

STAGE 2:

Matter 13 Wednesday 21 May PM

Answers to inspector's questions on T1 Sustainable and Active Transport and Travel

1. Is the Strategic Transport Assessment [ST15] based on a sound methodology and are the conclusions reasonable, in concluding that the quantum and distribution of the development proposed in the Plan, and the resulting transport impacts, are capable of mitigation at the strategic level?

The aspirations of policy T1 sub policies i, ii, and iii are the right ones to bring about the scale of the change required to achieve the carbon emissions reduction required by policy CN1. Unfortunately the practical requirements set out in sub-policies iv and v are unlikely to have sufficient impact on the transport mix that will result from a development to limit the greenhouse gases it will generate to deliver the scale of the reduction required by policy CN1.

2. How has the Strategic Transport Assessment, including its findings in relation to park and ride infrastructure, informed the Plan?

Although the Strategic Transport Assessment concludes that the plan is therefore deliverable and sound from a transport perspective it is looking narrowly at the traffic flow implications only. It says however that transport emissions will increase by 2041 by 2-3% without mitigation, and recommends as mitigation only three schemes that will have the effect of increasing transport capacity and therefore increase transport emissions still further. Mode share, it estimates, will change very little ('Highway' by -0.3%). Clearly despite their aspirations, the transport proposals are too weak to achieve the targets of policy CN1,

3. The supporting text to strategic policy T1 runs for many pages and is repetitious in places (e.g. the key issues repeat previous text in places). Taken together, would the supporting text and policy be clear, unambiguous, so it is evident how a decision maker should react to development proposals?

The supporting text should be rewritten to provide a checklist for developers and decision-makers specifying what will be required as transport infrastructure in terms of both quality and quantity, on and off site.

4. How has the concept and principles of '20 minute neighbourhoods' informed the Plan's spatial strategy as set out in strategic policy SP2?

Despite a full-page diagram and glossary entry the draft plan still needs a definition to help decision-makers. Some statement in policy SP2 setting out the requirement for and characteristics of a 20-minute neighbourhood would be essential (percentage of facilities required, distance between boundaries (1 mile?), relationship with 'liveable neighbourhood' and 'low-traffic neighbourhood,' targets for through traffic volumes).

5. Would strategic policy T1iii, in seeking development to prioritise the concept of 20 minute neighbourhoods, be clear and unambiguous?

There seems little value in ‘prioritising a concept.’ We would prefer to see an unambiguous sub-policy listing unambiguously the facilities that developers would be required to ensure, and what they would need to do to ensure liveability within 1 mile of all buildings proposed.

6. Would paragraph 6.4 reflect the current status of the Local Transport Plan?

The Local Transport Plan has been approved but is at an earlier stage than the summary suggests. Section 8 sets out ‘an implementation approach’ but no new plans, and none of the proposed monitoring of current transport patterns have been published.

7. Should the requirements in paragraph 6.5, which set out what development will need to be, be included in the policy? Would it appropriately refer to untested documents such as Hampshire County Council Guidance?

LTP 4 includes e.g. policy DM2: support for proactive masterplanning of new development sites. Referring to LTP 4 that then supports local plans and local planning practices may be unnecessarily circular. A summary of key sections of LTP 4 in the supporting text, such as LTP 4 policy DM2 with a requirement in the policy referring to the summary would be more direct and less ambiguous.

8. Paragraph 6.16 refers to ‘... guidance in the NPPF...’. In doing so, would the text clearly set out that NPPF is national policy?

This presumably is a reference to Chapter 9 of the NPPF. Since NPPF is guidance for planning authorities this reference is again circular. We should assume that all the provisions have been incorporated. If not, they should be adopted as direct requirements and added to the draft plan.

9. Paragraph 6.21 sets out requirements of new development? In so doing would this introduce policy that should properly be included within the policy text?

It would be good to add these policies to Policy T1. As part of a discursive supporting paragraph they are of secondary importance. They should be converted into six new sub-policies. A requirement to demonstrate significant uptake and prominence for walking, wheeling and cycling, and using public transport services should be linked to standards of what will be sufficient.

10. Strategic policy T1ii requires development to be in compliance with the Hampshire Movement and Place Framework. Would the policy wording confer the status of a local plan policy on other guidance that is established outside the plan making system?

It would seem necessary to include other guidance to be in compliance with the Movement and Place Framework in order to prevent anomalies. It would also seem necessary to add the Healthy Streets approach and the Road User Utility Framework to the compliance requirements, since these are both additional LTP 4 requirements.

11. Would strategic policy T1, in its requirement for a transport assessment be clear and unambiguous and would it accord with national guidance in this respect?

The reference in T1 to transport assessment is worded ambiguously: it should be made clearer that it is not the assessment that should prioritise the subsequent paragraphs, but the development itself. The word 'prioritise' is too indirect, and should be replaced by 'demonstrate that it will maximise infrastructure that will successfully provide: ...' A mode share prediction with an analysis of how the proposals will achieve this should be required as the core part of the assessment.

12. In all other ways, would strategic policy T1 be clear and unambiguous, so it is evident how a decision maker should react to development proposals?

The implications of T1 for transport emissions are unclear and need to be set out more clearly. In the draft plan there is no information and document ST15 does not even address 'do something' emissions by 2041. The data in paras 9.18 and 9.19 on extra train and bus passengers is vague, is not related to emissions, and refer to a bus service that does not exist. Indeed para 8.6 says plainly that the STRM model used was unable to predict the impact of T1. No effort was made to use Active Travel England tools, nor public transport prediction tools. Decision-makers will need far greater clarity.

Answers to Inspector's questions on T2 Parking for New Developments

1. Would policy T2, in providing 'parking provision assessment criteria', instead of parking standards, provide the appropriate level of clarity and certainty for developers and decision makers in relation to parking provision requirements?

T2ii is too ambiguous. There is a need to add, for each of the four criteria mentioned, formulae for how these criteria will affect the number of parking spaces, and to add in the formulae applying to the other criteria not included in the examples. Otherwise developers and planning committees will have no idea what is required.

2. Would the policy strike the right balance between promoting active travel and sustainable travel modes and delivering good quality development and placemaking, ensuring highway safety?

The draft plan does not address this and document ST15 does not provide any information that can be used to assess what the right balance is. Policy CN1 implies the right balance is for transport emissions to be net zero by 2030. Document ST1 (7.10) says that without intervention, by 2041 transport emissions will be 2 to 3% higher than they are today (786kt, 49.9%). ST15 does not calculate the impact of these policies.

3. Would policy T2i requirements for a design and access statement, transport assessment and travel plan capture all relevant development proposals? In requiring demonstration of how sustainable transport modes have been prioritised, would the policy provide the necessary clarity and would it be effective in reducing car parking levels and trip generation?

There is a need to add, for each of the four criteria mentioned, formulae for how these criteria will affect the number of parking spaces, and to add in the formulae applying to the other criteria not included in the examples. Otherwise developers and planning committees will have no idea what is required.

4. Would policy T2ii, in referring to local context accord with NPPF paragraph 9, which refers to local circumstances? [i.e. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area]

The wording of T2ii allows for any interpretation of local circumstances. It needs to add words to reflect the NPPF's 'Planning policies and decisions should play an active role in guiding development towards sustainable solutions' and add more information about the climate context and implications of this.

6. Would the policy provide appropriate requirements and guidance in relation to matters such as assessing car parking demand, on street parking stress, parking and loading requirements for operational vehicles, the requirements for car parking management plans, the role for restriction of resident parking permits, as appropriate?

It would be helpful to provide comprehensive guidance on car parking standards and their application, with supporting context on the need for emissions reduction.

Answers to inspector's questions on T3 Promoting Sustainable Travel Modes of Transport and the Design and Layout of Parking for New Developments

2. Would it adequately reflect the need to promote active travel modes as suggested in the policy title?

There needs to be more on the scale, standards and design of active travel and public transport infrastructure. Only the highest quality provision will bring about the necessary modal switch.

4. Would the policy trigger, (all but householder) be appropriate and justified? Would the policy be effective in this regard?

It is hard to see why householder applications are excluded from the trigger. Removing the exclusion could discourage householders from concreting over their front gardens, creating parking areas on former orchards, and encourage them to develop cycle parking facilities, for example.

5. Would the policy wording provide the necessary clarity, be clear and unambiguous as to how a decision maker should react to development proposals? In particular in its introduction '...to prioritise sustainable and active modes of travel... to demonstrate through the design process..' and policy T3i, in requiring '... priority is given to active and e mobility travel...'?

Without specific guidance on what is required for active travel infrastructure many developers will be confused, and others will propose inadequate solutions that follow in

the tradition of unusable cycle ways, poor footpaths, patchy provisions. Decision-makers need the tools to test proposals and see through rhetoric

6. In the absence of standards for matters such as active and e mobility travel would the policy be effective?

Standards for active, mobility, and public transport travel are essential for effectiveness.

7. Would policy T3iv be effective in requiring ‘...opportunities to be explored through the design process...’?

No. To determine specific results the draft plan should concentrate on specifying outputs and outcomes. Specifying processes will not guarantee results. Whether opportunities materialise to produce the results the plan requires will not depend on whether a developer follows a “design process.”

Answers to Inspector’s questions on T4 Access for New Developments

1. Would policy T4 be clear and unambiguous, so it is evident how a decision maker should react to development proposals? In, particular should it include provisions to control access arrangements?

It would be important to encourage and add guidelines on excluding motorised vehicular traffic, especially through traffic, but important to require cycling and pedestrian through permeability.

2. Would policy T4i in requiring connection to the nearest public transport stop be effective in supporting non-car modes of transport and to provide safe and attractive routes to, from and within a site?

The requirements need more practical detail about the most functional connection to public transport. ‘nearest public transport’ is an insufficient requirement. Sometimes it will be appropriate to require the establishment of a new bus route, or new railway station, and sometimes a good connection with the second nearest public transport route would be important too. It will depend on where the public transport route goes to, and the frequency. This policy will only have the required impact if the necessary details are set out on a site-by-site basis, either as part of this policy, or as parts of the site-specific policies..

3. Would the requirements of policy T4i, which requires development to prioritise the needs of walking, wheeling and cycling...be clear and unambiguous?

T4i should not rely on a subjective process term such as ‘prioritise.’ There is a need to quantify the scale and nature of active travel infrastructure. At a strategic level this needs to be a formula for amount of infrastructure per hectare by mode and standards for construction. At a site-specific level there should be specific requirements for each site.