

**Wiltshire and Swindon Minerals and Waste
Local Development Framework**

Waste Core Strategy DPD: Examination

Session 2: Transport (covering Matters 3 and 6)

**Written statement by New Forest National Park Authority
(Representor Reference: 4171)**



Session 2: Transport (covering Matters 3 and 6)

1. The Vision for Waste Planning (CS p14) includes *the development of a sustainable waste management framework* and the Strategic Objectives (CS p16) state that *options for sustainable transportation should be encouraged in order to reduce the impacts of transporting waste through Wiltshire and Swindon*. However, there is little reference to transport elsewhere in the document. The Highways Agency has picked this up in its representation. Policy WCS6(i) includes within the required audit *proposals for the transport of waste created during the development process*. But transport considerations are not made explicit in the location policies WCS2 and WCS3. Consequently the CS appears not to have taken the possibilities for limiting transport, and for a more sustainable approach to transport, fully into account in its strategic spatial policies.

- 1.1 The New Forest National Park Authority welcomes the reference, in paragraph 4.6 of the submitted Waste Core Strategy, to the sustainable transport of waste material and the recognition of the importance of minimising cross-boundary movement of waste. This is followed up, to some degree, in Strategic Objective 3 which emphasises the need to “*minimise cross-boundary impacts of waste management upon features of the natural and cultural environment*”. However, it then further refers only to “*options for sustainable transportation*” of waste to reduce the impact of transporting waste through Wiltshire and Swindon and not adjacent areas. The scope of the strategic objectives is primarily concerned with the impacts on Wiltshire and Swindon with little on minimising the impacts on adjacent areas, particularly protected landscape such as the New Forest National Park.
- 1.2 Furthermore, the issues mentioned in the strategic objectives do not seem to be explicitly addressed in the plan policies, particularly in relation to the transportation of waste and cross-boundary impacts. It thus remains unclear how the Strategic Objectives, particularly Objective 3, will be achieved. This is contrary to Planning Policy Statement 12 Local Spatial Planning which states that the Core Strategy should “*show how the objectives will be delivered*” (paragraph 4.4).

- 2. The evidence base suggests otherwise: it explores the various transport policy sources and shows that they have been taken into account. However, the CS itself makes no reference, for example, to the following, which occur in the Evidence Base:**
- **the possibility of rail transport (Evidence Base A p56) – would the suggested inter-modal freight facility at Westbury be capable of contributing to waste provision? Would any of the Strategic Sites be capable of being served by rail?**
 - **The means by which waste is transported to Slough from Salisbury, and if not by rail, whether this would be feasible in future;**
 - **The means by which waste imports into Wiltshire are currently carried, and the scope for their diversion to rail;**
 - **The Freight Strategy Policies including FT5 to *consider the recycling of waste using rail as a means of distribution*;**
 - **Concern about the use of country roads by HGVs; the Wiltshire Freight Strategy and the Wiltshire Freight Map; and freight operator co-operation in supporting local routes;**
 - **The reported encouragement of the Waste Local Plan (where?) for waste facilities to be located within 5km of the Strategic Lorry Route Network and within 2km of the Local Lorry Route Network.**

1.3 The New Forest National Park Authority considers that wider cross boundary traffic issues affecting the National Park are not explicitly addressed in the Core Strategy policies. This is of particular concern as there are longstanding traffic issues in the northern part of the National Park around the boundary with Wiltshire County Council, affecting the communities of Godshill, Hale, Brook, Whiteparish, Downton and Redlynch. The key issues are:

- the high level of animals injured or killed in road accidents on the unfenced Forest roads;
- lorries taking alternative routes through the villages of Whiteparish, Downton, Redlynch and Godshill, primarily along the B3078/79 and B3080;
- erosion of the National Park's special qualities including tranquillity;
- The narrowness and alignment of some of the stretches of road. It is difficult for large vehicles to pass in parts of the village of Downton, this sometimes leads to congestion for considerable periods;
- Lorries passing through villages early in the morning, disturbing sleep. There are a considerable number of houses that are very near the road as they front directly onto the pavement;
- Noise and pollution, making it less attractive to walk and cycle;
- The designation of the New Forest as a National Park further brought into question the appropriateness of through traffic using these relatively minor roads (particularly HGVs);

- 1.4 The evidence base report Part A (Spatial Context) refers to the role played by Freight Quality Partnerships (paragraphs 6.59 and 6.60) but does not go into any details on that or other similar joint working arrangements. The longstanding traffic issues in the area around, and beyond, the boundary between Wiltshire County and the National Park lead to the establishment of a 7.5 tonne weight restriction order. It came into effect in March 2007 and applies to all the roads within the area bounded by the A31, A338 and A36, and means HGVs are prevented from entering the zone unless stopping for legitimate delivery or access.
- 1.5 It was developed through a working group comprised of local residents, councillors, freight companies, freight groups, pressure groups and officers at both Wiltshire County Council and Hampshire County Council. The group concluded that a 7.5 weight limit with an “Except for Access” exemption was the only realistic way of minimising the impacts of HGVs in the area.
- 1.6 In addition it is unclear how consideration has been given to the proximity of or links to the strategic and local lorry route network in the adjacent county of Hampshire. The National Park Authority considers that this should be a factor in the selection of suitable sites, in addition to proximity to the lorry route network within Wiltshire and Swindon.

3. Whilst recognising that some of this detail might more appropriately be contained in the DC Policies DPD, it remains unclear to what extent the CS has taken account of those possibilities that exist for progress in the sustainable transport of waste within its timespan to 2026. Does the CS provide a sufficient basis for subsequent DC policies relating to sustainable transport?

- 1.7 The Core Strategy does not provide a sufficient basis for the subsequent Development Control policies as it does not have a relevant Core Strategy policy ‘hook’ which steers the general approach to site selection and consideration of issues such as transportation, cross-boundary impacts and specific impacts on the New Forest National Park, as outlined above.
- 1.8 Although Appendix 2 of the Core Strategy does set out the broad topic areas to be covered in the Development Control Policies Development Plan Document, policy WCS1 and site location policies WCS2 and WCS3 do not cross-refer to those topic areas. The National Park Authority considers that the Core Strategy policies should set out explicitly the general approach to transport considerations on which the spatial strategy is based.

Matter 6 THE INFLUENCE OF THE NEW FOREST NATIONAL PARK

1. How and where does the CS show that it has taken sufficient account of the New Forest National Park?

- 1.9 The Core Strategy sets out the explanation of the status and role of the New Forest National Park Authority in paragraphs 1.1 and 1.2 of the Introduction. It helpfully refers to the Environment Act Section 62(2) responsibilities to have regard to the National Park purposes which are:
- (a) conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park; and
 - (b) promoting opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.
- 1.10 The Vision only refers to the plan area, and not adjacent protected areas, when stating the need to protect the “*sensitive environment*”. However, Strategic Objective 3 recognises the need to consider the wider impacts of waste development as it emphasises the need to “*minimise the cross boundary impacts of waste management upon features of the natural and cultural environment*”. However, none of the policies appear to specifically support or work towards the achievement of this objective.
- 1.11 It is the view of the National Park Authority that Policy WCS2 be amended to incorporate proximity to, and minimising harmful impacts on, the New Forest National Park as a consideration in the location of future waste sites, in line with the approach taken on AONBs within the plan area. This would help to achieve Strategic Objective 3 in minimising cross-boundary impacts.
- 1.12 The evidence base report, Part A Spatial Context highlights the importance of considering impacts on the National Park as it emphasises “*The significant biodiversity value of the New Forest National Park, and its location adjacent to Wiltshire’s southern boundary, means the possible impacts of minerals and waste development within the vicinity of the New Forest National Park must be considered.*” (paragraph 9.71). It also recognises that “*The potential for cross-boundary landscape impacts of minerals and waste development upon the New Forest National Park, particularly with regard to the purposes of the NFP, needs to be considered*” (paragraph 7.62). However, these issues relating to impacts on the National Park are not explicitly followed up in the Core Strategy.
- 1.13 The policies in the Core Strategy should reflect the importance of the need to minimise adverse impacts on the National Park with particular regard to cross-boundary transportation issues, impact on the landscape and biodiversity value.