

## EBC consultation response – LTP4

**To what extent do you agree, or disagree, that the proposed vision reflects how Hampshire’s transport system should look in 2050 (taking into account its role in delivering a better environment, economy and society)?**

Strongly disagree	
Disagree	
Neither agree nor disagree	
Agree	<b>X</b>
Strongly agree	

**What changes to the proposed vision would you recommend?**

The proposed outcome of ‘A carbon neutral, resilient Hampshire’ includes a target to ‘reduce transport-related carbon emissions to net zero (neutrality) by 2050’. At a time of environmental and climate emergency Eastleigh Borough Council considers this to be unambitious and would support a faster pace of change.

**To what extent do you agree, or disagree, that that we have identified the correct outcomes for Hampshire?**

Strongly disagree	
Disagree	
Neither agree nor disagree	
Agree	<b>X</b>
Strongly agree	

**What do you feel should be changed?**

Another outcome which should be considered is ‘An improved transport network that is well maintained’. A high quality and well-maintained public highway will support the achievement of the overall objectives and is an important factor in road safety.

**To what extent do you agree, or disagree, that the following two principles should help to guide decisions about Hampshire’s transport system?**

	Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree
Significantly reduce dependency on the private car				<b>X</b>	
Provide a transport system that promotes high quality places and puts people first				<b>X</b>	

**Assuming sufficient funding, how confident do you feel that the policies within the proposed Local Transport Plan 4 will:**

	Not at all confident	Fairly confident	Very confident	Don't know
Reduce transport-related carbon emissions to net zero (neutrality) by 2050	X			
Help create a transport network that is resilient to climate change, extreme weather, incidents and major disruptive events		X		
Protect and enhance Hampshire's natural and historic environments, resulting in an overall net environmental gain		X		
Improve air quality and reduce noise disturbance from transport		X		
Support a connected economy, create successful places, and ensure Hampshire continues to prosper whilst reducing its emissions		X		
Support sustainable housing and employment growth and regeneration that positively supports the LTP4 vision				X
Promote active travel and active lifestyles to improve our health and wellbeing				X
Provide more equitable access to services, opportunities and life chances, delivering improved quality of life for all in Hampshire	X			

**Why don't you feel confident that a reduction in transport-related carbon emissions to net zero (neutrality) by 2050 could be achieved through the proposed policies?**

EBC do not believe the 10% reduction in the distance travelled by cars in Hampshire by 2030 (p36) will be sufficient to reduce transport emissions by the amount indicated in the graphs on p26 and 27 (noting that a rapid uptake of EVs will also be required, which is also not within the County Councils direct control).

Policy C4a outlines that in order to achieve the reductions in carbon emissions required to be carbon neutral and resilient to the impacts of climate change by 2050, travel behaviour change and an acceleration in the shift to zero emission vehicles will be required. It is not clear if the County Council have included the embedded lifecycle carbon emissions in an assumed increased EV uptake (for both the disposal of combustion vehicles and the manufacture of new EVs).

## **Why don't you feel confident that a transport network that is resilient to climate change?**

Policy C4 outlines that 'designing for climate change' will be included for new transport schemes and existing infrastructure, which will involve assessing schemes to understand their carbon impact and resilience to the effects of climate change, seeking to identify mitigation measures to offset any net increase in carbon, using materials and assets with a lower carbon footprint and resilient to the effects of climate change and retrofitting existing infrastructure to make it more resilient where there is a good case for doing so.

EBC support the assessment of climate change and resilience impact as part of our overall transport investment prioritisation approach. This should however be a fundamental element of prioritisation schemes moving forward, and the Council offers it support in developing these schemes. Extreme weather, incidents and major disruptive events are likely to become continually worse and so this should also be factored in.

## **Why don't you feel confident that the policies within the proposed Local Transport Plan 4 will protect and enhance Hampshire's natural and historic environments, resulting in an overall net environmental gain?**

Policy C9 indicates a net gain in biodiversity (with a target of 10% or greater across the whole programme).

Biodiversity Net Gain (BNG) will be mandatory for development (likely from Spring 2023) and so this should be strengthened in the Policy. BNG should also be delivered on site as much as possible, rather than solely stating 'across the whole programme'.

The supporting text to the policy outlines that 'In the past, transport schemes have often adversely impacted the environment' and so, in addition to future work, how will the County Council seek to recover the previous (as is recognised) loss of biodiversity and natural environment?

In the section on the implementation of the policy, there are few practical steps that HCC will take to achieve environmental net gain – for example, clear targets for protecting plants, animals and ecosystems are not given.

The implementation also states that ensuring all LTP4 schemes are assessed from the early stages of development to understand any potential environmental impacts, and where possible, avoid or mitigate any negative impacts identified and enhance any positive impacts. In order to achieve the policy to protect and enhance, this statement should be strengthened (and solely be based up 'where possible').

## **Why don't you feel confident that improved air quality and reduced noise disturbance from transport could be achieved through the proposed policies?**

As part of the implementation of Policy C8, EBC would welcome the County Councils 'support (with) district (and unitary) councils to carry out air quality reviews, identify and monitor Air Quality Management Areas (AQMAs), and prepare and implement Air Quality Action Plans in locations where AQMAs have been declared, in line with our statutory duties'. Reporting AQMAs is however the responsibility and expertise of the LPAs and so this aspiration may also perhaps reflect a lack of detailed understanding of the role of Districts at the County.

No mechanism for this supporting role is given however, nor clarity on how HCC will prioritise and balance County and local level priorities. For example, there is reference to prioritising locations with the highest proportion of vulnerable people, however vulnerable people are not defined. Furthermore, the LAQM guidance that Districts follow in their Air Quality work does not make such a distinction either.

Working towards no AQMAs is also supported however this does not consider a previous statement that there are no safe concentrations of air pollutants.

The Policy notes adherence to the statutory requirements however does not directly reference the Environment Act 2021 which will set a more stringent target for PM 2.5 and require greater partnership working with Local Air Quality Partners.

The implementation text also identifies the need to 'accelerate the shift to low emission vehicles, for example, through the provision of electric vehicle charging infrastructure and seeking funding and other opportunities to work towards the replacement of the existing diesel fleet of buses with zero emission buses' – however it may also be prudent, as EBC have already done with its RCV fleet to introduce HVO fuel immediately to reduce impacts.

Finally with regards to air quality, within the implementation text, 'exploring the use of new demand management and enforcement measures in locations where poor air quality adversely impacts on the health of residents and visitors, including emissions based charging or Clean Air Zones' is supported but it is understood that the legislation is such that a CAZ would be a voluntary action on the part of the District, albeit with close cooperation with County.

Reducing the number of residents in the County exposed to noise above 55 night and 65 day decibels is given as a target, however it is not clear how these figures have been arrived at, and what acoustic metric they represent.

Under the Environmental Noise Directive, the government carries out modelling of noise levels from transport sources, and Important Areas defined as those areas where the population fall within the top 1% noisiest locations. There are numerous such areas within Eastleigh that fall to the County to deal with, either singly or in conjunction with National Highways, and even more across Hampshire. It would help if HCC shared how they have arrived at their stated aim, and how they intend to show progress towards meeting it.

The sections where noise is discussed also mention rail and air alongside road noise, but do not clearly explain that; road noise is by a large margin the most significant source of high noise exposure, or how they will reduce noise from rail or air when they have no powers for such.

#### **Why don't you feel confident that the policies within the proposed Local Transport Plan 4 will support a connected economy create successful places and ensure Hampshire continues to prosper whilst reducing its emissions?**

The LTP4 identifies that in order to support the local economy, transport investment will be required to connect people, goods and places, encourage regeneration in disadvantaged areas and to support sustainable housing growth.

The strategic transport routes including the Ports of Southampton and Portsmouth, Southampton Airport, and Heathrow Airport are noted however the LTP4 lacks an assessment of the where the current and future local Hampshire economic centres are now, and what infrastructure needs to be planned for the future.

There is reference to residents in rural areas often being more reliant on the private car – however the rural economy should not be overlooked, especially as Covid-19 has brought about more, sustained working from home.

In relation to the local economy, there is also no reference to the preference to use local (Hampshire or regional) based suppliers.

**Why don't you feel confident that the policies within the proposed Local Transport Plan will promote active travel and active lifestyles to improve our health and wellbeing?**

The LTP4 identifies that 51% of commuting trips of less than 1.25 miles are made by car. The reasons for this have not been explored however EBC consider that this is likely due to a lack of good walking, cycling, and public transport alternatives.

All journey types (commuting, leisure, school drop off / collection) should be considered and identified within the LTP4 – and will need to be ambitious to achieve the policy.

**Why don't you feel confident that the policies within the proposed Local Transport Plan will support sustainable housing and employment growth and regeneration that positively supports the LTP4 vision?**

New development will inevitably generate more carbon emissions from that locality and so the aim should be to minimise these and reduce carbon emissions across the wider network. As such, the LTP4 would benefit from identifying housing and employment growth areas, and link into LPA Local Plans.

EBC would support the concept of the 20-minute neighbourhood and locating new development with good access to public transport services, however these services need to provide an effective alternative. For example, choosing locations for new development near to train stations with poor services and no plans for improvement, would not deliver accessible developments.

**Why don't you feel confident that the proposed Local Transport Plan 4 will more equitable access to services, opportunities and life chances delivering improved quality of life for all in Hampshire?**

The LTP4 identifies a 10-point plan for equitable public transport which, together with Policy PT1b seeks to work with transport operators and customers to understand and address barriers to public transport use to achieve a more equitable service provision.

HCC were unsuccessful in securing government funding to implement the recently adopted Hampshire Bus Service Improvement Plan, this has resulted in HCC proposed savings to public and community transport services, currently out to public consultation, and makes it highly unlikely that this objective will be achieved without significant investment in both passenger services and infrastructure.

The withdrawal of high street services, such as banks, post offices, cash points and local healthcare provision being centralised is increasing the need for travel in some areas, particularly rural locations. The distances people need to travel to access these services is increasing at the time when government wants people to walk, cycle and use public transport more often.

**Are there any other policies or principles that you feel should be included in the Local Transport Plan 4? If so, please clarify which and why below.**

The Passenger Transport and Concessionary Travel consultation should link to the LTP4 as service cuts will have a direct impact on reducing public travel and adversarial impact on the guiding principle to significantly reduce dependency on the private car.

The LTP4 identifies that 'Local planning policies are set out in Local Plans, which are the responsibility of local planning authorities' – and that 'A coordinated, strategic approach to transport and land use

integration therefore depends upon effective and pro-active partnership working with the local planning authorities across Hampshire’ – however the LTP4 does not suggest how this could be achieved, which will be fundamental to delivering well connected, sustainable housing, employment growth and regeneration.

**To what extent do you agree or disagree with the proposed approach to meeting our outcomes in the following areas?**

	Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	Don't know
Healthy Places				X		
Future Mobility				X		
Balancing Travel Demand				X		
Rural Transport				X		
Asset Management				X		
Development and Master planning				X		
Strategic Infrastructure				X		

**Are there any other measures that you feel should be included in the Local Transport Plan 4?**

The LTP4 refers to a divergence from the traditional capacity increase to manage the highway however there is no reference as to how the current capacity can be managed down.

The LTP4 recognises that the Covid-19 pandemic has had a far-reaching impact on our lifestyles, travel behaviour and choices however in relation to research by the Chartered Institute of Personnel and Development (CIPD) identifying that the proportion of people working from home on a regular basis once the crisis is over will increase to 37% compared to 18% before the pandemic impact, there may also be an impact on second (or primary) car ownership.

There could be greater opportunities for people to try different modes of transport. Generally, people are more comfortable with what we know, and opportunities for people to try EVs and electric bikes etc, could remove some of the fear and uncertainty. In addition, the LTP4 could further explore the benefits of mobility hubs to facilitate modal shift.

An [Integrated Sustainability Appraisal](#) (ISA) has been undertaken on the draft Local Transport Plan 4. The ISA evaluates the social, economic, environmental, health, community safety and equality consequences of the proposed LTP4 in order to ensure they are fully considered and addressed. The ISA has assessed the draft LTP4 as a whole; detailed assessment of specific schemes will be undertaken at a later stage as applicable. Details of the ISA can be found within the supporting documents at [www.hants.gov.uk/localtransportplan](http://www.hants.gov.uk/localtransportplan).

**We would welcome your views on the impacts that have been identified and any impacts that you feel are missing.**

The ISA notes that ‘the LTP4 does not promote specific schemes or locations for improvements within the Plan Area’ however, Theme Policy SI1 does support targeted improvements to the wider strategic road network and major road network which are listed as specific schemes within LTP4.

EBC considers that these schemes should be included within the ISA as these will have tangible impacts for residents.

EBC agrees with the ISA conclusion to formalise the requirement for 10% biodiversity net gain to be included as this could have a huge a positive cumulative effect across the County and is a missed opportunity. Enhancing vegetation maintenance along the highway also provides huge potential for biodiversity enhancement, with regards to habitat connectivity and increases in diversity.

EBC also agree, as concluded within the ISA, that the LTP should have more specific measurable targets to make the plan more robust and to allow for effective meaningful monitoring. Such SMART measures should at least form part of process for future transport strategies and area action plans, if not as part of the LTP4 itself.

An Equalities Impact Assessment (EQiA) has also been undertaken. The assessment considers to policies against the 9 protected characteristics plus an additional two protected characteristics of Poverty and Rurality. The definition for Poverty and Rurality are undefined however in particular for Poverty, EBC consider that this indicator may need to be broadened to include income levels, particularly in relation to the cost-of-living crisis.

**If you would like to make any further comments or suggestions regarding the draft Local Transport Plan 4 please do so in the box below.**

The “Strategic transport infrastructure priorities for Hampshire” on page 116 of the draft LTP4 in the “International gateways” refer to “A326 multi modal improvements to support the Solent Freeport”.

Please can a further item in that table, under the section “Major Road Network” be added to read as follows: “Chickenhall Lane Eastleigh Link Road to support the Solent Freeport”.

The LTP4 appears very light on rail and influencing the rail network.