

Local Transport Plan 4 Consultation – New Forest District Council Response

Thank you for giving New Forest District Council (NFDC) the opportunity to make comment on Hampshire's Local Transport Plan (LTP4) consultation document and the policies contained within it. This Council would also welcome the opportunity to continue to work closely with the County Council to help further refine and implement the new transport strategy and plan.

This response sets this Council's comments on the draft policies in the context of NFDC, and highlights some of the key issues that will require consideration for this District.

New Forest District comments

This Council is keen to work closely with the County Council in considering transport issues within the District. As you are aware we are already working with HCC on transport issues in the Waterside area and other parts of the District, and are currently progressing work with HCC, New Forest National Park Authority and Forestry England to develop a Local Cycling and Walking Infrastructure Plan (LCWIP) for the wider New Forest. Our detailed local knowledge of the area and its communities' needs can make a major contribution to the County Council's work.

With regard to the draft LTP4 policies there are a number of matters which have direct implications that could affect the New Forest area and district as detailed below:-

Policy C2 - Efficient and sustainable movement of goods and Policy SI1 (Work with partners to deliver targeted improvements to Hampshire's strategic rail, road and digital infrastructure

The LTP4 acknowledges the importance of the Port of Southampton and its role in the national economy, and reference is made to the Freeport proposal and to A326 multi-modal improvements. NFDC supports the policy, but it is also imperative that LTP4 addresses the Freeport in much more detail if the proposals go ahead as anticipated, and that the appropriate partners are identified and engaged with a clear set of priorities for addressing future growth in this part of the district.

Policy HP1 - Deliver the infrastructure required to support a large-scale shift towards walking and cycling for everyday trips

The Plan sets out that HCC is looking to put in place a number of Local Cycling and Walking Infrastructure Plans (LCWIPs) that identify preferred routes for walkers and cyclists, and prioritise future funding. NFDC welcomes this and notes that the existing joint work with HCC on LCWIPs, and involving other partners, will need to continue in order to deliver these schemes.

Policy RT1 - Maintaining accessibility in rural areas, and providing realistic alternatives to reduce dependency on the private car

For NFDC's area, transport links with neighbouring areas and local accessibility are important to, and have a significant impact on, the lives of communities in the Plan Area. Large parts of the district are very rural with heavy dependence on private transport to access basic services and needs. NFDC acknowledges that there is a tension between carbon reduction and the geographical location of existing communities, but maintaining accessibility in these rural areas will be paramount in supporting our local communities.

The New Forest District (outside the National Park) Local Plan sets the current development strategy for the area up to 2036 and largely reflects the pre-existing spatial pattern of development within the District. Whilst NFDC strongly supports the direction for change in the LTP4, the LTP also needs to recognise and support the needs of existing communities and be realistic in its ambitions for supporting behaviour and infrastructure changes. The County Council is looking to deliver community-led place and transport improvements and encourage transport providers to bring services to rural localities, and whilst NFDC support this it is not clear how some of the challenges around sustainable funding will be achieved (see Policy DM1 below).

Policy C8 - Managing the harmful health effects of poor air quality and noise disturbance due to transport

HCC anticipates undertaking a strategic co-ordination role on actions to reduce all transport-related pollutants, including the impact of nitrogen dioxide (NO₂) and particulates (PM) on air quality and traffic-related noise levels – working closely with the district and borough councils. This is welcomed by NFDC and also links with our comments on Policy C9 below.

Policy C9: Protecting the environment

The LTP seeks to protect the environment through Biodiversity Net Gain and overall net environmental gain by 2050. It will look to minimise and mitigate the adverse impacts of traffic and travel on our natural and built environment – seeking opportunities to deliver environmental enhancements through new or upgraded infrastructure schemes, maintenance and operational procedures.

In relation to potential significant adverse effects on parts of the New Forest SAC and SPA the above approach is supported, alongside any advice that Natural England may provide to NFDC. The Council has instigated a monitoring regime to monitor the condition of sensitive vegetation within the New Forest SPA, SAC and RAMSAR sites, to assess whether or not nutrient nitrogen deposition, acid deposition and ammonia levels from traffic emissions are having an adverse effect on these designated European sites. If air quality monitoring identifies that significant adverse effects are occurring or likely, mitigation measures will need to be put in place to ensure that the impact of development can be addressed.

NFDC has also recently adopted a new Supplementary Planning Document entitled 'Air Quality Assessments in New Development' which provides guidance on when an Air Quality Assessment will be needed to support a planning application and what the assessment needs to address. It also confirms when an Air Quality Statement is required. Where necessary to enable development to take place, appropriate mitigation measures will be required, the document contains suggested mitigation measures.

Policy DM1 - Integrate transport and strategic land-use planning to reduce the need to travel

HCC wish to engage with LPA's at the earliest stage in the planning process before site allocations have been determined, to influence location / design of development); and support strategic sites subject to a number of criteria set out in Policy DM1. This is a very welcome move but HCC will need to be prepared for short bursts of dialogue when Local Plan preparation reaches critical stages – there may be periods when a number of LPAs require feedback and liaison regarding potential site allocations and their transport impacts. HCC careful to apply its resources at the right stage. HCC must be prepared to engage with Local Planning Authorities (LPAs) before the various consultation stages of Local Plan production and before the strategic direction of the Local Plan has been agreed at a local

level. The recently published Environment Bill has set an ambitious timeframe for the production for Local Plans and providing prompt advice to LPAs will be paramount.

LTP4 should also be clear that it will engage with work being undertaken at the PfSH level. Careful discussion is needed on how projects are identified to ensure that developer contributions can be justified and meet the CIL Regulation tests to offset traffic impact of development where there are high levels of car dependency.

Policy DM2 - Support proactive masterplanning of new development sites for high quality neighbourhoods

DM2 looks to establish masterplanning guidelines and transport development codes through which transport impacts can be assessed and mitigated. This includes resisting developments that do not apply certain principles; requiring transport impacts that detail carbon emissions and air pollution; appropriate mitigation; and only supporting new accesses onto A-roads where flow of traffic is not compromised.

NFDC would welcome further discussion with HCC on how this Policy could be delivered.

Summary

NFDC supports the overall vision and principles of the LTP. NFDC is of the view that there remains the need for a significant shift in behaviour. This is perhaps more acute within the district given the demographic profile of the population, the size of the district and the existing provision of public transport. Solutions for this area will need to reflect the geography of NFDC (in particular the more rural aspects) and what can realistically be achieved within the pattern of development.

This Council would welcome further discussion and engagement with HCC on how we work collaboratively to deliver the vision set out in LTP4.