

# **Examination of the Welwyn Hatfield Local Plan**

**Council's Statement for the  
Stage 3 Hearing on  
20<sup>th</sup> to 22<sup>nd</sup> February 2018**

**Session 10**

**SP4 Transport and Travel and SADM2-3**



## **SP4 Transport and Travel**

### **1) What are the fundamental transport issues that need to be addressed over the plan period?**

#### ***Welwyn Hatfield Response***

- a) The fundamental transport issues that need to be addressed over the plan period are discussed in some detail in the Infrastructure topic paper (TPA/5). Other documents of direct relevance are the Infrastructure Delivery Plan (INF/20), and Hertfordshire County Council's 'Transport Vision 2050 (INF/27). The latter document is a precursor to the full consultation draft of LTP4, published in November 2017 as 'Hertfordshire's Local Transport Plan'.
- b) Key issues for the plan period can be identified as:
- The future use and capacity of the key strategic highway routes through the borough – the A1(M) running north-south and the A414 running east-west – and addressing problems of congestion;
  - Capacity, reliability and frequency issues of rail and bus services, affecting their attractiveness as sustainable means of transport;
  - The need for adequate investment in, and incentives to use, new cycling and walking infrastructure, to promote active travel;
  - An overarching issue of locating development such that the need to travel is reduced and, where travel is essential, achieving modal shift to sustainable non-car modes of transport, involving behavioural change and demand management.

### **2) Does the plan provide a clear strategy to resolve the Borough's transport issues?**

#### ***Welwyn Hatfield Response***

- a) Section 7 of the submitted Local Plan deals with Movement, and Policy SP 4 in particular sets out the Council's general approach to supporting both planned growth and existing development with appropriate transport infrastructure. The Council is not the highway or transport authority and therefore will need to continue to work closely with the County Council as local highway authority, Highways England and public transport operators to deliver the necessary infrastructure and promotion of sustainable modes. The record of co-operation to date between the Council, the County Council and Highways England, and the intentions of all parties to continue such co-operation, are set out in the Memorandum of Understanding, completed on

21<sup>st</sup> August 2017 and listed as an examination document (ref: EX13).

- b) Policy SP 4 also sets out that the Council will work with developers to design and fund necessary improvements to transport infrastructure. Policy SP 13 of the Plan in the Infrastructure section, refers to the Infrastructure Delivery Plan (IDP) as setting out key infrastructure projects that will be required to deliver the objectives of the Local Plan. The policy specifies that the Council may use Section 106 agreements and, when adopted, a CIL charging schedule to secure funding for necessary infrastructure.
- c) Paragraphs 13.9 to 13.18 of the supporting text of the Local Plan provide further background to the transport infrastructure improvements and projects that have been or will be undertaken to support growth. The IDP gives more comprehensive background and detail on transport planning and infrastructure schemes.
- d) The Local Plan provides a clear strategy for addressing the borough's transport issues, when considered alongside other key plans and strategies. The most significant document here is the County Council's draft Local Transport Plan (LTP4), which builds on the Transport Vision 2050 (INF/27) and takes into account consultation responses to that document.
- e) The most important message of LTP4 is that it will not be possible to solve highway congestion solely by new road building and improvement. Some localised capacity enhancements can be undertaken (such as those identified for Welwyn Hatfield in the IDP) but larger scale road building is very costly and can have adverse environmental consequences. Accordingly the emphasis needs to move towards reduction in travel demand and modal shift.
- f) Key projects for Welwyn Hatfield which are set out in the draft LTP4 include the identification of Welwyn Garden City and Hatfield as 'Sustainable Travel Towns' and, in the longer term, the implementation of an east-west rapid bus transit route between Hemel Hempstead in the west and Welwyn Garden City in the east, presenting an alternative to transport by car along the A414. Draft LTP4 also identifies, in the scheme table at p102, that an A414 Corridor Strategy will investigate the feasibility of multiple junction improvements to ease flows on this key route.
- g) The Local Plan policies such as SP 4, SADM 2, SADM 3 and SP 13 provide the tools for development management to implement the LTP 4 approach. Additionally, the Growth and Transport Plan for the South Central Hertfordshire area, currently being prepared for the County Council in conjunction with this Council and other stakeholders, will provide details of policy and physical interventions to address the issues identified in 1 b) above. The Growth and Transport Plan is due to be completed later in 2018.

- h) As set out in the Local Plan at paragraph 7.6 the Council will continue its active membership of the A1(M) consortium and A414 group to co-ordinate local policies and interventions with those of the County Council and neighbouring authorities, and to provide a platform for any bids for funding of transport improvements in those strategic corridors.

**3) Should the Highway Authority's Transport Vision for 2050 be referred to in the plan?**

***Welwyn Hatfield Response***

- a) The Transport Vision 2050 was a document produced as part of an initial stage of consultation on the development of LTP4. This Council responded to the document and its response is at Appendix 2 to the Infrastructure topic paper (TPA/5). The Local Plan itself refers to the Local Transport Plan process in general terms at paragraphs 7.2 and 7.6. Though Transport Vision 2050 is not specifically referred to in the Local Plan, it is referenced in some detail at paragraphs 5.37 to 5.41 of the IDP.
- b) The vision, objectives, policies and schemes contained in the Transport Vision 2050 document have been supplemented, amended and updated in the current draft LTP4 which is being consulted on until late January 2018. The IDP is a living document and will be updated later this year, when it will reflect the latest position on LTP4. If required the supporting text of the Local Plan at paragraphs 7.2. and 7.6 could be amended also to reflect the up to date position.

**4) Should the policy be promoting long term strategies that contain sustainable solutions to the transportation issues?**

***Welwyn Hatfield Response***

- a) Policy SP 4 is worded in a way which allows the Council to support such strategies, the details of which are emerging through other documents, including LTP4 and the Growth and Transport Plan for South Central Hertfordshire. The policy makes clear the emphasis on promoting the use of sustainable modes of travel, but is not the place to articulate specific transport strategies as these may change independently of the Local Plan. The supporting text to the policy gives a general picture of how policy SP 4 will work with existing and proposed transport strategies, while the IDP at Section 5 gives much more detail on those strategies. The Local Plan is consistent with the sustainable solutions identified in draft LTP4.

**5) Should the Highway Authority's individual highway improvement schemes be referred to?**

***Welwyn Hatfield Response***

- a) The local highway authority, Hertfordshire County Council, currently has no significant highway improvement schemes proposed within Welwyn Hatfield. Close to the western boundary of Welwyn Hatfield, however, signalisation of the A414 'longabout' at Colney Heath has been put forward in HCC's capital programme for 2018/19 with delivery in 2019/20. Highways England has identified a scheme for 'smart motorway' between Junctions 6 and 8 of the A1(M) which has been allocated funding and is due to be implemented in 2020. This scheme is referred to in the text of the Infrastructure chapter of the Local Plan at 13.12 and is set in the context of Highways England's Roads Investment Strategy (RIS) in the IDP at 5.65 to 5.75.
- b) The IDP also refers to a number of local highway improvement schemes in the table at paragraph 5.112. These schemes are not at this stage formal schemes being proposed by the County Council. They were developed through design work looking at potential mitigation measures for the increased traffic arising from Local Plan growth, alongside the WHaSH transport modelling work. This work was carried out in partnership with the County Council as local highway authority, and it is likely that developer funding through Section 106 or CIL would be sought to implement the mitigation schemes as Local Plan housing and employment growth takes place.
- c) The Council does not consider that Policy SP 4 should refer to particular highway improvement schemes. In so far as these schemes exist and are not already committed, they are best referenced in the IDP or picked up in the emerging LTP4 and Growth and Transport Plan (GTP) for South Central Hertfordshire. The GTP, which is currently being developed, is expected to identify packages of schemes, some of which will be relevant to Welwyn Hatfield. The GTP will also incorporate some of the schemes already published in the Hatfield 2030+ Transport Strategy. These schemes can then be incorporated in an updated IDP.

- 6) **Will the Policy ensure that the future development and use of land in the Borough will contribute to the mitigation of and adaptation to climate change as required by Section 19(1a) of the Planning and Compulsory Purchase Act 2004 (P&CPA 2004)?**

***Welwyn Hatfield Response***

- a) The duty imposed by Section 19(A) of the Planning and Compulsory Purchase Act 2004 relates to the Plan “taken as a whole”. The Plan must include policies designed to secure that the development and use of land in the local planning authority’s area contributes to the mitigation of, and adaptation to, climate change. In order for a plan to be sound, it is not therefore necessary that the sole aim or effect of any particular plan policy taken individually is that it contributes to mitigation of or adaptation to climate change. Some policies may deal with mitigation, others with adaptation, while some may deal with both.
- b) Policy SP1 – *Delivering Sustainable Development* – provides a set of guiding principles to bring about sustainable development in the borough. They will be relevant to the application of Policy SP4. The third bullet point directs development to sustainable locations, seeks to protect areas of highest environmental value and avoid development in areas of high flood risk. The fifth bullet point specifically mentions adaptation and mitigation principles relating to climate change.
- c) Policy SP4 sets out that the Council will seek to support both planned growth and existing development with appropriate transport infrastructure, with the emphasis on promoting the use of sustainable modes of travel. This emphasis on sustainable modes of travel will serve to limit emissions from vehicles, thereby mitigating the effect of future development on climate change. Policy SP4 will therefore, by its terms, in particular with its emphasis on promoting sustainable modes of transport and improving accessibility to centres and facilities, contribute to the mitigation of climate change.

**7) What specific measures does the plan contain to encourage the use of alternatives to the private car as a means of travel?**

***Welwyn Hatfield Response***

- a) The Local Plan contains Policy SADM 3 which stipulates that a Travel Plan should be submitted with all proposals for significant development and that development should make provision (where appropriate) for a range of sustainable modes of transport. These modes include cycling, walking, public transport, community transport and ultra-low emission vehicles. Travel Plans should be prepared in accordance with the County Council's published guidance on Travel Plans (HER/11) ensuring that such plans have meaningful targets and incentives.
- b) Policy SP 9 concerning quality of new development requires (fifth bullet point) that public spaces seek to prioritise the pedestrian and cyclist above motor vehicles in their layout, landscaping and provision of street furniture and facilities. This accords with the proposed Policy 1 of draft LTP4 on the 'Transport User Hierarchy'.
- c) Policy SADM 12 on parking, servicing and refuse, states that the provision of vehicle and cycle parking within development proposals will be informed by the Council's parking standards. The Council intends to review its adopted parking standards commencing later in 2018, in the light of policies in LTP4. Parking provision will also take into account a site's accessibility to public transport, opportunities for shared parking and the need to promote more sustainable forms of travel within the borough. These factors may result in fewer parking spaces being provided at particular developments, thereby increasing the incentive to travel by sustainable modes.
- d) Policy SP 12 on strategic green infrastructure includes a section on the Welwyn Hatfield Green Corridor. The policy states the intention that the Green Corridor will provide greater connectivity to off-road routes for cycling and walking, thereby encouraging active travel for certain journeys, as opposed to car-borne travel.
- e) Numerous policies within the Settlement Policies section of the Local Plan contain elements specifically designed to encourage and provide for the use of sustainable modes of transport as alternatives to the private car. These include the following policies; SP 16 (third bullet point), SADM 19, SP 18, SP 19, SP 20, SADM 22, SP 21, SP 22, SP 23 and SP 24, which concern development within the two town centres of Welwyn Garden City and Hatfield, the strategic housing and employment growth sites, and the University of Hertfordshire.

**8) Is any dedicated cycling and/or walking infrastructure, capable of being used for strategic trips, being proposed?**

***Welwyn Hatfield Response***

- a) The Local Plan cannot unilaterally propose new strategic cycling or walking infrastructure, as such infrastructure will either form part of adoptable highway infrastructure provided by a developer, which is the responsibility of the local highway authority, or alternatively may be a 'green' route provided by a landowner or landowners and offered up as a public right of way. Policies SP 4 and SP 13 of the Local Plan, however, allow the Council to seek the design, funding, provision and enhancement of dedicated cycling and walking infrastructure as part of proposals for new development. The Council will work with the County Council and other stakeholders to improve accessibility throughout the borough on foot and by cycle.
- b) Three existing strategic leisure cycling/walking routes exist, making use of the routes of former railway lines; these are the Cole Green Way between Hertford and Welwyn Garden City, the Alban Way between Hatfield and St Albans and the Ayot Greenway between Welwyn Garden City and Wheathampstead. A fourth strategic route is the Great North Way running from south to north through the borough, partly on-road and partly on sections of dedicated cycleway. The Great North Way forms part of Sustrans National Cycle Route 12 between north London and Lincolnshire. The Council will work with the County Council and others as appropriate to enhance the quality and connectivity of these cycle routes.
- c) Many strategic trips to and from Welwyn Hatfield are undertaken by rail to the north and south. It is therefore important to consider the 'last mile' element of these trips, to and from the borough's railway stations, as part of strategic journeys. The Council will work with the County Council to enhance cycling and walking infrastructure and promote a shift away from car use for these short trips.
- d) The consultation draft of LTP4 identifies Welwyn Garden City and Hatfield as Cycle Infrastructure Improvement Towns and Sustainable Travel Towns and this offers opportunities for prioritising investment in infrastructure for active travel. The County Council's proposed Growth and Transport Plans and Active Travel Strategy will be important in this regard, as will the Hatfield 2030+ Transport Strategy commissioned by the Hatfield Renewal Partnership and referenced in LTP4.

**9) If not why not?**

- a) Not applicable.

## SADM 2 Highway Network and Safety

### 10) Is the consideration of highway impact, in the context of its severity, consistent with national policy?

#### *Welwyn Hatfield Response*

- c) Policy SADM 2 is principally a development management policy to guide the determination of planning applications, however the supporting text at 7.14 states that the policy also *“supports the implementation of the overall intent of Policy SP4 and strategy for growth in the borough set out within the Local Plan.”*
- d) Sub-paragraph i of the policy refers to *“unacceptable impacts on the local and/or strategic transport network”* while sub-paragraph ii refers to *“negative impacts on highway safety”*. The Council acknowledges however that national planning policy, as set out in the NPPF paragraph 32, contains the statement that *“Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.”* The context of the paragraph implies that this policy should apply to both plans and development management decisions.
- e) In order to be consistent with national planning policy the Council proposes to make minor modifications to the wording of the policy as follows:
- Delete first sentence of sub-paragraph i and replace with;
- “There would be no severe residual cumulative impacts on the local and/or strategic transport network once any cost-effective and achievable mitigating measures have been taken into account.”*
- f) For further consistency with the NPPF wording, the following modifications are proposed;
- At sub-paragraph iii, delete the words *“and site operation”* and replace with *“to and from the site for all people”*;
- g) At sub-paragraph iv, add after the word *“parking”* the following; *“taking into account the accessibility, type, mix and use of the development, and the opportunities for public transport, cycling and walking.”* This modification acknowledges the national policy at paragraph 39 of the NPPF and gives context to the decision-maker in deciding what might be a *“satisfactory and suitable”* level of parking.

**11) Does the east-west highway infrastructure across the Borough have sufficient capacity to support the amount of development being proposed to the west of the A1(M)?**

***Welwyn Hatfield Response***

- a) As stated in response to question 10) above, Policy SADM 2 is principally a development management policy to guide the determination of planning applications. The issue of capacity in the east-west highway infrastructure to accommodate the strategic housing allocations shown in the Local Plan has been addressed through extensive transport modelling work and through consultation with the County Council as local highway authority.
- b) The details of the WHaSH modelling work are set out in some detail in the documents INF/12, INF/13 and INF/15 in the Examination Library, as well as being referenced in the Infrastructure Delivery Plan (IDP) (INF/20), the Infrastructure topic paper (TPA/5) and in the Memorandum of Understanding between the Council, the County Council and Highways England (DTC/10, EX13).
- c) The modelling work has shown generally worsening congestion and delays on key east-west routes by 2031, though the extent of this deterioration can be limited by the implementation of local mitigation schemes and capacity improvements as identified in the table at paragraph 5.112 of the IDP.
- d) The County Council has been invited to comment on the findings of the modelling work and proposed mitigation measures in its representations on the Draft Local Plan Proposed Submission (2016). The representation from the County Council, dated 21<sup>st</sup> October 2016, addresses these matters in some detail and is generally supportive of the work which has been undertaken, including the identification of mitigation schemes.
- e) Specifically in relation to capacity on the A414 east-west route, particularly at its intersection with the A1(M) at Junctions 3 and 4, the County Council notes in its representations (dlpps 2004) that;

*“Some further work is still ongoing around more strategic locations such as the testing of various options for A1(M) Junction 4, Jack Oldings and the A414/Great North Road (Olding East) junctions along with A1(M) junctions 3 and 4. The A414 Member Group, has been established to provide a forum for partnership working and collaboration on spatial planning and infrastructure issues along the corridor, which will play a role in seeking to find a collaborative solution to transport infrastructure and delivery for the A414.*

*There are some limited capacity benefits from implementing a short term scheme at A1(M) Junction 4, identified in the Highways England design study. However the medium and long term options identified to date do not provide the required level of*

*mitigation and further options are being investigated to determine their acceptability. Due to constraints at this location, long term aspirations need to be driven towards a modal shift agenda.”*

- f) The majority of the proposed Local Plan development west of the A1(M) is contained within strategic sites SDS5 (Hat 1) and SDS6 (Hat 15). The County Council comments in its representations (dlpps 2016, 2018, 2019) that:

*“The Hat1 and Hat15 sites are isolated from rail services at Hatfield Station. The A1(M) and Comet Way act as a barrier. Significant improvements to the walking and cycling facilities around both sites would need to be developed, to link into the network of paths implemented in the Hatfield Business Park and ensure that settlements can connect to the strategic network and other amenities.”*

Also:

*“North West Hatfield – SP(22) (Hat1)*

*The landowner has carried out initial transportation studies to establish a preliminary access strategy. As a result the County Council is reasonably assured that improvements to the local highway network can be undertaken that will provide additional capacity. However, capacity improvements at local junctions will need to be developed alongside significant sustainable transport linkages to ensure the site is well connected for all modes. A master planning phase will be critical in the development of the proposal to ensure sufficient allowances are made for integrating the site to the surrounding neighbourhoods and facilities.*

*New Village SP(24) (Hat15)*

*Policy SP24 appears to cover all the major issues associated with taking this proposal forward. There appears to be an obvious relationship with Hat 1 which will have to be considered, whether it is associated with services or facilities within Hat 1 or the sustainable transport links both proposals will require and share. This point also carries through to capacity improvements.”*

- g) Throughout its representations the County Council emphasises the need for continued collaborative working and for significant sustainable transport packages and linkages to make sure that movement from the strategic sites west of the A1(M) is satisfactorily integrated into the existing network, with local mitigation where appropriate. Significantly, the County Council as highway authority does not object on highway grounds to the inclusion of these sites in the Local Plan, nor does it at any point refer to ‘severe residual cumulative impacts’ (to use the language of the NPPF) from the proposed development which might cause the developments to be prevented.

- h) Highways England is not responsible for the A414 or other east-west routes through Welwyn Hatfield, except to the extent that traffic along the A414 travels on the A1(M) between Junctions 3 and 4. In its letter of 23<sup>rd</sup> February 2017 (at Appendix B to the Memorandum of Understanding; document DTC/10b or EX13) in response to the Local Plan proposals, Highways England states the following at paragraph 22;

*“It appears the long term improvements required to the A1(M) Junctions 3 and 4 are likely to be considered too substantial for implementation as part of the Local Plan infrastructure provision. It could therefore be assumed that there may be residual impacts at Junctions 3 and 4. This should be addressed in the next iteration of the Local Plan with a clear indication of the anticipated scale of the improvement required to resolve residual impacts (if any) and assumed funding source for the required mitigations measures.”*

- i) Highways England raises no objection in principle to the development of the strategic sites west of the A1(M), nor does it identify any severe residual cumulative impacts on the strategic road network.

**12) If not, what evidence is there to demonstrate that this capacity issue could be resolved during the plan period?**

***Welwyn Hatfield Response***

- i) As noted in the response to question 11) above, neither the County Council as local highway authority nor Highways England as the responsible body for the A1(M), have referred to severe residual cumulative impacts being likely to arise from development of the strategic sites to the west of the A1(M). Neither body objects to the plan proposals on highway grounds.
- j) On this basis there is no capacity issue to be resolved in respect of the housing proposals in the submitted Local Plan, subject to the implementation of the mitigation measures specified in the IDP and the funding and delivery of significant sustainable transport packages as a requirement of bringing forward the strategic sites.
- k) Having said this, both the County Council and Highways England refer in their representations on the Local Plan to possible residual impacts at and around Junctions 3 and 4 of the A1(M). These impacts are not explicitly forecast to be severe. Highways England suggests that this issue and its possible resolution should be fully addressed in the next iteration of the Local Plan (which would now be at the first review of the Plan) while the County Council suggests that, because of constraints at this location (Junction 4), *“long term aspirations need to be driven towards a modal shift agenda”*. Continued collaborative working through membership of the A414 Group and A1 Consortium, and a willingness by all parties to explore a range of funding sources, will be necessary in order to address this issue.

- 13) **Should there be a continuation of the policy that restricts development in the rural parts of the Borough when it is likely to necessitate a change in the character of rural roads?**

***Welwyn Hatfield Response***

- a) This reference is to Policy RA28 of the adopted District Plan (2005), entitled “*New Development using Rural Roads*”. That policy states that;

*“The Council, in association with the County Council, will not permit developments which are expected to increase or to change the type of traffic on local rural roads where:*

- (i) The road is poor in terms of width, alignment or structural conditions; or  
(ii) The increased traffic would have an adverse effect on the local environment, either to the rural character of the road or the residential properties along it.”*

- b) This is a development management policy primarily for use in the determination of planning applications, however representations to the Local Plan, particularly in respect of the proposed strategic site at Symondshyde (SDS6 or Hat15), have drawn attention to the issue of impact on rural roads arising from substantial new development.

- c) Whilst the Local Plan has Policy SADM 2 (potentially in the revised form detailed in response to question 10 above), it does not contain a policy referring specifically to the effects of development in rural areas on the character of rural roads. Whilst the Council will seek to protect rural character through the use of other policies in the plan (for example Green Belt policy), the pressure for new housing development to meet objectively assessed needs is such that not all rural areas can be protected from growth or from changes in character to rural roads. For this reason the new Local Plan does not contain a policy equivalent to Policy RA28 of the District Plan.

- d) Policy 5 of draft LTP4 on Development Management, however, does contain a statement that the County Council will work with development promoters and the district and borough councils to, amongst other objectives;

*“g) Resist development that would either severely affect the rural or residential character of a road or other right of way or which would severely affect safety on rural roads, local roads and rights of way especially for vulnerable road users.”*

The Council will support this policy approach where severe effects on character or safety are involved.

- e) It remains very important that access to development sites is safe and suitable in highway terms and that a full technical assessment of this is carried out in the case of

developments of significant size, hence the wording of Policy SADM 2. In the particular case of Symondshyde, for example, the existing access road to the site, which has the character of a rural lane, would not be suitable to provide vehicular access to the proposed new settlement. For this reason, new access roads designed to standards acceptable to the highway authority are proposed as part of the development. These new access roads and accompanying cycle and walking routes would form part of a comprehensive sustainable transport strategy for serving the development.

### **SADM 3 Sustainable Travel for All**

**14) Is the policy, as currently worded, likely to be effective in achieving changes towards the use of more sustainable modes of travel through new development?**

***Welwyn Hatfield Response***

- h) We believe so, yes. The policy will be one of a number of tools used to promote use of sustainable modes. Other relevant policy approaches will be contained in the Local Transport Plan (LTP4 is currently at consultation draft stage and identifies Hatfield and Welwyn Garden City as Sustainable Travel Towns), the emerging Growth and Transport Plan, and other strategies (such as the Active Travel Strategy and Bus Strategy) being prepared under LTP4. Adequate funding will clearly be required to deliver a choice of sustainable options. The government's Cycling and Walking Investment Strategy (DfT, March 2016) is helpful in this respect, and gives guidance on preparing plans for cycling and walking and on seeking appropriate funding.
- i) Another key part of achieving modal shift, as acknowledged in the draft LTP4, will be a balanced approach to provision of car parking in new developments, so that overprovision is avoided. Policies SADM 2 and SADM 12 of the Local Plan address the issue of parking standards, and the Council's current parking standards document, dated 2004, will be reviewed at an early date (probably later in 2018) as part of implementation of the Local Plan policies.

**15) Will the Policy ensure that the requirements of Section 19(1a) of the P&CPA 2004, with regard to the future development and use of land in the Borough contributing to the mitigation of and adaptation to climate change, will be met?**

***Welwyn Hatfield Response***

- a) The duty imposed by Section 19(A) of the Planning and Compulsory Purchase Act 2004 relates to the Plan "taken as a whole". The Plan must include policies designed to secure that the development and use of land in the local planning authority's area contributes to the mitigation of, and adaptation to, climate change. In order for a plan to be sound, it is not therefore necessary that the sole aim or effect of any particular

plan policy taken individually is that it contributes to mitigation of or adaptation to climate change. Some policies may deal with mitigation, others with adaptation, some may deal with both.

- b) Policy SP1 – *Delivering Sustainable Development* – provides a set of guiding principles to bring about sustainable development in the borough. The third bullet point directs development to sustainable locations, seeks to protect areas of highest environmental value and avoid development in areas of high flood risk. The fifth bullet point specifically mentions adaptation and mitigation principles relating to climate change.
  
- c) Policy SADM 3 requires a Travel Plan to be submitted for all developments of a significant size and seeks to promote through new development the use of sustainable modes of transport, including facilities for charging plug-in and other ultra-low emission vehicles. This will contribute to the improvement of air quality and mitigation of climate change through reduction of potential vehicle emissions. In a similar way to that stated in response to question 14 above, the policy is one of a number of tools that will be used towards this end. Policies 19 and 20 of the draft LTP4 refer to Emissions Reduction and Air Quality respectively. Accordingly, Policy SADM 3 will contribute to both mitigation and adaptation to climate change.