applicants to improve access, wherever possible, on and around the national networks by designing and delivering schemes that take account of the accessibility requirements of all those who use, or are affected by, national networks infrastructure, including disabled users. | The 2024 NNNPS sets out a requirement to improve access where possible by taking account of the accessibility requirements of all, including disabled users. |
| Equality Act 2010 | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 4.75 | Applicants must comply with any obligations under the Equality Act 2010. Public authority applicants are | The ANPS contains comparable provisions at 4.27. |

| | | | | | | | |
|-----------------------------|------|---|-----|-----------------------------------|------|---|--|
| | | | | | | <p>reminded of their duty to promote equality and to consider the needs of disabled people as part of their normal practice. The Public Sector Equality Duty requires that public authorities have due regard to the need to:</p> <ul style="list-style-type: none"> • eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Equality Act. • advance equality of opportunity between people who share a protected characteristic and people who do not share it. • foster good relations between people who share a protected characteristic and people who do not share it. | |
| Public Sector Equality Duty | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 4.76 | All applicants are also reminded that the Secretary of State must have regard to the Public Sector Equality Duty when exercising their functions. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Improving access | 4.76 | <p>In accordance with legal and best practice in relation to accessibility:</p> <ul style="list-style-type: none"> • The Government requires the applicant to include clear details of how plans will improve access on and around the airport by designing and delivering | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |

| | | | | | | | |
|--|--|--|--|--|--|--|--|
| | | <p>schemes (both new construction and upgrade or refurbishment) that address the accessibility needs of all those who use, or are affected by, surface access infrastructure, including those with physical and/or mental impairments as well as older users. Every opportunity to deliver improvements in accessibility on and to the existing national road network should also be taken;</p> <ul style="list-style-type: none"> • The Government will continue to work to ensure that all bus and train fleets comply with legal access standards by 2020, and to improve rail station access for those with impairments in accordance with legislation and best practice; and • The car will continue to play an important role, providing disabled people with independence where other forms of transport are not accessible or available. Easy access and car parking provision at the airports is essential to this goal and must meet standards set down in guidance (such as the Department for Transport's Inclusive Mobility). | | | | | |
|--|--|--|--|--|--|--|--|

| | | | | | | | |
|------------------|-----|-----------------------------------|-----|-----------------------------------|------|---|--|
| Business case | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 4.77 | As set out in paragraphs 4.6 to 4.7 applicants for road and rail projects (excluding SRFIs) will normally be supported by a business case prepared in accordance with Transport Business Case guidance. This includes distributional analysis, which can include information relevant to the Equality Act public sector equality duty. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Improving access | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 4.78 | <p>Applicants should demonstrate the following where relevant:</p> <ul style="list-style-type: none"> • all reasonable opportunities to deliver improvements in accessibility on and to the existing national road network should be taken, including improvements for non-motorised users • severance can be a problem in some locations; where appropriate, applicants should seek to deliver improvements that reduce community severance and improve accessibility • national network infrastructure should incorporate good design (which is inclusive by default), as expanded on in paragraphs 4.27 to 4.32, which includes delivering accessible infrastructure for users. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |

| Assessment of Impacts | | | | | | | | | |
|---------------------------------|-----|---|-----|-----------------------------------|-----|-----------------------------------|-----|-----------------------------------|--|
| Surface access | | | | | | | | | |
| Surface access | 5.5 | The Government's objective for surface access is to ensure that access to the airport by road, rail and public transport is high quality, efficient and reliable for passengers, freight operators and airport workers who use transport on a daily basis. The Government also wishes to see the number of journeys made to airports by sustainable modes of transport maximised as much as possible. This should be delivered in a way that minimises congestion and environmental impacts, for example on air quality. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |
| Airport surface access strategy | 5.9 | The applicant must prepare an airport surface access strategy in conjunction with its Airport Transport Forum, in accordance with the guidance contained in the Aviation Policy Framework. The airport surface access strategy must reflect the needs of the scheme contained in the application for development consent, including any phasing over its development, implementation and operational stages, reflecting the changing number of passengers, freight operators and airport workers attributable to the number of air traffic movements. The strategy should reference the role of | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |

| | | | | | | | |
|---|------|---|-----|-----------------------------------|-----|-----------------------------------|--|
| | | <p>surface transport in relation to air quality and carbon. The airport surface access strategy must contain specific targets for maximising the proportion of journeys made to the airport by public transport, cycling or walking. The strategy should also contain actions, policies and defined performance indicators for delivering against targets, and should include a mechanism whereby the Airport Transport Forum can oversee implementation of the strategy and monitor progress against targets alongside the implementation and operation of the preferred scheme.</p> | | | | | |
| <p>Implications of airport expansion on surface access network capacity</p> | 5.10 | <p>The applicant should assess the implications of airport expansion on surface access network capacity using the WebTAG methodology stipulated in the Department for Transport guidance, or any successor to such methodology. The applicant should consult Highways England, Network Rail and highway and transport authorities, as appropriate, on the assessment and proposed mitigation measures. The assessment should distinguish between the construction and operational project stages for the development comprised in the application.</p> | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |

| | | | | | | | |
|--------------------------|------|--|-----|-----------------------------------|-----|-----------------------------------|--|
| Consultation | 5.11 | The applicant should also consult with Highways England, Network Rail and relevant highway and transport authorities, and transport operators, to understand the target completion dates of any third party or external schemes included in existing rail, road or other transport investment plans. It will need to assess the effects of the preferred scheme as influenced by such schemes and plans. Such consultation and assessment, both of third party schemes on which the preferred scheme depends, and others which interact with it, all of which may be subject to their own planning, funding and approval processes, must be understood in terms of implications of the timings for the applicant's own surface access proposals. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |
| Surface access proposals | 5.13 | For schemes and related surface access proposals or other works impacting on the strategic road network, the applicant should have regard to DfT Circular 02/2013, The Strategic Road Network and the delivery of sustainable development (or prevailing policy), and the National Networks NPS. This sets out the way in which the highway authority for the strategic road network will engage with communities and the | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |

| | | | | | | | |
|-------------------------|------|---|-----|-----------------------------------|-----|-----------------------------------|--|
| | | development industry to deliver sustainable development and economic growth, whilst safeguarding the primary function and purpose of the network | | | | | |
| Severance | 5.14 | The surface access systems and proposed airport infrastructure may have the potential to result in severance in some locations. Where appropriate, the applicant should seek to deliver improvements or mitigation measures that reduce community severance and improve accessibility | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |
| Mitigation measures | 5.15 | In its application, the applicant should set out the mitigation measures that it considers are required to minimise and mitigate the effect of expansion on existing surface access arrangements. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |
| Surface access strategy | 5.16 | The applicant should demonstrate in its assessment that the proposed surface access strategy will support the additional transport demands generated by airport expansion. This should be appropriately secured. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |
| Surface access strategy | 5.17 | Any application for development consent and accompanying airport surface access strategy must include details of how the applicant will increase the | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |

| | | | | | | | |
|-------------------------|------|--|-----|-----------------------------------|-----|-----------------------------------|--|
| | | proportion of journeys made to the airport by public transport, cycling and walking to achieve a public transport mode share of at least 50% by 2030, and at least 55% by 2040 for passengers. The applicant should also include details of how, from a 2013 baseline level, it will achieve a 25% reduction of all staff car trips by 2030, and a reduction of 50% by 2040. | | | | | |
| Surface access strategy | 5.18 | The applicant should commit to annual public reporting on performance against these specific targets. The airport surface access strategy should consider measures and incentives which could help to manage demand by car users travelling to and from the airport, as well as physical infrastructure interventions, having at all times due regard to the effect of its strategy on the surrounding area and transport networks. The strategy should also include an assessment of the feasibility of the measures proposed as well as the benefits and disbenefits related to those measures, including any implications for Highways England, Network Rail and affected relevant highway authorities and transport providers. These measures could be used to help achieve mode share targets and should be considered in conjunction | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |

| | | | | | | | |
|--------------------|------|---|-----|-----------------------------------|-----|-----------------------------------|--|
| | | with measures to mitigate air quality impacts as described in the Airports NPS. | | | | | |
| Funding | 5.20 | Where a surface transport scheme is not solely required to deliver airport capacity and has a wider range of beneficiaries, the Government, along with relevant stakeholders, will consider the need for a public funding contribution alongside an appropriate contribution from the airport on a case by case basis. The Government recognises that there may be some works which may not be required at the time the additional runway opens, but will be needed as the additional capacity becomes fully utilised. The same principle applies that, where a transport scheme is not solely required to deliver airport capacity, the Government, along with relevant stakeholders, will consider the need for a public funding contribution alongside an appropriate contribution from the airport on a case by case basis. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |
| Mitigating impacts | 5.21 | The applicant's proposals will give rise to impacts on the existing and surrounding transport infrastructure. The Secretary of State will consider whether the applicant has taken all reasonable steps to mitigate these impacts during both the | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |

| | | | | | | | |
|---|------|---|-----|---|------|---|---|
| | | development and construction phase and the operational phase. Where the proposed mitigation measures are insufficient to effectively offset or reduce the impact on the transport network, arising from expansion, of additional passengers, freight operators and airport workers, the Secretary of State will impose requirements on the applicant to accept requirements and / or obligations to fund infrastructure or implement other measures to mitigate the adverse impacts, including air quality. | | | | | |
| Planning obligations | 5.22 | Provided the applicant is willing to commit to transport planning obligations to satisfactorily mitigate transport impacts identified in the transport assessment (including environment and social impacts), with costs being considered in accordance with the Department for Transport's policy on the funding of surface access schemes, development consent should not be withheld on surface access grounds. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. See further below – there are equivalent provisions in the NNNPSs – see 2024 5.277. |
| Air quality | | | | | | | |
| Assessing significant air quality effects | 5.32 | The applicant should undertake an assessment of the project, to be included as part of the environmental statement, demonstrating to the Secretary of State that the construction | 5.6 | Where the impacts of the project (both on and off-scheme) are likely to have significant air quality effects in relation to meeting EIA requirements and / or affect the UKs ability to | 5.12 | The applicant should undertake an assessment as part of their Development Consent Order application where the impacts of the project (both on and offscheme) are likely to have | The ANPS policy relates to assessing air quality effects in relation to the construction and operation of the Heathrow Northwest Runway. |

| | | | | | | | |
|---|------|---|-----|---|------|--|---|
| | | and operation of the Northwest Runway will not affect the UK's ability to comply with legal obligations. Failure to demonstrate this will result in refusal of development consent. | | comply with the Air Quality Directive, the applicant should undertake an assessment of the impacts of the proposed project as part of the environmental statement. | | significant air quality effects in relation to meeting environmental assessment requirements or affect the UK's ability to comply with the Air Quality Standards Regulations 2010, or impact the relevant local authority's ability to comply with The Air Quality (England) Regulations 2000. | |
| Assessing significant air quality effects | 5.33 | <p>The environmental statement should assess:</p> <ul style="list-style-type: none"> Existing air quality levels for all relevant pollutants referred to in the Air Quality Standards Regulations 2010 and the National Emission Ceilings Regulations 2002 (as amended) or referred to in any successor regulations; Forecasts of levels for all relevant air quality pollutants at the time of opening, (a) assuming that the scheme is not built (the 'future baseline'), and (b) taking account of the impact of the scheme, including when at full capacity; and Any likely significant air quality effects of the scheme, their mitigation and any residual likely significant effects, distinguishing between those applicable to the construction and operation of the scheme | 5.7 | <p>The environmental statement should describe:</p> <ul style="list-style-type: none"> existing air quality levels; forecasts of air quality at the time of opening, assuming that the scheme is not built (the future baseline) and taking account of the impact of the scheme; and any significant air quality effects, their mitigation and any residual effects, distinguishing between the construction and operation stages and taking account of the impact of road traffic generated by the project. | 5.13 | <p>The assessment should describe:</p> <ul style="list-style-type: none"> existing air quality emissions and concentrations. forecasts of emissions and concentrations at the time of opening, assuming that the scheme is not built (the future baseline) and taking account of the impact of the scheme. any significant air quality effects, their mitigation and any residual effects, distinguishing between the construction and operation stages and taking account of the impact of any road traffic generated by the project. the predicted emissions, concentration change and absolute concentrations of the proposed project after mitigation methods have been applied. | <p>The 2024 NNNPS requires the assessment to include the predicted emissions after mitigation methods have been applied, potential impacts on nearby designated sites, and the proximity and nature of nearby receptors which would be impacted. However, the ANPS and 2015 NNNPS provide for the consideration of residual effects and include general requirements to assess likely significant effects which will include any effects that apply to designated sites and relevant receptors.</p> |

| | | | | | | | |
|---|------|---|------|--|------|---|--|
| | | including any interaction between construction and operational changes and taking account of the impact that the scheme is likely to cause on air quality arising from road and other surface access traffic. | | | | <ul style="list-style-type: none"> any potential impacts on nearby designated habitats from air pollutants. the proximity and nature of nearby receptors which could be impacted, including those more sensitive to poor air quality. | |
| Assessing significant air quality effects | 5.34 | Defra publishes future national projections of air quality based on evidence of future emissions. Projections may be updated as the evidence base changes. The applicant's assessment should, in so far as practicable, be based on the latest available projections. | 5.8 | Defra publishes future national projections of air quality based on evidence of future emissions, traffic and vehicle fleet. Projections are updated as the evidence base changes. Applicant's assessment should be consistent with this but may include more detailed modelling to demonstrate local impacts. | 5.15 | Defra publishes future projections of UK air pollutant emissions based on evidence of future emissions, traffic and vehicle fleet. Projections are updated as the evidence base changes. The applicant's assessment should be consistent with this approach but may include more detailed modelling to demonstrate local impacts. | The 2015 and 2024 NNNPSs both note that air quality assessments may include detailed modelling to demonstrate local impacts. |
| Compliance with the Air Quality Directive | N/A | No relevant equivalent provision. | 5.9 | In addition to information on the likely significant effects of a project in relation to EIA, the Secretary of State must be provided with a judgement on the risk as to whether the project would affect the UK's ability to comply with the Air Quality Directive. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the ANPS and 2024 NNNPS. |
| Mitigation measures | 5.35 | The Secretary of State will need to be satisfied that the mitigation measures put forward by the applicant are acceptable, including at the construction stage. A management / project plan may help record and secure mitigation measures | 5.14 | The Secretary of State should consider whether mitigation measures put forward by the applicant are acceptable. A management plan may help codify mitigation at this stage. The proposed mitigation measures should ensure that | 5.22 | In all cases the Secretary of State must take account of any relevant statutory air quality limits, objectives and targets. The Secretary of State should consider whether mitigation measures put forward by the applicant are acceptable. In | The 2024 NNNPS sets out that the Secretary of State should have regard to relevant guidance when considering the mitigation measures put forward by the applicant. |

| | | | | | | | |
|---------------------|------|---|------|--|------|--|---|
| | | | | the net impact of a project does not delay the point at which a zone will meet compliance timescales. | | doing so the Secretary of State should have regard to relevant guidance including within the Air Quality Strategy or any successor to it, Local Air Quality Management guidance and any relevant PM2.5 target guidance. | |
| Mitigation measures | 5.36 | Mitigation measures may affect the project design, layout, construction and operation, and / or may comprise measures to improve air quality in pollution hotspots beyond the immediate locality of the scheme. | 5.15 | Mitigation measures may affect the project design, layout, construction, operation and/or may comprise measures to improve air quality in pollution hotspots beyond the immediate locality of the scheme. Measures could include, but are not limited to, changes to the route of the new scheme, changes to the proximity of vehicles to local receptors in the existing route, physical means including barriers to trap or better disperse emissions, and speed control. The implementation of mitigation measures may require working with partners to support their delivery. | 5.17 | Mitigation measures may affect the project design, layout, construction, operation and/or may consist of measures to improve air quality beyond the immediate locality of the scheme. Measures could include, but are not limited to, changes to the route or design of the new scheme, changes to the proximity of vehicles to local receptors in the existing route, physical means including barriers to better disperse emissions, and/or speed control. | No significant distinction derives from marginally different wording. |
| Mitigation measures | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.18 | Where a project is likely to lead to a breach of any relevant statutory air quality limits, objectives or targets, the applicant should work with the relevant authorities to secure appropriate mitigation measures. Where a project is located within, or in close proximity to, an Air Quality Management Area or Clean Air Zone, applicants should engage | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |

| | | | | | | | |
|-------------------------------------|------|---|-----|-----------------------------------|-----|---|--|
| | | | | | | with the relevant local authority to ensure the project is compatible with the Local Air Quality Action Plan. | |
| Consultation on mitigation measures | 5.37 | While the precise package of mitigations should be subject to consultation with local communities and relevant stakeholders to ensure the most effective measures are taken forward, an extensive range of mitigation measures is likely to be required. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |
| Mitigation measures | 5.39 | Other mitigation measures which may be put forward by the applicant could include, but are not limited to: <ul style="list-style-type: none"> • Landing charges structured to reward airlines for operating cleaner flights (for example NOx emissions charging); • Zero- or low-emission hybrid or electric vehicle use (ultra-low emission vehicles), charging and fuel facilities; • Reduced or single engine taxiing (improved taxiing efficiency); • Reducing emissions from aircraft at the gate (for example installation of fixed electrical ground power and preconditioned air to aircraft stands to reduce the use of auxiliary power unit); | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |

| | | | | | | | |
|----------------------------------|------|---|-----|-----------------------------------|-----|-----------------------------------|--|
| | | <ul style="list-style-type: none"> • Modernised heating supplies in airport buildings; • Changes to the layout of surface access arrangements; • Traffic restrictions and / or traffic relocation around sensitive areas; • An emissions-based access charge; and • Physical means, including barriers to trap or better disperse emissions and speed control on roads. | | | | | |
| Construction mitigation measures | 5.40 | <p>Mitigation measures at the construction stage should also be provided and draw on best practice from other major construction schemes, including during the procurement of contractors. Specific measures could include but are not limited to:</p> <ul style="list-style-type: none"> • Development of a construction traffic management plan (which may include the possible use of rail and consolidation sites or waterways); • The use of low emission construction plant / fleet, fitting of diesel particulate filters, and use of cleaner engines; | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |

| | | | | | | | |
|---------------------|------|--|------|---|------|--|--|
| | | <ul style="list-style-type: none"> • The use of freight consolidation sites; • Active workforce management / a worker transport scheme; • Construction site connection to grid electricity to avoid use of mobile generation; and • Selection of construction material to minimise distance of transport and increase recycling percentages of the material where appropriate. | | | | | |
| Mitigation measures | 5.42 | The Secretary of State will consider air quality impacts over the wider area likely to be affected, as well as in the vicinity of the scheme. In order to grant development consent, the Secretary of State will need to be satisfied that, with mitigation, the scheme would be compliant with legal obligations that provide for the protection of human health and the environment. | 5.10 | The Secretary of State should consider air quality impacts over the wider area likely to be affected, as well as in the near vicinity of the scheme. In all cases the Secretary of State must take account of relevant statutory air quality thresholds set out in domestic and European legislation. Where a project is likely to lead to a breach of the air quality thresholds, the applicant should work with the relevant authorities to secure appropriate mitigation measures with a view to ensuring so far as possible that those thresholds are not breached. | N/A | No relevant equivalent provision. | The 2024 NNNPS sets out that the Secretary of State must take account of relevant statutory air quality thresholds set out in domestic and European legislation. |
| Mitigation measures | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.19 | With respect to all relevant statutory air quality limits, objectives and targets other than those set under The | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |

| | | | | | | | |
|------------------------------|------|--|------|--|------|--|---|
| | | | | | | Environmental Targets (Fine Particulate Matter) (England) Regulations 2023, all reasonable mitigation action should be taken. At a minimum, the proposed mitigation measures should ensure that the net impact of a project does not delay compliance with those objectives. | |
| PM2.5 | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.20 | With respect to The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023, the applicant should take all reasonable steps to reduce emissions of PM2.5 and its precursor pollutants in the construction and operational stage of the development by following available Defra guidance. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Deterioration of air quality | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.21 | Where a scheme is expected to lead to a deterioration of air quality the applicant should justify why the level of mitigation proposed is deemed to be reasonable. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Air quality considerations | 5.43 | Air quality considerations are likely to be particularly relevant where the proposed scheme: <ul style="list-style-type: none"> is within or adjacent to Air Quality Management Areas, roads identified as being above limit values, or nature conservation sites (including Natura 2000 sites and Sites of Special Scientific Interest); | 5.11 | Air quality considerations are likely to be particularly relevant where schemes are proposed: <ul style="list-style-type: none"> within or adjacent to Air Quality Management Areas (AQMA); roads identified as being above Limit Values or nature conservation sites (including Natura 2000 sites and SSSIs, including those outside England); and | 5.23 | Air quality considerations are likely to be particularly relevant where schemes are proposed: <ul style="list-style-type: none"> within or adjacent to Air Quality Management Areas; roads identified as being above Limit Values; and where changes are sufficient to bring about the need for a new Air Quality Management Area or | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|------------------------------|----------------------|--|------|--|------|--|---|
| | | <ul style="list-style-type: none"> would have effects sufficient to bring about the need for new Air Quality Management Areas or change the size of an existing Air Quality Management Area, or bring about changes to exceedances of the limit values, or have the potential to have an impact on nature conservation sites; and after taking into account mitigation, would lead to a significant air quality impact in relation to Environmental Impact Assessment and / or to a deterioration in air quality in a zone or agglomeration. | | <ul style="list-style-type: none"> where changes are sufficient to bring about the need for a new AQMAs or change the size of an existing AQMA; or bring about changes to exceedances of the Limit Values, or where they may have the potential to impact on nature conservation sites. | | change the size of an existing Air Quality Management Area; or bring about changes to exceedances of the Limit Values. | |
| Air quality considerations | Refer to policy 5.43 | Refer to policy 5.43. | 5.12 | The Secretary of State must give air quality considerations substantial weight where, after taking into account mitigation, a project would lead to a significant air quality impact in relation to EIA and / or where they lead to a deterioration in air quality in a zone/agglomeration. | 5.24 | The Secretary of State should give air quality considerations substantial weight where, after taking into account mitigation, a project would lead to a significant air quality impact in relation to meeting environmental assessment requirements; or where they lead to a deterioration in air quality in a zone/agglomeration. | No significant distinction derives from marginally different wording. |
| Refusing development consent | N/A | No relevant equivalent provision. | 5.13 | The Secretary of State should refuse consent where, after taking into account mitigation, the air quality impacts of the scheme will: <ul style="list-style-type: none"> result in a zone/agglomeration which is | 5.25 | The Secretary of State should refuse consent where, after taking into account mitigation, the air quality impacts resulting from the proposed scheme will either: | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|----------------------------|------|--|-------|---|-------|--|--|
| | | | | <p>currently reported as being compliant with the Air Quality Directive becoming non-compliant; or</p> <ul style="list-style-type: none"> affect the ability of a non-compliant area to achieve compliance within the most recent timescales reported to the European Commission at the time of the decision. | | <ul style="list-style-type: none"> result in a zone/agglomeration which is currently reported as being compliant with the Air Quality Standards Regulations (2010) becoming non-compliant; or affect the ability of a non-compliant area to achieve compliance within the most recent published timescales reported to the Examining Authority at the examination. | |
| Noise and vibration | | | | | | | |
| Noise Assessment | 5.52 | <p>Pursuant to the terms of the Environmental Impact Assessment Regulations, the applicant should undertake a noise assessment for any period of change in air traffic movements prior to opening, for the time of opening, and at the time the airport is forecast to reach full capacity, and (if applicable, being different to either of the other assessment periods) at a point when the airport's noise impact is forecast to be highest. This should form part of the environmental statement. The noise assessment should include the following:</p> <ul style="list-style-type: none"> A description of the noise sources; An assessment of the likely significant effect of predicted | 5.189 | <p>Where a development is subject to EIA and significant noise impacts are likely to arise from the proposed development, the applicant should include the following in the noise assessment, which should form part of the environment statement:</p> <ul style="list-style-type: none"> a description of the noise sources including likely usage in terms of number of movements, fleet mix and diurnal pattern. For any associated fixed structures, such as ventilation fans for tunnels, information about the noise sources including the identification of any distinctive tonal, impulsive or low frequency characteristics of the noise. | 5.230 | <p>Where noise impacts are likely to arise from the proposed development, the applicant should include the following in its noise assessment:</p> <ul style="list-style-type: none"> a description of the noise sources including likely usage in terms of number of movements, fleet mix and diurnal pattern. For any associated fixed structures, such as ventilation fans for tunnels, information about the noise sources including the identification of any distinctive tonal, impulsive or low frequency characteristics of the noise. identification of noise sensitive premises and noise sensitive areas that may be affected. | <p>The ANPS requires applicants to undertake a noise assessment for any period of change in air traffic movements prior to opening, for the time of opening, and at the time the airport is forecast to reach full capacity and at a point when the airport's noise impact is forecast to be highest. The noise assessment should take into account construction and operational noise and aircraft noise.</p> |

| | | | | | | | |
|--|--|--|--|---|--|--|--|
| | | <p>changes in the noise environment on any noise sensitive premises (including schools and hospitals) and noise sensitive areas (including National Parks and Areas of Outstanding Natural Beauty);</p> <ul style="list-style-type: none"> • The characteristics of the existing noise environment, including noise from aircraft, using noise exposure maps, and from surface transport and ground operations associated with the project, the latter during both the construction and operational phases of the project; • A prediction on how the noise environment will change with the proposed project; and • Measures to be employed in mitigating the effects of noise. <p>These should take into account construction and operational noise (including from surface access arrangements) and aircraft noise. The applicant's assessment of aircraft noise should be undertaken in accordance with the developing indicative airspace design. This may involve the use of appropriate design parameters</p> | | <ul style="list-style-type: none"> • identification of noise sensitive premises and noise sensitive areas that may be affected. • the characteristics of the existing noise environment. • a prediction on how the noise environment will change with the proposed development: <ul style="list-style-type: none"> ○ in the shorter term such as during the construction period; ○ in the longer term during the operating life of the infrastructure; ○ at particular times of the day, evening and night as appropriate. • an assessment of the effect of predicted changes in the noise environment on any noise sensitive premises and noise sensitive areas. • measures to be employed in mitigating the effects of noise. Applicants should consider using best available techniques to reduce noise impacts. <p>The nature and extent of the noise assessment should be proportionate to the likely noise impact.</p> | | <ul style="list-style-type: none"> • the characteristics of the existing noise environment. • a prediction on how the noise environment will change with the proposed development. <ul style="list-style-type: none"> ○ in the shorter term such as during the construction period. ○ in the longer term during the operating life of the infrastructure. ○ at particular times of the day, evening and night (including weekends) as appropriate. • an assessment of the effect of predicted changes in the noise environment on any noise sensitive premises and noise sensitive areas, including identifying whether any particular groups are more likely to be affected. • measures to be employed in mitigating the effects of noise applicants should consider using best available techniques to reduce noise impacts. | |
|--|--|--|--|---|--|--|--|

| | | | | | | | |
|-------------------|------|--|-------|---|-------|--|---|
| | | and scenarios based on indicative flightpaths. | | | | | |
| Operational noise | 5.53 | Operational noise, with respect to human receptors, should be assessed using the principles of the relevant British Standards and other guidance. For the prediction, assessment and management of construction noise, reference should be made to any British Standards and other guidance which give examples of mitigation strategies. In assessing the likely significant impacts of aircraft noise, the applicant should have regard to the noise assessment principles, including noise metrics, set out in the national policy on airspace. | 5.191 | Operational noise, with respect to human receptors, should be assessed using the principles of the relevant British Standards and other guidance. The prediction of road traffic noise should be based on the method described in Calculation of Road Traffic Noise. The prediction of noise from new railways should be based on the method described in Calculation of Railway Noise. For the prediction, assessment and management of construction noise, reference should be made to any relevant British Standards and other guidance which also give examples of mitigation strategies. | 5.233 | Operational noise, with respect to human and structural receptors, should be assessed using the principles of the relevant British Standards and other guidance. The prediction of road traffic noise should be based on the method described in Calculation of Road Traffic Noise (Department for Transport 1988) or any official published succession to this methodology. The prediction of noise from railways should be based on the method described in Calculation of Railway Noise (Department for Transport 1995) or any official published succession to this methodology. For the prediction, assessment and management of construction noise, reference should be made to any relevant British Standards and other guidance which also give examples of mitigation strategies. | There are slight differences in the legislation referenced between the ANPS and the 2015 and 2024 NNNPS. The 2015 and 2024 NNNPS require the prediction of road traffic noise to be based on the method described in Calculation of Road Traffic Noise. |
| Noise impact | N/A | No relevant equivalent provision. | 5.190 | The potential noise impact elsewhere that is directly associated with the development, such as changes in road and rail traffic movements elsewhere on the national networks, should be considered as appropriate. | 5.232 | The potential noise impact elsewhere that is directly associated with the development, such as changes in road and rail traffic movements elsewhere on the national networks, should be considered as appropriate. | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|-----------------------------------|------|--|-------|--|-------|---|--|
| Consultation with Natural England | N/A | No relevant equivalent provision. | 5.192 | The applicant should consult Natural England with regard to assessment of noise on designated nature conservation sites, protected landscapes, protected species or other wildlife. The results of any noise surveys and predictions may inform the ecological assessment. The seasonality of potentially affected species in nearby sites may also need to be taken into account. | 5.234 | The applicant should consult Natural England with regard to assessment of noise on designated nature conservation sites, protected landscapes, protected species or other wildlife. The results of any noise surveys and predictions may inform the ecological assessment. The seasonality of potentially affected species in nearby sites may also need to be taken into account | No significant distinction derives from marginally different wording. |
| Mitigation measures | 5.58 | The Secretary of State will consider whether the mitigation measures put forward by the applicant following consultation are acceptable. The noise mitigation measures should ensure the impact of aircraft noise is limited and, where possible, reduced compared to the 2013 baseline assessed by the Airports Commission. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |
| Noise envelope | 5.60 | The applicant should put forward plans for a noise envelope. Such an envelope should be tailored to local priorities and include clear noise performance targets. As such, the design of the envelope should be defined in consultation with local communities and relevant stakeholders, and take account of any independent guidance such as from the Independent Commission on Civil Aviation Noise. The benefits of future | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |

| | | | | | | | |
|--------------------------|------|---|-----|-----------------------------------|-----|-----------------------------------|--|
| | | <p>technological improvements should be shared between the applicant and its local communities, hence helping to achieve a balance between growth and noise reduction. Suitable review periods should be set in consultation with the parties mentioned above to ensure the noise envelope's framework remains relevant.</p> | | | | | |
| Runway alteration scheme | 5.61 | <p>The applicant should put forward plans for a runway alternation scheme that provides communities affected with predictable periods of respite (though the Government acknowledges that the duration of periods of respite that currently apply will be reduced). Predictability should be afforded to the extent that this is within the airport operator's control. The details of any such scheme, including timings, duration and scheduling, should be defined in consultation with local communities and relevant stakeholders, and take account of any independent guidance such as from the Independent Commission on Civil Aviation Noise.</p> | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |
| Night flights | 5.62 | <p>The Government also expects a ban on scheduled night flights for a period of six and a half hours, between the hours of 11pm and 7am, to be implemented. The rules around</p> | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |

| | | | | | | | |
|--|------|---|-----|-----------------------------------|-----|-----------------------------------|--|
| | | its operation, including the exact timings of such a ban, should be defined in consultation with local communities and relevant stakeholders, in line with EU Regulation 598/2014. In addition, outside the hours of a ban, the Government expects the applicant to make particular efforts to incentivise the use of the quietest aircraft at night. | | | | | |
| Construction mitigation measures | 5.64 | Noise mitigation measures at the construction stage should also be provided. These should draw on best practice from other major construction schemes, with due regard given to any relevant British Standards and other guidance, and should be taken into account during the procurement of contractors. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |
| Construction and operation mitigation measures | 5.65 | Other measures to mitigate noise during the construction and operation of the development may include one or more of the following: <ul style="list-style-type: none"> • Reducing noise at point of generation and containment of noise generated; • Where possible, optimising the distance between source and noise-sensitive receptors, and incorporating good design to minimise noise transmission through screening by natural barriers or other buildings; and | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |

| | | | | | | | |
|------------------------------|------|---|-------|--|-------|---|--|
| | | <ul style="list-style-type: none"> Restricting activities allowed on the site. | | | | | |
| Securing mitigation measures | 5.66 | The Secretary of State will expect the applicant to put forward proposals as to how these measures may be secured and enforced, including the bodies who may enforce the measures. These bodies might include the Secretary of State, local authorities (including those over a wider area), and / or the Civil Aviation Authority. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |
| Mitigation measures | N/A | No relevant equivalent provision. | 5.197 | The Examining Authority and the Secretary of State should consider whether mitigation measures are needed both for operational and construction noise over and above any which may form part of the project application. The Secretary of State may wish to impose requirements to ensure delivery of all mitigation measures. | 5.235 | The Examining Authority and the Secretary of State should consider whether mitigation measures are needed both for operational and construction noise over and above any which may form part of the project application. The Secretary of State may wish to impose requirements to ensure delivery and future maintenance of all mitigation measures. | No significant distinction derives from marginally different wording. |
| Mitigation measures | N/A | No relevant equivalent provision. | 5.198 | <p>Mitigation measures for the project should be proportionate and reasonable and may include one or more of the following:</p> <ul style="list-style-type: none"> engineering: containment of noise generated; materials: use of materials that reduce noise, (for example low noise road surfacing); | 5.236 | <p>Mitigation measures for the project should be proportionate and reasonable and may include one or more of the following:</p> <ul style="list-style-type: none"> engineering - containment of noise generated. materials - use of materials that reduce noise, (for example, low noise road surfacing). | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|-------------------------------|-----|-----------------------------------|-------|---|-------|--|---|
| | | | | <ul style="list-style-type: none"> lay-out: adequate distance between source and noise-sensitive receptors; incorporating good design to minimise noise transmission through screening by natural or purpose built barriers; administration: specifying acceptable noise limits or times of use (e.g., in the case of railway station PA systems). | | <ul style="list-style-type: none"> lay-out - adequate distance between source and noise-sensitive receptors. incorporating good design: to minimise noise transmission through landscaping and screening by natural or purpose-built barriers including topographical changes. administration - specifying appropriate noise criteria or times of use (for example, in the case of railway station public address systems). | |
| Sound insulation to dwellings | N/A | No relevant equivalent provision. | 5.199 | For most national network projects, the relevant Noise Insulation Regulations will apply. These place a duty on and provide powers to the relevant authority to offer noise mitigation through improved sound insulation to dwellings, with associated ventilation to deal with both construction and operational noise. An indication of the likely eligibility for such compensation should be included in the assessment. In extreme cases, the applicant may consider it appropriate to provide noise mitigation through the compulsory acquisition of affected properties in order to gain consent for what might otherwise be unacceptable development. Where mitigation is proposed to be dealt with through compulsory acquisition, | 5.237 | For most national network projects, the relevant Noise Insulation Regulations will apply. These place a duty on, and provide powers to, the relevant authority to offer noise mitigation through improved sound insulation to dwellings, with associated ventilation to deal with both construction and operational noise. An indication of the likely eligibility for such compensation should be included in the assessment. In extreme cases, the applicant may consider it appropriate to provide noise mitigation, through the compulsory acquisition of affected properties in order to gain consent for what might otherwise be unacceptable development. Where mitigation is proposed to be dealt with through compulsory acquisition, | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|---------------------------------|------|--|-------|---|-------|---|--|
| | | | | such properties would have to be included within the development consent order land in relation to which compulsory acquisition powers are being sought. | | such properties would have to be included within the Development Consent Order land in relation to which compulsory acquisition powers are being sought. | |
| Addressing noise related issues | N/A | No relevant equivalent provision. | 5.200 | Applicants should consider opportunities to address the noise issues associated with the Important Areas as identified through the noise action planning process. | 5.238 | Applicants should consider opportunities to address the noise issues associated with the Important Areas as identified through the noise action planning process. | No significant distinction derives from marginally different wording. |
| Statutory obligations for noise | 5.67 | The proposed development must be undertaken in accordance with statutory obligations for noise. Due regard must have been given to national policy on aviation noise, and the relevant sections of the Noise Policy Statement for England, the National Planning Policy Framework, and the Government's associated planning guidance on noise. However, the Airports NPS must be used as the primary policy on noise when considering the Heathrow Northwest Runway scheme, and has primacy over other wider noise policy sources. | 5.193 | Developments must be undertaken in accordance with statutory requirements for noise. Due regard must have been given to the relevant sections of the Noise Policy Statement for England, National Planning Policy Framework and the Government's associated planning guidance on noise. | 5.239 | Developments must be undertaken in accordance with statutory requirements for noise. Due regard must have been given to the relevant sections of the Noise Policy Statement for England, National Planning Policy Framework and the government's associated planning guidance on noise. | The ANPS sets out that it must be used as the primary policy on noise. |
| Scheme design | N/A | No relevant equivalent provision. | 5.194 | The project should demonstrate good design through optimisation of scheme layout to minimise noise emissions and, where possible, the use of landscaping, bunds or noise barriers to reduce noise transmission. The project should also consider the need for the mitigation of impacts | 5.240 | The project should demonstrate good design through optimisation of scheme layout to minimise noise emissions and, where practicable and sustainable, the use of landscaping, bunds or noise barriers to reduce noise transmission. The project | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|----------------------------|------|--|-------|---|-------|---|--|
| | | | | elsewhere on the road and rail networks that have been identified as arising from the development, according to Government policy. | | should also consider the need for the mitigation of impacts elsewhere on the road and rail networks that have been identified as arising from the development, according to government policy. | |
| Determining an application | 5.68 | <p>Development consent should not be granted unless the Secretary of State is satisfied that the proposals will meet the following aims for the effective management and control of noise, within the context of Government policy on sustainable development:</p> <ul style="list-style-type: none"> • Avoid significant adverse impacts on health and quality of life from noise; • Mitigate and minimise adverse impacts on health and quality of life from noise; and • Where possible, contribute to improvements to health and quality of life. | 5.195 | <p>The Secretary of State should not grant development consent unless satisfied that the proposals will meet, the following aims, within the context of Government policy on sustainable development:</p> <ul style="list-style-type: none"> • avoid significant adverse impacts on health and quality of life from noise as a result of the new development; • mitigate and minimise other adverse impacts on health and quality of life from noise from the new development; and • contribute to improvements to health and quality of life through the effective management and control of noise, where possible. | 5.241 | <p>The Secretary of State should not grant development consent unless satisfied that the proposals will meet the following aims, within the context of government policy on sustainable development:</p> <ul style="list-style-type: none"> • avoid significant adverse impacts on health and quality of life from noise as a result of the new development • mitigate and minimise other adverse impacts on health and quality of life from noise from the new development • contribute to improvements to health and quality of life through the effective management and control of noise, where possible | No significant distinction derives from marginally different wording. The core tests are the same. |
| DCO requirements | N/A | No relevant equivalent provision. | 5.196 | In determining an application, the Secretary of State should consider whether requirements are needed which specify that the mitigation measures put forward by the applicant are put in place to ensure that the noise levels from the project do not exceed those described in the | 5.242 | In determining an application, the Secretary of State should consider whether requirements are needed which specify that the mitigation measures put forward by the applicant are put in place to ensure that the noise levels from the project do | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|-------------------------|------|--|------|---|-----|--|---|
| | | | | assessment or any other estimates on which the decision was based. | | not exceed those described in the assessment or any other estimates on which the decision was based. | |
| Carbon emissions | | | | | | | |
| Carbon assessment | 5.76 | Pursuant to the terms of the Environmental Impact Assessment Regulations, the applicant should undertake an assessment of the project as part of the environmental statement, to include an assessment of any likely significant climate factors. The applicant should provide evidence of the carbon impact of the project (including embodied carbon), both from construction and operation, such that it can be assessed against the Government's carbon obligations, including but not limited to carbon budgets. The applicant should quantify the greenhouse gas impacts before and after mitigation to show the impacts of the proposed mitigation. This will require emissions to be split into traded sector and non-traded sector emissions, and for a distinction to be made between international and domestic aviation emissions. | 5.17 | Carbon impacts will be considered as part of the appraisal of scheme options (in the business case), prior to the submission of an application for DCO. Where the development is subject to EIA, any Environmental Statement will need to describe an assessment of any likely significant climate factors in accordance with the requirements in the EIA Directive. It is very unlikely that the impact of a road project will, in isolation, affect the ability of Government to meet its carbon reduction plan targets. However, for road projects applicants should provide evidence of the carbon impact of the project and an assessment against the Government's carbon budgets. | N/A | No relevant equivalent provision. | The ANPS requires applicants to quantify greenhouse gas impacts before and after mitigation and also requires emissions to be split into traded sector and non-traded sector emissions, and for a distinction to be made between international and domestic aviation emissions. |
| Carbon assessment | 5.77 | As far as possible, the applicant's assessment should | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |

| | | | | | | | |
|----------------------------|-----|--|-----|-----------------------------------|------|--|--|
| | | <p>also seek to quantify impacts including:</p> <ul style="list-style-type: none"> • Emissions from surface access due to airport and construction staff; • Emissions from surface access due to freight and retail operations and construction site traffic. • Emissions from surface access due to airport passengers / visitors; and • Emissions from airport operations including energy and fuel use. <p>This should be undertaken in both a 'do minimum' and also in the 'do something' scenario for the opening, peak operation, and worst case scenario.</p> | | | | | |
| Assessing carbon emissions | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.38 | The Secretary of State must be satisfied that the applicant has as far as possible assessed the carbon emissions at all stages of the development. The Secretary of State for Energy Security and Net Zero regularly assesses whether the UK has sufficient policies and proposals overall to meet the UK carbon budgets, with a view to meeting the net zero target, in line with the duties under section 13 of the Climate Change Act 2008. It would not be feasible or sensible for such an assessment to be done at the time of taking individual | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |

| | | | | | | | |
|----------------------------|-----|-----------------------------------|-----|-----------------------------------|------|---|--|
| | | | | | | development decisions, and there is no legal requirement to do so. | |
| Assessing carbon emissions | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.39 | S.1(1) of the Climate Change Act 2008 reflects and puts into effect the net zero target set in light of the temperature goal of the Paris Agreement. The target was increased from 80% emission reductions by 2050 to 100% emission reductions by 2050 in June 2019. Carbon budgets 1 to 5 were set to meet the 80% emission reduction target, but carbon budget 6 (2033-2037) has been set to meet the 2050 net zero target, so it is more stretching. The UK's current Nationally Determined Contribution (set in line with Article 4 of the Paris Agreement) commits to reducing economy-wide greenhouse gas emissions by at least 68% by 2030, compared to 1990 levels, so it is more stretching than carbon budget 5. The UK's Nationally Determined Contribution is on the pathway to the 2050 net zero target. Where it provides useful context, applicants may wish to compare their scheme emissions against carbon budgets, net zero and the UK Nationally Determined Contribution. Where an applicant assesses the carbon impacts of its scheme against carbon budget 6, and later carbon budgets, it is to be taken also to have assessed | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |

| | | | | | | | |
|------------------------------|-----|-----------------------------------|-----|-----------------------------------|------|---|--|
| | | | | | | the carbon impacts of the scheme against the net zero target in the Climate Change Act 2008, as they are in line with this target. | |
| Assessing carbon emissions | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.42 | Any carbon assessment will include an assessment of operational carbon emissions, but the policies set out in chapter 2 of this NPS, apply to these emissions. Operational emissions will be addressed in a managed, economywide manner, to ensure consistency with carbon budgets, net zero and our international climate commitments. Therefore, approval of schemes with residual carbon emissions is allowable and can be consistent with meeting net zero. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Whole Life Carbon Assessment | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.31 | Emissions occur across the lifecycle of a project, and assessing the Whole Life Carbon emissions throughout a project will identify areas for efficiency and potential carbon reductions. All proposals for national network infrastructure projects should include a Whole Life Carbon Assessment at critical stages in the project lifecycle, for example the submission of a major business case. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Whole Life Carbon Assessment | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.32 | Undertaking a Whole Life Carbon Assessment involves calculating the emissions from 'cradle to grave' of a project. | |

| | | | | | | | | |
|------------------------------|-----|-----------------------------------|-----|-----------------------------------|------|---|---|--|
| | | | | | | | This builds a comprehensive understanding of the emissions generated when building, operating, using, maintaining and discontinuing the infrastructure. | |
| Whole Life Carbon Assessment | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.33 | A Whole Life Carbon Assessment should be conducted according to the guidance, standards and methodologies set out in Transport Analysis Guidance Unit A3. Also refer to the Environmental Assessment at paragraph 4.12 of this NPS document for more information about cumulative assessment. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. | |
| Whole Life Carbon Assessment | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.34 | As referenced in Transport Analysis Guidance, the guiding principles of managing whole life carbon are established in PAS 2080: Carbon Management in Buildings and Infrastructure (2023). This demonstrates how the whole value chain can support infrastructure decarbonisation. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. | |
| Carbon management plan | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.35 | Having regard to current knowledge, a carbon management plan should be produced as part of the Development Consent Order submission and include: <ul style="list-style-type: none"> • a Whole Life Carbon assessment for the project. • an explanation of the steps that have been taken to | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. | |

| | | | | | | | |
|------------------------|-----|-----------------------------------|-----|-----------------------------------|------|---|--|
| | | | | | | <p>drive down the carbon impacts of the project.</p> <ul style="list-style-type: none"> • how construction and operational emissions and, where applicable, emissions from maintenance activities, have been reduced as much as possible using the carbon reduction hierarchy (e.g., as set out in PAS2080) (recognising that in the case of road projects while the developer can estimate the likely emissions from road traffic, it is not solely responsible for controlling them). • whether and how any residual carbon emissions will be (voluntarily) offset or removed using a recognised framework (any offsetting of emissions should not be included in the Whole Life Carbon Assessment headline figures). • where there are residual emissions, the level of emissions and the impact of those on any relevant statutory carbon budgets. | |
| Carbon management plan | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.37 | Steps taken to minimise, capture and offset emissions in design and construction, should be set out in the carbon management plan, secured under the Development Consent Order. This could | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |

| | | | | | | | |
|---------------------|------|---|-----|-----------------------------------|-----|--|--|
| | | | | | | include, for example, mitigation through woodland creation on or adjacent to the site, contributing to offsetting residual emissions. Applicants may wish to refer to the Institute of Environmental Management and Assessment Greenhouse Gas Management Hierarchy guidance when drafting their application. | |
| Mitigation measures | 5.78 | <p>The Secretary of State will need to be satisfied that the mitigation measures put forward by the applicant are acceptable, including at the construction stage. A management / project plan may help clarify and secure mitigation at this stage. The applicant is expected to take measures to limit the carbon impact of the project, which may include, but are not limited to:</p> <ul style="list-style-type: none"> • Zero or low-emission hybrid or electric vehicle use (ultra-low emission vehicles), charging and fuel facilities; • Reduced engine taxiing (improved taxiing efficiency); • Reducing emissions from aircraft at the gate; • Reduced emissions from airport buildings (for example from lower carbon heating); | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |

| | | | | | | | |
|---------------------|-----|---|-----|-----------------------------------|------|---|--|
| | | <ul style="list-style-type: none"> Changes to the layout of surface access arrangements; and Encouraging increased use of public transport by staff and passengers. | | | | | |
| Mitigation measures | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.36 | Applicants should look for opportunities within the design of the proposed development to embed nature-based or technological solutions to mitigate, capture or offset the emissions of construction. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. The NNNPS 2024 contains additional; policies encouraging carbon capture or offset emissions from construction. |
| | | | | | 5.37 | Steps taken to minimise, capture and offset emissions in design and construction, should be set out in the carbon management plan, secured under the Development Consent Order. This could include, for example, mitigation through woodland creation on or adjacent to the site, contributing to offsetting residual emissions. Applicants may wish to refer to the Institute of Environmental Management and Assessment Greenhouse Gas Management Hierarchy guidance when drafting their application. | The 2024 NNNPS requires a carbon management plan. |
| | | | | | 5.38 | The Secretary of State must be satisfied that the applicant has as far as possible assessed the carbon emissions at all stages of the development. The Secretary of State for Energy Security and Net Zero regularly assesses whether the UK has | The 2024 NNNPS makes clear the SoS will ensure that policies are in place to achieve compliance with carbon budgets and net zero; and that this is not a matter for individual applications. |

| | | | | | | |
|--|--|--|--|--|---|---|
| | | | | | <p>sufficient policies and proposals overall to meet the UK carbon budgets, with a view to meeting the net zero target, in line with the duties under section 13 of the Climate Change Act 2008. It would not be feasible or sensible for such an assessment to be done at the time of taking individual development decisions, and there is no legal requirement to do so.</p> <p>5.39 The UK's current Nationally Determined Contribution (set in line with Article 4 of the Paris Agreement) commits to reducing economy-wide greenhouse gas emissions by at least 68% by 2030, compared to 1990 levels, so it is more stretching than carbon budget 5. The UK's Nationally Determined Contribution is on the pathway to the 2050 net zero target. Where it provides useful context, applicants may wish to compare their scheme emissions against carbon budgets, net zero and the UK Nationally Determined Contribution. Where an applicant assesses the carbon impacts of its scheme against carbon budget 6, and later carbon budgets, it is to be taken also to have assessed the carbon impacts of the scheme against the net zero target in the</p> | <p>The 2024 NNNPS provides more detail about the UK carbon targets and budgets and confirms that an assessment against carbon budgets will equate to an assessment against net zero commitments, because the two are aligned.</p> |
|--|--|--|--|--|---|---|

| | | | | | | | |
|----------------------------------|------|---|-----|-----------------------------------|------|---|--|
| | | | | | | Climate Change Act 2008, as they are in line with this target. | |
| Mitigation measures | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.40 | The Secretary of State should be content that the applicant has taken all reasonable steps to reduce the total carbon emissions at all stages of development. The Secretary of State should also give positive weight to projects that embed nature-based or technological processes to mitigate or offset the emissions of construction and within the proposed development. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Construction mitigation measures | 5.80 | <p>Mitigation measures at the construction stage should also be provided and draw on best practice from other major construction schemes, including during the procurement of contractors. Specific measures could include but are not limited to:</p> <ul style="list-style-type: none"> • Development of a construction traffic management plan (which may include the possible use of rail and consolidation sites); • Transport of materials to site by alternative modes to road (for example by rail or water); • Increased efficiency in use of construction plant; | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |

| | | | | | | | |
|---------------------------------------|------|---|------|---|-----|-----------------------------------|--|
| | | <ul style="list-style-type: none"> • Use of energy efficient site accommodation; • Reduction of waste, and the transport of waste; • Construction site connection to grid electricity to avoid use of mobile generation; • Selection of construction material to utilise low carbon options; and • Selection of construction material to minimise distance of transport. | | | | | |
| Implementation of mitigation measures | 5.81 | The implementation of mitigation measures may require working with partners to support their delivery. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |
| Mitigation measures | 5.83 | Evidence of appropriate mitigation measures (incorporating engineering plans on configuration and layout, and use of materials) in both design and construction should be presented as part of any application for development consent. The Secretary of State will consider the effectiveness of such mitigation measures in order to ensure that, in relation to design and construction, the carbon footprint is not unnecessarily high. The Secretary of State's view of the adequacy of the mitigation measures relating to design, construction and operational | 5.19 | Evidence of appropriate mitigation measures (incorporating engineering plans on configuration and layout, and use of materials) in both design and construction should be presented. The Secretary of State will consider the effectiveness of such mitigation measures in order to ensure that, in relation to design and construction, the carbon footprint is not unnecessarily high. The Secretary of State's view of the adequacy of the mitigation measures relating to design and construction will be a material factor in the decision making process. | N/A | No relevant equivalent provision. | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|--|------|--|------|---|------------------|---|---|
| | | phases will be a material factor in the decision making process. | | | | | |
| Increase in carbon emissions | 5.82 | Any increase in carbon emissions alone is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the project is so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets, including carbon budgets. | 5.18 | The Government has an overarching national carbon reduction strategy (as set out in the Carbon Plan 2011) which is a credible plan for meeting carbon budgets. It includes a range of non-planning policies which will, subject to the occurrence of the very unlikely event described above, ensure that any carbon increases from road development do not compromise its overall carbon reduction commitments. The Government is legally required to meet this plan. Therefore, any increase in carbon emissions is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the proposed scheme are so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets. | 5.41 5.42 | Operational carbon emissions from some types of national network infrastructure cannot be totally avoided. Given the range of non-planning policies aimed at decarbonising the transport system, government has determined that a net increase in operational carbon emissions is not, of itself, reason to prohibit the consenting of national network projects or to impose more restrictions on them in the planning policy framework. However, where the increase in carbon emissions resulting from the proposed scheme are so significant that it would have a material impact on the ability of government to achieve its statutory carbon budgets, the Secretary of State should refuse consent. | The ANPS, 2015 NNNPS and 2024 NNNPS all recognise that an increase in carbon emissions is not a reason to refuse consent, albeit that the 2024 NNNPS refers to a net increase and to operational emissions only. The ANPS and 2015 NNNPS go on to state '...unless the increase is so significant that it would have a material impact on the ability of government to reach its carbon reduction targets'. The 2024 NNNPS states that where the increase is of such significance the Secretary of State should refuse consent and refers to carbon budgets (see too paragraph 5.39). |
| Biodiversity and ecological conservation | | | | | | | |
| Likely significant effects on internationally, nationally and locally designated sites | 5.89 | The applicant should ensure that the environmental statement submitted with its application for development consent clearly sets out any likely significant effects on internationally, nationally and locally designated sites of ecological or geological importance, protected species, | 5.22 | Where the project is subject to EIA the applicant should ensure that the environmental statement clearly sets out any likely significant effects on internationally, nationally and locally designated sites of ecological or geological conservation importance (including those outside England) on protected species | N/A | No relevant equivalent provision. | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|--|------|--|------|--|------|---|---|
| | | and habitats and other species identified as being of principal importance for the conservation of biodiversity. | | and on habitats and other species identified as being of principal importance for the conservation of biodiversity and that the statement considers the full range of potential impacts on ecosystems. | | | |
| Environmental Impact Assessment | 5.90 | The Environmental Impact Assessment should reflect the principles of Biodiversity 2020 and identify how the effects on the natural environment will be influenced by climate change, and how ecological networks and their physical and biological process will be maintained. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |
| Direct and indirect impacts | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.46 | The applicant should consider the potential direct and indirect impacts on ecosystems including the impacts on habitats and protected species and the interactions between these, and provide environmental information proportionate to the likely impacts of the infrastructure on biodiversity and nature. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Opportunities to conserve biodiversity | 5.91 | The applicant should show how the project has taken advantage of and maximised opportunities to conserve biodiversity and geological conservation interests. | 5.23 | The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests. | 5.47 | The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests as well as consider how their proposal will deliver biodiversity net gain in line with the requirements in a Biodiversity Gain Statement. | The 2024 NNNPS requires applicants to consider how their proposal will deliver biodiversity net gain. |

| | | | | | | | |
|------------|------|--|------|--|------|--|--|
| Mitigation | 5.96 | As a general principle, and subject to the specific policies set out below and the Infrastructure Planning (Decisions) Regulations 2010, development should avoid significant harm to biodiversity and geological conservation interests, including through mitigation and consideration of reasonable alternatives. The applicant may also wish to make use of biodiversity offsetting in devising compensation proposals to counteract any impacts on biodiversity which cannot be avoided or mitigated. Where significant harm cannot be avoided or mitigated, as a last resort appropriate compensation measures should be sought. The development consent order, or any associated planning obligations, will need to make provision for the long term management of such measures. | 5.25 | As a general principle, and subject to the specific policies below, development should avoid significant harm to biodiversity and geological conservation interests, including through mitigation and consideration of reasonable alternatives. The applicant may also wish to make use of biodiversity offsetting in devising compensation proposals to counteract any impacts on biodiversity which cannot be avoided or mitigated. Where significant harm cannot be avoided or mitigated, as a last resort, appropriate compensation measures should be sought. | 5.55 | As a general principle, and subject to the specific policies below, development should, at first avoid significant harm to biodiversity and geological conservation interests, including through consideration of reasonable alternatives. If avoidance is not possible, mitigation needs to be considered (as set out in paragraphs 5.48 to 5.52 above). Where significant harm cannot be avoided or mitigated it should be compensated for as a last resort, with on-site mitigation being considered prior to off-site. The Secretary of State will give significant weight to any residual harm. | The ANPS sets out that the development consent order, or any associated planning obligations, will need to make provision for the long term management of compensation measures. The 2024 NNNPS identifies a preference for on-site mitigation measures over off-site measures. |
| Mitigation | N/A | No relevant equivalent provision. | 5.36 | Applicants should include appropriate mitigation measures as an integral part of their proposed development, including identifying where and how these will be secured. In particular, the applicant should demonstrate that: <ul style="list-style-type: none"> during construction, they will seek to ensure that activities will be confined to the | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the ANPS and 2024 NNNPS. |

| | | | | | | | |
|----------------------|-----|-----------------------------------|-----|--|------|--|--|
| | | | | <p>minimum areas required for the works;</p> <ul style="list-style-type: none"> • during construction and operation, best practice will be followed to ensure that risk of disturbance or damage to species or habitats is minimised (including as a consequence of transport access arrangements); • habitats will, where practicable, be restored after construction works have finished; • developments will be designed and landscaped to provide green corridors and minimise habitat fragmentation where reasonable; • opportunities will be taken to enhance existing habitats and, where practicable, to create new habitats of value within the site landscaping proposals, for example through techniques such as the 'greening' of existing network crossing points, the use of green bridges and the habitat improvement of the network verge. | | | |
| Mitigation hierarchy | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.48 | To avoid direct and indirect harm or disturbance in line with the mitigation hierarchy the | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |

| | | | | | | |
|--|--|--|--|--|--|--|
| | | | | | <p>applicant should demonstrate that:</p> <ul style="list-style-type: none"> • developments are designed to avoid the risk of harm, for example by minimising the footprint of the development and/or retaining the site's important habitat features. • developments are designed and landscaped to provide green corridors and minimise habitat fragmentation (for example using underpasses or green bridges to link habitats). • during construction, they will seek to ensure that activities will be confined to the minimum areas required for the works. • during construction and operation, best practice will be followed to ensure that risk of disturbance or damage to species or habitats follows the mitigation hierarchy (including as a consequence of transport access arrangements). For example, plan for construction work to be carried out at specific times to avoid sensitive times and location, such as the breeding season for wild birds and lifecycles of migratory fish. | |
|--|--|--|--|--|--|--|

| | | | | | | | |
|--|------|---|-----|-----------------------------------|------|--|--|
| Mitigation hierarchy | 5.94 | The applicant's proposal should address the mitigation hierarchy (which supports efforts to conserve and enhance biodiversity), which is set out in the National Planning Policy Framework. | N/A | No relevant equivalent provision. | 5.49 | If avoidance or reduction of harm is not possible, applicants should include appropriate mitigation measures, in line with the mitigation hierarchy, as an integral part of their proposed development, including identifying where and how these will be secured in the long term. | The 2024 NNPS requires the applicant to identify how mitigation measures will be secured in the long-term. |
| Compensation measures | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.50 | If avoidance or bespoke mitigation measures are insufficient or not possible, as a last resort, appropriate compensation measures should be sought and implemented. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Opportunities to conserve and enhance biodiversity | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.51 | The applicant should not just look to mitigate direct harms but should show how the project has taken advantage of opportunities to conserve and enhance biodiversity, having due regard to any relevant local nature recovery strategies and species conservation strategies. Opportunities will be taken to enhance, expand or connect existing habitats and create new habitats in accordance with biodiversity net gain requirements. Habitat creation, enhancement and management proposals should include measures for climate resilience, including appropriate species selection. Maintaining and improving habitat connectivity is important for climate resilience | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |

| | | | | | | | |
|--------------------------------------|-------|---|------|--|-----|---|---|
| | | | | | | and the biodiversity of ecological networks | |
| Important sites for biodiversity | 5.98 | <p>The most important sites for biodiversity are those identified through international conventions and European Directives. The Habitats Regulations provide statutory protection for European sites and require an assessment of impacts upon such sites. The Government considers that the following wildlife sites should have the same protection as European sites:</p> <ul style="list-style-type: none"> • Potential Special Protection Areas and possible Special Areas of Conservation; • Listed or proposed Ramsar sites; and • Sites identified or required as compensatory measures for adverse effects on European sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites. | 5.27 | <p>The most important sites for biodiversity are those identified through international conventions and European Directives. The Habitats Regulations provide statutory protection for European sites⁷⁶ (see also paragraphs 4.22 to 4.25). The National Planning Policy Framework states that the following wildlife sites should have the same protection as European sites:</p> <ul style="list-style-type: none"> • potential Special Protection Areas and possible Special Areas of Conservation; • listed or proposed Ramsar sites; and • sites identified, or required, as compensatory measures for adverse effects on European sites, potential Special Protection Areas, possible Special Areas of Conservation and listed or proposed Ramsar sites. | N/A | No relevant equivalent provision. | No significant distinction derives from marginally different wording. |
| Sites of Special Scientific Interest | 5.100 | <p>Many Sites of Special Scientific Interest are also designated as sites of international importance and will be protected accordingly. Those that are not, or those features of Sites of Special Scientific Interest that are not covered by an international designation, will be</p> | 5.28 | <p>Many Sites of Special Scientific Interest (SSSIs) are also designated as sites of international importance and will be protected accordingly. Those that are not, or those features of SSSIs not covered by an international designation, should be given a high degree of</p> | N/A | No relevant equivalent provision. | The ANPS sets out that all National Nature Reserves are notified as Sites of Special Scientific Interest. |

| | | | | | | | |
|--------------------------------------|-------|---|------|--|------|--|---|
| | | given a high degree of protection. All National Nature Reserves are notified as Sites of Special Scientific Interest. | | protection. All National Nature Reserves are notified as SSSIs. | | | |
| Sites of Special Scientific Interest | 5.101 | Where a proposed development on land within or outside a Site of Special Scientific Interest is likely to have an adverse effect on the site (either individually or in combination with other developments), development consent should not normally be granted. Where an adverse effect on the site's notified special interest features is likely, an exception should be made only where the benefits of the development at this site clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest. The Secretary of State will ensure that the applicant's proposals to mitigate the harmful aspects of the development and, where possible, to ensure the conservation and enhancement of the site's biodiversity or geological interest, are acceptable. Where necessary, requirements and / or planning obligations should be used to ensure these proposals are delivered. | 5.29 | Where a proposed development on land within or outside a SSSI is likely to have an adverse effect on an SSSI (either individually or in combination with other developments), development consent should not normally be granted. Where an adverse effect on the site's notified special interest features is likely, an exception should be made only where the benefits of the development at this site clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest, and any broader impacts on the national network of SSSIs. The Secretary of State should ensure that the applicant's proposals to mitigate the harmful aspects of the development and, where possible, to ensure the conservation and enhancement of the site's biodiversity or geological interest, are acceptable. Where necessary, requirements and/or planning obligations should be used to ensure these proposals are delivered. | 5.61 | Where a proposed development on land within or outside a Site of Special Scientific Interest is likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments), development consent should not normally be granted. An exception should only be made where the benefits of the development proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest. The Secretary of State should ensure that the applicant's proposals to mitigate the harmful aspects of the development and, where possible, to ensure the conservation and enhancement of the site's biodiversity or geological interest, are acceptable. | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|---|--------------|---|-------------|---|-------------|--|---|
| <p>Sites of regional and local biodiversity and geological interest</p> | <p>5.102</p> | <p>Sites of regional and local biodiversity interest (which include Local Nature Reserves, Local Wildlife Sites and Nature Improvement Areas) have a fundamental role to play in meeting overall national biodiversity targets, contributing to the quality of life and the wellbeing of the community, and supporting research and education. The Secretary of State will give due consideration to such regional or local designations. However, given the need for new infrastructure, these designations should not be used in themselves to refuse development consent, although adequate compensation should always be considered, and ecological corridors and their physical processes should be maintained as a priority to mitigate widespread impacts.</p> | <p>5.31</p> | <p>Sites of regional and local biodiversity and geological interest (which include Local Geological Sites, Local Nature Reserves and Local Wildlife Sites and Nature Improvement Areas) have a fundamental role to play in meeting overall national biodiversity targets, in contributing to the quality of life and the well-being of the community, and in supporting research and education. The Secretary of State should give due consideration to such regional or local designations. However, given the need for new infrastructure, these designations should not be used in themselves to refuse development consent.</p> | <p>5.65</p> | <p>Sites of regional and local biodiversity and geological interest, which include Local Geological Sites, Local Nature Reserves and Local Wildlife Sites and Nature Improvement Areas, are areas of substantive nature conservation value and make an important contribution to ecological networks and nature’s recovery. They can also provide wider benefits including contributing to the quality of life and the well-being of the community, and in supporting research and education. The Secretary of State should give due consideration to any such harm to the detriment of biodiversity and geological features of regional or local importance which s/he considers may result from a proposed development. However, given the need for new infrastructure, these designations should not be used in themselves to refuse development consent, nevertheless the mitigation hierarchy applies to these sites.</p> | <p>The ANPS sets out that ecological corridors and their physical processes should be maintained as a priority to mitigate widespread impacts.</p> <p>The 2024 NNNPS notes that the mitigation hierarchy applies to sites of regional and local biodiversity and geological interest.</p> |
| <p>Ancient woodland</p> | <p>5.103</p> | <p>Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Once lost, it cannot be recreated. The Secretary of State should not grant development consent for any development that would result in the loss or deterioration</p> | <p>5.32</p> | <p>Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Once lost it cannot be recreated. The Secretary of State should not grant development consent for any development that would result in the loss or deterioration</p> | <p>5.63</p> | <p>The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of irreplaceable habitats including ancient woodland and ancient and veteran trees unless there are wholly exceptional reasons (for</p> | <p>The 2024 NPS emphasises the requirement for a suitable compensation strategy for the loss or deterioration of irreplaceable habitats including ancient woodland.</p> |

| | | | | | | | |
|----------------------------|-------|--|------|--|-----|---|---|
| | | of irreplaceable habitats including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the national need for and benefits of the development, in that location, clearly outweigh the loss. Aged or veteran trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided. Where such trees would be affected by development proposals, the applicant should set out proposals for their conservation or, where their loss is unavoidable, the reasons for this. | | of irreplaceable habitats including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the national need for and benefits of the development, in that location, clearly outweigh the loss. Aged or veteran trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided. Where such trees would be affected by development proposals, the applicant should set out proposals for their conservation or, where their loss is unavoidable, the reasons for this. | | example, where the public benefit would clearly outweigh the loss or deterioration of habitat) and a suitable compensation strategy exists. | |
| Other habitats and species | 5.105 | In addition to the habitats and species that are subject to statutory protection or international, regional or local designation, other habitats and species have been identified as being of principal importance for the conservation of biodiversity in England and Wales and therefore requiring conservation action. The Secretary of State will ensure that the applicant has taken measures to ensure that these other habitats and species are protected from the adverse effects of development. Where appropriate, requirements or planning obligations may be used in order to deliver this protection. | 5.35 | Other species and habitats have been identified as being of principal importance for the conservation of biodiversity in England and Wales and therefore requiring conservation action. The Secretary of State should ensure that applicants have taken measures to ensure these species and habitats are protected from the adverse effects of development. Where appropriate, requirements or planning obligations may be used in order to deliver this protection. The Secretary of State should refuse consent where harm to the habitats or species and their habitats would result, unless the benefits of the | N/A | No relevant equivalent provision. | The ANPS emphasises the requirement for a suitable compensation strategy. |

| | | | | | | | |
|--|------|--|-----|--|------|---|---|
| | | The Secretary of State will refuse consent where harm to these other habitats, or species and their habitats, would result, unless the benefits of the development (including need) clearly outweigh that harm. In such cases, compensation will generally be expected to be included in the design proposals. | | development (including need) clearly outweigh that harm. | | | |
| Accounting for policy and government targets | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.53 | The Secretary of State should consider the ten goals of the government's Environmental Improvement Plan, the United Nations Environmental Programme Convention on Biological Diversity of 1992 and any relevant measures and targets, such as the Environment Act 2021 targets. In doing so, the Secretary of State should also take account of the context of the challenge of climate change: failure to address this challenge will result in significant adverse impacts to biodiversity. The benefits of nationally significant low carbon transport infrastructure development may include benefits for biodiversity and geological conservation interests and these benefits may outweigh harm to these interests. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Consultation | 5.93 | The Secretary of State will take account of any mitigation measures agreed between the | N/A | No relevant equivalent provision. | 5.57 | The Secretary of State will need to take account of the advice provided to the applicant by | The 2024 NNNPS confirms that the Secretary of State will need to take account of the advice provided to the |

| | | | | | | | |
|----------------------|-----|---|-----|-----------------------------------|------|--|---|
| | | applicant and Natural England, and whether Natural England has granted or refused, or intends to grant or refuse, any relevant licences, including protected species mitigation licences. | | | | Natural England and/or the Marine Management Organisation and/or the Environment Agency, as regards any necessary mitigation measures and whether these organisations have granted or refused, or intend to grant or refuse, any relevant licences or permit, including protected species mitigation licences. In advance of the formal submission, applicants are encouraged to use Natural England's Letter of No Impediment Approach and engage with Natural England. | applicant by Natural England and/or the Marine Management Organisation and/or the Environment Agency. |
| Enhancement measures | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.52 | Wider ecosystem services and benefits of natural capital should also be considered when designing enhancement measures in order to maximise multifunctional benefits whilst minimising land take. For example, this can be achieved through integration of biodiversity features within a sustainable drainage system; the use of green roofs and walls to harvest rainwater and ameliorate urban heating; or the restoration of rivers to reduce flood risk and provide attractive amenity areas. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Enhancement measures | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.67 | Consideration should be given to the impacts on, and improvement to, habitats and | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |

| | | | | | | | |
|---------------------|------|---|-----|-----------------------------------|-----|--|--|
| | | | | | | species in, around and beyond developments, for wider ecosystem services and natural capital benefits, relevant to the local area and communities. The value of linear infrastructure and its footprint in supporting biodiversity and connecting habitats ecosystems should also be taken into account. Local nature recovery strategies will identify opportunities to create or enhance habitat likely to have greatest benefit to biodiversity and wider environmental improvement. Consideration should also be given to national priorities and targets, such as reduced flood risk, improved air or water quality, and increased access to natural greenspace, or tree planting, woodland creation and protecting long established woodlands. | |
| Compensation ratios | 5.95 | Compensation ratios relating to the effects of the preferred scheme should be considered in more detail during the design. The application of 2:1 compensation ratio is considered to represent the minimum requirement. However, there are other mechanisms for establishing compensation ratios, such as Defra's biodiversity offsetting metric. Equally, it is important to note that habitat ratios form only one part of potential | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |

| | | | | | | | |
|-------------------------|-------|---|------|---|------|---|---|
| | | compensation which should be considered, and the location and quality of any compensation land is of key importance. In this regard, habitat creation, where required, should be focused on areas where the most ecological and ecosystems services benefits can be realised. | | | | | |
| Beneficial biodiversity | 5.104 | The proposed development comprised in the preferred scheme should provide many opportunities for building in beneficial biodiversity as part of good design. When considering proposals, the Secretary of State will consider whether the applicant has maximised such opportunities in and around developments, and particularly to establishing and enhancing green infrastructure. The Secretary of State may use requirements or planning obligations where appropriate in order to ensure that such beneficial features are delivered. | 5.33 | 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. The Secretary of State may use requirements or planning obligations where appropriate in order to ensure that such beneficial features are delivered. | N/A | No relevant equivalent provision. | The ANPS emphasises the need to establish and enhance green infrastructure. |
| Decision making | 5.97 | In taking decisions, the Secretary of State will ensure that appropriate weight is attached to designated sites of international, national and local importance, protected species, habitats and other species of principal importance for the conservation of biodiversity, | 5.26 | In taking decisions, the Secretary of State should ensure that appropriate weight is attached to designated sites of international, national and local importance, protected species, habitats and other species of principal importance for the conservation of biodiversity, and to biodiversity | 5.56 | The Secretary of State should ensure that appropriate weight is attached to: designated sites of international, national, and local importance; irreplaceable habitats; protected species and habitats; other species of principal importance for the conservation of biodiversity; | The 2024 NNNPS states the Secretary of State should ensure that appropriate weight is attached to areas prioritised for nature's recovery in the relevant local nature recovery strategies. |

| | | | | | | | |
|-----------------------------------|------|---|-----|--|------|--|---|
| | | and to biodiversity and geological interests within the wider environment. | | and geological interests within the wider environment. | | biodiversity and geological interests within the wider environment and to areas prioritised for nature's recovery in the relevant local nature recovery strategies. | |
| Requirements | 5.92 | The Secretary of State will consider what requirements should be attached to any consent and / or in any planning obligations entered into in order to ensure that mitigation measures are delivered and monitored for their effectiveness. | N/A | No relevant equivalent provision. | 5.54 | The Secretary of State should consider what appropriate requirements should be attached to any consent and/or in any planning obligations entered into, to ensure that any necessary mitigation and compensatory measures are secured, delivered, managed and if necessary enforced, and that biodiversity improvements are registered in accordance with biodiversity net gain requirements. | The 2024 NNNPS requires biodiversity improvements to be registered in accordance with biodiversity net gain requirements. |
| Enhancement of wider biodiversity | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.68 | When considering proposals, the Secretary of State should consider whether the applicant has maximised such opportunities and enhancement of wider biodiversity, in and around developments. The Secretary of State may use requirements or planning obligations where appropriate in order to ensure that such beneficial features are delivered, and ongoing management and maintenance secured. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |

| | | | | | | | |
|---|-------|--|-----|-----------------------------------|------|---|--|
| Enhancement of wider biodiversity | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.69 | As a public authority, the Secretary of State is bound by the duty in section 40 of the Natural Environment and Rural Communities Act 2006 (as amended by section 102 of the Environment Act 2021) to periodically consider what action the authority can take, consistent with the exercise of its functions, to further the conservation and enhancement of biodiversity. In doing so the Secretary of State may consider the impact on species or habitats listed under Section 41 of the Act. The Secretary of State should ensure that applicants have taken measures to ensure these species and habitats are protected from the adverse effects of development by using requirements, planning obligations, or licence conditions. The Secretary of State should refuse consent where harm to the habitats or species and their habitats would result, unless the benefits of the development (including need) clearly outweigh that harm. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Land use including open space, green infrastructure and Green Belt | | | | | | | |
| Land contamination | 5.110 | Construction and operation of airport facilities is a potential source of contaminative substances (for example, | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |

| | | | | | | | |
|---|-------|--|-------|---|-------|--|---|
| | | through de-icing or leaks and spills of fuel). Where preexisting land contamination is being considered through development, the objective is to ensure that the site is suitable for its intended use. Risks would require consideration in accordance with the contaminated land statutory guidance as a minimum. | | | | | |
| Existing and proposed land uses | 5.111 | The applicant should identify existing and proposed land uses near the project, including any effects of replacing an existing development or use of the site with the proposed project or preventing a development or use on a neighbouring site from continuing. The applicant should also assess any effects of precluding a new development or use proposed in the development plan. The assessment should be proportionate to the scale of the preferred scheme and its likely impacts on such receptors. | 5.165 | The applicant should identify existing and proposed land uses near the project, any effects of replacing an existing development or use of the site with the proposed project or preventing a development or use on a neighbouring site from continuing. Applicants should also assess any effects of precluding a new development or use proposed in the development plan. The assessment should be proportionate to the scale of the preferred scheme and its likely impacts on such receptors. | 5.184 | The applicant should identify existing and proposed land uses near the project, any effects of replacing an existing development or use of the site with the proposed project, or preventing a development or use on a neighbouring site from continuing. Applicants should also assess any effects of precluding a new development or use proposed in the development plan. The assessment should be proportionate. | N/A - No significant distinction derives from marginally different wording. |
| Existing open space, sports and recreational buildings and land | 5.112 | Existing open space, sports and recreational buildings and land should not be developed unless the land is no longer needed or the loss would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location. If the applicant is considering proposals which would involve | 5.166 | Existing open space, sports and recreational buildings and land should not be developed unless the land is surplus to requirements or the loss would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location. Applicants considering proposals which would involve developing such land should | 5.185 | Existing open space, sports and recreational buildings and land should not be developed unless the land is surplus to requirements or the loss would be replaced by equivalent or better provision in terms of quantity, quality and functionality in a suitable and accessible location. Applicants | N/A - No significant distinction derives from marginally different wording. |

| | | | | | | | |
|---|-------|--|-------|---|-------|---|--|
| | | developing such land, it should have regard to any local authority's assessment of need for such types of land and buildings. | | have regard to any local authority's assessment of need for such types of land and buildings. | | considering proposals which would involve developing such land should have regard to any local authority's assessment of need for such types of land and buildings. | |
| Existing open space, sports and recreational buildings and land | 5.124 | The Secretary of State should not grant consent for development on existing open space, sports and recreational buildings and land, including playing fields, unless an assessment has been undertaken either by the local authority or independently, which has shown the open space or the buildings and land to be no longer needed, or the Secretary of State determines that the benefits of the project (including need) outweigh the potential loss of such facilities, taking into account any positive proposals made by the applicant to provide new, improved or compensatory land or facilities. | 5.174 | The Secretary of State should not grant consent for development on existing open space, sports and recreational buildings and land, including playing fields, unless an assessment has been undertaken either by the local authority or independently, which has shown the open space or the buildings and land to be surplus to requirements, or the Secretary of State determines that the benefits of the project (including need) outweigh the potential loss of such facilities, taking into account any positive proposals made by the applicant to provide new, improved or compensatory land or facilities. | 5.200 | The Secretary of State should not grant consent for development on existing open space, sports and recreational buildings and land, including playing fields, unless an assessment has been undertaken either by the local authority or independently, which has shown the open space or the buildings and land to be surplus to requirements, or the Secretary of State determines that the benefits of the project (including need) outweigh the potential loss of such facilities, taking into account any positive proposals made by the applicant to provide new, improved or compensatory land or facilities. | No significant distinction derives from marginally different wording. |
| Pre-application discussions | 5.113 | During any pre-application discussions with the applicant, the local planning authority should identify any concerns it has about the impacts of the application on land use, having regard to the development plan and relevant applications and including, where relevant, | 5.167 | During any pre-application discussions with the applicant, the local planning authority should identify any concerns it has about the impacts of the application on land-use, having regard to the development plan and relevant applications, and including, where relevant, | 5.186 | The applicant should engage in pre-application discussions with the local planning authority and other regulatory bodies at the earliest opportunity. It is essential that engagement is meaningful and supported where necessary by Statements of Common Ground. | The 2024 NNNPS notes that stakeholder engagement should be supported where necessary by Statements of Common Ground. |

| | | | | | | | |
|---|-------|--|-------|---|-------|---|---|
| | | whether it agrees with any independent assessment that the land is no longer needed. These are also matters that local authorities may wish to include in their Local Impact Report which can be submitted after an application for development consent has been accepted. | | whether it agrees with any independent assessment that the land is surplus to requirements. These are also matters that local authorities may wish to include in their Local Impact Report which can be submitted after an application for development consent has been accepted. | | Discussions will cover a range of potential local impacts and issues, and the local planning authority should identify any concerns it has about the impacts of the application on land-use, having regard to the development plan and relevant applications. This includes, where relevant, whether it agrees with any independent assessment that the land is surplus to requirements. These are also matters that local authorities may wish to include in their Local Impact Report which is submitted during examination and after an application for development consent has been accepted. | |
| Best and most versatile agricultural land | 5.115 | The applicant should take into account the economic and other benefits of best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, the applicant should seek to use areas of poorer quality land in preference to that of a higher quality. The applicant should also identify any effects, and seek to minimise impacts, on soil quality, taking into account any mitigation measures proposed. | 5.168 | Applicants should take into account the economic and other benefits of the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification). Where significant development of agricultural land is demonstrated to be necessary, applicants should seek to use areas of poorer quality land in preference to that of a higher quality. Applicants should also identify any effects, and seek to minimise impacts, on soil quality, taking into account any mitigation measures proposed. Where possible, developments should be on previously developed (brownfield) sites | 5.189 | Applicants should take into account the economic and other benefits of the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification). Where significant development of agricultural land is demonstrated to be necessary, applicants should seek to use areas of poorer quality land in preference to that of a higher quality. Applicants should also identify any effects, and seek to minimise impacts, on soil health and protect and improve soils, taking into account any mitigation measures proposed. | The 2015 NNNPS sets out that where possible, developments should be on brownfield sites. The 2024 NNNPS notes that applicants should improve soil quality. |

| | | | | | | | |
|---|-------|--|-------|---|-------|---|--|
| | | | | provided that it is not of high environmental value. For developments on previously developed land, applicants should ensure that they have considered the risk posed by land contamination and how it is proposed to address this. | | | |
| Best and most versatile agricultural land | 5.126 | The Secretary of State will take into account the economic and other benefits of the best and most versatile agricultural land, and ensure the applicant has put forward appropriate mitigation measures to minimise impacts on soils or soil resources. | 5.176 | The decision-maker should take into account the economic and other benefits of the best and most versatile agricultural land. The decisionmaker should give little weight to the loss of agricultural land in grades 3b, 4 and 5, except in areas (such as uplands) where particular agricultural practices may themselves contribute to the quality and character of the environment or the local economy. | 5.202 | The Secretary of State should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The Secretary of State should ensure that the applicant has put forward appropriate mitigation measures to minimise impacts on soils or soil resources. | The 2015 NNNPS sets out that little weight should be given to the loss of agricultural land in grades 3b, 4 and 5, except in areas where particular agricultural practices may themselves contribute to the quality and character of the environment or the local economy. |
| Green Belt development | 5.114 | The general policies controlling development in the countryside apply with equal force in Green Belts but there is, in addition, a general presumption against inappropriate development within them. Such development should not be approved except in very special circumstances which are already the subject of Government guidance. The applicant should therefore determine whether the proposal, or any part of it, is within an established Green Belt and, if so, whether its | 5.170 | The general policies controlling development in the countryside apply with equal force in Green Belts but there is, in addition, a general presumption against inappropriate development within them. Such development should not be approved except in very special circumstances. Applicants should therefore determine whether their proposal, or any part of it, is within an established Green Belt and, if so, whether their proposal may be considered inappropriate development within the meaning of Green | 5.187 | The general policies controlling development in the countryside apply with equal force in Green Belts but there is, in addition, a general presumption against inappropriate development within them. Such development should not be approved except in very special circumstances. Applicants should therefore determine whether their proposal, or any part of it, is within an established Green Belt and, if so, whether their proposal may be considered inappropriate development | N/A - No significant distinction derives from marginally different wording. |

| | | | | | | | |
|--------------------------------|-------|--|-------|---|-------|--|---|
| | | proposal may be considered inappropriate development within the meaning of Green Belt policy. Metropolitan Open Land and land designated a Local Green Space in a local or neighbourhood plan are subject to the same policies of protection as Green Belt, and inappropriate development should not be approved except in very special circumstances. | | Belt policy. Metropolitan Open Land, and land designated as Local Green Space in a local or neighbourhood plan, are subject to the same policies of protection as Green Belt, and inappropriate development should not be approved except in very special circumstances. | | within the meaning of Green Belt policy. Metropolitan Open Land, and land designated as Local Green Space in a local or neighbourhood plan, are subject to the same policies of protection as Green Belt, and inappropriate development should not be approved except in very special circumstances. | |
| Green Belt development | N/A | No relevant equivalent provision. | 5.171 | Linear infrastructure linking an area near a Green Belt with other locations will often have to pass through Green Belt land. The identification of a policy need for linear infrastructure will take account of the fact that there will be an impact on the Green Belt and as far as possible, of the need to contribute to the achievement of the objectives for the use of land in Green Belts. | 5.188 | Linear infrastructure linking an area near a Green Belt with other locations will often have to pass through Green Belt land. The identification of a policy need for linear infrastructure will take account of the fact that there will be an impact on the Green Belt and, as far as possible, of the need to contribute to the achievement of the objectives for the use of land in Green Belts. | N/A - No significant distinction derives from marginally different wording. |
| Safeguarding mineral resources | 5.117 | The applicant should safeguard any mineral resources on the proposed site for the preferred scheme as far as possible. | 5.169 | Applicants should safeguard any mineral resources on the proposed site as far as possible. | 5.191 | Applicants should safeguard any mineral resources on the proposed site as far as possible. Taking into account the policies of the Minerals Planning Authority, applicants should consider whether prior extraction of the minerals would be appropriate. | N/A - No significant distinction derives from marginally different wording. |
| Soil Resources and | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.190 | Applicants are encouraged to develop and implement a Soil Resources and Management Plan which could help to use | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |

| | | | | | | | |
|--|-------|---|-------|---|-------|--|--|
| Management Plan | | | | | | and manage soils sustainably and minimise adverse impacts on soil health and potential land contamination. This is to be in line with the ambition set out in the Environmental Improvement Plan for sustainable management of agricultural soils. | |
| Functionality and connectivity of the green infrastructure network | 5.119 | Where green infrastructure is affected, the applicant should aim to ensure the functionality and connectivity of the green infrastructure network is maintained and any necessary works are undertaken, where possible, to mitigate any adverse impact and, where appropriate, to improve that network and other areas of open space, including appropriate access to National Trails and other public rights of way. | 5.180 | Where green infrastructure is affected, applicants should aim to ensure the functionality and connectivity of the green infrastructure network is maintained and any necessary works are undertaken, where possible, to mitigate any adverse impact and, where appropriate, to improve that network and other areas of open space, including appropriate access to new coastal access routes, National Trails and other public rights of way. | 5.193 | Where green infrastructure is affected, applicants should aim to ensure the functionality and connectivity of the green infrastructure network is maintained and any necessary works are undertaken, where possible, to avoid or mitigate any adverse impact. Applicants should endeavour to improve networks green infrastructure and other areas of open space, including appropriate access to new coastal access routes, National Trails and other public rights of way. | No significant distinction derives from marginally different wording. |
| Contaminated land | 5.116 | For developments where land may be affected by contamination, or existing mitigation is in place in respect of historic contamination, the applicant should have regard to the statutory regime contained in Part IIA of the Environmental Protection Act 1990 and relevant Government guidance relating to or dealing with contaminated land. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |

| | | | | | | | |
|----------------------------------|-------|---|-------|---|-------|---|---|
| Conflict with development plan | N/A | No relevant equivalent provision. | 5.173 | Where the project conflicts with a proposal in a development plan, the Secretary of State should take account of the stage which the development plan document has reached in deciding what weight to give to the plan for the purposes of determining the planning significance of what is replaced, prevented or precluded. The closer the development plan document is to being adopted by the local plan, the greater the weight which can be attached to the impact of the proposal on the plan. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Design principles | 5.118 | The applicant can minimise the direct effects of a project on the existing use of the proposed site, or proposed uses near the site, by the application of good design principles, including the layout of the project and the protection of soils during construction. | 5.179 | Applicants can minimise the direct effects of a project on the existing use of the proposed site, or proposed uses near the site by the application of good design principles, including the layout of the project and the protection of soils during construction. | 5.192 | Applicants can avoid, or minimise, the direct effects of a project on the existing use of the proposed site or proposed uses near the site, by the application of good design principles, including the layout of the project and the protection of soils during construction. | No significant distinction derives from marginally different wording. |
| Networks of green infrastructure | 5.125 | Where networks of green infrastructure have been identified in development plans, they should normally be protected from development and, where possible, strengthened by or integrated within it. The Secretary of State will also have regard to the effect of the development upon and resulting from existing land contamination, as well as the mitigation proposed. | 5.175 | Where networks of green infrastructure have been identified in development plans, they should normally be protected from development, and, where possible, strengthened by or integrated within it. The value of linear infrastructure and its footprint in supporting biodiversity and ecosystems should also be taken into account when assessing the impact on green infrastructure. | 5.201 | Where networks of green infrastructure have been identified in development plans, they should be protected from development, and, where possible, strengthened. The environmental and visual value of linear infrastructure and its footprint in supporting biodiversity and ecosystems should also be taken into account, including the creation of new green infrastructure, when assessing the impact on | The 2024 NNNPS recognises that the value of the development in improving connectivity, particularly through active travel links and recreation should also be taken into account when assessing the impact on green infrastructure. |

| | | | | | | | |
|--|-------|---|-------|---|-------|--|---|
| | | | | | | green infrastructure. The value of the development in improving connectivity, particularly through active travel links and recreation should also be taken into account when assessing the impact on green infrastructure. | |
| Existing trees and woodlands and mitigation measures | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.195 | Existing trees and woodlands should be retained where possible. The applicant should assess the impacts on, and loss of, all trees and woodlands within the project boundary and avoid and mitigate for any direct and indirect effects and any risk of net deforestation as a result of the scheme (Irreplaceable Habitats require separate consideration 5.57-5.58). Mitigation may include the use of buffers to enhance resilience, improvements to connectivity, and improved woodland management. Where woodland loss is unavoidable, compensation schemes will be required, and the long-term management and maintenance of newly planted trees should be secured. Opportunities for tree planting and woodland creation should be maximised. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Safeguarding mineral resources. | 5.121 | Where the preferred scheme has an impact on a mineral safeguarding area, the Secretary of State must ensure that the applicant has put forward appropriate mitigation | 5.182 | Where a proposed development has an impact on a Mineral Safeguarding Area (MSA), the Secretary of State should ensure that the applicant has put forward appropriate mitigation | 5.196 | Where a proposed development has an impact on a Mineral Safeguarding Area, the Secretary of State should ensure that the applicant has put forward appropriate | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|--------------------------------|-------|---|-------|--|-------|--|---|
| | | measures to safeguard mineral resources. | | measures to safeguard mineral resources. | | mitigation measures to safeguard mineral resources. | |
| Sterilising effect on land use | 5.122 | Where a project has a sterilising effect on land use, there may be scope for this to be mitigated through, for example, using the land for nature conservation or wildlife corridors. | 5.183 | Where a project has a sterilising effect on land use there may be scope for this to be mitigated through, for example, using the land for nature conservation or wildlife corridors or for parking and storage in employment areas. | 5.197 | Where a project has a sterilising effect on land use there may be scope for this to be mitigated through, for example, using the land for nature conservation or wildlife corridors, or improving access and connectivity. Other examples include, prioritising active travel or well-designed optimised parking and storage in employment areas with appropriate landscaping. | The 2024 NNNPS sets out that where a project has a sterilising effect on land use, examples of mitigation that can be implemented also include improving access and connectivity and prioritising active travel or well-designed optimised parking and storage in employment areas. |
| Mitigation measures | 5.120 | The Secretary of State must also consider whether mitigation of any adverse effects on green infrastructure or open space is adequately provided for by means of requirements, planning obligations, or any other means, for example to provide exchange land and provide for appropriate management and maintenance agreements. Any exchange land should be at least as good in terms of size, usefulness, attractiveness, quality and accessibility. Alternatively, where sections 131 and 132 of the Planning Act 2008 apply, any replacement land provided under those sections will need to conform to the requirements of those sections. | 5.181 | The Secretary of State should also consider whether mitigation of any adverse effects on green infrastructure or open space is adequately provided for by means of any planning obligations, for example, to provide exchange land and provide for appropriate management and maintenance agreements. Any exchange land should be at least as good in terms of size, usefulness, attractiveness, quality and accessibility. Alternatively, where Sections 131 and 132 of the Planning Act 2008 apply, any replacement land provided under those sections will need to conform to the requirements of those sections. | 5.194 | The Secretary of State should also consider whether mitigation of any adverse effects on green infrastructure or open space is adequately provided for by means of any planning obligations, for example, to provide an exchange of land between two owners and provide for appropriate management and maintenance agreements. Any exchange land should be at least as good in terms of size, usefulness, attractiveness, quality and accessibility. Alternatively, where sections 131 and 132 of the Planning Act apply, any replacement land provided under those sections will need to conform to the requirements of those sections. | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|--|-------|---|-------|---|-------|---|--|
| Public rights of way, National Trails and other rights of access | 5.123 | Public rights of way, National Trails and other rights of access to land are important recreational facilities for walkers, cyclists and equestrians. The applicant is expected to take appropriate mitigation measures to address adverse effects on National Trails, other public rights of way and open access land and, where appropriate, to consider what opportunities there may be to improve access. In considering revisions to an existing right of way, consideration needs to be given to the use, character, attractiveness and convenience of the right of way. The Secretary of State should consider whether the mitigation measures put forward by an applicant are acceptable and whether requirements or other provisions in respect of these measures might be attached to any grant of development consent. | 5.184 | Public rights of way, National Trails, and other rights of access to land (e.g. open access land) are important recreational facilities for walkers, cyclists and equestrians. Applicants are expected to take appropriate mitigation measures to address adverse effects on coastal access, National Trails, other public rights of way and open access land and, where appropriate, to consider what opportunities there may be to improve access. In considering revisions to an existing right of way consideration needs to be given to the use, character, attractiveness and convenience of the right of way. The Secretary of State should consider whether the mitigation measures put forward by an applicant are acceptable and whether requirements in respect of these measures might be attached to any grant of development consent. | 5.198 | Public rights of way, National Trails, and other rights of access to land (for example, open access land) are important recreational facilities for pedestrians, wheelers, cyclists and equestrians. Applicants are expected to take appropriate mitigation measures to address adverse effects on coastal access, National Trails, public rights of way and open access land, and to consider what opportunities there may be to improve access and connectivity. In considering revisions to an existing right of way, consideration needs to be given to the use, character, attractiveness and convenience of the right of way. The Secretary of State should consider whether the mitigation measures put forward by an applicant are acceptable and whether requirements in respect of these measures might be attached to any grant of development consent | No significant distinction derives from marginally different wording. |
| Very Special Circumstances | 5.127 | When located in the Green Belt, projects may comprise inappropriate development. Inappropriate development is by definition harmful to the Green Belt and there is a presumption against it except in very special circumstances. The Secretary of State will need to assess whether there are very special circumstances to justify | 5.178 | When located in the Green Belt national networks infrastructure projects may comprise inappropriate development. Inappropriate development is by definition harmful to the Green Belt and there is a presumption against it except in very special circumstances. The Secretary of State will need to assess whether there are very special | 5.203 | Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any Development Consent Order, the Examining Authority and Secretary of State should ensure that substantial weight is given to any harm to the Green Belt. 'Very special | The ANPS states that the Secretary of State may require the provision of other land by the applicant, to be declared as Green Belt under the Green Belt (London and the Home Counties) Act 1938. |

| | | | | | | | |
|----------------------|-----|---|-------|---|-------|--|---|
| | | <p>inappropriate development. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. In view of the presumption against inappropriate development, the Secretary of State will attach substantial weight to the harm to the Green Belt, when considering any application for such development. In exchange for, or so as to ensure the re-provision of, lost Green Belt land, the Secretary of State may require the provision of other land by the applicant, to be declared as Green Belt under the Green Belt (London and the Home Counties) Act 1938. The provision of such land should be in accordance with the National Planning Policy Framework or any successor document, and take into account relevant development plan policies.</p> | | <p>circumstances to justify inappropriate development. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. In view of the presumption against inappropriate development, the Secretary of State will attach substantial weight to the harm to the Green Belt, when considering any application for such development.</p> | | <p>circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. When located in the Green Belt, elements of many national networks infrastructure projects may comprise inappropriate development. In such cases, scheme promoters will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the safety benefits associated with improvements to the relevant section of the national network.</p> | |
| Public rights of way | N/A | No relevant equivalent provision. | 5.185 | Public rights of way can be extinguished under Section 136 of the Act if the Secretary of State is satisfied that an alternative has been or will be provided or is not required. | 5.199 | Public rights of way can be extinguished under section 136 of the Planning Act if the Secretary of State is satisfied that an alternative has been or will be provided or is not required. | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|--|-------|---|------|---|-------|--|---|
| Public rights of way | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.198 | Public rights of way, National Trails, and other rights of access to land (for example, open access land) are important recreational facilities for pedestrians, wheelers, cyclists and equestrians. Applicants are expected to take appropriate mitigation measures to address adverse effects on coastal access, National Trails, public rights of way and open access land, and to consider what opportunities there may be to improve access and connectivity. In considering revisions to an existing right of way, consideration needs to be given to the use, character, attractiveness and convenience of the right of way. The Secretary of State should consider whether the mitigation measures put forward by an applicant are acceptable and whether requirements in respect of these measures might be attached to any grant of development consent. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Resource and waste management | | | | | | | |
| Government policy on hazardous and non-hazardous waste | 5.135 | Government policy on hazardous and non-hazardous waste is intended to protect human health and the environment by producing less waste and by using it as a resource wherever possible. Where this is not possible, waste management regulation | 5.39 | Government policy on hazardous and non-hazardous waste is intended to protect human health and the environment by producing less waste and by using it as a resource wherever possible. Where this is not possible, waste management regulation | 5.70 | Government policy on resource and waste management is to protect human health and the environment by reducing waste safely and carefully in accordance with the principles set out in the waste hierarchy, and to maximise resource use | The 2024 NNNPS sets out requirements to reduce waste in accordance with the principles set out in the waste hierarchy and to move towards a circular economy. |

| | | | | | | | |
|------------------------------|-------|---|------|--|------|--|--|
| | | ensures that waste is disposed of in a way that is least damaging to the environment and to human health. | | ensures that waste is disposed of in a way that is least damaging to the environment and to human health. | | by moving towards a more circular economy. | |
| Sustainable waste management | 5.136 | Sustainable waste management is implemented through the waste hierarchy: <ul style="list-style-type: none"> • Waste prevention; • Preparing for reuse; • Recycling; • Other recovery, including energy recovery; and • Disposal. | 5.40 | Sustainable waste management is implemented through the “waste hierarchy”: <ul style="list-style-type: none"> • prevention; • preparing for reuse; • recycling; • other recovery, including energy recovery; and • disposal | 5.73 | Sustainable waste management is implemented through the waste hierarchy: <ul style="list-style-type: none"> • prevention • preparing for reuse • recycling • other recovery, including energy recovery • disposal | No significant distinction derives from marginally different wording. |
| Waste targets | 5.137 | The targets for preparation for re-use and recycling of municipal waste (50%), and for construction and demolition waste (70%) set out by the Waste Framework Directive (2008/98/EC) should be considered ‘minimum acceptable practice’ for the construction and operation of any new airport infrastructure. Exceeding these targets if possible by aiming for exemplar performance in resource efficiency and waste management is recommended, to align with the principles of the EU Action Plan for the Circular Economy. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |
| Managing waste produced | 5.141 | The applicant should set out the arrangements that are proposed for managing any | 5.42 | The applicant should set out the arrangements that are proposed for managing any waste | N/A | No relevant equivalent provision. | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|---------------------------------|-----|---|-----|---|------|--|--|
| | | waste produced in the application for development consent. The arrangements described should include information on the proposed waste recovery and disposal system for all waste generated by the development. The applicant should seek to minimise the volume of waste sent for disposal unless it can be demonstrated that the alternative is the best overall environmental, social and economic outcome when considered over the whole lifetime of the project. | | produced. The arrangements described should include information on the proposed waste recovery and disposal system for all waste generated by the development. The applicant should seek to minimise the volume of waste produced and the volume of waste sent for disposal unless it can be demonstrated that the alternative is the best overall environmental outcome. | | | |
| Adhering to the waste hierarchy | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.71 | The applicant should demonstrate that they will adhere to the waste hierarchy, preventing and reducing waste produced in the first place and maximising preparation for reuse and recycling for waste that cannot be prevented. Where possible, applicants are encouraged to use existing materials first, then low carbon materials, sustainable sources, and local suppliers. - Applicants should consider and take into account emerging government policy, including Maximising Resources, Minimising Waste, constituting the new Waste Prevention Programme for England and Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, which | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |

| | | | | | | | |
|---|-------|---|------|--|------|---|--|
| | | | | | | provides practical guidance on how to improve appropriate soil reuse on construction sites and reducing the volume that is sent to landfill. | |
| Generation of waste during construction and operation | 5.138 | Large airport infrastructure projects may generate hazardous and non-hazardous waste during construction and operation. The Environment Agency's environmental permitting regime incorporates operational waste management controls for certain activities. When the applicant applies to the Environment Agency for an environmental permit, the Environment Agency will require the application to demonstrate that processes are in place to meet all relevant conditions. | 5.41 | Large infrastructure projects may generate hazardous and nonhazardous waste during the construction and operation. The Environment Agency's environmental permitting regime incorporates operational waste management requirements for certain activities. When an applicant applies to the Environment Agency for an environmental permit, the Agency will require the application to demonstrate that processes are in place to meet all relevant permit requirements. | 5.74 | Large infrastructure projects may generate a range of hazardous and nonhazardous wastes during construction and operation. Projects need to comply with the relevant regulatory waste regimes. The Environmental Permitting regime, regulated by the Environment Agency in England, incorporates operational waste management requirements for certain activities. Applicants should therefore give consideration to how waste regulations apply to their development, including the Environmental Permitting requirements. | No significant distinction derives from marginally different wording. |
| Landfill waste | 5.140 | Waste generated and sent to landfill during construction and operation will be an ongoing management issue, and will continue to have adverse effects on the environment into and beyond the operational phase. The principal adverse effects of sending waste to landfill include: <ul style="list-style-type: none"> • Permanent loss of materials from potential use higher up | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |

| | | | | | | | |
|---------------------------------------|-------|---|-----|-----------------------------------|------|---|--|
| | | <p>the waste management hierarchy;</p> <ul style="list-style-type: none"> • Reduction of local and regional landfill capacity; • Visual, noise, health and other nuisance impacts on local communities; • Environmental degradation and pollution; • Greenhouse gas emissions; and • Environmental implications of transporting waste to landfill sites. | | | | | |
| Circular approach to waste management | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.71 | A circular approach to waste management is encouraged from the offset, for example, green and sustainable procurement exercises or using sustainably sourced materials from local suppliers. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Modern methods of construction | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.75 | Infrastructure projects should look to use Modern Methods of Construction, such as legal and sustainable timber and low carbon concrete and other sustainable design practices, where possible. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Mitigation measures | 5.143 | The applicant should set out a comprehensive suite of mitigations to eliminate or significantly reduce the risk of adverse impacts associated | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |

| | | | | | | | |
|---|-------|---|------|---|------|---|--|
| | | with resource and waste management. | | | | | |
| Effective management of hazardous and non-hazardous waste | 5.145 | <p>The Secretary of State will consider the extent to which the applicant has proposed an effective process that will be followed to ensure effective management of hazardous and non-hazardous waste arising from all stages of the lifetime of the development. The Secretary of State should be satisfied that the process set out provides assurance that:</p> <ul style="list-style-type: none"> Waste produced will be properly managed, both onsite and offsite; The waste from the proposed development can be dealt with appropriately by the waste infrastructure which is, or is likely to be, available. Such waste arising should not have an adverse effect on the capacity of existing waste management facilities to deal with other waste arising in the area; and Adequate steps have been taken to ensure that all waste arising from the site is subject to the principles of the waste hierarchy and are dealt with at the highest possible level within the hierarchy. | 5.43 | <p>The Secretary of State should consider the extent to which the applicant has proposed an effective process that will be followed to ensure effective management of hazardous and non-hazardous waste arising from the construction and operation of the proposed development. The Secretary of State should be satisfied that the process sets out:</p> <ul style="list-style-type: none"> any such waste will be properly managed, both on-site and off-site; the waste from the proposed facility can be dealt with appropriately by the waste infrastructure which is, or is likely to be, available. Such waste arisings should not have an adverse effect on the capacity of existing waste management facilities to deal with other waste arisings in the area; and adequate steps have been taken to minimise the volume of waste arisings, and of the volume of waste arisings sent to disposal, except where an alternative is the most sustainable outcome overall. | 5.76 | <p>The Secretary of State should consider the extent to which the applicant has proposed an effective process that will be followed to ensure safe and effective management of waste arising from the construction and operation of the proposed development. It is advised that this is detailed in the dedicated plans summarising the sustainable use of resources and waste for both construction and operation as part of the application documentation. The Secretary of State should be satisfied that the process sets out:</p> <ul style="list-style-type: none"> adequate steps have been taken to minimise the volume of waste arising and maximise opportunities for reuse and recycling. how waste will be managed, both on-site and off-site. that consideration has been given to available waste management infrastructure capacity to manage wastes arising from the development. | <p>The ANPS emphasises the need to comply with the principles of the waste hierarchy.</p> <p>The 2024 NNNPS advises applicants to submit dedicated plans summarising the sustainable use of resources and waste for both construction and operation.</p> |

| | | | | | | | |
|--|-------|---|------|--|-------|---|--|
| Resource management plan | 5.146 | Where necessary, the Secretary of State will require the applicant to develop a resource management plan to ensure that appropriate measures for sustainable resource and waste management are secured | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |
| Planning obligations | N/A | No relevant equivalent provision. | 5.44 | Where necessary, the Secretary of State should use requirements or planning obligations to ensure that appropriate measures for waste management are applied. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the ANPS and 2024 NNNPS. |
| Environment Agency's environmental permitting regime | N/A | No relevant equivalent provision. | 5.45 | Where the project will be subject to the Environment Agency's environmental permitting regime, waste management arrangements during operations will be covered by the permit and the considerations set out in paragraphs 4.48 to 4.56 will apply. | 5.77 | Where the project will be subject to the Environmental Permitting regime, waste management arrangements during operations will be covered by the permit and the considerations set out in paragraphs 4.44 to 4.51 will apply. | No significant distinction derives from marginally different wording. |
| Sustainable materials | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.78 | Where possible, projects should include the reuse of materials and use of sustainable materials and recycled materials. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Dust, odour, artificial light, smoke, steam | | | | | | | |
| Dust, odour, artificial light, smoke and steam impacts | 5.230 | The construction and operation of airports infrastructure has the potential to create a range of emissions such as dust, odour, artificial light, smoke and steam. All have the potential to have a detrimental impact on amenity or cause a common law nuisance or statutory nuisance under Part | 5.81 | As well as noise and vibration (paragraphs 5.186 to 5.200) the construction and operation of national networks infrastructure has the potential to create a range of emissions such as odour, dust, steam, smoke and artificial light. All have the potential to have a detrimental impact on amenity or cause a | 5.117 | As well as noise and vibration (paragraph numbers 5.227 to 5.242) the construction and operation of national networks infrastructure has the potential to create a range of emissions such as odour, dust, steam, smoke and artificial light. All | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|--|-------|---|------|---|-------|--|---|
| | | III, Environmental Protection Act 1990. These may also be covered by pollution control or other environmental consenting regimes. | | common law nuisance or statutory nuisance under Part III, Environmental Protection Act 1990. Note that pollution impacts from some of these emissions (e.g. dust, smoke) are covered in the section on air emissions and that these and others (e.g. odour) may also be covered by pollution control or other environmental consenting regimes so that paragraphs 4.48 to 4.56 and 5.3 to 5.15 will apply. | | have the potential to have a detrimental impact on amenity or cause a common law nuisance or statutory nuisance under Part III, Environmental Protection Act 1990. Note that pollution impacts from some of these emissions (e.g., dust, smoke) are covered in the section on air emissions and that these and others (e.g., odour) may also be covered by pollution control or other environmental consenting regimes so that paragraphs 5.7 to 5.25 and 4.45 to 4.52 will apply. | |
| Dust, odour, artificial light, smoke and steam impacts | 5.231 | Because of the potential effects of these emissions and in view of the availability of the defence of statutory authority against nuisance claims described previously, it is important that the potential for these impacts is considered by the applicant in its application, by the Examining Authority in examining applications, and by the Secretary of State in taking decisions on development consent. | 5.82 | Because of the potential effects of these emissions and in view of the availability of the defence of statutory authority against nuisance claims described previously, it is important that the potential for these impacts is considered by the applicant in their application, by the Examining Authority in examining applications and by the Secretary of State in taking decisions on development consents. | 5.118 | As a result of the potential effects of these emissions and in view of the availability of the defence of statutory authority against nuisance claims described previously, it is important that the potential for these impacts is considered by the applicant in their application, by the Examining Authority in examining applications and by the Secretary of State in taking decisions on development consents | No significant distinction derives from marginally different wording. |
| Dust, odour, artificial light, smoke and steam impacts | 5.232 | For nationally significant infrastructure projects of the type covered by the Airports NPS, some impact on amenity for local communities is likely to be unavoidable. Impacts should be kept to a minimum and should be at a level that is acceptable. | 5.83 | For nationally significant infrastructure projects of the type covered by this NPS, some impact on amenity for local communities is likely to be unavoidable. Impacts should be kept to a minimum and should be at a level that is acceptable. | 5.119 | For NSIPs of the type covered by this NPS, some impact on amenity for local communities is likely to be unavoidable. Impacts should be kept to a | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|-------------------|-------|---|------|---|-------|---|---|
| | | | | | | minimum and should be at a level that is acceptable. | |
| Assessing impacts | 5.233 | Where the development is subject to an Environmental Impact Assessment, the applicant should assess any likely significant effects on amenity from emissions of dust, odour, artificial light, smoke and steam, and describe these in the environmental statement. | 5.84 | Where the development is subject to an Environmental Impact Assessment, the applicant should assess any likely significant effects on amenity from emissions of odour, dust, steam, smoke and artificial light and describe these in the Environmental Statement. | 5.120 | The applicant should assess the potential for emissions of odour, dust, steam, smoke and artificial light to have a detrimental impact on amenity. | No significant distinction derives from marginally different wording. |
| Assessing impacts | 5.234 | In particular, the assessment provided by the applicant should describe: <ul style="list-style-type: none"> • The type and quantity of emissions; • Aspects of the development which may give rise to emissions during construction, operation and decommissioning; • Premises or locations that may be affected by the emissions; • Effects of the emission on identified premises or locations; and • Measures to be employed in preventing or mitigating the emissions. | 5.85 | In particular, the assessment provided by the applicant should describe: <ul style="list-style-type: none"> • the type and quantity of emissions; • aspects of the development which may give rise to emissions during construction, operation and decommissioning; • premises or locations that may be affected by the emissions; • effects of the emission on identified premises or locations; and • measures to be employed in preventing or mitigating the emissions. | 5.121 | In particular, the assessment provided by the applicant should describe: <ul style="list-style-type: none"> • the type and quantity of emissions. • aspects of the development which may give rise to emissions during construction, operation and decommissioning. • premises, locations or species that may be affected by the emission. • effects of the emission on identified premises or locations. • measures to be employed in preventing or mitigating the emissions. | No significant distinction derives from marginally different wording. |
| Assessing impacts | 5.235 | The applicant is advised to consult the relevant local planning authority and, where appropriate, the Environment Agency, about the scope and methodology of the assessment. | 5.86 | The applicant is advised to consult the relevant local planning authority and, where appropriate, the Environment Agency about the scope and methodology of the assessment. | 5.122 | The applicant is advised to consult the relevant local environmental health team and, where appropriate, the Environment Agency about the | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|------------------------------|-------|--|------|---|-------|---|---|
| | | | | | | scope and methodology of the assessment. | |
| Mitigation measures | 5.236 | The Secretary of State should ensure the applicant has provided sufficient information to show that any necessary mitigation will be put into place. In particular, the Secretary of State should consider whether to require the applicant to abide by a scheme of management and mitigation concerning emissions of dust, odour, artificial light, smoke and steam from the development to reduce any loss to amenity which might arise during the construction and operation of the development. A construction management plan may help clarify and secure mitigation. | 5.89 | The Secretary of State should ensure the applicant has provided sufficient information to show that any necessary mitigation will be put into place. In particular, the Secretary of State should consider whether to require the applicant to abide by a scheme of management and mitigation concerning emissions of odour, dust, steam, smoke, artificial light from the development to reduce any loss to amenity which might arise during the construction and operation of the development. A construction management plan may help codify mitigation. | 5.123 | The Secretary of State should ensure the applicant has provided sufficient information to show that any necessary mitigation will be put into place. In particular, the Secretary of State should consider whether to require the applicant to abide by a scheme of management and mitigation concerning emissions of odour, dust, steam, smoke, and artificial light from the development to reduce any loss to amenity which might arise during the construction and operation of the development. This should be detailed within a Statement Relating to Statutory Nuisance. | The ANPS and 2015 NNNPS recommend that a construction management plan is submitted. The 2024 NNNPS specifies that mitigation should be detailed within a Statement Relating to Statutory Nuisance. |
| Mitigation measures | 5.237 | The Secretary of State should be satisfied that all reasonable steps have been taken, and will be taken, to minimise any detrimental impact on amenity from emissions of dust, odour, artificial light, smoke and steam. This includes the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation. | 5.87 | The Secretary of State should be satisfied that all reasonable steps have been taken, and will be taken, to minimise any detrimental impact on amenity from emissions of odour, dust, steam, smoke and artificial light. This includes the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation. | 5.124 | The Secretary of State should be satisfied that all reasonable steps have been taken, and will be taken, to minimise any detrimental impact on amenity from emissions of odour, dust, steam, smoke and artificial light. This includes the impact of light pollution from artificial light on local amenity, landscapes and protected species and habitats, using directed light when necessary. | No significant distinction derives from marginally different wording. |
| Granting development consent | 5.238 | If development consent is granted for a project, the Secretary of State should consider whether there is a justification for all of the | 5.88 | If development consent is granted for a project, the Secretary of State should consider whether there is a justification for all of the | 5.125 | If development consent is granted for a project, the Secretary of State should consider whether there is a | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|---|-------|---|------|--|-------|---|---|
| | | authorised project (including any associated development) being covered by a defence of statutory authority against nuisance claims. If the Secretary of State cannot conclude that this is justified, then the defence should be disapplied, in whole or in part, through a provision in the development consent order | | authorised project (including any associated development) being covered by a defence of statutory authority against nuisance claims. If the Secretary of State cannot conclude that this is justified, then the defence should be disapplied, in whole or in part, through a provision in the Development Consent Order. | | justification for all of the authorised project (including any associated development) being covered by a defence of statutory authority against nuisance claims. If the Secretary of State cannot conclude that this is justified, then the defence should be disapplied, in whole or in part, through a provision in the Development Consent Order. | |
| Flood Risk | | | | | | | |
| Consent for development in Flood Risk Zones | 5.148 | The National Planning Policy Framework sets out that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. But where development is necessary, it should be made safe without increasing flood risk elsewhere. Supporting guidance explains that essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk is permissible in areas of high flood risk, subject to the Exception Test. In addition, as set out in the National Planning Policy Framework, new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. | 5.91 | The National Planning Policy Framework (paragraphs 100 to 104) makes clear that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. But where development is necessary, it should be made safe without increasing flood risk elsewhere. The guidance supporting the National Planning Policy Framework explains that essential transport infrastructure (including mass evacuation routes), which has to cross the area at risk, is permissible in areas of high flood risk, subject to the requirements of the Exception Test. | 5.126 | The National Planning Policy Framework is clear that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary, it should be made safe without increasing flood risk elsewhere. | No significant distinction derives from marginally different wording. The ANPS and 2015 NNNPS include additional information on guidance on essential transport infrastructure and that it is permissible in areas of high flood risk, subject to the requirements of the Exception Test. |

| | | | | | | | |
|-----------------|-----|-----------------------------------|-------|--|-------|---|---|
| Sequential Test | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.127 | The Sequential Test ensures that a sequential, risk-based approach is followed to steer new development to areas with the lowest risk of flooding from any source. All projects should apply the sequential approach to locating development within the site. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Exception Test | N/A | No relevant equivalent provision. | 5.107 | The Exception Test is only appropriate for use where the Sequential Test alone cannot deliver an acceptable site, taking into account the need for national networks infrastructure to remain operational during floods. | 5.128 | <p>The Exception test provides a method of allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available. It assesses the safety of a site, including whether the proposed development will be safe from flooding for its lifetime. The Exception Test should only be applied if, once the Sequential Test has been satisfactorily applied, it has not proved possible for the development to be located in areas with a lower risk of flooding. For the Exception Test to be passed:</p> <ul style="list-style-type: none"> • it must be demonstrated that the project provides wider sustainability benefits to the community that outweigh flood risk. • a Flood Risk Assessment must demonstrate that the project will be safe for its lifetime, without increasing flood risk elsewhere and, | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|--------------------------|-------|--|-------|--|-----------------------|--|---|
| | | | | | | where possible, will reduce flood risk overall. | |
| Exception Test | N/A | No relevant equivalent provision. | 5.108 | Both elements of the test will have to be passed for development to be consented. For the Exception Test to be passed: <ul style="list-style-type: none"> it must be demonstrated that the project provides wider sustainability benefits to the community that outweigh flood risk; and a FRA must demonstrate that the project will be safe for its lifetime, without increasing flood risk elsewhere and, where possible, will reduce flood risk overall. | Refer to policy 5.128 | Refer to policy 5.128 | No significant distinction derives from marginally different wording. |
| Essential Infrastructure | N/A | No relevant equivalent provision. | 5.109 | In addition, any project that is classified as 'essential infrastructure' and proposed to be located in Flood Zone 3a or b should be designed and constructed to remain operational and safe for users in times of flood; and any project in Zone 3b should result in no net loss of floodplain storage and not impede water flows. | 5.129 | The guidance to the National Planning Policy Framework explains that essential transport infrastructure (including mass evacuation routes), which has to cross the area at risk, has a vulnerability classification of 'Essential Infrastructure'. Table 2 of planning practice guidance sets out that Essential Infrastructure is potentially permissible in areas of high flood risk, subject to the requirements of the Exception Test. | The 2015 NNNPS includes more detailed information on essential infrastructure and where it is permissible. |
| FRA | 5.152 | Applications for projects in the following locations should be | 5.92 | Applications for projects in the following locations should be | 5.131 | Applications for projects in the following locations should be | The 2024 NNNPS includes more detail for applications in Flood Zone 1, such as 'land identified in a strategic flood |

| | | | | | | | |
|---------------------|-------|---|------|--|-------|--|--|
| | | <p>accompanied by a flood risk assessment:</p> <ul style="list-style-type: none"> Flood Zones 2 and 3 (medium and high probability of river and sea flooding); Flood Zone 1 (low probability of river and sea flooding) for projects of 1 hectare or greater, or projects which may be subject to other sources of flooding (local watercourses, surface water, groundwater or reservoirs), or where the Environment Agency has notified the local planning authority that there are critical drainage problems | | <p>accompanied by a flood risk assessment (FRA):</p> <ul style="list-style-type: none"> Flood Zones 2 and 3, medium and high probability of river and sea flooding; Flood Zone 1 (low probability of river and sea flooding) for projects of 1 hectare or greater, projects which may be subject to other sources of flooding (local watercourses, surface water, groundwater or reservoirs), or where the Environment Agency has notified the local planning authority that there are critical drainage problems. | | <p>accompanied by a Flood Risk Assessment:</p> <ul style="list-style-type: none"> applications in flood Zones 2 and 3, which represent a medium and high probability of river and sea flooding applications in flood Zone 1 (a low probability of river and sea flooding) involving sites of 1 hectare or more; land which has been identified by the Environment Agency as having critical drainage problems; land identified in a strategic flood risk assessment as being at increased flood risk in future; or land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use. | <p>risk assessment as being at increased flood risk in future; or land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use’.</p> |
| Identify Flood Risk | 5.153 | The applicant should identify and assess the risks of all forms of flooding to and from the preferred scheme, and demonstrate how these flood risks will be managed, taking climate change into account | 5.93 | This should identify and assess the risks of all forms of flooding to and from the project and demonstrate how these flood risks will be managed, taking climate change into account. | 5.132 | The Flood Risk Assessment should identify and assess the risks of all forms of flooding and coastal erosion to and from the project and demonstrate how these flood risks will be managed, taking climate change into account. | The 2024 NNNPS includes identifying and assessing the risk of coastal erosion. |
| Preparing FRA | 5.154 | In preparing a flood risk assessment the applicant should: <ul style="list-style-type: none"> Consider the risk of all forms of flooding arising from the | 5.94 | In preparing an FRA the applicant should: <ul style="list-style-type: none"> consider the risk of all forms of flooding arising from the project (including in adjacent | 5.133 | In preparing a Flood Risk Assessment the applicant should: <ul style="list-style-type: none"> consider the risk of all sources of flooding arising | The 2024 NNNPS includes demonstrating ‘how residual risks from reservoirs will be safely managed and/or mitigated’. It also alters the wording from ‘evidence’ to ‘provide the rationale’ on the application of the Sequential |

| | | | | | | | |
|--|--|---|--|---|--|---|---|
| | | <p>development comprised in the preferred scheme, in addition to the risk of flooding to the project, and demonstrate how these risks will be managed and, where relevant, mitigated, so that the development remains safe throughout its lifetime;</p> <ul style="list-style-type: none"> • Take into account the impacts of climate change, clearly stating the development lifetime over which the assessment has been made; • Consider the need for safe access and exit arrangements; • Include the assessment of residual risk after risk reduction measures have been taken into account, and demonstrate that this is acceptable for the development; • Consider if there is a need to remain operational during a worst case flood event over the preferred scheme's lifetime; and • Provide evidence for the Secretary of State to apply the Sequential Test and Exception Test, as appropriate. | | <p>parts of the United Kingdom), in addition to the risk of flooding to the project, and demonstrate how these risks will be managed and, where relevant, mitigated, so that the development remains safe throughout its lifetime;</p> <ul style="list-style-type: none"> • take the impacts of climate change into account, clearly stating the development lifetime over which the assessment has been made; • consider the vulnerability of those using the infrastructure including arrangements for safe access and exit; • include the assessment of the remaining (known as 'residual') risk after risk reduction measures have been taken into account and demonstrate that this is acceptable for the particular project; • consider if there is a need to remain operational during a worst case flood event over the development's lifetime; • provide the evidence for the Secretary of State to apply the Sequential Test and Exception Test, as appropriate. | | <p>from the project (including in adjacent parts of the United Kingdom), in addition to the risk of flooding to the project, and demonstrate how these risks will be managed and, where relevant, mitigated, so that the development remains safe throughout its lifetimes.</p> <ul style="list-style-type: none"> • take the impacts of climate change into account, clearly stating the development lifetime over which the assessment has been made. • demonstrate how residual risks from reservoirs will be safely managed and/ or mitigated. • consider the vulnerability of those using the infrastructure including arrangements for safe access and escape. • include the assessment of the remaining (known as 'residual') risk after risk reduction measures have been taken into account and demonstrate that these risks can be safely managed. • consider if there is a need to remain operational during a worst-case flood event over the development's lifetime. • provide the rationale for the Secretary of State on the | <p>Test and Exception Test, as appropriate.</p> |
|--|--|---|--|---|--|---|---|

| | | | | | | | |
|-----------------------------|-------|--|------|---|-------|---|---|
| | | | | | | application of the Sequential Test and Exception Test, as appropriate. | |
| Pre-Application Discussions | 5.155 | Where the preferred scheme may be affected by, or may add to, flood risk, the applicant is advised to seek early pre-application discussions with the Environment Agency, and, where relevant, other flood risk management bodies such as lead local flood authorities, Internal Drainage Boards, sewerage undertakers, highways authorities and reservoir owners and operators. These discussions can be used to identify the likelihood and possible extent and nature of the flood risk, help scope the flood risk assessment, and identify the information that may be required by the Secretary of State to reach a decision on the application. If the Environment Agency has concerns about proposals on flood risk grounds, the applicant is encouraged to discuss these concerns at a sufficiently early stage with the Environment Agency and explore ways in which the proposal might be amended, or additional information provided, which would satisfy the Environment Agency's concerns, before the application for development consent is submitted. | 5.96 | Applicants for projects which may be affected by, or may add to, flood risk are advised to seek sufficiently early pre-application discussions with the Environment Agency, and, where relevant, other flood risk management bodies such as lead local flood authorities, Internal Drainage Boards, sewerage undertakers, highways authorities and reservoir owners and operators. Such discussions can be used to identify the likelihood and possible extent and nature of the flood risk, to help scope the FRA, and identify the information that will be required by the Secretary of State to reach a decision on the application once it has been submitted and examined. If the Environment Agency has concerns about the proposal on flood risk grounds, the applicant is encouraged to discuss these concerns with the Environment Agency and look to agree ways in which the proposal might be amended, or additional information provided, which would satisfy the Environment Agency's concerns, preferably before the application for | 5.134 | Applicants for projects which may be affected by, or may add to, flood risk should seek sufficiently early pre-application discussions, before the official preapplication stage of the NSIP process with the Environment Agency, and, where relevant, other flood risk management bodies such as lead local flood authorities, Internal Drainage Boards, sewerage undertakers, and highways authorities. Such discussions can be used to identify the likelihood and possible extent and nature of the flood risk, to help scope the Flood Risk Assessment, and identify the information that will be required by the Secretary of State to reach a decision on the application once it has been submitted and examined. If the Environment Agency has concerns about the proposal on flood risk grounds, the applicant should discuss these concerns with the Environment Agency and look to agree ways in which the proposal might be amended, or additional information provided, which would satisfy the Environment Agency's concerns, before the | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|------------------------------|-------|--|------|---|-------|--|--|
| | | | | development consent is submitted. | | application for development consent is submitted. | |
| Flood Risk Assessment | 5.156 | For local flood risk (surface water, groundwater and ordinary watercourse flooding), local flood risk management strategies and surface water management plans provide useful sources of information for consideration in a flood risk assessment. Surface water flood issues need to be understood to allow them to be taken into account, for example by clearly identifying and managing flow routes. | 5.97 | For local flood risk (surface water, groundwater and ordinary watercourse flooding), local flood risk management strategies and surface water management plans provide useful sources of information for consideration in Flood Risk Assessments. Surface water flood issues need to be understood and then account of these issues can be taken, for example flow routes should be clearly identified and managed. | 5.135 | For local flood risk (surface water, groundwater and ordinary watercourse flooding), local flood risk management strategies and surface water management plans provide useful sources of information for consideration in Flood Risk Assessments. Surface water flood issues need to be understood and then account of these issues can be taken, for example, flow routes should be clearly identified and managed. | No significant distinction derives from marginally different wording. |
| Prioritising the Use of SuDS | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.136 | Proposals should prioritise the use of Sustainable Drainage Systems unless there is clear evidence that this would be inappropriate. A drainage strategy should also be produced and submitted as part of the Flood Risk Assessment. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Climate Change | 5.157 | When assessing the potential impacts of climate change on airports which can be wider than flooding impacts, such as implications from heat and water availability and the potential adaptation strategies for them, the applicant should take into account the latest UK Climate Change Risk Assessment, the latest set of UK Climate Projections, and | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |

| | | | | | | | |
|------------------------------|-------|---|-------|--|-------|--|---|
| | | other relevant sources of climate change evidence. | | | | | |
| Scheme Design | 5.158 | The applicant should ensure that the preferred scheme design takes into account flood risk, and should put forward measures to mitigate the impact of flooding. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A – no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |
| Mitigation Measures | 5.159 | Mitigation measures will need to be developed as part of the applicant’s application for development consent to ensure that it is safe from flooding, and will not increase flood risk elsewhere for the proposed development’s lifetime, taking into account climate change. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |
| Planning Obligations | 5.160 | To satisfactorily manage flood risk and the impact of the natural water cycle on people, property and ecosystems, good design and infrastructure may need to be secured using requirements or planning obligations. This may include the use of sustainable drainage systems but could also include vegetation to help to slow runoff, hold back peak flows, and make landscapes more able to absorb the impact of severe weather events. | 5.110 | To satisfactorily manage flood risk and the impact of the natural water cycle on people, property and ecosystems, good design and infrastructure may need to be secured using requirements or planning obligations. This may include the use of sustainable drainage systems but could also include vegetation to help to slow runoff, hold back peak flows and make landscapes more able to absorb the impact of severe weather events. | 5.138 | To satisfactorily manage flood risk and the impact of the natural water cycle on people, property and ecosystems, good design and infrastructure may need to be secured using requirements or planning obligations. This may include the use of Sustainable Drainage Systems but could also include vegetation to help to slow runoff, hold back peak flows and make landscapes more able to absorb the impact of severe weather events. | No significant distinction derives from marginally different wording. |
| Sustainable Drainage Systems | 5.161 | In the Airports NPS, the term sustainable drainage systems is used and taken to cover the whole range of sustainable approaches to surface water | 5.111 | In this document the term Sustainable Drainage Systems (SuDS) is frequently used and taken to cover the whole range of sustainable approaches to | 5.137 | The term Sustainable Drainage Systems is taken to cover the whole range of sustainable approaches to surface water | The 2024 NNNPS includes the use of Sustainable Drainage Systems Management Trains to improve water quality. |

| | | | | |
|--|---|--|---|--|
| | <p>drainage management including:</p> <ul style="list-style-type: none"> • Source control measures including rainwater recycling and drainage; • Infiltration devices to allow water to soak into the ground, that can include individual soakaways and communal facilities; • Filter strips and swales, which are vegetated features that hold and drain water downhill mimicking natural drainage patterns; • Filter drains and porous pavements to allow rainwater and runoff to infiltrate into permeable material below ground and provide storage if needed; • Basins and ponds to hold excess water after rain and allow controlled discharge that avoids flooding; and • Flood routes to carry and direct excess water through developments to minimise the impact of severe rainfall flooding. | <p>surface water drainage management including:</p> <ul style="list-style-type: none"> • source control measures including rainwater recycling and drainage; • infiltration devices to allow water to soak into the ground, that can include individual soakaways and communal facilities; • filter strips and swales, which are vegetated features that hold and drain water downhill mimicking natural drainage patterns; • filter drains and porous pavements to allow rainwater and run-off to infiltrate into permeable material below ground and provide storage if needed; • basins and ponds to hold excess water after rain and allow controlled discharge that avoids flooding; and • flood routes to carry and direct excess water through developments to minimise the impact of severe rainfall flooding. | <p>drainage management including:</p> <ul style="list-style-type: none"> • source control measures including rainwater recycling and drainage. • use of Sustainable Drainage Systems Management Trains to improve water quality. • infiltration devices to allow water to soak into the ground, that can include individual soakaways and communal facilities. • filter strips and swales, which are vegetated features that hold and drain water downhill mimicking natural drainage patterns. • filter drains and porous pavements to allow rainwater and run-off to infiltrate into permeable material below ground and provide storage if needed. • basins and ponds to hold excess water after rain and allow controlled discharge that avoids flooding flood routes to carry and direct excess water through developments to minimise the impact of severe rainfall flooding. | |
|--|---|--|---|--|

| | | | | | | | |
|--|-------|--|-------|--|-------|--|--|
| Site Layout | 5.162 | Site layout and surface water drainage systems should be able to cope with events that exceed the design capacity of the system, so that excess water can be safely stored on or conveyed from the site without adverse impacts | 5.112 | Site layout and surface water drainage systems should cope with events that exceed the design capacity of the system, so that excess water can be safely stored on or conveyed from the site without adverse impacts. | 5.139 | Site layout and surface water drainage systems should cope with events that exceed the design capacity of the system, so that excess water can be safely stored on or conveyed from the site without adverse impacts. | No distinction derives from marginally different wording. |
| Rates of Flow | 5.163 | The surface water drainage arrangements for any project should be such that the volumes and peak flow rates of surface water leaving the site are no greater than the rates prior to the proposed project, taking into account climate change, unless specific off-site arrangements are made and result in the same net effect. | 5.113 | The surface water drainage arrangements for any project should be such that the volumes and peak flow rates of surface water leaving the site are no greater than the rates prior to the proposed project, unless specific off-site arrangements are made and result in the same net effect. | 5.140 | The surface water drainage arrangements for any project should be such that the volumes and peak flow rates of surface water leaving the site are no greater than the rates prior to the proposed project unless specific off-site arrangements are made and result in the same net effect. | No distinction derives from marginally different wording. |
| Surface Water Storage and Infiltration | 5.164 | It may be necessary to provide surface water storage and infiltration to limit and reduce both the peak rate of discharge from the site and the total volume discharged from the main application site. There may be circumstances where it is appropriate for infiltration attenuation storage to be provided outside the project site, if necessary through the use of a planning obligation or a development consent order requirement. | 5.114 | It may be necessary to provide surface water storage and infiltration to limit and reduce both the peak rate of discharge from the site and the total volume discharged from the site. There may be circumstances where it is appropriate for infiltration attenuation storage to be provided outside the project site, if necessary through the use of a planning obligation. | 5.141 | If there are no viable Sustainable Drainage Systems options available, it may be necessary to provide surface water storage and infiltration to limit and reduce both the peak rate of discharge from the site and the total volume discharged from the site. There may be circumstances where it is appropriate for infiltration attenuation storage to be provided outside the project site, if necessary, through the use of a planning obligation. | The NNNPS 2024 makes the distinction that it may be necessary to provide surface water storage and infiltration 'if there are no viable Sustainable Drainage System options available' |
| Sequential Test | 5.165 | The sequential approach should be applied to the layout and design of the project. Vulnerable uses should be | 5.115 | The sequential approach should be applied to the layout and design of the project. Vulnerable uses should be | 5.142 | The sequential approach should be applied to the layout and design of the project. Vulnerable uses should be | The ANPS and NNNPS 2015 include the distinction that 'Opportunities can be taken to lower flood risk by |

| | | | | | | | |
|-------------------------|-------|---|-------|--|-------|---|---|
| | | located on parts of the site at lower probability and residual risk of flooding. The applicant should seek opportunities where appropriate to use open space for multiple purposes such as amenity, wildlife habitat, and flood storage uses. Opportunities can be taken to lower flood risk by improving flow routes, flood storage capacity and using sustainable drainage systems. | | located on parts of the site at lower probability and residual risk of flooding. Applicants should seek opportunities to use open space for multiple purposes such as amenity, wildlife habitat and flood storage uses. Opportunities can be taken to lower flood risk by improving flow routes, flood storage capacity and using SuDS. | | located on parts of the site at lower probability and residual risk of flooding. Applicants should seek opportunities to use open space for multiple purposes such as amenity, wildlife habitat and flood storage uses. | improving flow routes, flood storage capacity and using SuDS.’. |
| Sequential Test | N/A | No relevant equivalent provision. | 5.105 | Preference should be given to locating projects in Flood Zone 1. If there is no reasonably available site in Flood Zone 1, then projects can be located in Flood Zone 2. If there is no reasonably available site in Flood Zones 1 or 2, then national networks infrastructure projects can be located in Flood Zone 3, subject to the Exception Test. If the development is not essential transport infrastructure that has to cross the area at risk, it is not appropriate in Flood Zone 3b, the functional floodplain where water has to flow and be stored in times of flood. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the ANPS and 2024 NNNPS. |
| Application for Consent | 5.166 | Where flood risk is a factor in determining an application for development consent, the Secretary of State will need to be satisfied that, where relevant: | 5.98 | Where flood risk is a factor in determining an application for development consent, the Secretary of State should be satisfied that, where relevant: | 5.143 | Where flood risk is a factor in determining an application for development consent, the Secretary of State should be satisfied that, where relevant: | The NNNPS 2015 includes an additional section on applying the Exception Test. |

| | | | | | | | |
|--------------------------------------|-----|---|-----|---|-------|---|--|
| | | <ul style="list-style-type: none"> The application is supported by an appropriate flood risk assessment; and The Sequential Test has been applied as part of site selection and, if required, the Exception Test. | | <ul style="list-style-type: none"> the application is supported by an appropriate FRA; the Sequential Test (see the National Planning Policy Framework) has been applied as part of site selection and, if required, the Exception Test (see the National Planning Policy Framework). <p>If, following application of the Sequential Test, it is not possible, consistent with wider sustainability objectives, for the project to be located in zones of lower probability of flooding than Flood Zone 3a, the Exception Test can be applied. The test provides a method of managing flood risk while still allowing necessary development to occur.</p> | | <ul style="list-style-type: none"> the application is supported by an appropriate Flood Risk Assessment the Sequential Test has been satisfactorily applied as part of site selection and, if required, the Exception Test. | |
| Consent once meeting Sequential Test | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.144 | The Secretary of State should not consent development in flood risk areas (including flood zones 2 and 3 and locations at risk of flooding from local watercourses, surface water, groundwater or reservoirs) accounting for the predicted impacts of climate change unless they are satisfied that the sequential test requirements have been met. In addition, the Secretary of State should not consent development in Flood Zone 3 unless they are satisfied that both the Sequential and | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |

| | | | | | | | |
|--------------------------------|-------|--|------|--|-------|---|--|
| | | | | | | Exception Test requirements have been met. | |
| Increased Flood Risk elsewhere | 5.167 | <p>When determining an application, the Secretary of State will need to be satisfied that flood risk will not be increased elsewhere, and will only consider development appropriate in areas at risk of flooding where, informed by a flood risk assessment, following the Sequential Test and, if required, the Exception Test, it can be demonstrated that:</p> <ul style="list-style-type: none"> • Within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location; and • Over its lifetime, development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning, and that priority is given to the use of sustainable drainage systems. | 5.99 | <p>When determining an application the Secretary of State should be satisfied that flood risk will not be increased elsewhere and only consider development appropriate in areas at risk of flooding where (informed by a flood risk assessment, following the Sequential Test and, if required, the Exception Test), it can be demonstrated that:</p> <ul style="list-style-type: none"> • within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location; and • development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and priority is given to the use of sustainable drainage systems. | 5.145 | <p>When determining an application, the Secretary of State should be satisfied that flood risk will not be increased elsewhere and only consider development appropriate in areas at risk of flooding where (informed by a Flood Risk Assessment, following the Sequential Test and, if required, the Exception Test), it can be demonstrated that:</p> <ul style="list-style-type: none"> • within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location. • development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and priority is given to the use of Sustainable Drainage Systems. | No distinction derives from marginally different wording. |
| Essential Infrastructure | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.146 | In addition, any project that is classified as 'essential infrastructure' and proposed to be located in Flood Zone 3a or b should be designed and | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |

| | | | | | | | |
|---------------------------|-------|---|-----|-----------------------------------|-----|---|--|
| | | | | | | constructed to remain operational and safe for users in times of flood; and any project in Flood Zone 3b should result in no net loss of floodplain storage and not impede water flows. | |
| Climate Change Assessment | 5.168 | The applicant should take into account the potential impacts of climate change using the latest UK Climate Change Risk Assessment, the latest set of UK Climate Projections, and other relevant sources of climate change evidence. The applicant should also ensure any environment statement that is prepared identifies appropriate mitigation or adaptation measures. This should cover the estimated lifetime of the new infrastructure. Should a new set of UK Climate Projections become available after the preparation of an environmental statement, the Examining Authority or the Secretary of State will consider whether they need to request additional information from the applicant as part of the development consent application. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |
| Climate Change and Design | 5.169 | When determining an application, the Secretary of State will need to be satisfied that the potential effects of climate change on the development have been | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |

| | | | | | | | |
|-----------------|-------|---|-------|--|-------|---|---|
| | | considered as part of the design. | | | | | |
| Drainage System | 5.170 | For construction work which has drainage implications, approval for the preferred scheme's overall approach to drainage systems will form part of any development consent issued by the Secretary of State. The Secretary of State will therefore need to be satisfied that the proposed drainage system complies with any technical standards issued by the Government or to any National Standards issued under Schedule 3 to the Flood and Water Management Act 2010. In addition, the development consent order, or any associated planning obligations, will need to make provision for the adoption and maintenance of any sustainable drainage systems, including any necessary access rights to property. The Secretary of State will need to be satisfied that the most appropriate body would be given the responsibility for maintaining any sustainable drainage systems, taking into account the nature and security of the infrastructure on the proposed site. The responsible body could include, for example, the applicant, the landowner, the relevant local | 5.100 | For construction work which has drainage implications, approval for the project's drainage system will form part of any development consent issued by the Secretary of State. The Secretary of State will therefore need to be satisfied that the proposed drainage system complies with any National Standards published by Ministers under Paragraph 5(1) of Schedule 3 to the Flood and Water Management Act 2010. ⁹³ In addition, the development consent order, or any associated planning obligations, will need to make provision for the adoption and maintenance of any Sustainable Drainage Systems (SuDS), including any necessary access rights to property. The Secretary of State, should be satisfied that the most appropriate body is being given the responsibility for maintaining any SuDS, taking into account the nature and security of the infrastructure on the proposed site. The responsible body could include, for example, the applicant, the landowner, the relevant local authority, or | 5.151 | For construction work which has drainage implications, approval for the project's drainage system will form part of any development consent issued by the Secretary of State. The Secretary of State will therefore need to be satisfied that the proposed drainage system complies with Technical Standards published by Ministers. In addition, the Development Consent Order, or any associated planning obligations, will need to make provision for the adoption and maintenance of any Sustainable Drainage Systems, including any necessary access rights to property. Sustainable Drainage Systems should deliver multifunctional benefits and help to achieve biodiversity net gain. The Secretary of State should be satisfied that the most appropriate body is being given the responsibility for maintaining any Sustainable Drainage Systems, taking into account the nature and security of the infrastructure on the proposed site. | NNNPS 2024 makes a small distinction, including SuDS delivering multifunctional benefits including biodiversity net gain. It does not include who the responsible bodies could include, unlike the ANPS and NNNPS 2015. |

| | | | | | | | |
|-------------------------------|-------|---|-------|--|-------|--|--|
| | | authority, or another body such as the Internal Drainage Board. | | another body such as the Internal Drainage Board. | | | |
| Environment Agency Engagement | 5.171 | If the Environment Agency continues to have concerns, and therefore objects to the grant of development consent on the grounds of flood risk, the Secretary of State can grant consent, but would need to be satisfied that all reasonable steps have been taken by the applicant and the Environment Agency to attempt to resolve the concerns. Similarly, if the lead local flood authority objects to the development consent on the grounds of surface or other local sources of flooding, the Secretary of State can grant consent, but would need to be satisfied that all reasonable steps have been taken by the applicant and the lead local flood authority to attempt to resolve the concerns. | 5.101 | If the Environment Agency continues to have concerns and objects to the grant of development consent on the grounds of flood risk, the Secretary of State can grant consent, but would need to be satisfied before deciding whether or not to do so that all reasonable steps have been taken by the applicant and the Environment Agency to try and resolve the concerns. | 5.147 | If the Environment Agency continues to have concerns and objects to the grant of development consent on the grounds of flood risk, the Secretary of State can grant consent, but would need to be satisfied before deciding whether or not to do so that all reasonable steps have been taken by the applicant and the Environment Agency to try and resolve the concerns. | ANPS includes reference to the lead local flood authority in addition to the Environment Agency. |
| Linear Infrastructure | N/A | No relevant equivalent provision. | 5.102 | The Secretary of State should expect that reasonable steps have been taken to avoid, limit and reduce the risk of flooding to the proposed infrastructure and others. However, the nature of linear infrastructure means that there will be cases where: · upgrades are made to existing infrastructure in an area at risk of flooding; | 5.148 | The Secretary of State should expect that reasonable steps have been taken to avoid, limit and reduce the risk of flooding to the proposed infrastructure and others. However, the nature of linear infrastructure means that there will be cases where: • upgrades are made to existing infrastructure in an area at risk of flooding | No distinction derives from the marginally different wording. |

| | | | | | | | |
|---------------------------------|-----|-----------------------------------|-------|---|-------|--|--|
| | | | | <ul style="list-style-type: none"> · infrastructure in a flood risk area is being replaced; · infrastructure is being provided to serve a flood risk area; and · infrastructure is being provided connecting two points that are not in flood risk areas, but where the most viable route between the two passes through such an area. | | <ul style="list-style-type: none"> • infrastructure in a flood risk area is being replaced • infrastructure is being provided to serve a flood risk area • infrastructure is being provided connecting two points that are not in flood risk areas, but where the most viable route between the two passes through such an area. | |
| Design of Linear Infrastructure | N/A | No relevant equivalent provision. | 5.103 | The design of linear infrastructure and the use of embankments in particular, may mean that linear infrastructure can reduce the risk of flooding for the surrounding area. In such cases the Secretary of State should take account of any positive benefit to placing linear infrastructure in a flood-risk area. | 5.149 | The design of linear infrastructure and the use of embankments in particular, may mean that linear infrastructure can reduce the risk of flooding for the surrounding area while also offering opportunities to enhance biodiversity. It should be demonstrated that there is no increase in flood risk elsewhere. In such cases the Secretary of State should take account of any positive benefit to placing linear infrastructure in a flood-risk area. | NNNPS 2024 includes additional text on ‘offering opportunities to enhance biodiversity’ and that ‘it should be demonstrated there is no increase in flood risk elsewhere’. |
| Mitigation Measures | N/A | No relevant equivalent provision. | 5.104 | Where linear infrastructure has been proposed in a flood risk area, the Secretary of State should expect reasonable mitigation measures to have been made, to ensure that the infrastructure remains functional in the event of predicted flooding. | 5.150 | Where linear infrastructure has been proposed in a flood risk area, the Secretary of State should expect reasonable mitigation measures to have been made, to ensure that the infrastructure remains functional in the event of predicted flooding. | No distinction derives from the marginally different wording. |

| | | | | | | | |
|-----------------|-----|-----------------------------------|-------|--|-----|-----------------------------------|--|
| Sequential Test | N/A | No relevant equivalent provision. | 5.106 | If, following application of the Sequential Test, it is not possible, consistent with wider sustainability objectives, for the project to be located in zones of lower probability of flooding than Flood Zone 3a, the Exception Test can be applied. The test provides a method of managing flood risk while still allowing necessary development to occur | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the ANPS and 2024 NNNPS. |
| Exception Test | N/A | No relevant equivalent provision. | 5.107 | The Exception Test is only appropriate for use where the Sequential Test alone cannot deliver an acceptable site, taking into account the need for national networks infrastructure to remain operational during floods. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the ANPS and 2024 NNNPS. |
| Exception Test | N/A | No relevant equivalent provision. | 5.108 | Both elements of the test will have to be passed for development to be consented. For the Exception Test to be passed: <ul style="list-style-type: none"> it must be demonstrated that the project provides wider sustainability benefits to the community that outweigh flood risk; and a FRA must demonstrate that the project will be safe for its lifetime, without increasing flood risk elsewhere and, where possible, will reduce flood risk overall. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the ANPS and 2024 NNNPS. |

| Community Compensation | | | | | | | |
|--------------------------------|-------|--|-----|-----------------------------------|-----|-----------------------------------|--|
| Community compensation package | 5.240 | The Secretary of State expects the applicant to provide an appropriate community compensation package, relevant to planning. This will include financial compensation to residents who will see their homes compulsorily acquired, as well as ongoing financial compensation to the local community. In addition to controlling and reducing aircraft noise impacts, the applicant will be required to commit appropriate resources to mitigate the impacts of aircraft through noise insulation programmes for both private homes and public buildings such as schools. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |
| Community compensation package | 5.241 | A number of statutory protections are provided in these areas, and the applicant must fulfil its statutory duties in a timely and efficient manner. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |
| Loss of property value | 5.243 | In addition, compensation can be sought in respect of loss of value of a property arising from the development during construction (under the Compulsory Purchase Act 1965) and for loss of value arising from the operation of an expanded airport (under Part 1 of the Land Compensation Act | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |

| | | | | | | | |
|-----------------------------|-------|--|-----|-----------------------------------|-----|-----------------------------------|--|
| | | 1973) after one year of operation | | | | | |
| Mitigation measures | 5.244 | People are entitled to know what steps will be taken to help protect them against aircraft noise and, where appropriate, to help them to move house. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |
| Community compensation fund | 5.250 | The applicant should seek to minimise impacts on local people, to consult on the details of its works, and to put them in place quickly. The Government also looks to the applicant to consult on the detail of a community compensation fund. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |
| Mitigation measures | 5.251 | The Secretary of State will consider whether and to what extent the applicant has sought to minimise impacts on local people, has consulted on the details of its works, and has put mitigations in place, at least to the level committed to in Heathrow Airport's public commitments. This includes whether the applicant has set out appropriate eligibility criteria, how delivery will be ensured, and whether the applicant has made reasonable efforts to put the works in place quickly. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |
| Community compensation fund | 5.252 | The Secretary of State will also consider whether the applicant has consulted on the details of a community compensation fund, including source of revenue, | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |

| | | | | | | | |
|-------------------------------|-------|---|-----|-----------------------------------|-------|--|--|
| | | size and duration of fund, eligibility, and how delivery will be ensured. | | | | | |
| Community compensation fund | 5.253 | The Secretary of State will expect the applicant to demonstrate how these provisions are secured, and how they will be operated. The applicant will also need to show how these measures will be administered to ensure that they are relevant to planning when in operation. The mechanisms for enforcing these provisions should also be demonstrated, along with the appropriateness of any identified enforcing body, which may include the Secretary of State. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 NNNPS and 2024 NNNPS. |
| Socio-economic Impacts | | | | | | | |
| Assessing impacts | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.244 | Where the project is likely to have socio-economic impacts at local or regional levels, the applicant should undertake and include in their application an assessment of these impacts. | N/A - no relevant equivalent provision in the ANPS and the 2015 NNNPS. |
| Assessing impacts | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.245 | This assessment should consider all relevant socio-economic impacts, which may include: <ul style="list-style-type: none"> the creation of jobs and training opportunities, applicants may wish to provide information on the sustainability of the jobs created, including where they will help to develop the | N/A - no relevant equivalent provision in the ANPS and the 2015 NNNPS. |

| | | | | | | |
|--|--|--|--|--|--|---|
| | | | | | | <p>skills needed for the UK's transition to net zero.</p> <ul style="list-style-type: none"> • the value of increased connectivity on productivity and access to jobs, services and housing. • the provision of additional local services and improvements to local infrastructure, including the provision of educational and visitor facilities, applicants should engage with local businesses and the local community at the pre-construction phase to understand opportunities for businesses and the community throughout construction, such as employment or educational programmes. • any indirect beneficial impacts for the region hosting the infrastructure, particularly in relation to use of local support services and supply chains • effects on tourism. • cumulative effects - if development consent were to be granted to for a number of projects within a region and these were developed in a similar timeframe, there could be some short-term negative effects, for example a potential shortage of |
|--|--|--|--|--|--|---|

| | | | | | | | |
|------------------------------------|-----|-----------------------------------|-----|-----------------------------------|-------|--|--|
| | | | | | | construction workers to meet the needs of other industries and major projects within the region. | |
| Existing socio-economic conditions | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.246 | Applicants should describe the existing socio-economic conditions in the areas surrounding the proposed development and should also refer to how the development's socio-economic impacts correlate with local planning policies. | N/A - no relevant equivalent provision in the ANPS and the 2015 NNNPS. |
| Mitigation measures | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.248 | The Secretary of State should consider whether mitigation measures are necessary to mitigate any adverse socio-economic impacts of the development. For example, high quality design can improve the visual and environmental experience for visitors and the local community alike. | |
| Assessing impacts | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.250 | The Secretary of State should have regard to the potential socio-economic impacts of new infrastructure identified by the applicant and from any other sources that the Secretary of State considers to be both relevant and important to its decision. | N/A - no relevant equivalent provision in the ANPS and the 2015 NNNPS. |
| Mitigation measures | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.251 | The Secretary of State should consider any relevant positive provisions the applicant has made, or is proposing to make, to mitigate impacts (for | N/A - no relevant equivalent provision in the ANPS and the 2015 NNNPS. |

| | | | | | | | |
|------------------------------------|-------|---|-------|---|-------|---|---|
| | | | | | | example, through planning obligations), and any legacy benefits that may arise. As well as any options for phasing development in relation to the socio-economic impacts | |
| Water Quality and Resources | | | | | | | |
| Impact on the Water Environment | 5.172 | Airport infrastructure projects can have adverse effects on the water environment, including groundwater, inland surface water and transitional waters. During construction and operation, it can lead to increased demand for water, involve discharges to water, and cause adverse ecological effects resulting from physical modifications to the water environment. There may also be an increased risk of spills and leaks of pollutants to the water environment. These effects could lead to adverse impacts on health or on protected and other species and habitats, and could, in particular, result in surface waters, groundwaters or protected areas failing to meet environmental objectives established under the Water Framework Directive. | 5.219 | Infrastructure development can have adverse effects on the water environment, including groundwater, inland surface water, transitional waters and coastal waters. During the construction and operation, it can lead to increased demand for water, involve discharges to water and cause adverse ecological effects resulting from physical modifications to the water environment. There may also be an increased risk of spills and leaks of pollutants to the water environment. These effects could lead to adverse impacts on health or on protected species and habitats (see Section paragraphs 5.20 to 5.38 on biodiversity and geological conservation), and could, in particular, result in surface waters, groundwaters or protected areas failing to meet environmental objectives established under the Water Framework Directive. | 5.252 | Infrastructure development can have adverse effects on the water environment, including groundwater, inland surface water, transitional waters and coastal waters. During the construction and operation, it can lead to increased demand for water, involve discharges to water and cause adverse ecological effects resulting from physical modifications to the water environment. There may also be an increased risk of spills and leaks of pollutants to the water environment. These effects could lead to adverse impacts on health or on species and habitats (see paragraphs 5.48 to 5.69), and could, in particular, result in surface waters, groundwaters or protected areas failing to meet environmental objectives established under the Water Framework Directive Regulations. | No significant distinction derives from marginally different wording. |
| Planning Policies and Guidance | 5.173 | The Government's planning policies make clear that the | 5.220 | The Government's planning policies make clear that the | 5.253 | The planning system should contribute to and enhance the | The ANPS and 2015 NNNPS require applicants to submit a plan with accompanying information identifying |

| | | | | | | | |
|---|-------|--|-------|--|-------|--|--|
| | | planning system should contribute to and enhance the natural and local environment by, amongst other things, preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, water pollution. The Government has issued guidance on water supply, wastewater and water quality considerations in the planning system. Where applicable, an application for development consent has to contain a plan with accompanying information identifying water bodies in a river basin management plan. | | planning system should contribute to and enhance the natural and local environment by, amongst other things, preventing both new and existing development from contributing to, or being put at unacceptable risk from, or being adversely affected by, water pollution. The Government has issued guidance on water supply, wastewater and water quality considerations in the planning system. Where applicable, an application for a development consent order has to contain a plan with accompanying information identifying water bodies in a River Basin Management Plan. | | natural and local environment by, amongst other things, preventing both new and existing development from contributing to, or being put at unacceptable risk from, or being adversely affected by, water pollution. The government has issued guidance on water supply, wastewater, and water quality considerations in the planning system. Where applicable, an application for a Development Consent Order has to have regard to the water body objectives of the River Basin Management Plan where the project is located and avoid or mitigate deterioration of water bodies in the area. | water bodies in a River Basin Management Plan. The 2024 NNNPS does not explicitly require applicants to submit a plan but requires applicants to have regard to the water body objectives of the River Basin Management Plan where the project is located and emphasises avoiding or mitigating deterioration of water bodies in the area. |
| Impact of De-icer and Hydrocarbons | 5.174 | Development may result in an increased potential for impacts on the water environment, especially the quality of the surface and groundwater through the discharge of waters contaminated with de-icer along with hydrocarbons and other pollutants. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 and 2024 NNNPS. |
| Early Engagement and Assessment of Impacts of the Project | 5.175 | The applicant should make sufficiently early contact with the relevant regulators, including the Environment Agency, for abstraction licensing and environmental permitting, and with the water supply company likely to supply the water. Where the proposed | 5.221 | Applicants should make early contact with the relevant regulators, including the Environment Agency, for abstraction licensing and with water supply companies likely to supply the water. Where a development is subject to EIA and the development is likely to | 5.254 | Applicants should make early contact with the relevant regulators, including the Environment Agency, for abstraction licensing or water quality activity or groundwater activity permits, and with relevant water undertakers. Where development is likely to | The 2024 NNNPS confirms that applicants to consider how the assessment may change due to the impact of climate change on rainfall patterns and water availability. |

| | | | | | | | |
|---|-----|--|-------|---|-------|---|---|
| | | development is subject to an Environmental Impact Assessment and the development is likely to have significant adverse effects on the water environment, the applicant should ascertain the existing status of, and carry out an assessment of, the impacts of the proposed project on water quality, water resources and physical characteristics as part of the environmental statement. | | have significant adverse effects on the water environment, the applicant should ascertain the existing status of, and carry out an assessment of the impacts of the proposed project on water quality, water resources and physical characteristics as part of the environmental statement. | | have adverse effects on the water environment, the applicant should undertake an assessment of the existing status and impacts of the proposed project on water quality, water resources and physical characteristics of the water environment as part of the Environmental Statement or equivalent. The assessment should also include how this might change due to the impact of climate change on rainfall patterns and consequently water availability across the water environment. | |
| Opportunities for Improving Existing Discharges | N/A | No relevant equivalent provision. | 5.222 | For those projects that are improvements to the existing infrastructure, such as road widening, opportunities should be taken, where feasible, to improve upon the quality of existing discharges where these are identified and shown to contribute towards Water Framework Directive commitments. | 5.255 | For those projects that are improving the existing infrastructure, such as road widening, opportunities should be taken, where feasible, to improve the quality of existing discharges where these are identified and shown to contribute towards water body quality failures under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (“Water Framework Directive Regulations”) commitments. A permit under the Environmental Permitting Regulations may also be required where improvements are being made to existing infrastructure, for example, the discharge of contaminated water from roads. | The 2024 NNNPS includes additional detail on Environmental Permitting Regulations and where they may be required. |

| | | | | | | | |
|-----------------------------|-------|--|-------|--|-------|---|--|
| Assessment | 5.176 | Any environmental statement should describe: <ul style="list-style-type: none"> The existing quality of water affected by the proposed project; Existing water resources affected by the proposed project and the impacts of the proposed project on water resources; Existing physical characteristics of the water environment (including quantity and dynamics of flow) affected by the proposed project, and any impact of physical modifications to these characteristics; Any impacts of the proposed project on water bodies or protected areas under the Water Framework Directive and source protection zones around potable groundwater abstractions; and Any cumulative effects. | 5.222 | Any environmental statement should describe: <ul style="list-style-type: none"> the existing quality of waters affected by the proposed project; existing water resources affected by the proposed project and the impacts of the proposed project on water resources; existing physical characteristics of the water environment (including quantity and dynamics of flow) affected by the proposed project, and any impact of physical modifications to these characteristics; any impacts of the proposed project on water bodies or protected areas under the Water Framework Directive and source protection zones (SPZs) around potable groundwater abstractions; and any cumulative effects. | 5.258 | Any assessment for both the construction and operational phases of the development should describe: <ul style="list-style-type: none"> the existing quality of waters affected by the proposed project, and how climate change will impact on this. existing water resources affected by the proposed project, the impacts of the proposed project on water resources, and how climate change will impact on this. existing physical characteristics of the water environment (including quantity and dynamics of flow) affected by the proposed project, and any impact of physical modifications to these characteristics. any impacts of the proposed project on water bodies or protected areas under the Water Framework Directive Regulations and source protection zones around potable groundwater abstractions; and how climate change will impact on this. any cumulative effects. | The 2024 NNNPS confirms that applicants should consider any impacts of the proposed project on water bodies or protected areas and also consider the impact of climate change. |
| Management of Surface Water | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.256 | Under the Environmental Permitting Regulations, | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |

| | | | | | | | |
|--|-------|--|-----|-----------------------------------|-------|--|--|
| during Construction | | | | | | applicants are required to manage surface water during construction by treating surface water runoff from exposed topsoil prior to discharging and to limit the discharge of suspended solids. | |
| Protective Measures to Control Risk of Pollution to Groundwater | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.257 | Applicants should consider protective measures to control the risk of pollution to groundwater; this could include, for example, the use of protective barriers. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Assessment of Effects on Other Water Usages | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.259 | The assessment should also identify protected areas and other water usages within the vicinity of any discharge, such as bathing waters, abstractions and fisheries at risk from proposed works and the permits/consents required. It should also identify opportunities, such as those included in the relevant local nature recovery strategy or catchment plan to improve water quality, for example, through nature-based approaches or solutions. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Assessment of Effects on Surrounding Water and Wastewater Treatment Works. | 5.177 | The applicant should assess the effects on the surrounding water and wastewater treatment network in cooperation with the relevant water and sewerage undertaker(s). It should also address any future water infrastructure needed for the preferred scheme, including for | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 and 2024 NNNPS. |

| | | | | | | | |
|--------------------------------------|-------|--|-------|--|-------|--|---|
| | | supplies and sewerage treatment, and the effects on the surrounding water and wastewater treatment network. This assessment would be based on the additional wastewater flows which would need to be treated at sewage treatment works and should be developed through liaison with the relevant water and sewerage undertaker(s). | | | | | |
| Designing for Efficient Use of Water | 5.178 | The impact on local water resources can be minimised through planning and design for the efficient use of water, including water recycling. | 5.228 | The impact on local water resources can be minimised through planning and design for the efficient use of water, including water recycling. | 5.260 | The impact on local water resources can be minimised through planning and design for the efficient use of water, including water recycling. If an applicant needs new water infrastructure, significant supplies or impacts other water supplies, the applicant should consult with the local water undertaker and the Environment Agency. | NNNPS 2024 includes added detail of consulting the local water undertaker and the EA if new water infrastructure is required. |
| Acceptability of Mitigation Measures | 5.179 | The Secretary of State will need to consider whether the mitigation measures put forward by the applicant which are needed for operation and construction (and which may be over and above any which may form part of the development consent application) are acceptable. | 5.229 | The Secretary of State should consider whether the mitigation measures put forward by the applicant which are needed for operation and construction (and which are over and above any which may form part of the project application) are acceptable. A construction management plan may help codify mitigation. | 5.261 | The Secretary of State should consider whether the mitigation measures put forward by the applicant which are needed for operation and construction (and which are over and above any which may form part of the project application) are acceptable. A construction management plan may help codify mitigation. | The ANPS does not include reference to a construction management plan helping to codify mitigation. |
| National Standards for Sustainable | 5.180 | The project should adhere to any national standards for sustainable drainage systems, | 5.230 | The project should adhere to any National Standards for sustainable drainage systems | 5.262 | The project should adhere to any National Standards for Sustainable Drainage Systems. | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|--|-------|--|-------|--|-------|--|--|
| Drainage Systems (SuDS) | | which introduce a hierarchical approach to drainage design that promotes the most sustainable approach but recognises the feasibility and use of conventional drainage systems as part of a sustainable solution for any given site given its constraints. | | (SuDs). The National SuDs Standards will introduce a hierarchical approach to drainage design that promotes the most sustainable approach but recognises feasibility, and use of conventional drainage systems as part of a sustainable solution for any given site given its constraints. | | The Sustainable Drainage Systems Technical Standards introduced a hierarchical approach to drainage design that promotes the most sustainable approach but recognises feasibility and use of conventional drainage systems as part of a sustainable solution for any given site given its constraints | |
| Blue Infrastructure and Sustainable Drainage | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.263 | The project should identify opportunities and secure measures to protect and improve water quality and resources through green and blue infrastructure and sustainable drainage. This will help to achieve Environmental Improvement Plan objectives and potentially provide greater capacity to support infrastructure needs. | N/A - no relevant equivalent provision in the 2015 and 2024 NNNPS. |
| Careful Design | 5.181 | The risk of impacts on the water environment can be reduced through careful design to adhere to good pollution practice. | 5.231 | The risk of impacts on the water environment can be reduced through careful design to facilitate adherence to good pollution control practice. For example, designated areas for storage and unloading, with appropriate drainage facilities, should be marked clearly. | 5.264 | The risk of impacts on the water environment can be reduced through careful design to facilitate adherence to good pollution control practice. For example, designated areas for storage and unloading, with appropriate drainage facilities, should be marked clearly. This may also include the need for treatment of water, which may need a permit under the Environmental Permitting Regulations. | The 2024 NNNPS sets out that designated areas for storage and unloading, with appropriate drainage facilities, should be marked clearly. |

| | | | | | | | |
|--|-------|--|-------|--|-------|--|---|
| Discharge to the Water Environment | 5.182 | Activities that discharge to the water environment are subject to pollution control, and the considerations set out at paragraphs 4.53-4.59 above covering the interface between planning and environmental permitting therefore apply. These considerations will also apply in an analogous way to the abstraction licensing regime regulating activities that take water from the environment, and to the control regimes relating to works to, and structures in, on, or under, a controlled water. | 5.224 | Activities that discharge to the water environment are subject to pollution control. The considerations set out in paragraphs 4.48-4.56 on the interface between planning and pollution control therefore apply. These considerations will also apply in an analogous way to the abstraction licensing regime regulating activities that take water from the water environment, and to the control regimes relating to works to, and structures in, on, or under a controlled water. | 5.265 | Activities that discharge to the water environment are subject to pollution control and potentially the Environmental Permitting Regulations. The considerations set out in paragraphs 4.44 to 4.51 on the interface between planning and pollution control therefore apply. These considerations will also apply in an analogous way to the abstraction licensing regime regulating activities that take water from the water environment, and to the control regimes relating to works to, and structures in, on, or under a controlled water. | No significant distinction derives from marginally different wording. |
| Adverse Effects on achievement of Environmental Objectives | 5.183 | The Secretary of State will generally need to give more weight to impacts on the water environment where a project would have adverse effects on the achievement of the environmental objectives established under the Water Framework Directive. | 5.225 | The Secretary of State will generally need to give impacts on the water environment more weight where a project would have adverse effects on the achievement of the environmental objectives established under the Water Framework Directive. | 5.266 | The Secretary of State will generally need to give impacts on the water environment more weight where a project would have adverse effects on the achievement of the environmental objectives established under the Water Framework Directive Regulations. | No significant distinction derives from marginally different wording. |
| Thames River Basin Framework Directive and Daughter Directives | 5.184 | The Secretary of State will need to be satisfied that a proposal has had regard to the Thames river basin management plan and the Water Framework Directive and its daughter Directives on priority substances and groundwater. In terms of Water Framework Directive compliance, the overall aim of development | 5.226 | The Secretary of State should be satisfied that a proposal has had regard to the River Basin Management Plans and the requirements of the Water Framework Directive (including Article 4.7) and its daughter directives, including those on priority substances and groundwater. The specific objectives for particular river | 5.267 | The Secretary of State should be satisfied that a proposal has had regard to the River Basin Management Plans and the requirements of the Water Framework Directive Regulations. The specific objectives for water bodies in particular river basins are set out in River Basin Management Plans. In terms of Water | The NNNPS references the overall aim of projects being to meet the environmental objectives under regulation 13 or if appropriate meet the exemption of overriding public interest by use of Reg 19 of the Water Framework Directive Regulations. The ANPS does not include considerations of the SoS and the interactions of the proposed project with other plans. |

| | | | | | | | |
|-------------------------------|-------|---|-------|---|-------|--|---|
| | | should be to prevent deterioration in status of water bodies, to support the achievement of the objectives in the Thames river basin management plan and not to jeopardise the future achievement of good status for any affected water bodies. If the development is considered likely to cause deterioration of water body status or to prevent the achievement of good groundwater status or of good ecological status or potential, compliance with Article 4.7 of the Water Framework Directive must be demonstrated. Any use of Article 4.7 must be reported in the Thames river basin management plan. | | basins are set out in River Basin Management Plans. In terms of Water Framework Directive compliance, the overall aim of projects should be no deterioration of ecological status in watercourses, ensuring that Article 4.7 of the Water Framework Directive Regulations does not need to be applied. The Secretary of State should also consider the interactions of the proposed project with other plans such as Water Resources Management Plans, Shoreline/Estuary Management Plans and Marine Plans. | | Framework Directive Regulations compliance, the overall aim of projects should be to meet the environmental objectives under regulation 13 or if appropriate meet the exemption of overriding public interest by use of regulation 19 of the Water Framework Directive Regulations 2017. The Secretary of State should also consider the interactions of the proposed project with other plans such as Water Resources Management Plans, Shoreline or Estuary Management Plans and Marine Plans. | |
| Interactions with other Plans | 5.185 | The Secretary of State will need to consider the interactions of the preferred scheme with other plans, such as statutory water resources management plans. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 and 2024 NNNPS. |
| Decision Making | 5.186 | The Secretary of State will need to consider proposals put forward by the applicant to mitigate adverse effects on the water environment, taking into account the likely impact of climate change on water availability, and whether appropriate requirements should be attached to any development consent and / or planning obligations. If the Environment Agency continues | 5.227 | The Examining Authority and the Secretary of State should consider proposals put forward by the applicant to mitigate adverse effects on the water environment and whether appropriate requirements should be attached to any development consent and/or planning obligations. If the Environment Agency continues to have concerns and objects to the grant of development | 5.266 | The Secretary of State should consider whether appropriate requirements should be attached to any development consent and/or planning obligations to mitigate adverse effects on the water environment. This should involve discussions with the Environment Agency. | The ANPS includes more detail, including taking account of the impact of climate change on water availability. The ANPS and 2015 NNNPS state that the Secretary of State can grant consent if the Environment Agency has concerns but will need to be satisfied that all reasonable steps have been taken by the applicant and the Environment Agency to try to resolve the concerns. |

| | | | | | | | |
|------------------------------------|-------|--|-------|--|-------|--|--|
| | | to have concerns, and objects to the grant of development consent on the grounds of impacts on water quality / resources, the Secretary of State can grant consent, but will need to be satisfied that all reasonable steps have been taken by the applicant and the Environment Agency to try to resolve the concerns. | | consent on the grounds of impacts on water quality/resources, the Secretary of State can grant consent, but will need to be satisfied before deciding whether or not to do so that all reasonable steps have been taken by the applicant and the Environment Agency to try to resolve the concerns, and that the Environment Agency is satisfied with the outcome. | | | |
| Historic Environment | | | | | | | |
| Adverse Impacts on Heritage Assets | 5.187 | The construction and operation of airports and associated infrastructure has the potential to result in adverse impacts on the historic environment above and below ground. This could be as a result of the scale, form and function of the development, and the wider impacts it can create in terms of associated infrastructure to connect the airport to existing transport networks, changes in aircraft movement on the ground and in the surrounding airspace, additional noise and light levels, and the need for security and space to ensure the airport's operation. | 5.120 | The construction and operation of national networks infrastructure has the potential to result in adverse impacts on the historic environment. | 5.204 | The construction and operation of national networks infrastructure has the potential to result in adverse impacts on the historic environment. | The ANPS explicitly recognises the need to consider impacts on the historic environment both above and below ground. |
| Historic Environment | 5.188 | The historic environment includes all aspects of the environment resulting from the interaction between people and | 5.121 | The historic environment includes all aspects of the environment resulting from the interaction between people and | 5.205 | The historic environment includes all aspects of the environment resulting from the interaction between people and | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|--|-------|--|-------|--|-------|---|---|
| | | places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora. | | places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora. | | places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora. | |
| Description of Heritage Assets | 5.189 | Those elements of the historic environment that hold value to this and future generations because of their historic, archaeological, architectural or artistic interest are called 'heritage assets'. Heritage assets may be buildings, monuments, sites, places, areas or landscapes, or any combination of these. The sum of the heritage interests that a heritage asset holds is referred to as its significance. Significance derives not only from a heritage asset's physical presence, but also from its setting | 5.122 | Those elements of the historic environment that hold value to this and future generations because of their historic, archaeological, architectural or artistic interest are called 'heritage assets'. Heritage assets may be buildings, monuments, sites, places, areas or landscapes. The sum of the heritage interests that a heritage asset holds is referred to as its significance. Significance derives not only from a heritage asset's physical presence, but also from its setting. | 5.206 | Those elements of the historic environment that hold value to this and future generations because of their historic, archaeological, architectural or artistic interest are called 'heritage assets'. Heritage assets may be buildings, monuments, sites, places, areas or landscapes. The sum of the heritage interests that a heritage asset holds is referred to as its significance. Significance derives not only from a heritage asset's physical presence, but also from its setting | No significant distinction derives from marginally different wording. |
| Categories of Designated Heritage Assets | 5.190 | Some heritage assets have a level of significance that justifies official designation. Categories of designated heritage assets are: <ul style="list-style-type: none"> • World Heritage Sites; • Scheduled Monuments; • Listed Buildings; • Protected Wreck Sites; • Protected Military Remains; | 5.123 | Some heritage assets have a level of significance that justifies official designation. Categories of designated heritage assets are: World Heritage Sites; Scheduled Monuments; Listed Buildings; Protected Wreck Sites; Protected Military Remains; Registered Parks and Gardens; and Registered Battlefields; Conservation Areas. | 5.207 | Some heritage assets have a level of significance that justifies official designation. Categories of designated heritage assets are: World Heritage Sites (natural and cultural); Scheduled Monuments; Listed Buildings; Protected Wreck Sites; Protected Military Remains; Registered Parks and Gardens; Registered Battlefields; and Conservation Areas | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|---|-------|--|-------|--|-------|---|---|
| | | <ul style="list-style-type: none"> • Registered Parks and Gardens; • Registered Battlefields; and • Conservation Areas | | | | | |
| Non-designated Heritage Asset Value | 5.191 | Non-designated heritage assets of archaeological interest that are demonstrably equivalent to Scheduled Monuments should be considered subject to the policies for designated heritage assets. The absence of designation for such heritage assets does not indicate lower significance. | 5.124 | Non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to Scheduled Monuments, should be considered subject to the policies for designated heritage assets. The absence of designation for such heritage assets does not indicate lower significance. | 5.208 | Non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to Scheduled Monuments, should be considered subject to the policies for designated heritage assets. The absence of designation for such heritage assets does not indicate lower significance. | No significant distinction derives from marginally different wording. |
| Impacts on other Non-designated heritage assets | 5.192 | The Secretary of State will also consider the impacts on other non-designated heritage assets on the basis of clear evidence that the assets have a significance that merits consideration in that decision, even though those assets are of lesser value than designated heritage assets. The non-designated heritage assets would be identified either through the development plan process by local authorities, including through 'local listing', or through the nationally significant infrastructure project examination and decision making process. | 5.125 | The Secretary of State should also consider the impacts on other non-designated heritage assets (as identified either through the development plan process by local authorities, including 'local listing', or through the nationally significant infrastructure project examination and decision making process) on the basis of clear evidence that the assets have a significance that merit consideration in that process, even though those assets are of lesser value than designated heritage assets. | 5.209 | The Secretary of State should also consider the impacts on other non-designated heritage assets (as identified either through the development plan process by local authorities, including 'local listing', or through the nationally significant infrastructure project examination and decision-making process), on the basis of clear evidence that the assets have a significance that merit consideration in that process. | No significant distinction derives from marginally different wording. |
| Assessment of any Likely | 5.193 | As part of the environmental statement, the applicant should provide a description of the | 5.126 | Where the development is subject to EIA the applicant should undertake an | 5.210 | The applicant should undertake an assessment of any significant heritage impacts of | The ANPS states that consideration will also need to be given to the possible impacts, including cumulative, on the wider historic environment. The |

| | | | | | | | |
|-------------------------------------|--|---|--|--|--|---|---|
| <p>Significant Heritage Impacts</p> | | <p>significance of the heritage assets affected by the proposed development, and the contribution of their setting to that significance. The level of detail should be proportionate to the asset's importance, and no more than is sufficient to understand the potential impact of the proposal on the significance of the asset. Consideration will also need to be given to the possible impacts, including cumulative, on the wider historic environment. At a minimum, the relevant Historic Environment Record should be consulted and the heritage assets assessed using appropriate expertise. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, the applicant should include an appropriate desk-based assessment and, where necessary, a field evaluation. The applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage asset affected can be adequately understood from the application and supporting documents.</p> | | <p>assessment of any likely significant heritage impacts of the proposed project as part of the Environmental Impact Assessment and describe these in the environmental statement.</p> | | <p>the proposed project and should describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum, the relevant Historic Environment Record should have been consulted and the heritage assets assessed using appropriate expertise. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, the applicant should include an appropriate desk-based assessment and, where necessary, a field evaluation.</p> | <p>2015 NNNPS however makes general reference to EIA.</p> |
|-------------------------------------|--|---|--|--|--|---|---|

| | | | | | | | |
|--|-----------------------|--|-------|--|-----------------------|--|---|
| Assessment of any Likely Significant Heritage Impacts | Refer to policy 5.193 | Refer to policy 5.193. | 5.127 | The applicant should describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant Historic Environment Record should have been consulted and the heritage assets assessed using appropriate expertise. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, the applicant should include an appropriate desk-based assessment and, where necessary, a field evaluation. | Refer to policy 5.210 | Refer to policy 5.210. | No significant distinction derives from marginally different wording. |
| Consideration of Heritage Assets | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.211 | The discovery of heritage assets has potential to have a significant delay on scheme development, and applicants should ensure that protection of the historic environment is considered early in the development process. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Evidence and Detail of Significance of Heritage Assets | 5.194 | Detailed studies will be required on those heritage assets affected by noise, light and indirect impacts based on the guidance provided in The Setting of Heritage Assets and the Aviation Noise Metric. | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 and 2024 NNNPS. |

| | | | | | | | |
|---|-------|---|-----|-----------------------------------|-----|-----------------------------------|--|
| | | Where proposed development will affect the setting of a heritage asset, accurate representative visualisations may be necessary to assess the impact. | | | | | |
| Positive Contribution to the Historic Environment | 5.195 | <p>The applicant is encouraged, where opportunities exist, to prepare proposals which can make a positive contribution to the historic environment, and to consider how their scheme takes account of the significance of heritage assets affected. This can include, where possible:</p> <ul style="list-style-type: none"> • Enhancing, through a range of measures such as sensitive design, the significance of heritage assets or setting affected; • Considering measures that address those heritage assets that are at risk, or which may become at risk, as a result of the scheme; and • Considering how visual or noise impacts can affect heritage assets, and whether there may be opportunities to enhance access to or interpretation, understanding and appreciation of the heritage assets affected by the scheme. Careful consideration in preparing | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 and 2024 NNNPS. |

| | | | | | | | |
|---------------------|-------|--|-------|--|-------|---|---|
| | | the scheme will be required on whether the impacts on the historic environment will be direct or indirect, temporary or permanent. | | | | | |
| Determining Factors | 5.196 | <p>In determining applications, the Secretary of State will seek to identify and assess the particular significance of any heritage asset that may be affected by the proposed development (including by development affecting the setting of a heritage asset), taking account of the available evidence and any necessary expertise from:</p> <ul style="list-style-type: none"> • Relevant information provided with the application and, where applicable, relevant information submitted during examination of the application; • Any designation records included on the National Heritage List for England; • Historic landscape character records; • The relevant Historic Environment Record(s) and similar sources of information; • Representations made by interested parties during the examination; and | 5.128 | <p>In determining applications, the Secretary of State should seek to identify and assess the particular significance of any heritage asset that may be affected by the proposed development (including by development affecting the setting of a heritage asset), taking account of the available evidence and any necessary expertise from:</p> <ul style="list-style-type: none"> • relevant information provided with the application and, where applicable, relevant information submitted during examination of the application; • any designation records; • the relevant Historic Environment Record(s), and similar sources of information; • representations made by interested parties during the examination; and • expert advice, where appropriate, and when the need to understand the | 5.216 | <p>In determining applications, the Secretary of State should seek to identify and assess the particular significance of any heritage asset that may be affected by the proposed development (including by development affecting the setting of a heritage asset). The Secretary of State should take account of the available evidence and any necessary expertise from:</p> <ul style="list-style-type: none"> • relevant information provided with the application and, where applicable, relevant information submitted during examination of the application. • any designation records. • the relevant Historic Environment Record(s), and similar sources of information. • representations made by interested parties during the examination. • expert advice, where appropriate, and when the need to understand. the | No significant distinction derives from marginally different wording. |

| | | <ul style="list-style-type: none"> Expert advice, where appropriate and when the need to understand the significance of the heritage asset demands it. | | significance of the heritage asset demands it. | | significance of the heritage asset demands it. | |
|--|-------|--|-------|--|-------|---|---|
| Listed Buildings, Conservation Areas and Scheduled Monuments | 5.197 | The Secretary of State must also comply with the regime relating to Listed Buildings, Conservation Areas and Scheduled Monuments set out in The Infrastructure Planning (Decisions) Regulations 2010 | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the 2015 and 2024 NNNPS. |
| Impacts on Heritage Assets | 5.198 | In considering the impact of a proposed development on any heritage assets, the Secretary of State will take into account the particular nature of the significance of the heritage asset and the value that they hold for this and future generations. This understanding should be used to avoid or minimise conflict between their conservation and any aspect of the proposal. | 5.129 | In considering the impact of a proposed development on any heritage assets, the Secretary of State should take into account the particular nature of the significance of the heritage asset and the value that they hold for this and future generations. This understanding should be used to avoid or minimise conflict between their conservation and any aspect of the proposal. | 5.217 | In considering the impact of a proposed development on any heritage assets, the Secretary of State should take into account the particular nature of the significance of the heritage asset, and the value that they hold for this and future generations. This understanding should be used to avoid or minimise conflict between their conservation and any aspect of the proposal. | No significant distinction derives from marginally different wording. |
| Consideration of Design | 5.199 | The Secretary of State will take into account: the desirability of sustaining and, where appropriate, enhancing the significance of heritage assets; the contribution of their settings; and the positive contribution their conservation can make to supporting sustainable communities – including to their quality of life, their economic vitality, and to the public’s enjoyment of these | 5.130 | The Secretary of State should take into account the desirability of sustaining and, where appropriate, enhancing the significance of heritage assets, the contribution of their settings and the positive contribution that their conservation can make to sustainable communities – including their economic vitality. The Secretary of State should also take into account the | 5.218 | The Secretary of State should take into account the desirability of sustaining and, where appropriate, enhancing the significance of heritage assets, the contribution of their settings and the positive contribution that their conservation can make to sustainable communities – including their economic vitality. The Secretary of State should also take into account the | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|--|-------|--|-------|---|-------|---|---|
| | | assets. The Secretary of State will also take into account the desirability of new development making a positive contribution to the character and local distinctiveness of the historic environment. The consideration of design should include scale, height, massing, alignment, materials, use and landscaping (for example screen planting). | | desirability of new development making a positive contribution to the character and local distinctiveness of the historic environment. The consideration of design should include scale, height, massing, alignment, materials, use and landscaping (for example, screen planting). | | desirability of new development making a positive contribution to the character and local distinctiveness of the historic environment. The consideration of design should include scale, height, massing, alignment, materials, use and landscaping (for example, screen planting). | |
| Weight given to Importance of Asset's Conservation | 5.200 | When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State will give great weight to the asset's conservation. The more important the asset, the greater the weight should be. The Secretary of State will take into account the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation, the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality, and the desirability of new development making a positive contribution to local character and distinctiveness. | 5.131 | When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset's conservation. The more important the asset, the greater the weight should be. Once lost, heritage assets cannot be replaced and their loss has a cultural, environmental, economic and social impact. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Given that heritage assets are irreplaceable, harm or loss affecting any designated heritage asset should require clear and convincing justification. Substantial harm to or loss of a grade II Listed Building or a grade II Registered Park or Garden should be exceptional. Substantial harm to or loss of designated assets of the | 5.219 | When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset's conservation. The more important the asset, the greater the weight should be. Once lost, heritage assets cannot be replaced, and their loss has a cultural, environmental, economic and social impact. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Given that heritage assets are irreplaceable, harm or loss affecting any designated heritage asset should require clear and convincing justification. Substantial harm to or loss of a grade II Listed Building, or a grade II Registered Park or Garden should be exceptional. Substantial harm to, or loss of, designated assets of the highest | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|--|-------|---|-----------------------|--|-----------------------|--|---|
| | | | | highest significance, including World Heritage Sites, Scheduled Monuments, grade I and II* Listed Buildings, Registered Battlefields, and grade I and II* Registered Parks and Gardens should be wholly exceptional. | | significance, including World Heritage Sites, Scheduled Monuments, grade I and II* Listed Buildings, Registered Battlefields, and grade I and II* Registered Parks and Gardens should be wholly exceptional. | |
| Harm or loss and need for Clear and Convincing Justification | 5.201 | Once lost, heritage assets cannot be replaced, and their loss has a cultural, environmental, economic and social impact. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Given that heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. | Refer to policy 5.131 | Refer to policy 5.131. | Refer to policy 5.219 | Refer to policy 5.219. | No significant distinction derives from marginally different wording. |
| Significance of Loss | 5.202 | Substantial harm to or loss of a Grade II Listed Building or a Grade II Registered Park or Garden should be exceptional. Substantial harm to or loss of designated sites of the highest significance, including World Heritage Sites, Scheduled Monuments, Grade I and II* Listed Buildings, Protected Wreck Sites, Registered Battlefields, and Grade I and II* Registered Parks and Gardens should be wholly exceptional. | Refer to policy 5.131 | Refer to policy 5.131. | Refer to policy 5.219 | Refer to policy 5.219. | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|--|-------|---|-------|---|-------|--|---|
| Level of Justification required for Loss | 5.203 | Any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of development, recognising that the greater the harm to the significance of the heritage asset, the greater the justification that will be needed for any loss | 5.132 | Any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of development, recognising that the greater the harm to the significance of the heritage asset, the greater the justification that will be needed for any loss. | 5.220 | Any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of development, recognising that the greater the harm to the significance of the heritage asset, the greater the justification that will be needed for any loss. | No significant distinction derives from marginally different wording. |
| Necessary loss of Heritage Asset to deliver Substantial Public Benefit | 5.204 | <p>Where the proposed development will lead to substantial harm to or the total loss of significance of a designated heritage asset, the Secretary of State will refuse consent unless it can be demonstrated that the substantial harm or loss of significance is necessary in order to deliver substantial public benefits that outweigh that loss or harm, or alternatively that all of the following apply:</p> <ul style="list-style-type: none"> • The nature of the heritage asset prevents all reasonable uses of the site; • No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; • Conservation by grant funding or some form of charitable or public | 5.133 | <p>Where the proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, the Secretary of State should refuse consent unless it can be demonstrated that the substantial harm or loss of significance is necessary in order to deliver substantial public benefits that outweigh that loss or harm, or alternatively that all of the following apply:</p> <ul style="list-style-type: none"> • the nature of the heritage asset prevents all reasonable uses of the site; and • no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and • conservation by grant-funding or some form of charitable or public | 5.221 | <p>Where the proposed development will lead to substantial harm to, or total loss of, significance of a designated heritage asset, the Secretary of State should refuse consent unless it can be demonstrated that it is necessary to deliver substantial public benefits that outweigh that loss or harm. Alternatively, that all of the following apply:</p> <ul style="list-style-type: none"> • the nature of the heritage asset prevents all reasonable uses of the site. • no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation. • conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible. • the harm or loss is outweighed by the benefit of | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|--|-------|---|-------|---|-------|---|---|
| | | ownership is demonstrably not possible; and • The harm or loss is outweighed by the benefit of bringing the site back into use. | | ownership is demonstrably not possible; and • the harm or loss is outweighed by the benefit of bringing the site back into use. | | bringing the site back into use. | |
| Harm Weighed Against Public Benefits | 5.205 | Where the proposed development will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. | 5.134 | Where the proposed development will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. | 5.222 | Where the proposed development will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. | No significant distinction derives from marginally different wording. |
| Positive Contribution to the Significance of a World Heritage Site | 5.206 | Not all elements of a World Heritage Site or conservation area will necessarily contribute to its significance. The Secretary of State will treat the loss of a building (or other element) that makes a positive contribution to the significance of a World Heritage Site or conservation area's significance either as substantial harm or less than substantial harm, as appropriate, taking into account the relative significance of the elements affected and their contribution to the significance of the World Heritage Site or conservation area as a whole. | 5.135 | Not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance. The Secretary of State should treat the loss of a building (or other element) that makes a positive contribution to the site's significance either as substantial harm or less than substantial harm, as appropriate, taking into account the relative significance of the elements affected and their contribution to the significance of the Conservation Area or World Heritage Site as a whole. | 5.223 | Not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance. The Secretary of State should treat the loss of a building (or other element) that makes a positive contribution to the site's significance either as substantial harm or less than substantial harm, as appropriate. This should take into account the relative significance of the elements affected and their contribution to the significance of the Conservation Area or World Heritage Site as a whole. | No significant distinction derives from marginally different wording. |
| Obligation on Consent | 5.207 | Where the loss of significance of any heritage asset is justified on the merits of the new | 5.136 | Where the loss of significance of any heritage asset has been justified by the applicant based | 5.224 | Where the loss of significance of any heritage asset has been justified by the applicant based | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|---|-------|---|-------|---|-------|---|---|
| | | development, the Secretary of State will consider imposing a requirement on the consent, or require the applicant to enter into an obligation, that will prevent the loss occurring until it is reasonably certain that the relevant part of the development is to proceed. | | on the merits of the new development and the significance of the asset in question, the Secretary of State should consider imposing a requirement that the applicant will prevent the loss occurring until the relevant development or part of development has commenced. | | on the merits of the new development and the significance of the asset in question, the Secretary of State should consider imposing a requirement that the applicant will prevent the loss occurring, until the relevant development or part of development has commenced. | |
| Enhancing the setting of Heritage Assets | 5.208 | The applicant should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance and better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably. | 5.137 | Applicants should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably. | 5.225 | Applicants should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to, or better reveal, the significance of the asset should be treated favourably. | No significant distinction derives from marginally different wording. |
| Evidence of Deliberate Neglect of or Damage | n/a | No relevant equivalent provision | 5.138 | Where there is evidence of deliberate neglect of or damage to a heritage asset the Secretary of State should not take its deteriorated state into account in any decision. | 5.226 | Where there is evidence of deliberate neglect of, or damage to, a heritage asset the Secretary of State should not take its deteriorated state into account in any decision. | No significant distinction derives from marginally different wording. |
| Recording Evidence | 5.209 | A documentary record of our past is not as valuable as retaining the heritage asset, and therefore the ability to record evidence of the asset should not be a factor in deciding whether consent should be given. | 5.139 | A documentary record of our past is not as valuable as retaining the heritage asset and therefore the ability to record evidence of the asset should not be a factor in deciding whether consent should be given. | 5.212 | A documentary record of our past is not as valuable as retaining the heritage asset and therefore the ability to record evidence of the asset should not be a factor in deciding whether consent should be given. | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|--------------------|-------|--|-------|---|-------|---|---|
| Recording Evidence | 5.210 | Where the loss of the whole or part of a heritage asset's significance is justified, the Secretary of State will require the applicant to record and advance understanding of the significance of the heritage asset before it is lost (wholly or in part). The extent of the requirement should be proportionate to the nature and level of the asset's significance. The applicant should be required to publish this evidence and to deposit copies of the reports with the relevant Historic Environmental Record. They should also be required to deposit the archive generated in a local museum or other public repository willing to receive it. | 5.140 | Where the loss of the whole or part of a heritage asset's significance is justified, the Secretary of State should require the applicant to record and advance understanding of the significance of the heritage asset before it is lost (wholly or in part). The extent of the requirement should be proportionate to the importance and the impact. Applicants should be required to deposit copies of the reports with the relevant Historic Environment Record. They should also be required to deposit the archive generated in a local museum or other public depository willing to receive it. | 5.213 | Where the loss of the whole or part of a heritage asset's significance is justified, the Secretary of State should require the applicant to record and advance understanding of the significance of the heritage asset before it is lost (wholly or in part). The extent of the requirement should be proportionate to the importance and the impact. Applicants should be required to deposit copies of the reports with the relevant Historic Environment Record. They should also be required to deposit the archive generated in a local museum or other public depository willing to receive it. | No significant distinction derives from marginally different wording. |
| Recording Evidence | 5.211 | Where appropriate, the Secretary of State will impose requirements to the development consent order to ensure that the work is undertaken in a timely manner, in accordance with a written scheme of investigation that complies with the policy in the Airports NPS and has been agreed in writing with the relevant local authority, and that the completion of the exercise is properly secured. | 5.141 | The Secretary of State may add requirements to the development consent order to ensure that this is undertaken in a timely manner in accordance with a written scheme of investigation that meets the requirements of this section and has been agreed in writing with the relevant Local Authority (or, where the development is in English waters, with the Marine Management Organisation and English Heritage) and that the completion of the exercise is properly secured. | 5.214 | The Secretary of State may add requirements to the Development Consent Order to ensure that this is undertaken in a timely manner in accordance with a written scheme of investigation that meets the requirements of this section, and has been agreed in writing with the relevant Local Authority, Historic England or Marine Management Organisation. | The 2024 NNNPS does not make reference to ensuring that the exercise of making a record and advance understanding of the significance of the heritage asset before it is lost is secured. |

| | | | | | | | |
|--|-------|--|-------|--|-------|--|---|
| Procedures in place for Identification and Treatment of yet Undiscovered Heritage Assets | 5.212 | Where there is a high probability that a development site may include as yet undiscovered heritage assets with archaeological interest, the Secretary of State will consider requirements to ensure appropriate procedures are in place for the identification and treatment of such assets discovered during construction. | 5.142 | Where there is a high probability that a development site may include as yet undiscovered heritage assets with archaeological interest, the Secretary of State should consider requirements to ensure that appropriate procedures are in place for the identification and treatment of such assets discovered during construction. | 5.215 | Where there is a high probability that a development site may include as yet undiscovered heritage assets with archaeological interest, the Secretary of State should consider requirements to ensure that appropriate procedures are in place for the identification and treatment of such assets discovered during construction. | No significant distinction derives from marginally different wording. |
| Landscape and Visual Impacts | | | | | | | |
| Landscape and visual effects | 5.213 | For airport development, landscape and visual effects also include tranquility effects, which would affect people's enjoyment of the natural environment and recreational facilities. In this context, references to landscape should be taken as covering local landscape, waterscape and townscape character and quality, where appropriate. | 5.143 | The landscape and visual effects of proposed projects will vary on a case by case basis according to the type of development, its location and the landscape setting of the proposed development. In this context, references to landscape should be taken as covering seascape and townscape, where appropriate. | 5.160 | The landscape and visual effects of proposed projects will vary on a case-by-case basis according to the type of development, its location and the landscape character and setting of the proposed development. In this context, references to landscape should be taken as also covering all landscape including seascape and townscape, where appropriate. | The ANPS sets out that for airport development, landscape and visual effects also include tranquility effects. |
| Likely Significant Landscape and Visual Impacts | 5.214 | Where the development is subject to an Environmental Impact Assessment, the applicant should undertake an assessment of any likely significant landscape and visual impacts and describe them in the environmental statement. The landscape and visual assessment should reference any landscape | 5.144 | Where the development is subject to EIA the applicant should undertake an assessment of any likely significant landscape and visual impacts in the environmental impact assessment and describe these in the environmental assessment. A number of guides have been produced to assist in | 5.161 | The applicant should carry out a landscape and visual impact assessment. A number of guides have been produced to assist in addressing landscape issues, for example, the third edition of Guidelines for Landscape and Visual Impact Assessment (GLVIA3) published by the Landscape Institute. The landscape and | No significant distinction derives from marginally different wording. Refer to policy 5.215 in the ANPS and policy 5.145 in the 2025 NNNPS. |

| | | | | | | | |
|--|-------|---|-------|--|-----------------------|---|---|
| | | character assessment and associated studies as a means of assessing landscape impacts relevant to the preferred scheme. In addition, the applicant's assessment should take account of any relevant policies based on these assessments in local development documents. | | addressing landscape issues. The landscape and visual assessment should include reference to any landscape character assessment and associated studies, as a means of assessing landscape impacts relevant to the proposed project. The applicant's assessment should also take account of any relevant policies based on these assessments in local development documents in England. | | visual assessment for the proposed project should include the impacts during construction and operation, and reference to any landscape character assessments. The applicant's assessment should also take account of any relevant policies based on these assessments in local development documents in England. | |
| Significant Effects during Construction | 5.215 | The applicant's assessment should include any significant effects during construction of the preferred scheme and / or the significant effects of the completed development and its operation on landscape components and landscape character, including historic characterisation. This should include assessment of any landscape and visual impacts as a result of the development, for example surface access proposals or aviation activity. | 5.145 | The applicant's assessment should include any significant effects during construction of the project and/or the significant effects of the completed development and its operation on landscape components and landscape character (including historic landscape characterisation). | Refer to policy 5.161 | Refer to policy 5.161. | No significant distinction derives from marginally different wording. |
| Visibility and conspicuousness during construction | 5.216 | The assessment should include the visibility and conspicuousness of the preferred scheme during construction and the presence and operation of the preferred scheme and potential impacts on views and visual amenity. This should include any noise | 5.146 | The assessment should include the visibility and conspicuousness of the project during construction and of the presence and operation of the project and potential impacts on views and visual amenity. This should include any noise and light pollution effects, including | 5.162 | The assessment should include the visibility and conspicuousness of the project during construction and of the presence and operation of the project, potential impacts on views (including protected views) and visual amenity. This should include any noise and/or | The 2024 NNNPS includes dark skies in any visual amenity assessment and during construction and operations activities. The assessment should also consider identified qualities of the special landscape areas. |

| | | | | | | | |
|--|-----|---|-------|--|-------|--|--|
| | | and light pollution effects, including on local amenity, tranquillity and nature conservation. | | on local amenity, tranquillity and nature conservation. | | light pollution effects, including on local amenity, dark skies, tranquillity, and nature conservation. The assessment should also demonstrate how noise and/or light pollution from construction and operational activities on residential amenity, sensitive locations, and other receptors will be minimised. The assessment should also consider identified special qualities for National Parks, the Broads and Areas of Outstanding Natural Beauty (now known as National Landscapes) (as set out in the management plans for these designations). | |
| In accordance with Acts protecting Parks and Countryside | N/A | No relevant equivalent provision. The ANPS does require assessment of noise effects on national parks and AoNB (5.52). | 5.147 | Any statutory undertaker commissioning or undertaking works in relation to, or so as to affect land in a National Park or Areas of Outstanding Natural Beauty, would need to comply with the respective duties in section 11A of the National Parks and Access to Countryside Act 1949 and section 85 of the Countryside and Rights of Way Act 2000. | 5.163 | Any statutory undertaker commissioning or undertaking works in relation to, or so as to affect land in England's National Parks and the Broads, or National Landscapes, must comply with the duties in section 11A of the National Parks and Access to Countryside Act 1949, section 17A of the Norfolk and Suffolk Broads Act 1988 and section 85 of the Countryside and Rights of Way Act 2000, as amended by Section 245 of the Levelling Up and Regeneration Act 2023. Government planning policy advises that major development should not take place within these areas unless | The 2024 NNNPS references works complying with amended Section 245 of the LURA 2023 and notes that major development should not take place unless exceptional circumstances apply. |

| | | | | | | | |
|---|-------|--|-------|---|-------|---|---|
| | | | | | | exceptional circumstances apply. | |
| Road Widening and New Roads in National Parks | N/A | No relevant equivalent provision. | 5.148 | For significant road widening or the building of new roads in National Parks and the Broads applicants also need to fulfil the requirements set out in Defra's English national parks and the broads: UK government vision and circular 2010 or successor documents. These requirements should also be complied with for significant road widening or the building of new roads in Areas of Outstanding Natural Beauty. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the ANPS and 2024 NNNPS. |
| Nature of Landscape and of the Effect likely to Occur | 5.218 | Landscape effects depend on the nature of the existing landscape likely to be changed and nature of the effect likely to occur. Both these factors need to be considered in judging the impact of the preferred scheme on the landscape. The preferred scheme needs to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints, the development should aim to avoid or minimise harm to the landscape, providing reasonable mitigation where possible and appropriate. | 5.149 | Landscape effects depend on the nature of the existing landscape likely to be affected and nature of the effect likely to occur. Both of these factors need to be considered in judging the impact of a project on landscape. Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints, the aim should be to avoid or minimise harm to the landscape, providing reasonable mitigation where possible and appropriate. | 5.169 | Landscape effects of the project depend on the existing character of the local landscape, its capacity to accommodate change and nature of the effect likely to occur. All of these factors need to be considered in judging the impact of a project on landscape. Projects need to have regard to siting, orientation, height operational and other relevant constraints. The aim should be to avoid or minimise harm to the landscape, where adverse impacts are unavoidable providing reasonable mitigation and deliver landscape enhancement measures where possible and appropriate. | The 2024 NNNPS includes additional detail of 'delivering landscape enhancement measures, where possible'. |

| | | | | | | | |
|--|-------|---|-------|---|-------|--|---|
| Conservation of Landscape and Scenic Beauty in Nationally Designated Areas | 5.219 | Great weight should be given to conserving landscape and scenic beauty in nationally designated areas. National Parks, the Broads and Areas of Outstanding Natural Beauty have the highest status of protection in relation to landscape and scenic beauty. Each of these designated areas has specific statutory purposes which help ensure their continued protection and which the Secretary of State has a statutory duty to have regard to in decisions. | 5.150 | Great weight should be given to conserving landscape and scenic beauty in nationally designated areas. National Parks, the Broads and Areas of Outstanding Natural Beauty have the highest status of protection in relation to landscape and scenic beauty. Each of these designated areas has specific statutory purposes which help ensure their continued protection and which the Secretary of State has a statutory duty to have regard to in decisions. | 5.170 | England's National Parks, the Broads and National Landscapes have been confirmed by the government as having the highest status of protection in relation to landscape and natural beauty. Each of these designated areas has specific statutory purposes. The conservation and enhancement of the natural beauty of the landscape and countryside should be given great weight by the Secretary of State in deciding on applications for development consent in these areas. The Secretary of State should be satisfied that the scheme's design and delivery complies with the duty as revised by section 245 of the Levelling Up and Regeneration Act 2023 and any regulations making provision about how the duty is to be complied with. Regard should also be had to any relevant Defra guidance | The 2024 NNNPS provides more detail on how the Secretary of State can make a decision, including making sure the scheme's design and delivery complies with the duty as revised by section 245 of the LURA 2023 and DEFRA guidance. |
| Demonstration of being in Public Interest | 5.220 | The Secretary of State should refuse development consent in these areas except in exceptional circumstances and where it can be demonstrated that it is in the public interest. Consideration of such applications should include an assessment of: <ul style="list-style-type: none"> The need for the development, including in | 5.151 | The Secretary of State should refuse development consent in these areas except in exceptional circumstances and where it can be demonstrated that it is in the public interest. Consideration of such applications should include an assessment of: <ul style="list-style-type: none"> the need for the development, including in | 5.170 | The Secretary of State should refuse development consent in England's National Parks, the Broads and National Landscapes unless there are exceptional circumstances, where the benefits outweigh the harm and where it can be demonstrated that it is in the public interest. Consideration of | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|--|-----|--|-------|--|-------|--|---|
| | | <p>terms of any national considerations, and the impact of consenting, or not consenting it, upon the local economy;</p> <ul style="list-style-type: none"> • The cost of, and scope for, developing elsewhere, outside the designated area, or meeting the need for it in some other way; and • Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated. | | <p>terms of any national considerations, and the impact of consenting, or not consenting it, upon the local economy;</p> <ul style="list-style-type: none"> • the cost of, and scope for, developing elsewhere, outside the designated area, or meeting the need for it in some other way; and • any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated. | | <p>such applications should include an assessment of:</p> <ul style="list-style-type: none"> • the need for the development, including any national considerations, and the impact of consenting, or not consenting it, upon the local economy. • the cost of, and scope for, developing elsewhere, outside the designated area, or meeting the need for it in some other way, taking account of the policy on alternatives set out in paragraphs 4.20 to 4.22. • any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that would be moderated. | |
| Road widening, New Roads and Strategic Freight Interchanges in Nationally Designated Areas | N/A | No relevant equivalent provision. | 5.152 | There is a strong presumption against any significant road widening or the building of new roads and strategic rail freight interchanges in a National Park, the Broads and Areas of Outstanding Natural Beauty, unless it can be shown there are compelling reasons for the new or enhanced capacity and with any benefits outweighing the costs very significantly. Planning of the Strategic Road Network should encourage routes that avoid National | 5.172 | There is a strong presumption against any significant road widening or the building of new roads and strategic rail freight interchanges in a National Park, the Broads and National Landscapes, unless it can be shown there are exceptional circumstances for the new or enhanced capacity and with any benefits very significantly outweighing the harm. Planning of the Strategic Road Network should encourage routes that avoid impacts to National | The 2024 NNNPS changes wording from 'benefits outweighing the costs' to 'outweighing the harm'. |

| | | | | | | | |
|---------------------------------------|-------|--|-------|---|-------|--|---|
| | | | | Parks, the Broads and Areas of Outstanding Natural Beauty. | | Parks, the Broads and National Landscapes. | |
| Environmental Standards | 5.221 | Where consent is given in these areas, the Secretary of State should be satisfied that the applicant has ensured that the preferred scheme will be carried out to high environmental standards and, where possible, includes measures to enhance other aspects of the environment. Where necessary, the Secretary of State should consider the imposition of appropriate requirements to ensure these standards are delivered. | 5.153 | Where consent is given in these areas, the Secretary of State should be satisfied that the project will be carried out to high environmental standards and where possible includes measures to enhance other aspects of the environment. Where necessary, the Secretary of State should consider the imposition of appropriate requirements to ensure these standards are delivered. | 5.173 | Where consent is given in these areas, the Secretary of State should be satisfied that the applicant has ensured that the project will be carried out to high environmental and design standards and includes measures to enhance the landscape and other aspects of the environment. Where necessary, the Secretary of State should consider the imposition of appropriate requirements to ensure these standards are delivered. | No significant distinction derives from marginally different wording. |
| Regard to Nationally Designated Areas | 5.222 | The duty to have regard to the purposes of nationally designated areas also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. The development should aim to avoid compromising the purposes of designation, and such projects should be designed sensitively given the various siting, operational, and other relevant constraints. | 5.154 | The duty to have regard to the purposes of nationally designated areas also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. The aim should be to avoid compromising the purposes of designation and such projects should be designed sensitively given the various siting, operational, and other relevant constraints. This should include projects in England which may have impacts on designated areas in Wales or on National Scenic Areas in Scotland. | 5.174 | The duty to seek to further the purposes of nationally designated landscapes also applies when considering applications for projects outside the boundaries of these areas (in their 'setting') which may have impacts within them. The aim should be to avoid harming the purposes of designation and such projects should be located and designed sensitively, to avoid or minimise impacts. This should include projects in England which may have impacts on designated areas in Wales or on National Scenic Areas in Scotland. The fact that a proposed project will be visible from within a designated area should not in | The 2024 NNNPS confirms how a proposed project being visible from within a designated area is not in itself a reason for refusal. |

| | | | | | | | |
|--|-------|---|-------|--|-------|--|---|
| | | | | | | itself be a reason for refusing consent. | |
| Visibility from within a Designated Area | N/A | No relevant equivalent provision. | 5.155 | The fact that a proposed project will be visible from within a designated area should not in itself be a reason for refusing consent. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the ANPS and the 2015 NNNPS. |
| High Value Local Landscapes | 5.223 | Outside nationally designated areas, there are local landscapes and townscapes that are highly valued locally and may be protected by local designation. Where a local development document in England has policies based on landscape character assessment, these should be given particular consideration. However, local landscape designations should not be used in themselves as reasons to refuse consent, as this may unduly restrict acceptable development. | 5.156 | Outside nationally designated areas, there are local landscapes that may be highly valued locally and protected by local designation. Where a local development document in England has policies based on landscape character assessment, these should be given particular consideration. However, local landscape designations should not be used in themselves as reasons to refuse consent, as this may unduly restrict acceptable development. | 5.175 | Outside nationally designated landscapes, there are landscapes that may be valued locally and protected by local policy. Where a local development plan in England has policies based on landscape character assessment, and has identified landscapes of local value, these should be given particular consideration. However, such areas should not be used in and of themselves as reasons to refuse consent, as this may unduly restrict acceptable development. | No significant distinction derives from the marginally different wording. |
| Heritage Coast Conservation | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.176 | Within areas defined as Heritage Coast that are not already within one of the nationally designated landscape areas, planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. Major development within a Heritage Coast is unlikely to be appropriate unless it is | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |

| | | | | | | | |
|--|-------|--|-------|---|-------|---|---|
| | | | | | | compatible with its special character. | |
| Environmental Effects | 5.224 | In taking decisions, the Secretary of State will consider whether the preferred scheme has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to avoid adverse effects on landscape or to minimise harm to the landscape, including by reasonable mitigation. | 5.157 | In taking decisions, the Secretary of State should consider whether the project has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to avoid adverse effects on landscape or to minimise harm to the landscape, including by reasonable mitigation. | 5.177 | In taking decisions, the Secretary of State should consider whether the project has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to avoid adverse effects on landscape or to minimise harm to the landscape, including by appropriate mitigation. | No significant distinction derives from the marginally different wording. |
| Visual Effects on Sensitive Receptors. | 5.225 | The Secretary of State will judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the development. | 5.152 | The Secretary of State will have to judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the development. Coastal areas are particularly vulnerable to visual intrusion because of the potential high visibility of development on the foreshore, on the skyline and affecting views along stretches of undeveloped coast, especially those defined as Heritage Coast. | 5.178 | The Secretary of State will have to judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the development. Coastal areas are particularly vulnerable to visual intrusion because of the potential high visibility of development on the foreshore, on the skyline and affecting views along stretches of undeveloped coast, especially those defined as Heritage Coast. Within areas defined as Heritage Coast, planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. | The 2024 NNNPS gives added detail of the level of importance of the Heritage Coast. |

| | | | | | | | |
|---------------------|-------|--|-------|--|-------|---|---|
| Reduction in Scale | N/A | No relevant equivalent provision. | 5.159 | Reducing the scale of a project or making changes to its operation can help to avoid or mitigate the visual and landscape effects of a proposed project. However, reducing the scale or otherwise amending the design or changing the operation of a proposed development may result in a significant operational constraint and reduction in function. There may, be exceptional circumstances, where mitigation could have a very significant benefit and warrant a small reduction in scale or function. In these circumstances, the Secretary of State may decide that the benefits of the mitigation to reduce the landscape effects outweigh the marginal loss of scale or function. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the ANPS and 2024 NNNPS. |
| Mitigation measures | 5.217 | Adverse landscape and visual effects may be minimised through appropriate design (including choice of materials), and landscaping schemes. Materials and designs for the Heathrow Northwest Runway scheme should be given careful consideration. | 5.160 | Adverse landscape and visual effects may be minimised through appropriate siting of infrastructure, design (including choice of materials), and landscaping schemes, depending on the size and type of proposed project. Materials and designs for infrastructure should always be given careful consideration. | 5.166 | Adverse landscape and visual effects may be minimised through appropriate siting of infrastructure, design (including choice of materials), and topographical interventions (for example, creation of bunds or lowering of ground level). Also, landscaping schemes (including screening options and design elements that soften the built form such as green bridges), depending on the size and type of the proposed project. Materials and | No significant distinction derives from the marginally different wording. |

| | | | | | | | |
|---|-------|---|-------|---|-------|--|---|
| | | | | | | designs for infrastructure should always be given careful consideration in terms of environmental standards. | |
| Offsite Landscaping | N/A | No relevant equivalent provision. | 5.161 | Depending on the topography of the surrounding terrain and areas of population it may be appropriate to undertake landscaping off site, although if such landscaping was proposed to be consented by the development consent order, it would have to be included within the order limits for that application. For example, filling in gaps in existing tree and hedge lines would mitigate the impact when viewed from a more distant vista. | 5.167 | Depending on the topography of the surrounding terrain and areas of population, it may be appropriate to undertake landscaping off-site, although if such landscaping was proposed to be consented by the Development Consent Order, it would have to be included within the order limits for that application. For example, filling in gaps in existing tree and hedge lines would mitigate the impact when viewed from a more distant vista. | No significant distinction derives from the marginally different wording. |
| Landscape Management Plans | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.168 | Applicants should consider how landscapes can be enhanced using landscape management plans, as this will help to enhance environmental assets where they contribute to landscape and townscape quality and can reinforce or enhance landscape features and character. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Land Instability and contamination | | | | | | | |
| Effects of Land Instability | 5.226 | The effects of land instability may result in landslides, subsidence or ground heave. Failing to deal with this issue could cause harm to human | 5.116 | The effects of land instability may result in landslides, subsidence or ground heave. Failing to deal with this issue could cause harm to human | 5.152 | The effects of land instability may result in landslides, subsidence or ground heave. Failing to deal with this issue could cause harm to human | No significant distinction derives from the marginally different wording. |

| | | | | | | | |
|----------------------------------|-------|--|-------|--|-------|---|--|
| | | health, local property and associated infrastructure, and the wider environment. They occur in different circumstances for different reasons and vary in their predictability and in their effect on development. | | health, local property and associated infrastructure, and the wider environment. They occur in different circumstances for different reasons and vary in their predictability and in their effect on development. | | health, local property and associated infrastructure, and the wider environment. They occur in different circumstances for different reasons and vary in their predictability and in their effect on development. | |
| Remediation of Contaminated Land | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.153 | Land contamination from previous and current uses can harm human health, drinking water supplies, groundwater and surface water, soils, habitats and biodiversity. Development should, where possible, remediate despoiled, degraded, derelict, contamination and unstable land, where appropriate. Failure to deal with this issue may result in the land being determined as contaminated land under Part IIA of the Environmental Protection Act 1990. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Land Stability | 5.227 | Where necessary, land stability should be considered in respect of new development, as set out in the National Planning Policy Framework and supporting planning guidance. Specifically, proposals should be appropriate for the location, including preventing unacceptable risks from land instability. If land stability could be an issue, the applicant should seek appropriate | 5.117 | Where necessary, land stability should be considered in respect of new development, as set out in the National Planning Policy Framework and supporting planning guidance. Specifically, proposals should be appropriate for the location, including preventing unacceptable risks from land instability. If land stability could be an issue, applicants should seek appropriate technical and environmental expert advice to | 5.154 | Where necessary, land contamination and instability should be considered in respect of new development. Specifically, proposals should be appropriate for the location, including preventing unacceptable risks from land contamination or instability. If land instability and/or land contamination may be an issue, applicants should seek appropriate technical and environmental expert advice | The 2024 NNNPS includes reference to land contamination as well as land instability. |

| | | | | | | | |
|--|-----------------------|--|-----------------------|--|-------|--|--|
| | | technical and environmental expert advice to assess the likely consequences of proposed developments on sites where subsidence, landslides and ground compression is known or suspected. Applicants should liaise with the Coal Authority if necessary. | | assess the likely consequences of proposed developments on sites where subsidence, landslides and ground compression is known or suspected. Applicants should liaise with the Coal Authority if necessary. | | from a competent person to prepare and carry out the appropriate assessments. Applicants should consult with the Coal Authority, Environment Agency and Local Authority if necessary. | |
| Preliminary assessment of ground instability | 5.228 | A preliminary assessment of ground instability should be carried out at the earliest possible stage before a detailed application for development consent is prepared. The applicant should ensure that any necessary investigations are undertaken to confirm that their sites are and will remain stable, or can be made so as part of the development. The site needs to be assessed in the context of surrounding areas where subsidence, landslides and land compression could threaten the development during its anticipated life or damage neighbouring land or property. This could be in the form of a land stability or slope stability risk assessment report. | 5.118 | A preliminary assessment of ground instability should be carried out at the earliest possible stage before a detailed application for development consent is prepared. Applicants should ensure that any necessary investigations are undertaken to ascertain that their sites are and will remain stable or can be made so as part of the development. The site needs to be assessed in context of surrounding areas where subsidence, landslides and land compression could threaten the development during its anticipated life or damage neighbouring land or property. This could be in the form of a land stability or slope stability risk assessment report. | 5.155 | For developments on previously developed land, applicants should ensure and demonstrate that they have considered the risks posed by land contamination in accordance with the Land Contamination Risk Management guidance. A preliminary assessment of land contamination and/or ground instability should be carried out at the earliest possible stage before a detailed application for development consent is prepared. | The 2024 NNNPS requires applicants to consider risk posed by land contamination. |
| Land Contamination Risk Management | Refer to policy 5.228 | Refer to policy 5.228. | Refer to policy 5.228 | Refer to policy 5.228. | 5.156 | Applicants should ensure that any necessary investigations are undertaken, in accordance with Land Contamination Risk Management guidance, to ascertain the risk from | The 2024 NNNPS requires applicants to ensure that any necessary investigations are undertaken, in accordance with Land Contamination Risk Management guidance, |

| | | | | | | | |
|---|-------|--|-------|---|-------|--|--|
| | | | | | | contamination and identify sensitive receptors and that their sites are, and will, remain stable or can be made so as part of the development. The site needs to be assessed in the context of surrounding areas where subsidence, landslides and land compression could threaten the development during its anticipated life or damage neighbouring land or property. This could be in the form of a land stability or slope stability risk assessment report. | |
| Mechanisms for mitigating and minimising risk of land instability | 5.229 | <p>The applicant has a range of mechanisms available to mitigate and minimise risks of land instability. These include:</p> <ul style="list-style-type: none"> • Establishing the principle and layout of new development, for example avoiding mine entries and other hazards; • Ensuring proper design of structures to cope with any movement expected and other hazards such as mine and / or ground gases; or • Requiring ground improvement techniques, usually involving the removal of poor material and its replacement with suitable inert and stable material. For development on land previously affected | 5.119 | <p>Applicants have a range of mechanisms available to mitigate and minimise risks of land instability. These include:</p> <ul style="list-style-type: none"> • Establishing the principle and layout of new development, for example avoiding mine entries and other hazards. • Ensuring proper design of structures to cope with any movement expected, and other hazards such as mine and/or ground gases; or • Requiring ground improvement techniques, usually involving the removal of poor material and its replacement with suitable inert and stable material. For development on land previously affected | 5.157 | <p>Applicants have a range of mechanisms available to mitigate and minimise risks of land instability. These include:</p> <ul style="list-style-type: none"> • establishing the principle and layout of new development, for example avoiding mine entries and other hazards. • ensuring proper design of structures to cope with any movement expected, and other hazards such as mine and/or ground gases. • requiring ground improvement techniques, usually involving the removal of poor material and its replacement with suitable inert and stable material, for development on land previously affected | No distinction derives from the wording. |

| | | by mining activity, this may mean prior extraction of any remaining mineral resource. | | by mining activity, this may mean prior extraction of any remaining mineral resource. | | by mining activity, this may mean prior extraction of any remaining mineral resource. | |
|---|-----|---|-------|---|-------|---|--|
| Coal Mining Risk Assessment | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.158 | Applicants should submit a coal mining risk assessment as part of their application in specific Development High Risk areas. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Options for minimizing risk of land and groundwater contamination | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.159 | Applicants have a range of options available to mitigate and minimise risks of land and groundwater contamination: <ul style="list-style-type: none"> these options should include sustainable remediation, sustainable remediation can provide the opportunity to manage unacceptable risks to human health and the environment, it can help to ensure that the benefit of doing the remediation is greater than its impact. in accordance with the Environmental Improvement Plan, disposal of soils to landfill should be minimised. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Impacts on transport network | | | | | | | |
| Consideration of policy | N/A | No relevant equivalent provision. | 5.203 | Applicants should have regard to the policies set out in local plans, for example, policies on demand management being undertaken at the local level. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the ANPS and 2024 NNNPS. |

| | | | | | | | |
|-----------------------------|-----|-----------------------------------|-------|---|-------|---|--|
| Stakeholder engagement | N/A | No relevant equivalent provision. | 5.204 | Applicants should consult the relevant highway authority, and local planning authority, as appropriate, on the assessment of transport impacts. | 5.271 | Applicants should consult the relevant highway and transport authorities, local planning authority, and Network Rail, as appropriate, on the assessment of transport impacts. This should include having appropriate regard to policies outlined in existing or emerging local plans, Local Transport Plans, Local Cycling and Walking Infrastructure Plans and Rights of Way Improvement Plans where appropriate and applicants should set out agreement on alignment of development proposals to these policies and plans | The 2024 NNNPS emphasises the need to have regard to policies outlined in existing or emerging local plans, Local Transport Plans, Local Cycling and Walking Infrastructure Plans and Rights of Way Improvement Plans. |
| Addressing severance issues | N/A | No relevant equivalent provision. | 5.205 | Applicants should consider reasonable opportunities to support other transport modes in developing infrastructure. As part of this, consistent with paragraph 3.19-3.22 above, the applicant should provide evidence that as part of the project they have used reasonable endeavours to address any existing severance issues that act as a barrier to nonmotorised users. | 5.274 | The applicant should provide evidence that as part of the project they have addressed any new or existing severance issues and/or safety concerns that act as a barrier to non-motorised users, unless it is unsafe or unviable to do so. | No significant distinction derives from marginally different wording. |
| Assessing impacts | N/A | No relevant equivalent provision. | 5.206 | For road and rail developments, if a development is subject to EIA and is likely to have significant environmental impacts arising from impacts on transport networks, the applicant's environmental | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the ANPS and 2024 NNNPS. |

| | | | | | | |
|-------------------|-----|-----------------------------------|-------|--|-------|--|
| | | | | statement should describe those impacts and mitigating commitments. In all other cases the applicant's assessment should include a proportionate assessment of the transport impacts on other networks as part of the application. | | |
| Assessing impacts | N/A | No relevant equivalent provision. | 5.207 | If a project is likely to have significant transport impacts it should include a Transport Assessment, using the WebTAG methodology stipulated in Department for Transport guidance, or any successor to such methodology. If a development is subject to EIA and is likely to have significant environmental impacts arising from impacts on transport networks, the applicant's environmental statement should describe those impacts. | 5.277 | If a project is likely to have significant transport impacts it should include a Transport Assessment, using the Transport Analysis Guidance methodology stipulated in Department for Transport guidance, or any successor to such methodology. The 2015 NNNPS confirms that if a project is likely to have significant environmental impacts arising from impacts on transport networks, the applicant's environmental statement should describe those impacts. ANPS 5.10 refers to assessments using WebTag – the effect may be similar . |
| Travel Plan | N/A | No relevant equivalent provision. | 5.208 | Where appropriate, the applicant should prepare a travel plan including management measures to mitigate transport impacts. The applicant should also provide details of proposed measures to improve access by public transport and sustainable modes where relevant, to reduce the need for any parking associated with the proposal and to mitigate transport impacts. | 5.278 | The applicant should also prepare a travel plan outlining management measures to mitigate transport impacts. A successful travel plan and mitigation strategy will understand the needs of people walking, wheeling or cycling. Audits should be undertaken to understand their movements and establish any barriers and opportunities to improve this environment. This includes detailing the accessibility of the development by active travel The 2024 NNNPS places additional requirements to detailing the accessibility of the development by active travel modes. |

| | | | | | | | |
|----------------------|-----|-----------------------------------|-------|--|-----|---|--|
| | | | | | | <p>modes, such as the provision of safe and secure cycle parking and associated facilities, creating high quality pedestrian environments including through public realm improvements, enhancing modal interchanges to create an integrated transport system and access via public transport such as bus stops within close proximity of the development. Mitigating measures should also look to reduce the need for any parking associated with the proposal, ensure the infrastructure needed to support the transition to alternative fuels including electric vehicles are in place during construction and ahead of operation, and to mitigate transport impacts.</p> | |
| DfT Circular 02/2013 | N/A | No relevant equivalent provision. | 5.209 | <p>For schemes impacting on the Strategic Road Network, applicants should have regard to DfT Circular 02/2013 The Strategic Road Network and the delivery of sustainable development (or prevailing policy) which sets out the way in which the highway authority for the Strategic Road Network, will engage with communities and the development industry to deliver sustainable development and, thus, economic growth, whilst safeguarding the primary</p> | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the ANPS and 2024 NNNPS. |

| | | | | | | | |
|--------------------------------|-----|-----------------------------------|-------|---|-------|--|---|
| | | | | function and purpose of the Strategic Road Network. | | | |
| Co-funding | N/A | No relevant equivalent provision. | 5.210 | If new transport infrastructure is proposed, applicants should discuss with network providers the possibility of co-funding by Government for any third-party benefits. Guidance has been issued in England which explains the circumstances where this may be possible. The Government cannot guarantee in advance that funding will be available for any given uncommitted scheme at any specified time, and cannot provide financial support to a scheme that solely mitigates the impacts of a specific development. Any decisions on co-funded transport infrastructure will need to be taken in the context of the Government's wider policy of transport improvements. | 5.280 | If new transport infrastructure is proposed, applicants should discuss with network providers the possibility of co-funding by government for any third-party benefits. The government cannot guarantee in advance that funding will be available for any given uncommitted scheme at any specified time and cannot provide financial support to a scheme that solely mitigates the impacts of a specific development. Any decisions on co-funded transport infrastructure will need to be taken in the context of the government's wider policy of transport improvements | No significant distinction derives from marginally different wording. |
| Serving different travel needs | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.272 | Different transport networks may need to share space within an area, even whilst serving different travel needs. For example, bus lanes, shared cycle lanes, green lanes, or bus and rail routes on the same corridor. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Integrated transport outcome | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.273 | Applicants should seek to offer an integrated transport outcome, significantly considering opportunities to support other sustainable | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |

| | | | | | | | |
|---|-----|-----------------------------------|-------|--|-------|--|---|
| | | | | | | transport modes, as well as improving local connectivity and accessibility in developing infrastructure. The needs of pedestrian and other vulnerable road users should be considered, where appropriate, in line with the principles of the road user hierarchy. | |
| Assessing impacts | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.275 | For road and rail developments, the applicant's assessment should include an assessment of the transport impacts on other networks as part of the application, based on discussions with the Local Highway Authority/Local Transport Authority/Local Planning Authority. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Mitigation measures | N/A | No relevant equivalent provision. | 5.215 | Mitigation measures for schemes should be proportionate and reasonable, focussed on promoting sustainable development. | 5.281 | Mitigation measures for schemes should be proportionate and reasonable, focussed on facilitating journeys by active travel, public transport, shared transport and cleaner fuels. | The 2024 places greater emphasis on facilitating journeys by active travel modes. |
| Maximising opportunities for sustainable travel modes | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.287 | Consideration should also be given to whether the applicant has maximised opportunities to allow for journeys associated with the development to be undertaken via sustainable modes. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Mitigation measures | N/A | No relevant equivalent provision. | 5.216 | Where development would worsen accessibility such impacts should be mitigated so far as reasonably possible. | 5.282 | Where development would worsen accessibility, there is a strong expectation that such impacts should be mitigated. | No significant distinction derives from marginally different wording. |

| | | | | | | | |
|---|-----|-----------------------------------|-------|---|-------|--|--|
| | | | | There is a very strong expectation that impacts on accessibility for non-motorised users should be mitigated | | Where impacts cannot be mitigated, the applicant is required to provide reasoning as to why impacts cannot be mitigated. | |
| Mitigation measures | N/A | No relevant equivalent provision. | 5.217 | Mitigation measures may relate to the design, lay-out or operation of the scheme. | 5.284 | Mitigation measures may relate to the design, lay-out or operation of the scheme, or any support or funding to the immediate surrounding area of the scheme. | The 2024 NNNPS sets out that mitigation measures can relate to support or funding to the immediate surrounding area of the scheme. |
| Network improvements | N/A | No relevant equivalent provision. | N/A | No relevant equivalent provision. | 5.283 | The applicant should provide evidence that the development improves the operation of the network and assists with capacity issues. | N/A - no relevant equivalent provision in the ANPS and 2015 NNNPS. |
| Consideration of impacts | N/A | No relevant equivalent provision. | 5.211 | The Examining Authority and the Secretary of State should give due consideration to impacts on local transport networks and policies set out in local plans, for example, policies on demand management being undertaken at the local level. | 5.286 | The Examining Authority and the Secretary of State should give due consideration to impacts on local transport networks and policies set out in existing and emerging local plans and Local Transport Plans, during both construction and operation. | The 2024 NNNPS identifies the need to consider impacts during both construction and operation. |
| Relevant local policies and local plans | N/A | No relevant equivalent provision. | 5.212 | Schemes should be developed and options considered in the light of relevant local policies and local plans, taking into account local models where appropriate, however the scheme must be decided in accordance with the NPS except to the extent that one or more of sub-sections 104(4) to | 5.288 | Schemes should be developed, and options considered, in the light of relevant policies and plans, both national and local, taking into account local models where appropriate. | The 2015 sets out the scheme must be decided in accordance with the NPS. |

| | | | | | | | |
|------------------------------|-----|-----------------------------------|-------|--|-------|---|--|
| | | | | 104(8) of the Planning Act 2008 applies. | | | |
| Mitigation measures | N/A | No relevant equivalent provision. | 5.213 | Projects may give rise to impacts on the surrounding transport infrastructure including connecting transport networks. The Secretary of State should therefore ensure that the applicant has taken reasonable steps to mitigate these impacts. Where the proposed mitigation measures are insufficient to reduce the impact on the transport infrastructure to acceptable levels, the Secretary of State should expect applicants to accept requirements and/or obligations for funding infrastructure and otherwise mitigating adverse impacts on transport networks, as set out below. | N/A | No relevant equivalent provision. | N/A - no relevant equivalent provision in the ANPS and 2024 NNNPS. |
| Granting development consent | N/A | See 5.22 above. | 5.214 | Provided that the applicant is willing to commit to transport planning obligations and, to mitigate transport impacts identified in the WebTAG transport assessment (including environment and social impacts), with attribution of costs calculated in accordance with the Department's guidance, then development consent should not be withheld. Appropriately limited weight should be applied to residual | 5.291 | Provided that the applicant is willing to commit to transport planning obligations and to mitigate transport impacts identified in the Transport Analysis Guidance (including environment and social impacts), with attribution of costs calculated in accordance with the Department's guidance, then development consent should not be withheld. Where residual effects on the surrounding transport infrastructure remain, | N/A – comparable provision at ANPS 5.22. |

| | | | | | | | |
|--|--|--|--|--|--|---|--|
| | | | | effects on the surrounding transport infrastructure. | | appropriately limited weight should be given. | |
|--|--|--|--|--|--|---|--|

2 References

Department for Transport (2018). Airports National Policy Statement.

Department for Transport (2015). National Networks National Policy Statement.

Department for Transport (2024). National Networks National Policy Statement.