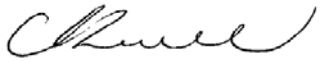
Northumberland's Third Local Transport Plan: Post Adoption Statement

Prepared by:

Anne-Marie Mackin
Environmental Scientist

Checked by:



Charlotte Clinton
Environmental Scientist

Approved by:

Nigel Pilkington
Regional Director

Rev No	Comments	Checked by	Approved by	Date
V0	Draft for Internal Review	CC	n/a	29.01.12
V1	First Issue – Post Adoption Statement	CC	NP	04.05.12

First Floor, One Trinity Gardens, Quayside, Newcastle upon Tyne, NE1 2HF
Telephone: 0191 224 6500 Website: http://www.aecom.com

Job No 60157675 Reference V1 Date Created September 2011

This document is confidential and the copyright of AECOM Limited. Any unauthorised reproduction or usage by any person other than the addressee is strictly prohibited.

p:\ukmcr1-ie\proposal\3512\northumbria ltp3 sea\sea\post adoption statement\ncc ltp3 sea - post adoption statement - first issue np.doc

Table of Contents

1 Introduction 1
1.1 Introduction 1
1.2 Northumberland's Third Local Transport Plan 1
1.3 The SEA Process 1
1.4 Post Adoption Statement (PAS) Requirements 1
1.5 Structure of the PAS 2

2 Description of the SEA process 3
2.1 Study Area 3
2.2 Approach of the SEA 3
2.3 SEA Objectives 4
2.4 Consultation Workshop 5
2.5 Study Limitations 5

3 Summary of Key Findings 6
3.1 Introduction 6
3.2 Summary of SEA Results 6

4 Consultation 11
4.1 Introduction 11
4.2 Public Consultation 11
4.3 Consultation Respondees 11

5 Summary of Consultation Responses 12
5.1 Online Public Consultation Responses 12
5.2 Conclusion 20

6 Monitoring the Strategy 21
6.1 Introduction 21
6.2 An Introduction to Monitoring 21
6.3 Monitoring Framework 21

Appendix A: Consultation Responses 26

List of Tables

Table 1: SEA Objectives 4
Table 2: Potential Negative Operational Effects of the LTP3 7
Table 3: Summary of Consultation Responses from the Online Public Consultation 13
Table 4: Suggested Monitoring Framework 23

List of Figures

Figure 1: Development of the SEA alongside LTP3 4

Capabilities on project:
Environment

1 Introduction

1.1 Introduction

This Post Adoption Statement (PAS) has been prepared on behalf of Northumberland County Council (NCC) in accordance to the requirements of the Strategic Environmental Assessment (SEA) Directive (2001/42/EC) and Environmental Assessment of Plans and Programmes Regulations 2004.

The PAS presents a summary of the responses received from the public consultation carried out as part of the NCC's 3rd Local Transport Plan (LTP3) SEA. It also provides a summary as to how the findings from the SEA and public consultation have been taken into account in the LTP3.

1.2 Northumberland's Third Local Transport Plan

The LTP3 is a strategy document which sets out the main objectives for highways and transport for the 15-year period 2011 to 2026 together with the strategies and policies necessary to achieve them.

The LTP3 has been subject to an SEA as required under the Environmental Assessment of Plans and Programme Regulations 2004. The results of the SEA were used to inform the preparation and delivery of the LTP3. Detailed results of the SEA are presented in the Environmental Report (ER) which is available to view online at: http://www.northumberland.gov.uk/default.aspx?page=7846.

1.3 The SEA Process

Progress to date and key milestones are outlined below along with details of how this document fits in with the preparation of the statutorily required PAS, and its contents:

Scoping report	The SEA Scoping Report was prepared in July 2010. The Scoping Report set out a list of relevant policies, plans and programmes, the SEA objectives and indicators, baseline information, key environmental considerations and the proposed assessment methodology.
Scoping report consultation	The SEA Scoping Report was issued to the Environment Agency, Natural England, and Northumberland National Park Authority for consultation. All comments received from the statutory consultees were taken into consideration in the SEA Environmental Report.
Workshop	An SEA workshop was held on 16 September 2010. A number of delegates were invited from Northumberland County Council, the Environment Agency, Natural England, English Heritage, Northumberland National Park Authority, Institute of Occupational Medicine, Strategic Health Authority and the Northumberland Care Trust.
Online consultation	Online public consultation on the LTP3 was undertaken between 18 November 2010 and 29 January 2011. The consultation documents were available to view online on the NCC website.
LTP3 adopted	The adopted LTP3 Strategy Document and Implementation Plan was adopted on 4 April 2011 and is available to view online at: http://www.northumberland.gov.uk/default.aspx?page=7846
Post Adoption Statement	The SEA Post Adoption Statement (this document) was prepared in March 2012.

1.4 Post Adoption Statement (PAS) Requirements

In order to satisfy the legal requirement of the Environmental Assessment of Plans and Programmes Regulations 2004, the responsible Authority (NCC) is required to produce a PAS. The PAS must be produced as soon as reasonably practicable after the **adoption** of the plan, programme or strategy (PPS) to provide specified information to Consultation Authorities and the public.

With regard to providing information, the Responsible Authority must inform the Consultation Authorities of the adoption of the PPS and send a copy, as adopted, along with a statement setting out the particulars referred to in section 16 of the Environmental Assessment of Plans and Programmes Regulations 2004.

These particulars include details of how the findings of the SEA have been integrated into the development of the PPS, how comments received from public consultation have been taken into account in the PPS, reasons for choosing the PPS as adopted and measures to monitor significant environmental effects.

1.5 Structure of the PAS

The structure of the LTP3 SEA PAS is outlined below:

Key Findings from the SEA:

- **Section 1**: Introduction.
- **Section 2**: Description of the SEA process.
- **Section 3**: Summary of key results/ findings from the assessment.

Consultation Responses:

- **Section 4**: Consultation responses.
- **Section 5**: Summary of general comments on the SEA.
- **Section 6**: Detailed consultation responses.

Recommendations

- **Section 7**: Summary of key recommendations for the LTP3 based on results of the SEA and Consultation Responses and summary of how key recommendations have been incorporated into the LTP3.

Monitoring the Statement:

- **Section 9**: Proposals for monitoring the implementation of the LTP3, including opportunities for 'feeding back' information from monitoring into the SEA process.

2 Description of the SEA process

2.1 Study Area

Northumberland is the northernmost county in England and acts as a gateway between England and Scotland. It borders Scotland to the north, Cumbria to the west and Durham and Tyne and Wear to the south. Geographically, Northumberland is one of the largest counties in England, with a surface area of approximately 500,000 ha. Demographically however, it is one of the smallest counties in England, with a population in 2008 of only 311,000. There is an uneven population distribution with over half of the population living in the urbanised south east, which covers only 5% of the County's surface area. There is a very low population density in the rural north and west which creates particular challenges for the delivery of services.

The LTP3 for Northumberland will cover the new unitary council area of Northumberland County Council. Following the unitary reform in 2009, the former districts of Northumberland were combined to form three service areas; North Northumberland, South East Northumberland and West Northumberland.

North Northumberland is the second largest of the three service areas in Northumberland and is a sparsely populated, mainly rural area centred on the main towns of Alnwick, Berwick-upon-Tweed and Morpeth. South East Northumberland is the smallest of the service areas and is centred on the urban areas of Ashington, Blyth and Cramlington and, as such, has a high population density compared to the rest of Northumberland. West Northumberland is the largest of the three areas and is predominantly rural in nature but is pocketed by a number of small towns such as Hexham, Prudhoe, Ponteland and Haltwhistle.

This SEA covers the environmental, social and economic considerations within Northumberland[1] and the potential for trans-boundary effects.

2.2 Approach of the SEA

The LTP3 was subject to an SEA which included the following activities:

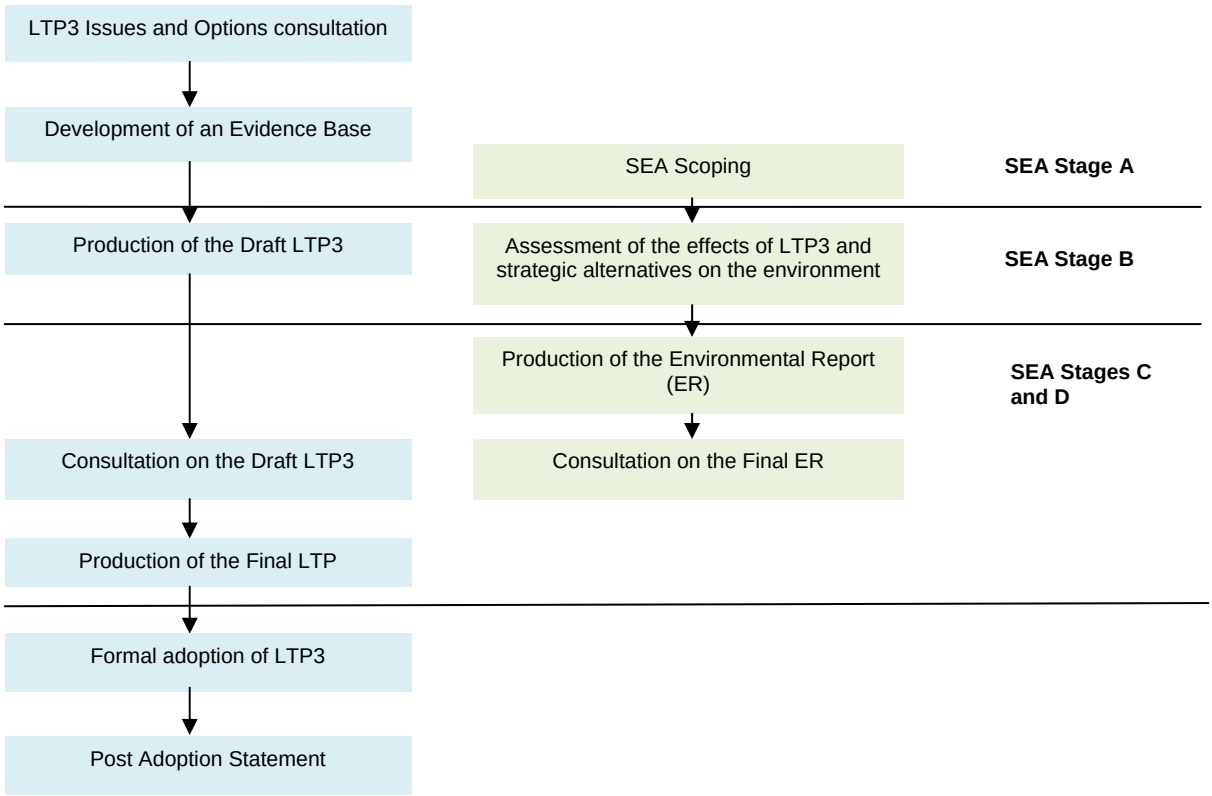
- Taking into account the views of the Environment Agency, Natural England and English Heritage regarding the scope and the level of detail that was appropriate for the Environmental Report (ER).
- Preparing an Environmental Report on the likely significant effects on the environment of the draft LTP which included consideration of:
  - Baseline data relating to the current state of the environment
  - Links between the LTP and other plans / programmes / strategies and environmental protection objectives
  - Existing environmental problems
  - The plans likely significant effects on the environment both positive and negative
  - Measures envisaged for prevention / reduction in adverse effects
  - Alternatives considered
  - Monitoring measures to ensure any unforeseen environmental effects will be identified allowing for appropriate remedial action to be taken.
- Consulting on the draft LTP and ER
- Taking into account the ER and results of consultation in making final decisions regarding the LTP.
- Setting out a programme for monitoring significant effects of implementing the LTP

SEA is an iterative process and this SEA has been carried out in conjunction with the preparation of the LTP3 to ensure any adverse effects of the plan on the environment have been identified, avoided and/or mitigated at the earliest opportunity. Figure 1 illustrates how the SEA has been undertaken alongside the LTP3.

[1] The Northumberland County Council area.

Capabilities on project:
Environment

Figure 1: Development of the SEA alongside LTP3



2.3 SEA Objectives

A series of objectives were developed which set out how the SEA would be delivered; these are shown in Table 1.

Table 1: SEA Objectives

SEA Topic	SEA Objective
Biodiversity	1. To protect and enhance Northumberland's biodiversity and geodiversity and to safeguard protected species.
Landscape	2. To maintain and enhance the local distinctiveness, character and appearance of Northumberland's rural and urban land and landscapes, including the public realm.
Archaeology and Heritage	3. To protect and enhance Northumberland's buildings, sites, areas and features of historic, archaeological and architectural interest and diversity.
Water	4. To reduce the risk of flooding.
	5. To protect and enhance the quality of Northumberland's ground, river and sea waters.
Noise	6. To reduce transport related noise.
Air	7. To ensure good local air quality.
Climatic Factors	8. To reduce the causes of climate change.
	9. To adapt to and mitigate for the effects of climate change.

SEA Topic	SEA Objective
Soil	10. To reduce the amount of waste produced and increase the amount recycled and composted.
Population	11. To ensure good accessibility for all to jobs, facilities, goods and services in Northumberland.
	12. Conserve and enhance opportunities for sustainable public access to the natural environment.
	13. To reduce road traffic and congestion through reducing the need to travel by car and improving travel choice.
	14. To increase public involvement in decision-making and civic activity.
Material Assets	15. To increase the vitality of town centres.
	16. To make better use of our resources.
	17. To improve efficiency in land use through the re-use of previously developed land and existing buildings, and encourage urban renaissance.
	18. Adopt a strategic approach to planning and provision of multi functional green infrastructure
Human Health	19. To reduce crime and the fear of crime.
	20. To improve health and reduce inequalities in health.
	21. To reduce poverty and social exclusion and close the gap between the most disadvantaged communities and the rest.

2.4 Consultation Workshop

An SEA workshop was held on 16 September 2010. A number of delegates were invited from Northumberland County Council, the Environment Agency, Natural England, English Heritage, Northumberland National Park Authority, Institute of Occupational Medicine, Strategic Health Authority and the Northumberland Care Trust.

The aim of the Workshop was to discuss the initial assessment of the Northumberland LTP3 and was used to collate the delegate's views and comments based on their local knowledge and expertise to ensure the assessment was appropriate to both the plan and had considered the local environment.

2.5 Study Limitations

The SEA was based on baseline information available at the time of the assessment. The assessment of potential effects also reflects the level of detail and information that was contained within the LTP3 at the time of the assessment.

The main limitations of the SEA are related to the level of detail associated with the interventions included in the LTP3. Due to the strategic level of the LTP3, although specific interventions were included, there was limited project specific information available in relation to the location of projects associated with the interventions, type of works that would be involved, construction requirements, scale of the schemes or project and associated timescales for delivery.

Consequently the results of the assessment reflect the knowledge, experience and understanding of the likely effects that transport related schemes could potentially have on the environment, rather than detailed assessment of the individual interventions and schemes presented in the LTP3. However, the assessment of the LTP3 should be carried out at a strategic level, not subject to a project specific, EIA type assessment.

3 Summary of Key Findings

3.1 Introduction

Both positive and negative environmental effects were predicted through the SEA process and were reported on in the Environmental Report.

3.2 Summary of SEA Results

3.2.1 Summary of Potential Beneficial Effects

Overall the SEA identified a number of beneficial effects of the LTP3 these are:

- Benefits to **biodiversity** associated with a reduction in deposition of pollutants associated with fewer cars on the road / modal shift to public transport.
- Benefits to **water** associated with a reduction in deposition of pollutants associated with fewer cars on the road / modal shift to public transport and also integration of treatment into the schemes.
- Benefits resulting from a reduction in **noise** due to reduced congestion and fewer cars on the road and a modal shift to public transport.
- Benefits to of improved **air quality** associated with a reduced congestion / emissions due to fewer cars on the road / modal shift to public transport.
- Benefits to **climate** associated with a reduction congestions / emissions due to fewer cars on the road / modal shift to public transport.
- Benefits to **population** due to improved public transport, better accessibility, increased flexibility, more predictable journey times to services and employment and people being more active.
- Benefits to **material assets** due to improved infrastructure.
- Benefits to **human health** due to more predictable journey times, reduced congestions and emissions and people being more active.

3.2.2 Potential Negative Construction Effects

Some of the LTP3 interventions were predicted to have potential temporary negative effects on the environment as a result of construction activities. However, the majority of these effects are temporary in nature and the potential impact can be avoided or reduced through mitigation. Construction Impacts and Mitigation are dealt with in Chapter 10 of the SEA Environmental Report.

3.2.3 Potential Negative Operational Effects

Operational effects are dealt with in Chapter 11 of the of the SEA Environmental Report. However, some interventions have both beneficial and negative effects on the same SEA topics (please refer to Table 11.1 of the SEA Environmental Report).

A summary of the potential negative operational effects of the LTP3 by SEA topic are summarised in Table 2.

Table 2: Potential Negative Operational Effects of the LTP3

SEA Topic	Negative Operational Effects	How effects have been addressed through mitigation measures incorporated within the LTP
Biodiversity	Negative effects on biodiversity due to land take and habitat loss (Highway Capacity Interventions1 to 3 & 5 to 8 and NMU Intervention 5*), development of footpaths/cycle routes and as a result of lighting on certain species e.g. bats (NMU Intervention 5* &10).	- All schemes with the potential to affect sites of international nature conservation importance (SPAs, SACs and Ramsar Sites) will be subject to an Environmental Impact Assessment (EIA) and an Habitats Regulations Assessment, as required under the Habitats Directive and Regulations. - Scheme or initiatives that are likely to affect one or more of the Northumberland SSSIs will be subject to a formal screening exercise prior to development to determine the need for an EIA. - Appropriate surveys will be carried out where there is potential for a programme of action or major scheme to have an adverse effect on Protected Species (under the Habitats Directive), European Species (under the Wildlife and Countryside Act 1981) or Priority BAP species. - Appropriate surveys will be carried out where there is potential for a programme of action or major scheme to have an adverse effect on priority BAP habitats or sites of local wildlife importance. - Appropriate surveys will be carried out where there is potential for schemes or initiative to have an adverse effect on badgers as required under the Badger Act 1992. - Appropriate surveys will be carried out where there is potential for schemes or initiative to have an adverse effect on bats as required under the Conservation (Natural Habitats &c) Regulations 1994. - Biodiversity and geodiversity enhancements will be implemented where appropriate e.g. use of wildflower mixes on grass verges and in other landscape schemes, use of native tree species in landscape schemes, creation of new habitats for protected species e.g. ponds (great crested newts), and the creation of 'green ways' and wildlife corridors along footpaths and cycleways, to encourage the movements of species.
Landscape	Negative effects on landscape as a result of the visual effect of the infrastructure improvements (Highway Capacity Interventions 1 to 3 & 6 and 7) due to increased street furniture (Highway Capacity Intervention 4 and NMU Interventions 5*, 8 and 9) and the requirement for additional parking facilities are located in rural locations (NMU Interventions 8 and 18).	- Carry out an EIA for any scheme that will potentially have an effect on Areas of Outstanding Natural Beauty (AONBs), National Park or Heritage Coasts. - Landscape assessment will be carried out for large schemes (as part of the EIA) to determine the exact effect of the scheme on landscape character, quality and key landscape features. - High quality design and construction principles will be applied to all new developments and schemes involving modifications and improvements. - Refer to the Countryside Agency (now Natural England) Design Guide for Roads in Rural Areas. - All schemes will be appropriately designed for the location.

SEA Topic	Negative Operational Effects	How effects have been addressed through mitigation measures incorporated within the LTP
		- All schemes will be maintained to ensure that they remain in good condition. - Landscaping schemes will be implemented in sensitive landscape areas. - All schemes will retain key landscape features (e.g. footpaths, hedgerows, trees) where possible. - Where key landscape features have to be removed/modified or landscape character will be temporarily altered Landscape Management Plans will be produced highlighting how the affected areas will be restored, replaced and enhanced. - All landscape schemes will incorporate biodiversity enhancements where appropriate e.g. use of native species, creation of greenways and green networks. - The LTP3 will improve the quality and appropriateness of street furniture (e.g. bins), lighting, public transport facilities and signage to ensure that they are appropriate to the location and do not have a negative effect on streetscape. - Improve and maintain the quality of existing roads, footpaths and cycleway. - Ensure that all new transport schemes in conservation areas of a high quality and are appropriate to the character of the conservation area and its setting.
Archaeology	Negative effects on archaeology associated with increased street furniture (Highway Capacity Intervention 4 & NMU Interventions 8 and 9).	- Adverse effects on the character and quality of conservation areas will be avoided or reduced by improving the quality, design and appropriateness of street furniture, lighting, road signs, safety features, public transport facilities (bus stops) and by reducing street clutter. Improvements to the quality and design of new and existing highways, footpaths and cycleways will also have positive effects on the character and quality of conservation areas.

Noise	Negative effects on noise due to an increase/decrease in noise (Public Transport Interventions 1 & 2* and Freight Interventions 1* & 2) and from increased noise due to deliveries outside of the regular working day (Freight Intervention 5*).	- Carry out noise impact assessments involving:
		  - Ambient noise survey at identified noise sensitive locations
		  - BS 5228 assessment and mitigation
		  - Development of noise mitigation based on BS 4142
		  - Traffic assessment in accordance with CTRN
		- Implement appropriate noise attenuation measures where there is potential for schemes or initiatives to have an adverse effect on noise levels.

Climate	Negative effects on climate resulting from an increased use of energy for heating and lighting (Miscellaneous Intervention 1*).	- Ensure that annual traffic monitoring is carried out to identify areas of traffic increase and congestion as they develop so that measures can be taken to reduce congestion and manage traffic growth as it occurs. - Ensure that the interventions to improve the sustainable road freight network, sustainable freight management and rail freight schemes are implemented effectively to promote rail/sea as an attractive and viable alternative mode of transport for moving freight and to improve the efficiency of road freight to minimise adverse effects on the environment.

SEA Topic	Negative Operational Effects	How effects have been addressed through mitigation measures incorporated within the LTP
Soil	Negative effects on soil due to the potential risk of contaminated land (Public Transport Interventions 1 & 2*) due to use of diesel trains and due to the need for soil resources during construction (Highway Capacity Interventions 1 to 3 & 5 to 8).	- Develop partnership working to ensure that the all new developments located on areas of previously developed land are accessible by public transport. - Investigate the implementation of schemes that will encourage and support future economic growth and the reuse of previously developed land. - Where new transport schemes and transport improvement works are likely to cause disturbance to contaminated land, advice will be sought from the Environmental Health Departments of the Local Planning Authorities. Where necessary PPC (Pollution Prevention Control) Permits must be obtained from the Environment Agency. - Develop partnership working to ensure that new transport schemes minimise the use of greenfield land and the severance of agricultural land holdings.
Population	Negative effects on population due to impacts on the vitality of Morpeth town centre (Highway Capacity Intervention 2) and as a result of disruption to passenger services due to more freight on the railways (Freight Interventions 1* & 2).	- Ensure adequate consultation is carried out with rail passengers and other stakeholders with regards to any disruption of rail timetables due to implementation of any intervention.
Material assets	Negative effects on material assets associated with the potential for increased maintenance due to an increased frequency of train services (Public Transport Intervention 2*) and associated with the potential for increased maintenance to railway line (Freight Interventions 1* & 2).	- Ensure appropriate measures are put in place to mitigate any impact associated with the increased maintenance that may result from an increased frequency of train services.

Capabilities on project:
Environment

3.2.4 Residual Effects

The SEA Environmental Report concluded that residual negative effects (please refer to Section 13.4 of the SEA Environmental Report) particularly associated with Highway Capacity Interventions. However, overall it was concluded that the residual beneficial effects of the LTP3 far outweigh the negative residual effects.

Many of the interventions will contribute to encouraging a modal shift to more sustainable modes of transport. A modal shift will result in the following:

- A beneficial effect on noise, quality, climatic factors and human health due to a reduction in congestion/ emissions due to fewer cars on the road;
- A reduction in deposition of pollutants associated with fewer cars on the road will have positive effects on biodiversity and water; and
- Benefits to the population which will include improved public transport, upgraded transport infrastructure, better accessibility, increased flexibility, more predictable journey times to services and employment and people being more active.

The SEA has concluded that the LTP3 and the interventions included in the plan are unlikely to have any significant adverse effects on the environment. Consequently there have been no suggested changes or amendments to the plan or the individual interventions.

However, in order to minimise any potential residual negative effects and avoid the potential for the occurrence of significant adverse effects, all infrastructure schemes taken forward/implemented under the LTP3 will be required to be subject to appropriate environmental assessments/appraisals and would be required to take into account the scheme and SEA subject specific mitigation measures outlined in the SEA Environmental Report.

4 Consultation

4.1 Introduction

The draft LTP and Environmental Report were subject to public consultation between 18 November 2010 and 29 January 2011. This allowed the public and consultation authorities the opportunity to comment on the draft LTP3 and SEA prior to the development of the final plan.

4.2 Public Consultation

Online public consultation was carried out on the SEA Environmental Report from between 18 November 2010 and 29 January 2011 at the same time as the online public consultation for the LTP3.

The following documents were available to view online on the NCC website:

- Third Northumberland Local Transport Plan
- Executive Summary
- LTP3 - Evidence Base - Main Report
- LTP3 - Evidence Base - Appendix A.
- LTP3 - SEA Environmental Report
- LTP3 Implementation Plan

4.3 Consultation Respondees

A list of the key organisations/groups/stakeholders that responded to the public consultation on the LTP3 is provided below. A summary of the responses received is presented in Section 5 of this report.

- Banks Group
- British Horse Society
- Campaign for National Parks
- Cyclists Touring Club
- English Heritage
- Greater Morpeth Development Trust
- Highways Agency
- Morpeth Town Council
- Natural England
- NCC Countryside Support
- NCC Planning Strategy
- NCC Regeneration
- NECTAR
- Nexus
- Northumberland Tourism
- Northumberland Tourism
- NSP Place Shaping Partnership
- ONE NE
- Resident

Capabilities on project:
Environment

5 Summary of Consultation Responses

5.1 Online Public Consultation Responses

In total, 19 written consultation responses were received, in addition to the comments received from the workshop and statutory consultees. A summary of the responses relevant to the SEA Environmental Report is included within Table 3.

Table 3: Summary of Consultation Responses from the Online Public Consultation

Organisation	Chapter	Comments	Response from NCC to update LTP3
English Heritage	Chapter 1	We are advised that protecting the natural environment was identified as a particular challenge, but unfortunately there is no recognition of our call for the protection of the historic environment, other than in respect of historic market towns.	Recognition of the need to protect the historic environment has been included in Chapter 10 – Quality of Life.
	Chapter 2	Chapter 2 – Wider Issues Chapter 2 informs us that the Regional Spatial Strategy (RSS) has now been revoked. Although it is clearly the Coalition Government's intention to do so (as expressed in the Decentralisation and Localism Bill) this is not yet the case and it continues to be a material consideration in determining planning matters. For the time being, its theme of conserving and enhancing the region's built and natural environment, together with its heritage and culture, remains pertinent. It is disappointing to note, therefore, that this theme is not thought important enough to be carried forward as a priority for transport planning, despite Eddington's view that impacts should be measured across a range of ....environmental outcomes. Failure to meaningfully incorporate environmental safeguarding in the LTP will almost inevitably result in a failure to satisfy the SEA Directive.	Conserving and enhancing the historic and natural environment has been added to Chapter 10 – Quality of Life.
	Chapter 5	Table 5.3 sets out the relationship between LTP goals, objectives, and indicators. How will you know if you have been successful in terms of improving quality of life if there are no indicators by which to measure performance.	The SEA and the RoWIP will provide the monitoring programme for the environmental objectives.
	Chapter 6	In the list of priorities we are advised that in the longer term the Network Rail compound at Berwick railway station will be relocated. I regard this as a planning enforcement matter which can and should be acted upon now. The compound is situated on a Scheduled Ancient Monument and does not have the necessary Scheduled Monument Consent. This offence is prosecutable. The planning situation is also questionable. English Heritage has written to the former district Council on this matter but has yet to see any satisfactory progress.	This section has been revised. This issue is a planning enforcement matter.
	Chapter 10	Where schemes are likely to have an effect upon the historic environment and any associated heritage assets appropriate in-house conservation, design, and archaeological advice should be sought, as well as the views of those who might be directly affected.	Chapter 10 has been revised to include this issue.

Organisation	Chapter	Comments	Response from NCC to update LTP3
Natural England	Chapter 1, Page 8	Page 8 National Transport Goals There is a need to ensure that a healthy natural environment is addressed as one of the over arching priorities in the Strategy document and supporting evidence base (please note later comments).	The importance of a healthy natural environment has been strengthened in the LTP, particularly in Chapter 10 – Quality of Life.
	Chapter 1, Page 10	Page 10 Habitats Regulations Assessment Please amend to the most recent legislation - The Conservation of Habitats and Species Regulations 2010 (Habitats Regulations).	Paragraph 1.25 has been amended as suggested.
	Chapter 1, Page 16	Local Policy Influences. This section should also describe the Northumberland Rights of Way Improvement Plan, any Cycling Strategies produced, and the emerging Green Infrastructure Strategy. In addition the transport objectives of the National Park Management Plan and AONB Management Plans should be recognised.	The National Park and AONB Management Plans have been added at paragraphs 2.51 and 2.52.
	Chapter 2, Page 20	Growth Point. There are also environmental conditions to be met with respect to the growth point areas including the development of a multi functional green infrastructure strategy, one function of which is to contribute to the provision of accessible walking and cycling routes in the area.	The Green Infrastructure Strategy is currently being drafted.
	Chapter 3, Page 23	Table - Environment. This should also include reference to the Heritage Coast, and the range of important biodiversity and geological designations including Special Protection Areas, Special Areas of Conservation, etc.	These have been added to Table 3.1
	Chapter 3, Page 27	Page 27 Environment This section only covers climate change. It should contain an assessment of the range of impacts from transport on the natural environment (looking for example at landscape, biodiversity, geodiversity, soils) in order to identify the full range of challenges in the county of meeting the national transport goal of 'promoting a healthy natural environment' and the issues and challenges should be added to the Table on Page 40.	The natural and historic environment has been added to this section (para 3.35 & subsequent emerging challenges). Emerging Challenges for Transport table has been updated.
	Chapter 4, Page 45	Page 45 Northumberland Coast: This section should recognise the Northumberland Coast AONB and Heritage Coast, and the important nature conservation designations along the coast (SPA/SAC/Ramsar/SSSI/NNR).	AONB and Heritage Coast have been added to paragraph 4.1 and 4.6.
	Chapter 4, Page 47	Page 47 Blyth. It should also be noted that the town also lies adjacent to the Northumbria Coast Special Protection Area and the Northumberland Shore SSSI.	Added to paragraph 4.11

Organisation	Chapter	Comments	Response from NCC to update LTP3
Natural England	Chapter 4, Page 51	Page 51 West Northumberland. This section could also make reference for the need for sustainable transport opportunities to be provided to the North Pennines AONB and the Northumberland National Park.	North Pennines AONB added at new paragraphs 4.28 and 4.29. National Park is also in North area.
	Chapter 5, Page 63	Page 63 Table 5.3. The SEA environmental report should also contain recommendations for a monitoring programme for the LTP3 which needs to be taken into account. Suggested indicators from the ROWIP and Green Infrastructure Strategy should also be considered.	This has been referred to in Table 5.2. Relationship between LTP Goals, Objectives & Indicators of the Adopted Plan.
	Chapter 5, Page 64	Page 64 Strategic Approach to Delivery. The most sustainable options should also be chosen to deliver the objectives as well as the most cost effective. Use of the SEA report and HRA report can inform this process. We suggest that an approach that mixes the best (and most sustainable) elements of each package is likely to the most appropriate way to meet the objectives and goals for transport.	Noted.
	Chapter 5, Page 65	Page 65 Strategic Environmental Assessment. The SEA should be used as part of an iterative process to inform both the choice of LTP3 objectives and to advise on the most sustainable interventions for the final plan.	Paragraphs 5.18 to 5.21 have been updated.
	Chapter 6	Page 78 - We welcome the priority list of proposals. We would add the need to maintain and improve walking, cycling and green infrastructure networks due to their contribution to allow local access to employment opportunities and the broader role they play in sustainable tourism opportunities (including for example in the protected landscapes, the Pennine Way National Trail and Hadrian's Wall Path, and other regionally important walking routes such as the Northumberland Coast Path and St Cuthbert's Way along with the National Cycle Routes).	This section has been revised.
	Chapter 7, Page 79	Page 79 Reducing Climate Change. Climate change is likely to have fundamental impacts on the natural environment and we encourage transport policy to have an integrated approach to climate change, addressing both adaptation and mitigation measures. Extreme flooding events also cause damage to the natural environment.	Noted.
	Chapter 7, Page 80	Page 80 - Please note that some of the biodiversity sites within Northumberland are being adversely affected by air quality issues, as highlighted in the SEA Environmental Report.	Noted. This is referred to in Chapter 10.

Organisation	Chapter	Comments	Response from NCC to update LTP3
		Weaknesses – the current levels of walking and cycling could also be considered as a weakness.	
Natural England	Chapter 10 – Quality of Life	Protection of the natural environment is important for the local economy, and in particular tourism. In progressing transport proposals, consideration needs to be given to potential impacts on the landscape character, biodiversity, geodiversity, soils, the coast and green infrastructure (along with air and noise pollution (loss of tranquillity) as well as impacts on the townscape (locality or streetscape). There is a need to ensure the highest level of protection for designated landscapes, habitats, sites and species. Policies and decisions about major transport proposals should safeguard important natural assets. Transport schemes should not only avoid and reduce impacts on the natural environment but also consider/provide opportunities for enhancement such as habitat restoration and creation schemes. Schemes should seek net environmental gain from necessary transport development whilst avoiding, mitigating or compensating for negative impacts. There is a need for the plan to address any adverse transport impacts on nationally important landscapes including the North Pennines AONB, Northumberland Coast AONB and Heritage Coast, and Northumberland National Park and protected sites including SAC/SPA/Ramsar and SSSI.	This has been added to para 6.3 and the SWOT analysis.
	Page 61 Quality of Life /Page 105 Chapter 10	Healthy Natural Environment A clear objective for protecting and enhancing the 'Healthy Natural Environment' should be included as part of the Quality of Life objective (see earlier comments), key issues identified and supporting text provided in Chapter 10. Clear actions relating to transport and the natural environment should be included on Page 106. In relation to biodiversity and landscape, local authorities have a duty to have regard to the conservation of biodiversity in exercising their functions and to have regard to the purposes of AONBs when making decisions or carrying out activities that affect land within these areas. Protection of the natural environment is important for the local economy, and in particular tourism. In progressing transport proposals, consideration needs to be given to potential impacts on the landscape character, biodiversity, geodiversity, soils, the coast and green infrastructure (along with air and noise pollution (loss of	This chapter has been revised to include the natural environment and a new objective (Protect the natural environment, heritage and landscape), has been added.

Organisation	Chapter	Comments	Response from NCC to update LTP3
Natural England		tranquillity) as well as impacts on the townscape (locality or streetscape). There is a need to ensure the highest level of protection for designated landscapes, habitats, sites and species. Policies and decisions about major transport proposals should safeguard important natural assets. Transport schemes should not only avoid and reduce impacts on the natural environment but also consider/provide opportunities for enhancement such as habitat restoration and creation schemes. Schemes should seek net environmental gain from necessary transport development whilst avoiding, mitigating or compensating for negative impacts. There are positive opportunities for creative design to improve the environmental performance of existing and new transport infrastructure in all landscapes – for example 'green' bridges and tunnels to reduce habitat fragmentation and the removal, reduction or better design of signs and lighting, environmentally friendly roadside verge management etc. There is a need for the plan to address any adverse transport impacts on nationally important landscapes including the North Pennines AONB, Northumberland Coast AONB and Heritage Coast, and Northumberland National Park and protected sites including SAC/SPA/Ramsar and SSSI. We advise that in particular, National Parks, AONBs and Heritage Coasts need environmentally sustainable, integrated and well designed transport networks both within and to these areas, that cater for both residents and visitors and in turn should become exemplars of such networks. This requires strategic planning, involvement of all key partners and long term investment to aid delivery. Our LTP3 guidance provides further details: Natural England Guidance note on Local Transport Plans and the Natural Environment. http://www.naturalengland.org.uk/Images/local-trans-plans_tcm6-15159.pdf The SEA Report should provide further evidence as to the key issues which should be included within the Strategy. (Page 106)	

Organisation	Chapter	Comments	Response from NCC to update LTP3
Natural England	Chapter 10, Page 105	Chapter 10, Page 105 See earlier main comments. Suggest amend the term ' widespread natural environment and rolling landscapes' with a high quality natural environment including National Park, and two AONBs and a diversity of landscape character ranging from uplands, river valleys, agricultural and urban landscapes, to the coast.	Paragraph 10.1 has been revised. To include this.
	General Comments	We welcome the overall strategic approach in the LTP3 with its focus on delivering the national transport goals at local level and a commitment to reducing carbon emissions. However we are concerned that the need to deliver the national goal of promoting a healthy natural environment is not clearly defined and carried through to the local level, and we would like to see objectives or policies to protect and enhance the natural environment included in the final Plan.	A new objective: "Minimise the impact of transport on the natural environment, heritage and landscape" has been added. Chapter 10 has been updated to reflect this.
NECTAR (North East Combined Transport Activists' Roundtable)	Chapter 1, Page 9-10	The text as written implies that the SEA, HIA and HRA are viewed as hurdles or barriers to the delivery of LTP3. Ideally, use of terms such as 'provide information', 'impacts', 'avoidance', 'mitigate' should not be used. Instead, the evaluation and appraisal processes should be recognised as means to generate positive options and opportunities to enhance the environment, public health etc. LTP3 should look to them for recommendations for win-win solutions contributing to an integrated Plan.	The terms used follow those used in Government guidance. Paragraph 5.20 outlines how the SEA has informed the development of the LTP.
	Chapter 3, Page 27	Environment is not just carbon emissions and climate change. LTP3 should also be considering the impact of existing and proposed transport corridors and schemes on landscape, biodiversity, and air & water quality. Transport can also have a huge impact on tranquillity and other environment-related aspects of quality of life. It should be noted that the Northumberland National Park Local Development Framework Core Strategy includes maintenance of tranquillity as a key objective. Tranquillity, landscape and wildlife are some of the main selling points of the County tourist industry. Transport provision to meet visitor needs must take care not to 'kill the goose that lays the golden eggs'.	This section has been revised to include the natural environment. (Paragraphs 3.19 to 3.26).

Organisation	Chapter	Comments	Response from NCC to update LTP3
NECTAR (North East Combined Transport Activists' Roundtable)	Chapter 5	Strategy Evaluation and Appraisal In the win-win integrated approach to sustainability, environment should be enhanced by interventions. Reference to 'mitigating environmental impact' is associated with the obsolete 'trade off' approach to sustainable development.	The SEA text has been updated (para's 5.18 to 5.21).
		Improving Facilities for Coach Travel A broader review appears to be necessary as facilities may become essential to protect rural attractions such as Holy Island, the National Park and National Trust and similar properties. Planning policy (in the emerging LDF) may also be needed to manage provision of coach facilities at the edge of towns.	Noted.
NSP Place Shaping Partnership	Chapter 5	P65 – Strategic Environmental Appraisal "The environmental impacts (of what-plan/proposals/each investment) have also been considered…." And rather than list the stages it might be more informative to list the environmental elements for which the plan has been appraised to give overview to those not familiar with an EIA process.	Paragraphs 5.18 to 5.21 have been updated.

Capabilities on project:
Environment

5.2 Conclusion

The responses relevant to the SEA Environmental Report are included within Table 3 above. These included responses from English Heritage, Natural England, NECTAR (North East Combined Transport Activists' Roundtable) and NSP Place Shaping Partnership.

Many of the comments related to the need to strengthen the LTP3 in terms of making more reference to the need to protect the historic environment and conserving and enhancing the historic and natural environment. The comments and responses received during consultation have been taken into account and have informed the final LTP strategy and implementation plan. Some of the main changes are highlighted below.

- Chapter 1 (Introduction) was updated to outline how the SEA has informed the development of the LTP.
- Chapter 3 (Northumberland Today) was updated to recognise the importance of the Northumberland Coast AONB and Heritage Coast, and to include a greater range of environmental aspects, e.g., biodiversity, and air and water quality, in addition to carbon emissions and climate change.
- Chapter 4 (The Changing Context for Travel) was updated to make reference to the need for sustainable transport opportunities to be provided to the North Pennines AONB and the Northumberland National Park.
- Chapter 5 (Vision, Goals & Objectives) was revised to highlight that SEA is an iterative process that has been carried out in conjunction with the preparation of the LTP3 to ensure any adverse effects of the plan on the environment have been identified, avoided and mitigated at the earliest opportunity.
- Chapter 6 (Supporting Sustainable Economic Growth) was revised to emphasise the need to maintain and improve walking, cycling and green infrastructure networks due to their contribution to allow local access to employment opportunities.
- Chapter 10 (Quality of Life) was revised to include a new objective 'Protect the natural environment, heritage and landscape'. The chapter has also been updated to emphasise that Northumberland has a rich natural and historic environment, and future transport provision must ensure that these qualities are not eroded.

6 Monitoring the Strategy

6.1 Introduction

It is necessary under the Environmental Assessment of Plans and Programmes Regulations 2004 as part of the SEA process, to set out how implementation of the 'strategy' will be monitored in the future with regard to the effects that it has on the environment.

6.2 An Introduction to Monitoring

Monitoring is an ongoing process that is undertaken continuously for the duration of the LTP3 implementation. Monitoring is a means of checking whether the LTP3 is performing as predicted by measuring how the baseline situation changes following implementation of the LTP3.

The main purpose of 'monitoring' is to carry out periodic 'checks' to examine whether:

- the results of the SEA were correct in terms of the predicted environment effects and the assumed effectiveness of the mitigation measures;
- whether there have been any 'unknown' or previously unidentified effects on the environment as a result of the implementation of the plan, programme or strategy (PPS); and
- to identify measures to remedy any unforeseen adverse effects.

Monitoring involves a 'review' of the environmental baseline against which the effects of a PPS are measured. Monitoring is therefore essential for obtaining further information about how the environment, or certain aspects of the environment, responds to a PPS or particular policies or programmes within that PPS. This information can then be used to inform future SEAs for similar PPSs and to assist with the development or evolution of the SEA process as a whole.

As part of the approach to SEA in general, one of the recognised mechanisms for monitoring PPSs is through the development of 'monitoring frameworks'. These frameworks set out a series of 'indicators' or 'targets' which relate directly to the environmental baseline and the SEA objectives. The monitoring framework also sets out timescales for the review of the 'baseline' situation. This tends to be on an 'annual basis'. However, due to their desk-based nature, a large proportion of SEAs rely on data from third parties. Subsequently some datasets may only be updated every 5 or 10 years. These variations in the frequency by which data is updated needs to be taken into account in 'monitoring framework'.

6.3 Monitoring Framework

Monitoring usually involves the use of indicators or targets. An 'indicator' is a measure of how the 'baseline' has changed. SEA indicators are used to monitor whether the LTP3 is performing as predicted. However there are a number of potential limitations associated with the reliance of certain indicators for the purpose of monitoring these are mainly in relation to:

1) Indicators that are not based on information / data / environments that will be directly affected by the implementation of the plan.

2) Data available is not always kept up to date and therefore will not identify any significant changes.

3) Collection of specific data is often the responsibility of a range of different organisations consequently this can lead to:

    a. Data being collected for different areas over different timescales;

    b. Data collection methods and techniques changing to reflect different requirements for data or availability of funding for data collection; and

    c. Data sets not being updated.

4) Some indicators are only relevant where specific receptors are present.

The monitoring framework presented in Table 4 includes a number of possible indicators that could be used to monitor the implementation of the LTP3. However, taking into account the limitations associated with this approach it is suggested that

monitoring is tied into the future reviews of the LTP and is related to monitoring the number and type of schemes that have been implemented during the year. This would include a review of the environmental works / studies and assessments undertaken to support these schemes as suggested as part of the mitigation set out in Chapter 13 of the SEA Report.

The monitoring framework set out in Table 4 below is preliminary and will be confirmed at the time of the adoption of LTP3. During public consultation additional data sources may be indentified which should be incorporated into the monitoring framework.

Table 4: Suggested Monitoring Framework

SEA Topics	SEA Objectives	Indicators	Responsibility/ Source	Suggested Review Timescale
Biodiversity	1. To protect and enhance Northumberland's biodiversity and geodiversity and to safeguard protected species.	- Change in area (ha) of designated biodiversity sites due to transport schemes	NCC/ Natural England	Annual
		- Proportion of local sites where active management is being achieved	NCC/ Natural England	Annual
		- Area of ancient woodland removed due to transport schemes	NCC/ Natural England	Annual
Landscape	2. To maintain and enhance the local distinctiveness, character and appearance of Northumberland's rural and urban land and landscapes, including the public realm.	- Change in area (ha) of designated landscapes e.g. AONB	NCC/ Natural England	Annual
		- Number of new/ proposed transport schemes in areas of land designated for its landscape quality or amenity value (AONB), national parks etc.	NCC	Annual
		- Number of schemes promoting landscape enhancement in urban fringe landscapes	NCC	Annual
Archaeology and Heritage	3. To protect and enhance Northumberland's buildings, sites, areas and features of historic, archaeological and architectural interest and diversity.	- Number of applications for listed building consent (including demolitions) and scheduled monument consent associated with transport projects	NCC/ National Monuments Record	Annual
		- Number of transport schemes affecting historic parks and gardens	NCC/ National Monuments Record	Annual
		- Number of transport schemes located within or affecting conservation areas	NCC	Annual
Water	4. To reduce the risk of flooding. 5. To protect and enhance the quality of Northumberland's ground, river and sea waters.	- Number of new transport infrastructure developments located in Flood Zones 2 & 3	NCC/ Environment Agency	Annual
		- % of new transport infrastructure developments incorporating SUDS features	NCC	Annual
		- % river length within Northumbria River Basin District achieving Good Ecological Potential	NCC / Environment Agency	Annual
Noise	6. To reduce transport related noise.	- Levels of noise pollution	NCC	Annual
		- Number of complaints received/resolved with regard to noise	NCC	Annual

Capabilities on project:
Environment

SEA Topics	SEA Objectives	Indicators	Responsibility/ Source	Suggested Review Timescale
Air	7. To ensure good local air quality.	- Number of Air Quality Management Areas	NCC	Annual
		- European Sites Affected by Air Pollutants (Critical load exceeded)	NCC/ Natural England	Annual
		- Annual average concentration of NO_2 (Local Air Quality Management Progress Report)	NCC	Annual
		- Annual average concentration of PM_{10} (Local Air Quality Management Progress Report)	NCC	Annual
		- Volume of traffic in billion vehicle kilometres (bvk)	NCC	Annual
Climatic Factors	8. To reduce the causes of climate change. 9. To adapt to and mitigate for the effects of climate change.	- Transport related CO_2 emissions	NCC	Annual
		- Number of buses and Local Authority vehicles with Euro 3 or above	NCC	Annual
		- Proportion of people travelling to work by car	NCC/ Census data	Annual
		- Proportion of people walking/cycling to work	NCC/ Census data	Annual
		- Proportion of children travelling to school by car	NCC/ Census data	Annual
		- Distances travelled to work	NCC/ Census data	Annual
		- Amount of freight using rail	NCC	Annual
		- Amount of freight using water	NCC	Annual
Soil	10. To reduce the amount of waste produced and increase the amount recycled and composted.	- Proportion of materials used in transport developments that are from secondary and recycled sources	NCC/ Contractor	Annual
		- Proportion of construction and demolition waste that is reused and recycled	NCC/ Contractor	Annual
Population	11. To ensure good accessibility for all to jobs, facilities, goods and services in Northumberland. 12. Conserve and enhance opportunities for sustainable public access to the natural environment.	- The percentage of persons overall economically active	NCC/ Census data	Annual
		- The percentage of f working population age seeking Job Seekers Allowance	NCC/ Census data	Annual
		- Bus patronage levels	NCC/ Census data	Annual
		- Rail patronage	NCC/ Census data	Annual

Capabilities on project:
Environment

SEA Topics	SEA Objectives	Indicators	Responsibility/ Source	Suggested Review Timescale
	13. To reduce road traffic and congestion through reducing the need to travel by car and improving travel choice. 14. To increase public involvement in decision-making and civic activity.	- Ward unemployment levels	NCC/ Census data	Annual
		- % of schools with Travel Plans.	NCC/ schools	Annual
		- No. of employees working for businesses with Travel Plans.	NCC	Annual
		- % of people travelling to work in private car involved in carshare schemes.	NCC	Annual
Material Assets	15. To increase the vitality of town centres. 16. To make better use of our resources. 17. To improve efficiency in land use through the re-use of previously developed land and existing buildings, and encourage urban renaissance. 18. Adopt a strategic approach to planning and provision of multi functional green infrastructure	- Amount (ha) of best and most versatile land lost to development	Natural England/ NCC	Annual
		- Number of new developments completed on previously developed land.	NCC	Annual
Human Health	19. To reduce crime and the fear of crime. 20. To improve health and reduce inequalities in health. 21. To reduce poverty and social exclusion and close the gap between the most disadvantaged communities and the rest.	- % of SOAs in lowest 20% IMD Health Domain.	Communities and Local Government: The English Indices of Deprivation 2007: Summary	Annual or when next Index of Deprivation released 2007
		- % of residents feeling 'safe' or 'fairly safe' outside in the local authority area after dark.	NCC	Annual

Capabilities on project:
Environment

Appendix A: Consultation Responses

LTP3 Consultation Responses by Chapter

NOTE: The LTP has been adopted as an interim strategy until the Sustainable Community Strategy is completed, when it will be refreshed. Some of the below comments will therefore be acted on as part of the refresh.

Chapter 1 – Introduction

Natural England	**Page 8 National Transport Goals** There is a need to ensure that a healthy natural environment is addressed as one of the over arching priorities in the Strategy document and supporting evidence base (please note later comments).	The importance of a healthy natural environment has been strengthened in the LTP, particularly in Chapter 10 – Quality of Life.
	Page 10 Habitats Regulations Assessment Please amend to the most recent legislation - The Conservation of Habitats and Species Regulations 2010 (Habitats Regulations).	Paragraph 1.25 has been amended as suggested.
English Heritage	We are advised that protecting the natural environment was identified as a particular challenge, but unfortunately there is no recognition of our call for the protection of the historic environment, other than in respect of historic market towns. References here and throughout the document to the Local Area Agreement should be removed. We are informed of the key achievements, and the difference made as a consequence, of the last LTP. We are advised that more people now use rail services, but it is not clear whether this has brought a corresponding reduction in the number of people using private motorised transport or simply whether more people are making such journeys. We are advised that the proportion of children walking and cycling to school has increased, but that the proportion driven has remained the same. This can only be achieved by an increase in school attendance. These ambiguous statements appear to be questionable as key achievements. I welcome the increase in the number of cycling trips and the improved management of transport assets, many of which will have heritage value.	Recognition of the need to protect the historic environment has been included in Chapter 10 – Quality of Life. References to the LAA have been removed. School travel (para 1.32) bullet point has been amended.
Northum-berland Tourism	p9 good to see that the first key issue recognises the rural nature of the county & associated issues ref accessibility. Aims – focus on local people and businesses, but seems little recognition of access requirements of our visitors – key to our economy.	Noted. The section referred to gives an account of the previous LTP. The Aims are from LTP2.

NSP Place Shaping Partnership	P5 paragraph 2 “The plan describes…” insert something about a resilient and responsive transport system for example: “The plan describes how Northumberland County Council and its partners will develop and maintain a sustainable local transport system which is resilient and responsive to changing needs, supports economic prosperity, minimises the environmental impact of travel…etc”	Paragraph 1.2 has been amended as suggested.
	P5 paragraph 4 “…Sustainable Community Strategy and reflecting local needs and local land use plans…etc”	Paragraph 1.4 has been amended as suggested.
	P8 paragraph 2 “The importance of...” needs to remove reference to the LAA	References to the LAA have been deleted.
NECTAR	Page 5, Page 16: Reference is made to the Tyne & Wear City Region Transport Strategy. This document, which is due for completion in March 2011, is intended to present an overarching Strategy covering the LTP3s of County Durham, Northumberland and Tyne & Wear. Note should therefore be taken of the fact that the Tyne & Wear LTP3 states: o *Continuing as we are is not an option. We are therefore promoting a radical shift in emphasis to more sustainable and lower-cost modes.* o *We will seek to ensure that development is focused on the most accessible locations that minimise demand to travel and make it easy to use sustainable modes.* o *We will continue to promote and invest in our existing transport networks, focusing particularly on active travel modes, such as walking and cycling, as well as public transport.* The order of wording of the last of these statements, with pedestrians first, followed by cycling and public transport, is very relevant and should be reflected in the Northumberland LTP3, as it will undoubtedly be a basic premise in the City Region Strategy.	The Implementation Plan has been revised with the amount of funding for pedestrians and cyclists increased to reflect the fact that walking and cycling are priorities, followed by public transport.
	Page 6: The statement that the Northumberland LTP3 has been prepared in accordance with the government’s ‘Guidance on Local Transport Plans (July 2009)’ is welcomed. The subsequent text however, appears not to have taken sufficient note of the requirement in the Guidance at Chapter 4, Section 2, paragraph 28 that states: *‘Local authorities should not assume that schemes which have been under consideration for a long period (particularly infrastructure projects) are still the most appropriate solution to identified challenges, and should include a review of available options in the option generation phase’*. Moreover, where such schemes are supported in LTP3, no evidence is presented that there has been close working *‘with those responsible for other functions, for example housing, environmental health and economic development in identifying options for resolving relevant challenges’.*	The schemes that are included in the LTP are considered to be appropriate solutions to the identified challenges. Many of the schemes have been identified through joint working with the County Council’s Planning and Regeneration Services. However, road based schemes will be reviewed during the LTP refresh to ensure they are fully justified.

	Page 8: Mention of the time spans of the strategies and documents referred to, in the context of the 15year time span of LTP3 would be helpful. It is noted that that the LAA ends very shortly and is not likely to be renewed in its present form. The emerging Northumberland Local Development Framework should be referred to as being aligned with LTP3, whilst the County response to the SCS "Stronger Together" will certainly influence the LTP3 Implementation Plan.	References to the LAA have been deleted.
	Page 9, Page 10: The text as written implies that the SEA, HIA and HRA are viewed as hurdles or barriers to the delivery of LTP3. Ideally, use of terms such as 'provide information', 'impacts', 'avoidance', 'mitigate' should not be used. Instead, the evaluation and appraisal processes should be recognised as means to generate positive options and opportunities to enhance the environment, public health etc. LTP3 should look to them for *recommendations* for win-win solutions contributing to an integrated Plan.	The terms used follow those used in Government guidance. Paragraph 5.20 outlines how the SEA has informed the development of the LTP.
	Page 12: All the bullet points made should be supported by useful statistics which should include absolute as well as relative values so that the scale of the LTP2 achievement and any residual problems for LTP3 to tackle can be clearly seen. Bullet five appears to imply that the proportion of children going to school by bus has reduced; is that correct and if so, is it an achievement? **Emerging challenges:** In line with the helpful approach adopted in other chapters, challenges emerging from Chapter 1 should be noted to include: o promoting a radical shift in emphasis to more sustainable, lower-cost active travel modes, with development focused on the most accessible locations that minimise demand to travel and make it easy to use sustainable modes. o recognising the hierarchy of road users to ensure that priority is given first to pedestrians, then cyclists and then public transport users. o challenging long favoured road schemes, making reference only to those for which options have been developed in collaboration with housing, environmental health and other functions. The challenges identified should be summarised into an issues and challenges table in concept similar to that at the end of Chapter 3.	Bullet 5 has been amended to refer only to walking and cycling to school. Chapter 1 sets out how the LTP has been developed. It does not raise issues therefore 'emerging challenges' are not relevant here.

NCC Countryside Support	Page 6 The LTP recognises the role of active travel solutions such as walking and cycling & should show how it integrates with the Council's other duty to prepare and review a Rights of Way Improvement Plan. An authority can choose to fully integrate the LTP and RoWIP or to keep them as separate documents. Because the RoWIP was newly prepared in 2007 and does not need to be reviewed until 2017 I previously suggested that we should adopt this approach. It would be beneficial, however, for the readers of the LTP to understand how the two documents relate to each other. I suggest inserting the following after "Part 3": **"Part 4 – Rights of Way Improvement Plan (separate document)** **Local transport authorities are required to produce and maintain a Rights of Way Improvement Plan (RoWIP) under the Countryside Act 2000. The Council's RoWIP sets out a ten year strategy (2007-2017) for the management of the pubic rights of way network. Because the RoWIP is a current strategy and continues to adequately address the future priorities for managing rights of way the Council has decided not to fully integrate the LTP and RoWIP. Instead, the RoWIP is a complementary document to the LTP and the policies, priorities and action proposals it contains will inform LTP transport and access related issues particularly in relation to active travel."**	This has been added as paragraph 1.13.
	Page 10 The title of the DDA is incorrect – it is "The Disability Discrimination Act 1995" However, I think you will find that most of the provisions of the DDA 95 have now been repealed/superseded by the "Equality Act 2010.	Paragraph 1.27 has been amended to refer to the Equality Act 2010.
	Page 12 2nd last bullet Insert **"and public rights of way"** after "road"	This has been added as suggested.

Chapter 2 – Wider Issues

NCC Regeneration	**Page 19** Update the information on the Local Enterprise Partnership. The approved North Eastern Local Enterprise Partnership covers Durham, Gateshead, Newcastle, Northumberland, North Tyneside, South Tyneside and Sunderland. The NELEP has transport and connectivity as one of its four strategic economic functions. Housing Strategy – is there a need to reference the Local Investment Plan?	The section on the LEP has been updated (paragraphs 2.14 to 2.18).
Natural England	**Page 15 Climate Change Adaptation** There is also a need for the natural environment to adapt to the impacts of climate change. There are opportunities for the transport network to assist the natural environment in adapting to climate change. Sound design principles for new transport infrastructure and innovative management of the existing transport network could achieve multiple benefits for both the natural environment and for network resilience.	This has been added in Chapter 6 under Climate Change adaptation (para. 6.58).
	Page 16 Tyne and Wear City Region Transport Strategy The Tyne and Wear City Region Transport Strategy should also consider strategic cycling and walking routes, linking up proposals in respective local authority rights of way improvement plans, cycling strategies, and green infrastructure strategies, alongside the local transport plan proposals.	Paragraph has been amended and refers to "all modes".
	Page 16 Local Policy Influences This section should also describe the Northumberland Rights of Way Improvement Plan, any Cycling Strategies produced, and the emerging Green Infrastructure Strategy. In addition the transport objectives of the National Park Management Plan and AONB Management Plans should be recognised.	RoWIP has been added at paragraphs 2.44 to 2.59. The cycling strategy and green infrastructure strategy are currently being drafted. The National Park and AONB Management Plans have been added at paragraphs 2.51 and 2.52.
	Page 17 SCS Delivery: The LTP should also provide opportunities to access the natural environment alongside key services and other facilities**.**	Paragraphs 2.22 to 2.24 have been updated to reflect the new SCS.
	Page 18 Land Use Plans We would advise that the LDF provide a framework for decision making and solutions which seek to integrate and deliver economic, social and environmental benefits. The new LDF should also be seeking opportunities to reduce the need to travel, and encouraging modal shift.	LDF comment noted.
	Page 19 Local Enterprise Partnerships The role of the Local Enterprise Partnership with regards to transport could also be highlighted in this section.	The section on the LEP has been updated (paragraphs 2.14 to 2.18).
	Page 20 Growth Point There are also environmental conditions to be met with respect to the growth point areas including the development of a multi functional green infrastructure strategy,	The Green Infrastructure Strategy is currently being drafted.

	one function of which is to contribute to the provision of accessible walking and cycling routes in the area.	
English Heritage	**Chapter 2 – Wider Issues** Chapter 2 informs us that the Regional Spatial Strategy (RSS) has now been revoked. Although it is clearly the Coalition Government's intention to do so (as expressed in the Decentralisation and Localism Bill) this is not yet the case and it continues to be a material consideration in determining planning matters. For the time being, its theme of conserving and enhancing the region's built and natural environment, together with its heritage and culture, remains pertinent. It is disappointing to note, therefore, that this theme is not thought important enough to be carried forward as a priority for transport planning, despite Eddington's view that impacts should be measured across a range of ....environmental outcomes. Failure to meaningfully incorporate environmental safeguarding in the LTP will almost inevitably result in a failure to satisfy the SEA Directive.	Conserving and enhancing the historic and natural environment has been added to Chapter 10 – Quality of Life.
	We are informed that the relationship between Northumberland and Tyne & Wear is critical. There is a call for good (better?) cross-boundary links to enable more people to have access to jobs and services. This does not read like a fundamental shift in behavioural patterns, or a move to a substantially different spatial model that reduces the need to travel. It reads like a manifesto for getting more people to live in Northumberland and commute to employment and leisure facilities on Tyneside.	It is recognised that Northumberland will have to provide more employment opportunities, e.g. through allocating land for employment, to help reduce the need to commute. However, it must be recognised that there is a need for people to commute to work, especially as regionally economic development is focussed in Tyne & Wear.
	Reference is made to the Sustainable Community Strategy. It has recently been updated and this needs to be reflected in the document. The national objective of achieving economic *growth* is unhelpful, and does not sit happily with the sustainability objective of the SCS, which calls for a more carefully nuanced, balanced, and locally attuned approach.	Paragraphs 2.22 to 2.24 have been updated to reflect the new SCS. References to economic growth have been prefaced with "sustainable" in line with the Economic Strategy.
	The county's SCS now has 7 Big Partnership Issues. It also recognises the social and economic importance of the environment to the wellbeing of the county, but this is not evident in the text of this document.	Paragraphs 2.22 to 2.24 have been updated to reflect the new SCS.
	Under the section entitled *Development Plans*, there is reference to 'land use planning'. The new Local Development Framework system advocates a shift away from this way of planning to a more spatial approach – going beyond matters of land use alone – taking cognisance of social and economic factors. Revocation of the RSS will not affect this.	The text as written was provided by the Planning Service.
	We are told that the Development Plan system provides a framework for reconciling competing	Comment noted.

	development and conservation interests. Sustainability is achieved by carefully *integrating* social, economic, and environmental objectives. To achieve one at the cost of the others cannot be regarded as truly 'sustainable'. It is for the Development Management process to attach weight to all the relevant factors when determining planning matters and to arrive at a balanced view.	
	Reference is made to Northumberland's Economic Strategy. There is a clear and urgent need for this Strategy to be brought into line with the SCS and for it to address the issue of economic/sustainable 'growth'.	Paragraphs 2.22 to 2.24 have been updated to reflect the new SCS. The SCS is still being finalised. The Economic Strategy refers to "Sustainable growth" which is in line with the emerging SCS.
	That section of the document dealing with *Local Economic Partnerships* needs updating to reflect the newly agreed geographies.	The section on the LEP has been updated (paragraphs 2.14 to 2.18).
	This section of the document reminds us of the commitment, through the Covenant of Mayors, to significantly reduce CO2 emissions. Despite the advice that in the LTP there should be quantifiable reductions in emissions, there is no cross-correlation between the measures outlined and the savings they are anticipated to achieve.	The LTP will be subject to review by the UK Climate Impacts Programme who will provide advice on this matter.
NSP Place Shaping Partnership	P13 – great to see reference to Stern but its not about avoiding climate change. Suggested wording of last sentence in that paragraph be amended to "The **Stern Review emphasised the costs of not adapting to the inevitable implications of climate change and concludes that the benefits of strong early action considerably outweigh the costs**".	Paragraph 2.3 amended as suggested.
	P13 last paragraph – there is no engagement with the challenge of "delivering strong economic growth while at the same time reducing greenhouse gas emissions"…this is a challenge…is it possible…is it possible locally in a rural county…are there other economic models which could deliver this challenge better? Subject to agreement of Point 1 above – could we use this to articulate Northumberland's local stance on how to ensure transition to a low carbon economy rather than growth?	References to economic growth have been changed to "sustainable economic growth". This is in line with the Economic Strategy which aims to achieve a low carbon economy, but also promotes sustainable growth.
	P14 second paragraph – granted there is a political desire to see improvements to the A1 but the inference that this is among "some of the most pressing transport problems in England" appears uncredible.	The DaSTS process was commissioned for this reason and includes the A1.
	P14 Climate Change Act 2008 – good paragraph some excellent points made in paragraphs 2 and 3 but the last sentence "In its Local Area Agreement…possible to attain" needs removing as no longer relevant.	References to the LAA have been deleted.
	P15 excellent points under Regional Spatial Strategy section "In line with these key themes…" but under Regional Economic Strategy exchange "growth of the regional economy" to "strengthening of the regional economy".	Paragraph 2.12 amended as suggested.

	The section "Local Policy Influences" P16 should consistently describe how the LTP will help to deliver each. This begins to be done for SCS but then no such section is included under 'Council Plan' 'Development Plans' 'Economic Strategy' "Local Enterprise Partnerships' (also needs correction in text from economic to 'enterprise'), 'Housing Strategy' or 'Corridor of Opportunity'. After each description it would be useful to have a few sentences about how the LTP will contribute to delivery. Coverage of health issues P25 and future forecasts is good, this should be mirrored for Place Shaping concerns.	The text for each strategy refers to the links with transport, however, the role of the LTP will be added where necessary as part of the initial refresh.
	P16 remove the sentence "~~A number of priorities for investment have been identified, including improvements to the A1, a key strategic link for Northumberland~~" as this interrupts the flow of the text and is already covered appropriately elsewhere.	This sentence is a factual statement and is considered appropriate.
	P16 Sustainable Community Strategy Vision needs updating "**to make Northumberland a place that is resilient for the future"**	Paragraphs 2.22 to 2.24 have been updated to reflect the new SCS.
	P16 bottom line – there are 7 Big Partnership Issues not 6 and there is a need to add the seventh "Providing healthy lifestyle choice" to the bullet point list.	Paragraphs 2.22 to 2.24 have been updated to reflect the new SCS.
	Next paragraph on P17 beginning "The Local Transport Plan will be central to achieving the aims of the SCS by assisting in:" should contain two additional bullet points: o "Providing transport networks that are adapted to withstand the impacts of projected changes in weather conditions" and o "Providing transport planning that takes into account the likely and projected changes in transport needs due to the direct and indirect impacts of climate change"	Paragraphs 2.22 to 2.24 have been updated to reflect the new SCS.
	P19 section on LEPs needs to be updated. Speak to Rob Strettle to get the most up to date wording.	The section on the LEP has been updated (paragraphs 2.14 to 2.18).
	P21 rewording of climate change section to read: **" Evidence published by the Inter-Governmental Panel on Climate Change (IPCC) clearly demonstrates that the net effect of human activity overt the last 250 years has been one of warming, particularly over the last 50 years. In order to address this challenge, individuals, organisations and governments need to assess their impact on the causes of climate change, where possible mitigate their effects and adapt to the inevitable changes in climate which have already been set in motion. The County Council has signed the Nottingham Declaration affirming the commitment of the former District and County Authorities. One of the key deliverables of the Nottingham Declaration is the preparation and implementation of a Climate Change**	Paragraphs 2.62 have been revised to include some of the suggestion.

	Action Plan which seeks to progressively address the causes and impacts of climate change. This plan was produced in 2010 and is set within the context of the Strategic Framework for Climate Change Planning In Northumberland " The Heat Is On" published by the Northumberland Strategic Partnership. This document sets out what climate change could mean for Northumberland, sets the local framework for addressing climate change and encourages all strategic partners in Northumberland to put in place measures to address the causes and implications of climate change by mainstreaming climate change planning within their own core business. **Northumberland County Council's Climate Change Action Plan entitled 'Facing Up to The Heat Is On' details the need for action by the County Council and the actions that it has adopted. This plan identifies actions at a strategic level that are supported by more detailed actions contained within Council Service Plans. This third LTP will deliver against these ambitions on climate change by future proofing transport infrastructure and travel needs and by providing a planned approach to delivering a reduction in carbon dioxide emissions from transport in line with the national recommendations."** Section on Covenant of Mayors is fine.	
NECTAR	Page 13: DaSTS paragraph 1 should end '… if climate change is to be managed.' The distinction is important as it conveys a clear obligation generally and on LTP3 specifically to commit to an engagement with the process.	Paragraph 2.3 has been revised to more accurately describe the STERN report.
	Page 14: The future of the DaSTS studies has not yet been made clear by the government. Moreover, the extensive evidence review associated with the suite of DaSTS studies did not support the claimed problems with the A1 road North of Newcastle. Therefore, the findings of the Access to Tyne & Wear City Region Study should not be anticipated. The whole DaSTS section should be edited to reflect the current situation and should draw only on findings currently available in the public domain and suitably referenced. Note can then be made of the existence of ongoing work that will contribute to the first review of the LTP3, likely to be in 2014. Climate Change Act 2008: the statement (paragraph 2) that: *'The DfT encourages local authorities to develop LTPs that take significant steps towards mitigating climate change, by encouraging the development of sustainable transport systems, facilitating behaviour change and reducing the need*	Paragraph 2.5 has been amended removing the reference to the "package of measures…" Climate Change: the local requirement for reducing carbon emissions is set out in paragraph 2.65.

	to travel.' Northumberland's LTP3 should explicitly identify the specific challenge identified by this statement and the quantified requirements set out in the previous paragraph.	
	Page 15 The extracts from the Regional Spatial Strategy are selective and partial; to be compatible with the 'DfT encouragement' (above), the second bullet should read simply: 'A regional Road Network Report approach …' and the equivalent engagement with the rail network should be illustrated. It should be noted that whilst the statutory Regional Spatial Strategy is currently being revoked through the Localism and Decentralisation Bill, the government has already revoked all other non-statutory regional strategies produced through the Regional Development Agency One NorthEast, including the Regional Economic Strategy.	The section on the RSS has been revised. The Regional Economic Strategy and its evidence base are being used by the LEP so remain relevant.
	Page 16 An abstract of the regional public health strategy *Better Health, Fairer Health* produced by NHS Public Health NorthEast should be included in the Regional Policy Influences section. This strategy makes a substantial contribution to the case for economic growth being pursued in a sustainable way but perhaps more importantly, it lays the foundation for the development of active travel (walking and cycling) as a measure that has become essential to combat the current rapid increase in obesogenic illnesses in the North East and across the nation. Active travel is at the heart of the DfT *encouraging the development of sustainable transport systems, facilitating behaviour change and reducing the need to travel (see above)*.	This has been added (paragraphs 2.19 to 2.21).
	Page 19 *Local Economic Partnerships:* the proposals as described have been rejected by government. A second round proposal for an LEP covering County Durham, the Tyne & Wear conurbation and Northumberland was approved by government in early January 2011. In addition, a less formal NE Economic Partnership involving the twelve North East local authorities and regional business interests has been established. The implications these new bodies have for transport provision in the County should be recognised in LTP3 insofar as they are known. *Housing:* it is hard to distinguish between bullet points 1 and 3 in the summary of the objectives of the Northumberland Housing Strategy. If the distinction is important then more detail is required, otherwise these two objectives should be merged for current purposes.	The section on the LEP has been updated (paragraphs 2.14 to 2.18).
	Page 20 The government is understood to have withdrawn funding from the Growth Point concept. The current status must be made clear if the section is to be left in LTP3 (see also Economy Page 26	The Growth Point Programme of Development remains our long tem vision and general statement of intent regarding

	and Morpeth Page 45). If the concept is to be taken forward as a County or LEP initiative, the key *transport* opportunities should be stressed in LTP3, such as the ability to design-in active travel and a reduced need to travel.	new housing growth in South East Northumberland. The scale, location and phasing of development will statutorily be determined through the Local Development Framework Core Strategy and other Development Plan Documents Paragraphs 2.59 to 2.60 have been updated to show the current position regarding the Growth Point.
	Page 21, 22 The recognition in LTP3 of the commitment by the County to the Nottingham declaration and the European Covenant of Mayors is useful. A clearer link to the Climate Change Act (Page 14) and the DaSTS studies (Page 13) would be a welcome improvement in the presentation and provide a quantified basis for one of the key transport challenges in this Chapter. **Emerging challenges:** Challenges emerging from Chapter 2 should be noted to include the need to: o Take significant steps towards mitigating climate change, by encouraging the development of sustainable transport systems, facilitating behaviour change and reducing the need to travel. o Implement the policies in *Better Health, Fairer Health*, making a substantial contribution the development of active travel to combat the rapid increase in obesogenic illnesses o Promote walking and cycling as they are the most effective ways of making local journeys in a healthy and sustainable way, particularly as low levels of funding in the future will favour this is a cost effective approach. The challenges identified should be summarised into an issues and challenges table in concept similar to that at the end of Chapter 3.	Chapter 2 sets out the wider policy context of the LTP and includes within the text the transport implications. 'Emerging challenges' are not appropriate.
NCC Countryside support	Page 15 Insert bullet point above Regional Economic Strategy title which says **"recognise the importance of the strategic public rights of way network for health, leisure and tourism".**	The section on the RSS has been revised. (para's 2.10 & 2.11)
	Page 16 Tyne and Wear City Region Transport Strategy – will this include something on "active travel" – if so can we include a reference in one of the sentences on its scope?	The Tyne & Wear City Region Transport Strategy has not yet been completed. Active Travel can be added during the LTP refresh if appropriate.
	Page 17	This section has been updated to reflect

	Add **"and enabling active travel"** at the end of bullet point 8. Amend 9th bullet point to read **"The provision of access for all to education and employment opportunities and to the Council's facilities and services;"**	the new SCS 'Big Partnership Issues'. (para's 2.25 to 2.27)

Chapter 3 – Northumberland Today

NCC Regeneration	**Page 23** Economy – the Economic Strategy 2010-2015 states that 80% of businesses employ less than five employees. There are c. 12,700 jobs in the Tourism sector.	Table 3.1 has been amended to show the correct figures, in line with the Economic Strategy.
	Page 24 Important to note the implications to population projections of the ageing population.	This is noted in paragraph 3.5, and the subsequent 'Emerging Challenges'.
	Page 26 Economy – emerging challenges: • Right to highlight the necessity of travel to work. Travel to learn / train / up-skill is also an issue and is fundamental in driving economic development in the county, for example in the support of sector growth. • Are there implications of public sector service reform that should be considered? • Improved external (domestic and global) connections, to help grow businesses particularly strengthening the capacity for export-lead growth and growth of key sectors, through supply chains and access to markets. • Ageing demographic – is referred to later in the strategy but a consideration in this section is important.	Noted. The contraction of the public sector has been added to paragraph 3.6. Connectivity has been added at paragraph 3.10 and has been added as an 'Emerging Challenge'. Ageing population is referred to in the preceding section.
	Page 31 Blyth Port is an important factor in the transition to becoming a low carbon economy.	This has been added to paragraph 3.39
	Page 33 It is not clear in the document whether these travel to work areas the same unit as Government's TTWAs?	Data is from the 2001 Census (journey to work data).

	Page 40 Local freight use, as identified on page 31, should be listed as an issue. Issues for low carbon transition include the capability of the transport network and infrastructure around the Port of Blyth, for example. A further challenge is how transport can support economic growth in town centres, market towns and smaller rural hubs	These are included in Table 3.6
ONE NE	The LTPs recognition of the distribution of deprivation is welcomed. The Plan would benefit from additional acknowledgement of the recent spending cuts and how service levels might be maintained.	Noted. The issue of public sector cuts is addressed in terms of the contraction of the public sector and the need to re-balance the local economy, (para 3.6)
Natural England	**Page 23 Introduction** This paragraph needs clarification.	Paragraph 3.1 has been revised.
	Page 23 Table Environment This should also include reference to the Heritage Coast, and the range of important biodiversity and geological designations including Special Protection Areas, Special Areas of Conservation, etc.	These have been added to Table 3.1
	Page 27 Environment This section only covers climate change. It should contain an assessment of the range of impacts from transport on the natural environment (looking for example at landscape, biodiversity, geodiversity, soils) in order to identify the full range of challenges in the county of meeting the national transport goal of 'promoting a healthy natural environment' and the issues and challenges should be added to the Table on Page 40.	The natural and historic environment has been added to this section (para 3.35 & subsequent emerging challenges)
	Page 31 Local Transport Links This section needs to include consideration of the accessibility to and the condition of the public rights of way network and strategic multi functional green infrastructure network, particularly for short journeys. Walking and Cycling Accessibility challenges should be identified.	This is more appropriately addressed in the Rights of Way Improvement Plan.
	Page 35 Road Safety This section only addresses road safety. It should also highlight if there any safety challenges faced on other parts of the sustainable transport network such as public transport, cycling and walking routes that need to be addressed. Challenges should also be recognised in the Rationalised Challenge Table on Page 60.	There are no significant safety issues on other parts of the transport network.
	Page 38 Accessibility to Services This section should also recognise that the transport network is also used to access leisure opportunities, for tourism, and to provide access to the natural environment in both urban and rural areas. Access to walking and cycling routes should also be assessed. Challenges should also be recognised in the Rationalised Challenge Table on Page 60.	Access to leisure and tourism has been added to paragraph 3.70
	Page 40 Table Transport Networks and Transport Problems Issues and challenges should also be identified for the cycling, rights of way network and green infrastructure network.	This will be considered as part of the LTP refresh.

English Heritage	The introduction to this chapter informs us of the rural nature of the north and east of the county. This is presumably the north and *west*? Chapter 3 provides us with an overview of 'Northumberland Today'. Despite the importance attached to the county's heritage in the Sustainable Community Strategy the only reference to assets of cultural importance is in respect of Hadrian's Wall World Heritage Site. The paragraph contains an error in sentence construction.	Deleted "east" replaced with "west". The historic environment has been added to this section (para 3.35) and to Chapter 10 – Quality of Life.
	Is it currently the case, following local government reorganisation, that the public sector remains the largest employer in the county, and is this likely to remain so in the light of yet more anticipated cuts? If 28% of the workforce commutes to Tyneside and many in-migrate for work in the leisure and tourism sector, yet economic performance remains poor, it suggests that the model is not working and that improving connections between the two sub-regions will not necessarily achieve real betterment. This is where the linkage with the Core Strategy and the Economic Strategy is so important.	Noted. The contraction of the public sector has been added to paragraph 3.6
	Under the heading of *Society* we are told that car ownership is set to decrease over the LTP period. This should be 'increase'?	Deleted "decrease", replaced with "increase".
	Reference is made to the issue of rail freight. In this section there is no reference to the North East's Freight Strategy, although I recognise that it is now probably some 5 years old.	The North East Freight Strategy is part of the former Regional Transport Strategy (now part of the RSS) which is being revoked.
	Under the heading of *Local Transport Links* we are informed that the bus network in the county is 'comprehensive'. Does this mean that it is performing satisfactorily? I would question any such assertion, which would appear to be at odds with the views expressed elsewhere in the document (see p38 and p39).	Paragraph 3.41 states that there is a comprehensive network "between main towns" and into Newcastle. It does not imply that network elsewhere is satisfactory.
	It is encouraging that some 33% of the population live within walking or cycling distance of their workplace, but disappointing that only 13% make the journey in this way? It is not clear what measures are being proposed to make meaningful improvements in this area.	Paragraph 3.46 is a statement of the current situation. The measures proposed to improve this area are more appropriately discussed in Part 2.
	Under the heading of *Emerging Challenges* we are informed that private motor car usage 'could' contribute to congestion and air quality issues. Why be equivocal on the matter? Occasional road traffic congestion should not always be seen as the excuse to build more road capacity. Improved alternatives or a reduced need to travel are legitimate options to pursue. Increased use of public transport is not in itself a measure of improved sustainability. It needs to be at the expense of private motorised journeys and not at the expense of, for example, active journeys or working at home.	Wording has been amended, removing "could".

	Table 3.6 contains issues, trends, and emerging challenges for transport in the county. It is to be regretted that none of these identify the safeguarding of the historic environment as an issue or challenge.	The historic environment has been added to Table 3.6
Northumberland Tourism	We welcome the recognition (p23) that tourism is one of Northumberland's most important industries / employers	Noted.
	P26 – Tourism is a growth industry, therefore the will be potential for increased traffic levels unless public transport connections are improved. However, there is no suggestion that the issue is about managing that traffic better, rather than curbing it? In fact, the identified worst congestion areas (p35) are not key tourism sites (with the exception perhaps, of Morpeth town centre). Market Town Welcome surveys already submitted clearly indicate where the problems are and need to be addressed if we are to provide a quality experience for our visitors (documents downloadable from www.northumberlandtourism.co.uk)	Paragraph 3.9 has been revised to include reference to the Market Town Welcome surveys.
	P33 Travel patterns – There appears to be no recognition that future growth of tourism could pull commuters into Northumberland to provide the necessary skills / labour.	This chapter sets out the current situation in Northumberland. The potential impact referred to is more appropriately discussed in Chapter 4.
NSP Place Shaping Partnership	P24 first paragraph – what will this mean for transport needs up to 2026 if the same pattern is followed? Is there any reason to suggest it might be different?	See the subsequent "Emerging Challenges"
	P25 – differences in population density – what are the challenges posed by this?	See the subsequent "Emerging Challenges"
	P25 bullet point 2…. 'which would lead to an increased need to travel or more responsive provision of local services'	The challenge states that there could be an increased need to travel if local services are not provided.
	P26 second sentence under 'Society' citation needed after 49% county classed as being rural and last paragraph re deprivation it would be worth pointing out that the figures tend to mask rural deprivation, which is therefore not well reflected in the IMD figures.	Paragraph 3.17 states that there are areas of deprivation outside the south east.
	P27 Emerging challenges under 'society' – the described levels of deprivation on top of implications for the viability of public transport services as a result of car ownership increases flag up concerns over transport fuel poverty as peak oil/taxation affects to price of carbon based fuels. This is an important emerging challenge that the LTP should be responding to.	The issue of peak oil/cost of fuel will be considered as part of the LTP refresh.

	P29 Emerging challenges – combine bullet points one and three and rephrase to read "Northumberland is committed to reducing carbon emissions by 2020 but currently CO_2 emissions in Northumberland from road transport per head of population are higher than the regional and national figures and CO_2 emissions from road transport in the North East are forecast to increase. Unless we take preventative action, this will contribute to increased anthropogenic climate change" National guidelines for LTP development specify that LTP3s should deliver quantified reductions in greenhouse gas emissions consistent with the Climate Change Bill and EU targets. This will be a huge challenge.	The challenges have been merged.
	Key emerging challenge under this section is resolving/addressing the internal contradiction in government policy and guidance with competing ambitions for economic growth and carbon reduction.	References to economic growth have been changed to "sustainable economic growth". This is in line with the Council's Economic Strategy which promotes sustainable growth and a low carbon economy.
	P30 third paragraph re freight – It is recommended that the important comments made at last Place shaping Partnership Meeting about changing directions for freight especially in the biomass industry is considered here. (This also resonates with text under local transport links about rural forestry and agriculture). It is important for the LTP3 to incorporate sufficient flexibility to respond to these changes in the direction and volume of freight movements as the changing patterns may run contrary to existing functional road hierarchy definitions and the expected maintenance etc that is allocated to each route.	This has been added to paragraph 3.40 and subsequently to Table 3.6
	P30 last paragraph re influence on delivery of rail services – this undermines the influential role of rail user groups and the local MP in significantly influencing timetabling	Paragraph 3.34 has been revised.
	Additional emerging challenges on P32 include: o How to prepare for the changing directions of freight o How to climate proof the list of assets on p29 o How to ensure these assets relate well to each other to encourage multimodal public travel. o If there is currently a feeling that the County Council is not achieving sufficient influence over rail timetabling then how can the LTP and partnership working help to redress this?	Future changes in freight is included in the 'emerging challenges' Network resilience is included in Chapter 6 and will be subject to review by the UK Climate Impacts Programme. Paragraph 3.32 has been amended removing the sentence about the Council's influence over rail.

	Infonet stats suggest that proportions of commuting have stayed roughly the same since 2001. An assumed increase in commuting to Tyneside is being used to justify road expansion e.g. p67 Key Issues - Changing patterns of employment. If Infonet stats are correct this would be a false justification.	The issue referred to is the continued need to commute to Tyne & Wear due to a lack of jobs in Northumberland and the fact that future employment growth focussed in Tyne & Wear will potentially increase commuting.
	P33 penultimate line '…10-30km than' not that. These figures suggest that there is a possibility that anywhere up to 32% of journeys to work are short enough that they could be made by active travel and yet the conclusion over the page (P34) focuses solely on the 33% travelling to Tyneside. Good transport links to Tyne and Wear Yorkshire, the North West and Scotland are essential to the local economy, if we are to reduce carbon emissions rail connections are particularly important here, but so are the short journeys.	Amended as suggested.
	P34 4th paragraph 'Berwick shows the highest proportion of people who walk to work (20%) ~~and~~ this is a consequence … The consequences of this statement are that car use (and public transport) are highest in the areas of the county with most convenient public transport (and air quality concerns)…this needs to be an emerging challenge.	Amended.
	P34 emerging challenges – ○ "Private motor car usage in Northumberland is higher than the national average. This ~~could~~ contributes to congestion, air quality issues and increased carbon emissions. The challenge will be how to encourage modal shift to active and public transport choices in line with LTP objectives." ○ "32% of trips…..Increased use of non-motorised transport could contribute to ~~both~~ transport, health and climate change objectives" ○ People in Northumberland travel longer distances to work compared to regional and national figures. There is a need to encourage rail commuting for longer distance journeys but at present there is often no viable alternative to the private car.	Challenge amended. Challenge amended. The issue does not just concern rail. Bus commuting is important too. Much of Northumberland lies away from the railway network.
	P35 It is possibly going too far to say that the localised issues of congestion in Northumberland will affect the economic vitality of these areas. Congestion in Northumberland is minor compared to elsewhere in UK.	The 'Emerging Challenge' has been amended to say it "could" affect the local economy. Evidence from Northumberland Tourism suggests congestion is an issue which affects the visitor economy.

	P37 Emerging challenges – local speed restrictions can deliver on these and improve carbon performance – although solutions not given here ensure this is picked up in issues and options.	Noted.
	P38 paragraph beginning "forecast trends in population growth is excellent, a similar approach should be adopted for climate change forecasting	Noted.
	P38 insert paragraph on p 39 as described below. P39 second paragraph, one of the many examples where economic growth could read economic prosperity to retain consistency of topics move the last sentence of that second paragraph "Analysis shows that 19%.....800 metre walk" to <u>after</u> the paragraph below ending in "health facilities are easily accessible." Then move whole paragraph now starting "In terms of Health….(and ending) 800 metre walk." To insert it on P38 <u>after</u> second paragraph ending "….cross boundary transport is an important consideration which needs to be addressed".	Paragraphs amended and moved as suggested. (3.67 & 3.68).
NECTAR	Page 23: Table 3.1 Society: *Bullet point 2 add:* There are also more localised areas of chronic deprivation elsewhere in the county e.g. Haltwhistle, Spital in Berwick, Leazes in Hexham, Stobhill in Morpeth. *Bullet point 4:* Actual numbers would be helpful *Bullet point 5:* As written, this implies that elsewhere more than 20% of residents say they have a limiting long-term illness. For the avoidance of doubt later in the document, a comparative number, perhaps for the nation as a whole, should be included. There is also significant variation in levels of health across the county, which are not identified by the statement. *Bullet point 6:* Actual numbers would be helpful	The bullet points in this part of Table 3.1 have been revised.

	Page 25 The emerging challenges are not well argued: *Bullet 1* requires more evidence; a growth in population, generated by more older people as described in the preceding paragraph may well lead to a lower demand per head on the transport network and a shift away from travel at peak employment/education times, both being derived from the fact that older people do not have to make a daily journey to and from employment. *Bullet 2* sets out only one aspect of the challenge; the real challenge is to bring the services needed to the people needing them; it may be more economic to subsidise travelling facilities than to support the transport networks through increased maintenance costs. *Bullet 3* should spell out that sustainable housing development sites are meant and that the challenge is to the planning process not to the transport network. In practice, much of the increase is among older people (see the preceding paragraphs and Bullet 4), and much of the relevant development will be needed in the town/village centres, effectively reducing the demand per head for journeys on the transport network and facilitating the take-up of active travel. *Bullet 4* is part of Bullet 2 and again the challenge is to recognise that the first call on any financial gains from centralised provision must be to pay for the increased travelling costs of those needing the service. Developing an integrated health and transport approach is the clear challenge. *New Bullet 5:* the provision and funding of concessionary travel for older people is a quite separate challenge from the need to access health facilities. Some statistics on the current take-up and use of concessionary travel should be provided and the cost put into the context of the expenditure on highways overall. An element of this challenge arises from the fact that concessionary travel is only available where bus services are provided. *New Bullet 6:* Tackling the entrenched attitude to use of the private car and reducing even a proportion of the work trips by this mode has to be treated with priority Census data shows that 21% of the population of Northumberland live within 2km of their workplace. <u>Economy:</u> A significant omission from this section is the contribution from personal pensions. The population description emphasises the high proportion of residents that are likely to be pensioners but the economy section fails to set out the impact of this stable, disposable income base on the overall economy of the County. In terms of the transport network, pension income is very efficient as it is credited without any need to travel. GVA, used to assess economic performance, is a poor indicator of the travel implications of the economy. For example, the agricultural work force may have continued to downsize but data should be presented on the trend for those still engaged to live in the towns and villages and travel to farms to work. The impact of mechanisation on this process is already and will over the plan period be an increasingly important factor. At the simple end of the transport scale, quad bikes have increased productivity enormously and at the other end of the scale massive farm machinery has changed the demands on the rural road network. Both of these factors should be considered in an appreciation of the impact on the gross turnover of the agricultural sector.	Bullet 1 – older people will still need to use the transport network and require access e.g. to hospitals. Bullet 2 – Has been amended to refer to local service provision. The location of local services is recognised as an issue in Chapter 9, however, there will still be a need for travel to services. Location of services/new development is an issue for the LDF. Bullet 3 – The increase in households is also due to working people living alone for longer. While this is an LDF issue, it is important it is recognised in the LTP. Bullet 4 – This is specifically about older people. Bullet 2 is not just about older people so the 2 bullet points have not been merged. The suggested new bullets are not relevant to the preceding text. Pension income varies and may not be significant for some residents.

	Page 26 Again, the emerging challenges do not clearly set out the challenge to the provision of adequate transport: *Bullet 1 and Bullet 4* are essentially the same statement. That some people will choose to work in neighbouring authorities may be a fact but the challenge should be to ameliorate the impact through an integrated approach to housing location and transport provision. *Bullet 2* the future of Growth Points is in doubt (Page 20) but the challenge anyway is to ensure that housing and employment are developed together in an integrated way as above (Bullets 1 & 4) *Bullet 3* is a statement of current fact but the challenge over the plan period is to protect the tourist attractions by increasing the proportion of visitors accessing them by public transport and active travel. *New Bullet 5:* The need to develop transport provision to meet the needs of the increasing numbers of pensioners who bring a large, stable, disposable income base into the overall economy of the County without any directly associated transport demand through journeys to work.	Bullet 4 has been changed and is now about connectivity, following comments from the Council's regeneration service. The County Council remains committed to housing growth in SE Northumberland. Bullet 3 has been revised. Pension income varies and may not be significant for some residents.
	Page 26 (See also Pages 38 & 39 below) Use of the integrated IMD data is misleading and masks some of the points that need to be made. It would be better to separate out three elements: access to services, health and income levels and present them separately, to eliminate masking effects. This will reveal that access to services is not a big problem in the financially deprived and unhealthy parts of SE Northumberland (e.g. Lynemouth SOA is in the top quartile for access to services) whilst access to services is a problem in the rural areas that are perceived to be more affluent.	This section gives an overview of deprivation in the county. Access to services is dealt with in more detail in Chapter 9.

	Page 27 Clarification is needed of the statements that: *'… number of households with a car in the county is set to decrease by just up to 5% … '* and that: *'Car ownership in Northumberland is forecast to increase …'* Both may be true as given that (Page 25) the number of households is increasing through single young people, old people living longer, family splits, old people too old to drive etc, all of which may lead to a reduction in the number of cars per household. The more relevant statistic is the number of people who have access to a car for the journey that they wish to make. Across the County, this is likely to include some 30% of the adult population with no access to a car and many more with only limited access because the one family car is used by one family member to get to work. The real challenge is not the quiescent emerging challenge shown, but as almost stated in the last sentence of the preceding paragraph: The challenge will be to encourage existing and new car owners to make increasing use of alternative forms of transport. The increasing pressure to provide extra parking places at the County's railway stations is just one example of a successful response to such a challenge.	Sentence has been corrected. Should be "increase". (Paragraph 3.18)
	Page 27 Environment is not just carbon emissions and climate change. LTP3 should also be considering the impact of existing and proposed transport corridors and schemes on landscape, biodiversity, and air & water quality. Transport can also have a huge impact on tranquillity and other environment-related aspects of quality of life. It should be noted that the Northumberland National Park Local Development Framework Core Strategy includes maintenance of tranquillity as a key objective. Tranquillity, landscape and wildlife are some of the main selling points of the County tourist industry. Transport provision to meet visitor needs must take care not to 'kill the goose that lays the golden eggs'.	This section has been revised to include the natural environment. (Paragraphs 3.19 to 3.26).

	Page 29 Merely quoting the regional Trajectories Study to say that without preventative measures, 2050 Carbon Dioxide emissions in the region will be 1% higher than the 1990 baseline does not convey the critical need to reduce carbon emissions. The target levels given in the NE Climate Change Strategy, the Climate Change Act and implicit in the commitments to the Nottingham Declaration and the Covenant of Mayors must be quoted to give context. Carbon emissions from transport in Northumberland should include the contribution from Newcastle Airport - both flights and airport operations - the most damaging transport source. Whilst transport-related carbon emissions in Northumberland are increasing and contributing to climate change, and should be reduced and minimised, it is global carbon emissions which are causing climate change. LTP3 response needs to be far wider than road transport: the real challenge is that over the next five to fifteen years, the County needs to be steadily switching to a low carbon lifestyle and economy. **Emerging Challenges** *Bullet 1:* Given the low population of the County, using CO2 emissions per capita distorts the perception of where the problem lies. It would be better to use total CO2 emissions. *Bullet 2:* To ensure that air quality problems are addressed and the generally high air quality in the County is not put at risk by road transport. *Bullet 3:* Amend to read 'To achieve progressive reductions in carbon emissions from transport including the contribution from Newcastle Airport in accordance with the Climate Change Act. *New Bullet 4:* To meet the changing transport needs of residents, visitors and industry without harming the landscapes, tranquillity, biodiversity and air & water quality, which make the County so attractive and contribute so much to the quality of life it sustains.	Paragraph 3.24 has been updated to include reference to the 34% reduction in carbon emissions compared to the 1990 level, required through the Covenant of Mayors. Newcastle airport lies outside Northumberland. Emissions from aviation are a matter for the airport and airlines. The County Council can help the airport reduce its carbon emissions through improving sustainable access. This will be addressed in the review of the interim LTP. In terms of the wider transition to low carbon, the LTP is just one of a number of strategies contributing to this, under the guidance of the SCS. The emerging challenges have been revised. (The national indicator for measuring carbon emissions uses emissions per capita).
	Page 30 The point should be made in this section that if the proposal to change the status of the A1 road North of Newcastle goes ahead, then the County will have very little power and limited influence on the future of the road. The DfT consultation document *Promoting Connectivity between the Capital Cities of the United Kingdom; A consultation on Revising the Strategic National Transport Corridors* spells out that '*The primary effect will be to change the way in which decisions as to the priority given to future investment are made. Decisions will be made entirely by the Secretary of State, without the formal involvement of local stakeholders.'*	This section is a factual statement about strategic links in the county. The A1 north of Newcastle will have the same status as the other roads listed (A19 and A69).

	Page 30 East Coast trains serve Scotland, the East Midlands, London and the South East. Cross Country trains serve Scotland but not the North West from Northumberland. The North West is accessed via network services by change of train in Newcastle. The County has more power and influence than is indicated, not least through the Network Rail and DfT consultation processes. Reference should be made, for example, to the Northern Route Utilisation Strategy and the associated study of capacity on the East Coast Main Line (ECML) for 2016. The limited number of stops mentioned is a specific reference to the ECML but access to, and parking at the stations is at least as important an issue for all routes.	Paragraph 3.3 amended as suggested. The sentence about the County Councils influence has been removed from paragraph 3.34.
	Rail freight Page 31 The Ashington Blyth and Tyne line also provides access to Edinburgh via Morpeth and is used by a key employer in the county (RioTintoAlcan). There is no Route Utilisation Strategy for the North East as such. Whilst the loading gauge of the two track section is recognised as a constraint it is not specifically a rail freight capacity constraint. The relevant RUS are the ECML RUS, the Freight RUS and the Northern RUS/ECML 2016 Capacity Review which address the capacity constraints across the plan period.	Paragraph 3.35 has been amended to make reference to "Rail Utilisation Strategies for the North East".

	Local transport links Page 31 Note should be made that the A697 also provides a direct link to the Scottish border towns and onwards to Edinburgh. **Emerging challenges** It is evident that the capacity and capability issues on the ECML are more acute – both for freight and passengers - than perceived congestion on the A1, a situation not reflected in the emerging challenges identified in the draft LTP3. Similarly while both the A1 and the ECML are outside direct control of the County, there seems to be a greater willingness to lobby the Highways Agency than Network Rail and the Train Operating Companies, though the County's rail user groups have excellent relationships with both the latter. In fact rail capacity constraints are given as a barrier to modal shift whereas infrastructure improvements are generally presented as solutions to perceived road congestion. There is a risk that prioritisation of challenges emerging from the assessment of existing transport infrastructure is being distorted by perceived ease of or local capacity for rectification. *Bullet 2* applies equally to all the roads in Northumberland. There is a challenge relating to road freight associated with e.g. quarrying, forestry, opencast and agriculture, but it is more general and relates both to freight transport and its impact on other traffic. There are similar issues with competition for capacity between freight and passenger services on the rail network (Bullet 4), which could be argued as being more serious. *Bullet 3* requires evidence 'have been cited' as is hardly adequate. *New Bullets 5-8:* A series of challenges should be set out to include improving local, regional and intercity passenger rail services on the ECML, access to stations and station car parking, improved passenger services on the Tyne Valley line and capacity/overcrowding issues over the plan period.	This can be seen in Figure 3.3. Capacity issues on the rail network are referred to in paragraph 3.56 and the subsequent emerging challenge. Paragraph 3.39 has been updated to include reference to the developing renewable energy sector at the Port of Blyth which will require improved infrastructure, as discussed elsewhere in the LTP and in the Economic Strategy.

	Travel to work Page 34 *"Good transport links…"* It would be useful to have data to support the various assertions in this paragraph (top of page), to inform the prioritisation of objectives within the LTP3. Specifically, Page 35 notes that *highway congestion is not considered to be a real problem in Northumberland*. Comment on Page 34 should therefore be based on objective analysis not on speculative opinion along the lines of *'could adversely affect.'*	The LTP3 Evidence Base (page 28) includes information on links of economic importance and shows that links to Tyne & Wear are important to business.
	Mode of travel The Regional Spatial Strategy Technical Report 10 showed that journeys to work comprise only some 15% of trips in the region; an analysis of the mode of travel for all trips in the County should be presented and form the basis for establishing the mode shift challenge towards active travel and public transport.	Background data is in the LTP3 Evidence Base.
	As noted above, working from home at 11% is only a small proportion of those whose income does not require a journey to work. The proportion whose income is derived from personal pensions (Pages 25, 26 above) should be included in this paragraph, not least because active travel needs remain for those who do not make a daily trip for work or education.	Wider data on modal share is unavailable at the time of writing.
	Specifically, the data presented are very selective. A more rounded summary would include the number walking and cycling to school, to shop, to work when they live in the same place. It would also establish the numbers who live and work in the same place.	
	There is a risk that the emerging challenges identified in this section may be distorted by the lack of readily available statistics on some topics.	
	Emerging Challenges The challenges are not made clear in the statements presented. *Bullet 1:* car usage does (not could) contribute very significantly. The challenge is to reduce car usage. *Bullet 2:* separate out rail and bus usage, include community transport and taxis – and look at distances as well as number of trips to make a meaningful comparison, which reflects the characteristics of the County. *Bullet 3:* the challenge is to increase the number of journeys made by active travel modes for all purposes, not just journeys to work. *Bullet 4:* there may be no alternative to the car for these trips but the challenge is to reduce the number of empty seats, for example by car sharing for all purposes, not just journeys to work. *New Bullet 6:* Review the rural road network, identifying the core routes for improvement with quiet lanes formally designated and maintained only to a standard needed for recreational walking, cycling and horse riding, linking the review to the Rights Of Way Improvement Plan.	Challenge amended as suggested. Challenge is a summary of the issue. More detail is available in the Evidence Base. Commuter trips are the most significant issue. Car sharing is one option that can be considered and is discussed in Part 2.

	Highway congestion Page 35 That *'highway congestion is not considered to be a real problem in Northumberland'* is reinforced on Page 89, Weakness Bullet 10 *'high traffic volumes and speeds, particularly in urban areas causing community severance.'* Hence congestion is not a strategic issue: mere assertion of a link between economic vitality, journey reliability and the scale of congestion across the County is not enough. Evidence of such a link is needed. Reference should be made to the number of people in cars at peak times; DfT data suggest that this is usually only the driver. The strategic approach to congested access to employment in Tyne & Wear is to promote mode shift and travel planning. The Darlington Sustainable Travel Town experience has shown that 3% year on year reduction in car journeys and increase in bus journeys can be achieved largely by improved information systems. The **emerging challenges** should therefore be revised to: *Bullet 1:* to identify ways of addressing local areas of highway congestion where this will help to improve the operation, reliability and consequent attractiveness of bus services. *Bullet 2:* to implement ways of reducing the number of empty seats in cars at peak travel times, and hence improve usage of existing road capacity *Bullet 3:* to replicate the successful Sustainable Travel Town experience achieved by Darlington. **Public Transport Overcrowding** The economic impact of lack of rail capacity is neither defined nor evaluated adequately. Rail overcrowding as presented is a barrier to modal shift that is evidently more severe than highway congestion. The Northern RUS, the ECML 2016 Capacity Review and subsequent discussions with Network Rail, DfT, the new LEP and the Train Operating Companies are all opportunities to work for an increase in provision for the County. The work of the county's various Rail User Groups in these areas could usefully be recognised. The **emerging challenge** should therefore be: *Bullet:* achieve an increase in passenger rail capacity for peak time travel during the first implementation period of LTP3.	This section has been revised to include reference to the Market Town Welcome Surveys, which found that congestion in Market Towns is an issue which affects the visitor economy. Further evidence of the economic impact of congestion on transport links is available in the LTP Evidence Base. Challenge amended to include "An increase in capacity is essential to encourage modal shift." It may not be possible to achieve this during the first implementation period as it requires action from outside parties.

	Road safety Page 37 The analysis is accepted but the derived challenges are not. Clearly the approach so far has failed to achieve the necessary reduction, even in killed and seriously injured people and a new approach is needed, particularly towards traffic management and driver behaviour on the 'A' road network in built up areas. It is noted that the A1 does not pass through any built-up areas in Northumberland. A section here on obesity, cardiopulmonary disease and asthma levels etc in the County would be useful background for assessing priority to be given to active travel and pollution control interventions, for example, in comparison with vehicle collision casualties. The result could be a greater understanding and sensitivity in the location of car parks, pedestrian zones and bus facilities. The **emerging challenges** as presented are effectively statements and should be replaced by: *Bullet 1:* The number of people killed and seriously injured by traffic incidents is unacceptable to the Council and demands a whole new approach to behavioural change by drivers that will make a step change in the reduction of road casualties of all types. *Bullet 2:* to reduce the proportion … *Bullet 3:* to reduce the proportion … *New Bullet 4:* to understand the interaction of active travel, road safety, car emission pollutants and both physical and mental health.	Bullet 1 has been amended to: "to continue to reduce the number of people killed or seriously injured on Northumberland's roads." The KSI target was on track until 2007, and increases since then have been mainly on trunk roads. Also, the reference to the 2010 target is out of date in the context of the new LTP. Bullets 2 and 3 amended as suggested. Bullet 4 as suggested is inappropriate in a section specifically about road safety.

	Access to Services Page 38 & 39 (See also Pages 26 & 27 above) This section essentially repeats the sections on population, economy and society on pages 24 to 27 of this chapter. The two sections should be edited together, taking into account the comment on separating out component themes of IMD data to provide a clearer picture. Similarly, thought should be given to the meaning of 'economically active generations'. As noted under economy at Page 25, those in receipt of personal pensions are highly active in the economy of the County, contributing their spending power but taking out nothing in the way of resources to provide employment. The recent abolition of Educational Maintenance Allowance is reportedly having a significant impact on further education students, with many no longer able to afford public transport travel to college. The Council may need to review policies on funding school transport. There is no consideration given to the cost of travelling by car: driver only is typical according to the travel to work statistics. Comments about the cost of bus travel need to be set in context against a reference cost based on the mileage allowance that the County pays for the use of private cars. This is estimated to work out at some £15 or more per day for the Blyth/Ashington Newcastle journey cited on Page 38, which is significantly more than the bus fares quoted of £3 to £4 per day (5 day week) without any allowance for parking charges. The journey time quoted also seems to be competitive with the journey time by car, since 15 miles (as a reference) at 30mph takes 30 minutes. Clearly, social issues do need to be taken into account but equally clearly they are not represented by journey time or real cost on the evidence presented. **Emerging challenges** The challenges presented should reflect the sections above and include: *New bullet 1:* to promote active travel, public transport car sharing and other techniques in the way used successfully by Darlington to reduce the number of car journeys made across the County. *New bullet 2:* to achieve service delivery closer to the point of need across of wide range of partner providers, but particularly including other branches of the County Council. *New bullet 3:* to appraise more realistically the cost and total time of car travel when comparisons are made with public transport and active travel. *New bullet 4:* to reflect the contribution of pension income into the balance when evaluating the cost of concessionary travel. *New bullet 5:* To develop a strategy that recognises the differing challenges in rural and urban areas. In short, the key challenge as quoted in more detail from Tyne & Wear LTP3 at Page 5 above, is to recognise that "c*ontinuing as we are is not an option, we must promote a radical shift in emphasis to more sustainable, lower-cost modes focusing particularly on active travel and public transport, ensuring that development is focused on the most accessible locations that minimise demand to travel and make it easy to use sustainable modes."*	This will be reviewed as part of the LTP refresh. This section is concerned with access for those without a car. Active travel is considered in Chapter 8. Service delivery is an issue for the LDF and service providers. This section is concerned with those who do not have a car. Pension incomes vary and for some may not be significant.

NCC Countryside Support	Page 23 introduction 2nd – delete "east" and replace with **"west"** 7th line – insert "the" before North 8th line – delete "AONB"	Paragraph 3.1 has been corrected as suggested.
	Page 25 Economy – 1st para – The substantial coal mining industry has not disappeared from Northumberland – there is a significant open cast industry – deep coal mining has disappeared.	Paragraph 3.6 amended to include "deep" coal mining.
	Page 31 Insert after last paragraph & before emerging challenges **"Active travel is also facilitated by the network of public rights of way. This network is a valuable resource which supports and enables the Council and partners in their programmes and actions to promote healthy lifestyles, leisure and the development of tourism. Detailed policies and actions to manage the public rights of way network are set out in the RoWIP."**	Added as paragraph 3.43
	Page 38 4th para Insert **"and walking and cycling"** after public transport.	Added to paragraph 3.69 as suggested.
	Page 39 Insert new bullet point after Emerging Challenges which says **"Opportunities to access services using non-motorized transport are not always adequate or available"**	New challenge added as suggested.
	Page 42 Column 1 – Transport Problems – insert new bullet point which says **"Accessibility to services by non-motorized transport** Column 2 – Transport Problems – insert a new bullet point which says **"Opportunities to access services using non-motorized transport are not always adequate or available"**	Added to Table 3.6 as suggested.

Chapter 4 – Changing Context for Travel

NCC Regeneration	**Page 46** North Northumberland – service centres are a driver of economic growth	This has been added to paragraph 4.1
	Page 47 Need to recognise the importance of the BEREZ.	New paragraphs 4.12 to 4.14 describe the BEREZ.
	Page 53 Key question is how to de-carbonise energy-related transport.	This will be considered in the LTP refresh.
	Page 55 A challenge is how to roll out of the network of electric vehicle charging points.	This has been added to Table 4.1
	Page 54 Town centres and service hubs are important factors of economic growth.	Not relevant to the page referred to.
Natural England	**Page 45 Northumberland Coast:** This section should recognise the Northumberland Coast AONB and Heritage Coast, and the important nature conservation designations along the coast (SPA/SAC/Ramsar/SSSI/NNR).	AONB and Heritage Coast have been added to paragraph 4.1 and 4.6.
	Page 47 Blyth It should also be noted that the town also lies adjacent to the Northumbria Coast Special Protection Area and the Northumberland Shore SSSI.	Added to paragraph 4.11
	Morpeth – also appears in the North Northumberland section.	Duplication deleted.
	Page 51 West Northumberland This section could also make reference for the need for sustainable transport opportunities to be provided to the North Pennines AONB and the Northumberland National Park.	North Pennines AONB added at new paragraphs 4.28 and 4.29. National Park is also in North area.
	Page 52 We welcome recognition of the promotion of walking and cycling as contribution to the health agenda. Physical schemes such as health walks, green exercise programmes etc, working in partnership with the health sector could also be implemented.	Noted.
	Page 53 There are also opportunities to enhance walking and cycling routes to schools.	This is included in Part 2 of the LTP.

English Heritage	Morpeth is located within the sub-area of North Northumberland yet is also included in the commentary for SE Northumberland. Chapter 4 deals with the *Changing Context of Travel*. I am pleased to note that there is an acknowledged call for sensitive solutions in respect of historic places. I also welcome the draft objective, insofar as it goes, to carefully integrate streetscape within the urban environment. Table 4.1 sets out local issues, trends, and implications for transport. In regard to economic growth and regeneration, I would opine that if planned properly, further housing and the development of business parks in the county could help stem the outward flow of commuter traffic. I am disappointed to observe the absence of environmental issues and trends in this table.	Morpeth duplication deleted. Noted. Noted.
Northumberland Tourism	It needs to be understood that while improved public transport will provide a valuable additional offer to some of our visitor market, the reality is that the current target market, as identified in the ATMaP will tend to prefer to use their own transport. As such, Northumberland Tourism advises that as well as developing ways to encourage more visitors to use alternative transport, there should also be greater effort to manage private car usage, e.g. in Market Town centre design, through careful route / car parking management in sensitive areas such as the Coast AONB. An example is in Alnwick – p44 does not identify or address the issues raised by 2009's Visitor Surveys or Market Town Welcome action plans which show that visitors are unhappy with the current traffic situation, and local businesses and communities seem keen to address this. In fact, none of the Market Town Welcome towns (Berwick, Wooler, Alnwick, Amble, Seahouses, Amble, Haltwhistle, Morpeth & Hexham) summaries in this section refer to the recent surveys or action plans, or the priority Destination Management Areas in the Northumberland Area Tourism Management Plan (ATMaP).	This has been added in Chapter 3 paragraphs 3.9, subsequent 'emerging challenges' 3.53 and 6.3. Chapter 4 is about potential new developments that may affect the transport network.
NSP Place Shaping Partnership	P43-56 see key point 2 above. Much of this section duplicates or should rightly be in Chapter 3 Northumberland today and there is little future scoping and exploration of the implications on transport in any of the sections beyond the first 'economic development and regeneration'. Often this was started in chapter three and so a combined chapter would be clearer and more concise.	This will be considered during the LTP refresh.
	P44 implications for transport include continued push to out of town sites undermines viability of town centres and creates dispersed transport needs not easily served by public transport	This issue is addressed by the LDF.
	P45 Amble opportunities for S106 on housing developments to contribute to transport provision.	This is a development control issue.
	P45 southbound access to A1 at Fairmoor and northbound access at Clifton would ease much of Morpeth's congestion issues and be lower cost than Morpeth bypass. S 106 from St George's developments?	This is an LDF/development control issue.

	Comment that west Northumberland introductory text stands out in comparison to north and south-east.	North and South East introductions have been expanded, (paragraphs 4.1 and 4.9.
	P50 all towns discussed need further interpretation on impact for transport e.g. market towns so should be hubs for public transport.	This Chapter is about potential development, not the existing situation. This Chapter will be reviewed during the LTP refresh.
	P52-53 Education and Training – surely the first priority for engagement of LTP with education and training is in ensuring residents can access education and training (a particular challenge when rural schools are being cut) with potential contribution to the Children and Young People's Plan being a secondary focus. Increasing choice provides challenges for transport in ensuring efficiency of school transport journeys and potential for a larger number of children to be making longer journeys to school. This whole section has a distinct non transport implications feel to it.	Chapter 4 is about the changing context for travel. As such the transport implications of changes in education provision are discussed here.
	P54 could be a whole section here of projected climate changes and impacts (see UKCIP support to write it?)	UKCIP support is being sought and will inform the LTP refresh.
NECTAR	Page 44: Presentation should be consistent, including population of each settlement. Berwick is some 60 miles from Edinburgh by rail or road. Travellers on the A1 road now bypass both Berwick and Alnwick; Alnwick is served by Alnmouth station on the ECML some 3 miles away.	Berwick distance from Edinburgh corrected, (paragraph 4.2)
	Page 45 Mention should be made of Wooler and the National Park in the text; Wooler is included in Fig 4.1 and the shaded area appears to be the National Park. The reference in the Northumberland Coast text should probably be to Amble rather than Alnwick. Mention should be made of the Heritage Coast – both the AONB and Druridge Bay. Morpeth has a station on the ECML but is bypassed by the A1.	N'land Coast text amended to Amble as suggested. The Heritage Coast and AONB have been added, (paragraph 4.6)
	Page 48 Bullet 3 The demise of the NHS care trusts and the potential removal of the artificial boundary between the County, North Tyneside and Newcastle health provision should facilitate the development of arrangements reflecting the natural and transport geography of communities north of the Tyne. The funding for the proposed new hospital appears now unlikely to be made available and a more rational location and transport arrangements should evolve, if the facility is needed.	The plans for the new hospital have recently submitted for planning approval.
	Page 51 Health care also refers to the former Cramlington hospital proposal, the comment above applies.	The plans for the new hospital have recently submitted for planning approval.

	Page 52 Specifically, the statement that: The transport role in delivering health improvements in the County is through continued partnership working with the health sector to develop and implement actions to improve accessibility to existing health care facilities, ensure proposed new health care developments are accessible and encourage walking and cycling as part of active lifestyles. is strongly supported. It would be useful to report childhood obesity and asthma data for the County here, and the role of Active Transport in addressing these problems.	Noted. This is addressed in Chapter 8.
	Page 52 **Education and training** There is a conflict between road safety leading to more school trips by car and child health leading to more active travel solutions. Data on the comparative risks is needed to identify the appropriate prioritisation of solutions. A cross-reference to the County Parking Strategy and parking restriction near schools is essential in this section. Comment on the County's position on the funding of school transport would be useful, particularly in the light of the recent abolition of Educational Maintenance Allowance. This would contribute to school transport, post-buses, NHS transport, mobile libraries etc and could be included with community transport elsewhere in the document e.g. at Page 99. The last paragraph in the section seems curiously out of place in a transport plan.	This will be considered during the LTP refresh. Paragraph deleted.

	Energy Page 53, 54 The ready appreciation of the reality of 'peak oil' reinforces the need for *a radical shift in emphasis to more sustainable, lower-cost, low carbon modes focusing particularly on active travel and public transport* over the Plan period (Pages 5, 38 and 39 above). The list of potential consequences for the County is supported with the note that the biomass bullet should be amended to delete heavy vehicles and insert rail and ship facilities. An additional bullet should be added: 'Demand for more electric trains and trams operating on expanded networks' supporting the need for the County to work now towards the provision of electric rolling stock and electrification of the railway to alleviate overcrowding problems (Page 35 above). Table 4.1 should be revised to take account of the foregoing discussion and re-presented with the amended implications identified.	Rail and sea have been added to the bullet point. Road vehicles retained as it is a potential issue. Rail electrification added to list after paragraph 4.45
NCC Countryside Support	Page 45 & 47 You have the Morpeth section in twice.	Duplication deleted.
	Page 52 Paragraph before Education and Training – Amend 1st sentence to read **"An important part of the health agenda is the encouragement of healthier, more physically active lifestyles."** Amend 2nd sentence to read **"There is an opportunity for the Council to work in partnership with the health sector to deliver the Physical Activity Strategy for Northumberland. The LTP & RoWIP can support this by ensuring that some resources and activity are aligned to initiatives and projects which enable and encourage more physical activity through walking and cycling."**	Paragraph 4.35 amended as suggested.
	Page 55 Last bullet point 1st column move across to 2nd column	The bullet referred to is a likely issue due to increased energy cost. The implication (column 2) is the need to provide facilities. This has been added to Table 4.1

Chapter 5 – Vision, Goals & Objectives

NCC Regeneration	We broadly support the vision and objectives of the draft LTP3. The transport strategy reflects the aspirations of the recently published Northumberland Economic Strategy 2010-2015 which sets out a vision to secure opportunities for residents and businesses in a resilient economy by becoming a low carbon economy, creating the conditions for sustainable growth, supporting resilient and diverse sectors and enabling inclusion and enterprise.	Noted.
	Page 60 Table 5.1 Economy The considerations in the table are internal (Northumberland level) with a focus on getting people to jobs. Issues are broader than this, such as supply chain, getting products to UK markets and export-lead growth.	Table 5.1 has been revised to include this issue.
	Page 61 We would like to see enhanced connectivity and integration better integration more fully reflected in the objectives. This would improve LTP3 fit with the Northumberland Economic Strategy. There is also a need to recognise these in table 5.3 The table on page 61 is missing a title.	A new objective has been added: *Improve external connections, both domestic and global, to help businesses grow through exports and access to markets.*
	Page 64 Modal integration should be considered. There could be a focus on alleviating challenges at key transport hubs, particularly where those hubs have a direct implication to the growth and success of Northumberland's key sectors.	Transport hubs, such as interchanges, are referred to in this section (para's 5.13 and 5.14).
Natural England	**Page 59** This chapter should also address the key challenges faced by the transport network in ensuring protecting and enhancement of the natural environment.	The Goals have been updated and a new Objective to protect the natural (and historic) environment has been added.
	Page 59 Goals We suggest the 3rd goal should read 'improving peoples access to services and facilities'. We suggest the last goal should read ' ensure that transport helps to improve quality of life for residents, employers and visitors, and protects and enhances the natural environment'	This has been added, (paragraph 5.4)
	Page 60 We consider that the environmental challenges have not been fully addressed in the previous chapter. Additional information should be provided and challenges identified within the rationalised challenge Table.	Environment has been added to Table 5.1.

	Page 55/Page 60 An important challenge appears to be missing – the need for better integration between spatial planning and transport planning, in order to reduce the need to travel, linked to more emphasis on accessibility of services and facilities, and opportunities to increase walking, cycling and public transport use.	This is included in paragraph 5.13 – Influencing the demand for travel.
	Page 61 Support Economic Growth It is also important to maintain the performance of the existing transport networks whilst improving those parts which are showing signs of congestion and unreliability. We would suggest there is a need to manage demand placed on the road networks, it will not always be possible to match demand with the necessary improvements, as this not consistent with Department for Transport objectives, particularly in relation to achievement of carbon reduction targets and reducing growth in private car usage	Managing & Maintaining the network is discussed in Chapter 5, (para's 5.11 & 5.12). This is recognised and the need to reduce the demand for travel is included in the LTP. (Chapter 9 para's 9.31 to 9.35).
	Public Realm objective It is also not clear why the quality of life objective is focused only on streetscapes and the urban (built) environment. Given the rural nature of the County, of equal importance in terms of management and maintenance of the transport network and new schemes, is the need for sensitive design and use of materials, reducing adverse impacts on and enhancing integration into the natural environment (and in particular in nationally important landscapes).	A new objective: *Protect the natural environment, heritage and landscape*, has been added.
	Page 63 Table 5.3 The SEA environmental report should also contain recommendations for a monitoring programme for the LTP3 which needs to be taken into account. Suggested indicators from the ROWIP and Green Infrastructure Strategy should also be considered.	This has been referred to in Table 5.3
	Page 64 Strategic Approach to Delivery The most sustainable options should also be chosen to deliver the objectives as well as the most cost effective. Use of the SEA report and HRA report can inform this process. We suggest that an approach that mixes the best (and most sustainable) elements of each package is likely to the most appropriate way to meet the objectives and goals for transport. We agree with the three delivery packages and their overall priority. It is important to manage demand on the existing network, before the provision of new infrastructure.	Noted.

	Managing and Maintaining the Existing Transport Networks We suggest the list should also ensure management of the rights of way network, and green infrastructure network in line with the ROWIP and emerging Green Infrastructure Strategy.	Rights of way have been included (para. 5.12)
	Influencing Demand for travel should equally address the reduction in need to travel and encouraging modal shift. We suggest the list should also include provision of innovative rural public transport services, and enhancements to the walking, cycling and green infrastructure networks, provision of visitor destination travel plans	List under para 5.13 amended as suggested.
	Improving Network Capacity should also address the development and enhancement of the green infrastructure network.	The Green Infrastructure Strategy is currently being drafted. This can be included when the Interim LTP is revised.
	Page 65 Supporting the Policy Context The LTP should also support the Northumberland Rights of Way Improvement Plan, any Cycling Strategies produced, and the emerging Green Infrastructure Strategy, the National Park Management Plan and AONB Management Plans.	Para 5.17 has been revised to include the RoWIP, National Park and AONB Management Plans.
	Page 65 Strategic Environmental Assessment The SEA should be used as part of an iterative process to inform both the choice of LTP3 objectives and to advise on the most sustainable interventions for the final plan.	Paragraphs 5.18 to 5.21 have been updated.
English Heritage	A goal for transport should be to minimise impacts upon the historic and natural environmental capital of the county. It is not simply a matter of addressing the issue of climate change, important though it undoubtedly is. The special environmental qualities of the county are vital to its locally distinctive offer and its ability to attract inward investment, and to attract people to live, work, and visit. It is also fundamental to people's quality of life.	New objectives: *Protect the natural environment*, *heritage and landscape* and *Protect the fabric of historic town centres* have been added.
	Table 5.1 outlines *rationalised challenges*. Nowhere in it is reducing the need to travel acknowledged as a challenge.	Table 5.1 will be revised during the LTP refresh.
	I am concerned that the sole means of achieving the Draft Objective of improving the quality of life for people in the county is limited to the better 'integration of streetscapes and the urban environment'. Streetscape is an inescapable component of all our towns and villages and very often characterises it for good or bad. The objective should be to recreate or reintroduce streetscape which, whilst resolving transport issues, simultaneously respects the locality in question in terms of its appearance, character and sense of place. This is an approach which is countywide in its relevance and applicability	A new objective: *Minimise the impact of transport on the natural environment, heritage and landscape*, has been added to Quality of Life.

	Table 5.3 sets out the relationship between LTP goals, objectives, and indicators. How will you know if you have been successful in terms of improving quality of life if there are no indicators by which to measure performance. Indicators can be relatively easily derived from a great many sources if the objective is broadened to include improvements in the quality of the environment in which people spend their time. Such consideration is more likely to sit comfortably with the key messages in the SCS and those likely to emerge through the Core Strategy.	This table will be revised during the LTP refresh. It is likely that indicators from the SEA and RoWIP are will be used.
	In various places throughout the document there is reference to National Indicators. As a measure of performance these now have little or no value.	The Government has retained a list of National Indicators.
	Under the heading of a *Strategic Approach to Delivery* we see for the first time the means by which a reduction in the need to travel might be brought about. I regard this as the first priority, inasmuch as it has implications for what improvements, if any, may be needed to increase network capacity (priority 3). It may also have implications for maintenance regimes (priority 1).	Noted.
	This section of the document also deals with *Strategy Evaluation and Appraisal*. It does not, however, provide indicative figures for the reductions in CO2 emissions anticipated by the measures proposed.	This is more appropriately addressed in Chapter 7 – Reducing Carbon Emissions.
	The section on SEA would be more useful if it contained a brief non-technical summary of the environmental effects of the Plan, rather than simply set out the stages through which the assessment must pass.	Paragraphs 5.18 to 5.21 have been updated.
Northumberl and Tourism	p61 States: Tourism: The majority of tourists who visit Northumberland use the car to access the region and throughout their stay. This is because of a lack of provision and awareness of alternative transport options and facilities. This is bold statements! Again, it ignores the characteristics of some of Northumberland's target markets, as outlined in the ATMaP, who prefer the independence and self sufficiency that private car transport often provides more satisfactorily (to them) than public transport can or would.	Table 5.1 has been amended to recognise this issue.
NSP Place Shaping Partnership	P59 first bullet point – another example where 'Support Northumberland's economic competitiveness and growth' could read 'Support Northumberland's economic competitiveness and equality of prosperity' (another example at bottom of page – 'Supporting local economic prosperity')	"Sustainable" has been added before "economic growth".
	P59 – last paragraph needs reference of the challenge this poses …but 'will lead to a better quality of life' etc.	This paragraph has been deleted.
	P60 – first paragraph – reference to …'a transport network that is not delivering for many users, particularly during peak periods' conflicts with assessments that congestion is not a significant problem. This focus is reflected throughout the document.	This sentence refers to all forms of transport, not just road. E.g. overcrowding on rail services.

	P60 Box 'Accessibility – Rationalised Challenge "The problem will be exacerbated in the coming years with an increase in the population in rural areas, an increase in the cost of fuel and an increase in the proportion of elderly..."	Table 5.1 amended as suggested.
	P60 Box 'Accessibility – Rationalised Challenge' "As a consequence, many residents have to commute into Tyne and Wear for work purposes. This can be difficult for people without access to a car as existing bus journeys are lengthy, costly and infrequent. Although train services allow commuting, these are restricted to key stations that are sparsely distributed across the county. If these journeys are taken by private car, the increased car trips will contribute to increased carbon emissions and congestion on the transport network both in Northumberland and Tyne and Wear."	Rail travel and carbon emissions added to Table 5.1 under 'Economy'.
	P60 Box 'Freight – Rationalised Challenge' – " …restrict the potential for modal shift. Emerging supply chains with new freight transport needs may create new movement patterns which require Northumberland's transport infrastructure to be flexible enough to accommodate such changes".	Table 5.1 Freight – Amended to include this issue.
	P64 – 65 Improving Network Capacity – From a sustainability point of view, increasing the capacity of road links and junctions needs to be activity of last resort as it encourages private car usage. The uptake of public and active transport relies on the disincentives of using a private car as well as the benefits of alternative choices. We must be careful not to speaking of one goal whilst undermining it with the other actions in the plan.	Noted. This section also refers to public transport, walking and cycling.
	P65 – Strategic Environmental Appraisal "The environmental impacts (of what-plan/proposals/each investment) have also been considered…." And rather than list the stages it might be more informative to list the environmental elements for which the plan has been appraised to give overview to those not familiar with an EIA process.	Paragraphs 5.18 to 5.21 have been updated.

NECTAR	**Key Challenges** Page 60, 61 The rationalised challenges as listed are not supported. They do not represent an objective summary of the emerging challenges identified in the preceding chapters and certainly do not reflect the additional evidence, analysis and commentary contributed in this paper. Challenges that are inadequately represented in Table 5.1 include, but are not limited to, the need to: o Promote a radical shift in emphasis to sustainable travel modes for all journey purposes, reducing the demand for separate car journeys and giving priority to active travellers. o Challenge long favoured road schemes, making reference only to those for which options have been developed in collaboration with housing, environmental health and other functions. o Implement the policies in *Better Health, Fairer Health*, making a substantial contribution the development of active travel to combat the rapid increase in obesogenic illnesses o Ameliorate the impact of peak traffic demands through an integrated approach to housing location, transport provision, parking strategy, service delivery and the driver-only occupancy of cars. o Develop transport provision to provide for the needs of pensioners who bring a large, stable, disposable income base into the overall economy of the County without any directly associated transport demand through journeys to work. o Improve the passenger rail service in the County, providing better access to stations and station car parking, improved timetables and reduced overcrowding. o Recognise that the A1 road is not unique and that the impact of HGV traffic is common to all roads. o Review the rural road network, identifying the core routes for improvement with quiet lanes formally designated and maintained only for recreational walking and cycling, linking the review to the Rights Of Way Improvement Plan. o Establish a new approach to behavioural change by drivers that will make a step change in the reduction of road casualties of all types and reflect an understanding of the interaction of active travel, road safety, car emission pollutants and health.	Table 5.1 will be revised during the LTP refresh.

	Draft Objectives Page 61 (Table 5.2?) The emphasis on the goals being mutually supportive, not competing alternatives, is welcome and could be reflected by a more positive approach to the contributions from the SEA, HIA and HRA processes. However – the section by section approach in the subsequent chapters could lead to a silo approach, as can already be seen to be developing in the presentation of Table 5.3. The term 'transport networks' under Support Economic Growth in Table 5.2 (?) should be expanded to 'rail, bus, active travel and road networks' to emphasize that the statement applies equally to all. In the context, 'corridors' may be a more appropriate description than network and 'congestion' must be understood to apply equally to overcrowded buses and trains and to roads full of (driver-only) cars. The doubt is clear under Safer and Healthier Travel, where reference must be to ' … safety of the road and active travel network …'. In this section or under Quality of Life an objective must be included to 'reduce the air quality problems caused by road transport by reducing noxious emissions.'	The term "transport networks" is fully inclusive. It is not necessary to list the different modes. There are no current air quality issues in the county so the objective is to maintain the current standards.
	Page 63 The Council's choice of outcome indicators is no longer limited to the national Indicator set which is being abolished. This provides an opportunity to review the indicators to be used in the implementation of LTP3, and to align them better with the goals and objectives. Indicators that should be included include *Supporting economic growth:* rail passenger numbers, rail passenger overcrowding, bus passenger numbers, cars parked at stations. *Reducing carbon emission:* number of walking trips *Safer and healthier travel:* number of walking trips, health indicators. *Improving access to services:* increase/decrease in services available locally *Quality of life, air quality objective:* air quality measurements at key locations, including road links and junctions as well as all urban areas.	Indicators are being revised.

	Strategic Approach to Delivery Page 64 The LTP3 should be signed up to by a wide range of partners. Such partners can help contribute to delivery by realigning their own funding and objectives appropriately. Specifically in the context of the ongoing spending review, LTP3 should recognise that the County should not be solely responsible for delivery of travel improvements, still less the County highways department. **Managing and Maintaining the Existing Transport Networks.** Amend fourth bullet to: o Engineering schemes to support new approach to understanding of the interaction of active travel, road safety, car emission pollutants and health. Introduce extra bullets: o Rationalise permitted speeds and introduce 20mph limits to all residential areas. o Develop the rights of way improvement programme. o Review the rural road network, identifying the core routes for improvement, with quiet lanes formally designated and maintained only for recreational walking and cycling. **Influencing Demand for Travel** Add additional bullet o Promote walking to work, shop and for recreation **Improving Network Capacity** Include additional bullet o Extend the number and scope of pedestrian only or shared space zones in built up areas. Car sharing schemes also make better use of road capacity so could be included in this section. **Strategy Evaluation and Appraisal** In the win-win integrated approach to sustainability, environment should be enhanced by interventions. Reference to 'mitigating environmental impact' is associated with the obsolete 'trade off' approach to sustainable development.	Noted. The forth bullet specifically refers to road safety engineering schemes. Rights of way are included in bullet 2 under paragraph 5.12. There are no current plans to introduce 20mph limits to all residential areas or to review the rural road network. These issues can be included in future revisions of the LTP if they come forward. The first bullet point is "encouraging and enabling people to use sustainable, low carbon travel". This includes walking. Pedestrian/shared space schemes do not necessarily improve capacity. Rather, they change the priority at existing sites. Such schemes are referred to in Chapter 10, Quality of Life, as potential ways of enhancing the local environment. The SEA text has been updated (para's 5.18 to 5.21).
NCC Countrysi de Support	Page 59 Goals for Transport – delete "local highway Council" and replace with **"Local Transport Authority"** or **"Highway Authority"**	Paragraph 5.3 amended as suggested.

	Page 60 First row 2nd column – insert **"and active travel"** after public transport in the first sentence. Key challenges – Insert **"Health"** in column One. Insert the following against the new health issue in column two: **"In Northumberland it is estimated that 8 out of 10 people do not take enough exercise. The cost of this inactivity is significant both for individuals and the health service. Encouraging the uptake of walking and cycling as part of a strategy to reduce obesity, prevent illness and foster well being is a challenge for the transport strategy."**	Table 5.1 amended as suggested. The source of this statement is required before it can be included in the LTP.
	Page 61 Insert **",public rights of way"** after highways in the last row of column two – rationalised challenge	Table 5.1 amended as suggested.
	Page 64 2nd set of bullet points – bullet point two – amend to **"Maintenance of footways, cycleways and public rights of way to encourage active travel; and"**	List following para. 5.12 amended as suggested.

Chapter 6 – Supporting Economic Growth

Cyclists Touring Club	**Page 70 Transport Asset Management** As most cycle journeys are on road, it is vital that the roads are kept in a safe condition. We would like to see a much higher priority given to removing the maintenance backlog and increasing investment in maintenance. We would like to see a much higher priority given to removing the maintenance backlog and increasing investment in maintenance.	Noted. Maintenance is a priority for the County Council.
	page 71, Increasing Network Capacity Junction improvements should also make it easier for pedestrians and cyclists to cross. There is no point taking cyclists off the road and then not providing adequate provision at crossing points i.e. signal controlled crossings. This can be a major deterrent to cycling.	

	The improvements for cyclists at Moor Farm and Seaton Burn are minimal and do not include high quality provision. This must not be allowed to happen in future schemes. There is currently no evidence that the proposed specialised Emergency Care Hospital near Cramlington will allow safe and easy access to the site by cycle for staff and visitors. **page 72, Improving Local Bus Travel** Measures to aid the free flow of buses should also accommodate cycles i.e. bus/cycle lanes. **page 73, Improving Rail Travel** The introduction of additional rolling stock to reduce overcrowding is vital. There also needs to be support for an increase in the number of cycles carried on-board trains. As provision for cycles on most trains is currently very limited, it is often suggested that commuters leave a cycle at stations at both ends of the journey. As cycles are left overnight secure undercover cycle parking is essential if this method of integrated transport is to be encouraged. Ease of access to transport interchanges by cycle is also important. Under *Widening Travel Choice* (page 100), for longer journeys the need for improved cycle carriage on trains and buses is vital for cyclists with no access to motor transport. **page 75, Improving Walking and Cycling for Tourists** The key priority (page 78) to *Develop sustainable travel options for major planned events* is an interesting one. Taking Kielder as an example, we would be very interested to learn how you can achieve this for those travelling with a cycle, especially as there is no rail link or regular bus service to the area, plus trains to Hexham currently have extremely limited cycle carriage capacity. Unless visiting cyclists are cycling through the area they are more than likely to continue to arrive by car. This is one of the downsides of mountain biking centres located in remote areas. This may also apply to some of the proposed Cycle Hubs. Speed limits are often too high on links between towns and villages where direct alternative routes for cyclists are not available, and can be a deterrent to cycle touring.	These issues are part of the design process. The County Council supports increased cycle carriage on trains and will lobby for this when new rolling stock is introduced. Cycle access and cycle parking at interchanges is referred to in the LTP. This section has been revised.
Nexus	The emphasis on improving cross boundary links is welcomed. In particular, Nexus welcomes the continued focus upon infrastructure development along the SE Northumberland Growth	Noted

	Corridor as a means of improving transport links within a single travel to work area.	
	Nexus is broadly supportive of your approach to ensuring better use of railway assets, including the proposed re-establishment of passenger services on the Ashington, Blyth & Tyne railway.	Noted
	Nexus supports the policy of seeking upgrades and improvements to the existing East Coast Main Line.	Noted
	There is little mention of improvements to bus services between SE Northumberland and Tyne & Wear.	Noted
NCC Regeneration	**Page 67** • It is important to set out how the transport strategy will help to grow businesses and provide job opportunities within our communities. • 3rd paragraph refers to a decline in manufacturing and agriculture. This is too general a comment. Job numbers have declined but productivity is increasing substantially with a corresponding increase in output. • Key issues should reflect freight use of local networks, as identified earlier in the document. • International transport links are an issue related to export-lead economic growth. • Do key sectors have other particular transport concerns / issues? • Transport to and within Northumberland's market towns is an important economic consideration given their role as service and local employment centres.	Paragraphs 6.3 and 6.4 have been revised to include these issues.
	Page 68 • Certain infrastructure improvements (e.g. A19 at Moor Farm and Seaton Burn) may act as constraints (weaknesses) if there are not considered within a shorter time horizon. Development at key industrial sites (e.g. West Hartford, Ashwood and Blyth) is already impacted and therefore investment may be threatened. A lack of shorter-term drivers to secure network improvements, consistent with the Economic Strategy, might also constrain attempts in the short term to attract mobile investment to the BEREZ (notable Blyth and Cambois). We must consider these major sites as opportunities alongside the South East Northumberland Growth Point. • Berwick is a priority and should be recognised. Economic growth at Cramlington is also strategically important. • A weakness is the need to better manage the reliance on road freight for the movement of goods both to and from market. The strategy should consider how best to manage this in the context of the A69 / A1 and minor road networks in the rural west and north.	Lack of infrastructure improvements is included as a 'Threat', both in terms of the network and specifically access to employment sites. Berwick & Cramlington added. Added to 'Weaknesses'.
	Page 71 Improvements to integrating transport modes are a means of improving network flow (although	Noted.

	not necessarily network capacity).	
	Page 75 Walking and cycling are also important travel choices for local residents.	Para. 6.38 amended to include residents.
	Page 77 The transport priorities in the Economic Strategy should be clearly articulated. Northumberland will need to work collaboratively with and through the North Eastern LEP to deliver against strategic economic and transport objectives.	These are set out in paragraphs 6.51 and 6.52, under the new objective relating to connectivity.
British Horse Society	**Page 75** Horse riding should be included in references to tourism.	Paragraph 6.38 has been revised.

Morpeth Town Council	Transport provision supports economic development. It should encourage sustainable economic development. The Town Council supports: The Morpeth Northern Bypass; Re-instatement of passenger services on the Ashington Blyth Tyne rail line to link with Intercity rail services, to free up capacity on the East Coast Mainline and to link to other road and rail services County; Semi-fast rail services: Newcastle ⇨ Morpeth ⇨ Edinburgh; Increase of stopping trains at Morpeth, both local and Intercity; <u>Morpeth Junction Improvements</u> Telford Bridge – the Town Council accepts that the proposed coordination of traffic lights on Dark L Bridge Street and Castle Square should improve traffic flow, but is concerned about the likely incr in traffic associated with the proposed food store on Dark Lane; Sun Inn Junction – the introduction of traffic lights is essential: the present difficulties experienced junction is a major contributor to traffic congestion in the town; Traffic lights at the Coopies Lane junction are needed to maintain the economic viability of the trad estate. These should be introduced alongside improved rail and 'bus interchange and car parking rail station; Additional car parking facilities. The Town Council welcomes that the car parking strategy will be integrated into the programme for the next 15 years, and will be part of an overall a traffic manage policy, St George's Development: Given the withdrawal of Government funding for the SE Northumberlan Growth Point, is Northumberland County Council supporting the concept of the scheme? If so, the this will be achieved should be emphatically expressed in the document. We note that developmer George's is dependent on the Morpeth Northern Bypass; Promote the use of local shops rather than supermarkets which encourage 'large shopping' outing use of the car even by people living near the town centre.	Noted. This is a planning issue which will be addressed via the development control process. This is too detailed to be included in the LTP strategy. This scheme has been investigated in the past but was rejected. This is too detailed to be included in the LTP strategy but can be considered for the Integrated Transport Programme. Noted. The Growth Point Programme of Development remains our long term vision and general statement of intent regarding new housing growth in South East Northumberland. The scale, location and phasing of development will be determined through the Local Development Framework Core Strategy and other Development Plan Documents.

Resident	The justification you give for the proposed Morpeth Northern Bypass is weak. Please drop it from the LTP.	The proposed Morpeth Northern Bypass is critical to the housing and employment growth ambitions of the North Morpeth Growth Area. It has recently been included in the development pool of schemes which the DfT will consider for funding.
Greater Morpeth Development Trust	We support the proposed Morpeth Northern Bypass as it will improve local links and enable development at St Georges and Fairmoor.	Noted
	We welcome the commitment to press for improvements to the A1 north of Morpeth.	Noted.
	We welcome the commitment to improve congestion in Morpeth and to encourage more stopping trains at Morpeth Station.	Noted.
Natural England	**Page 67 Supporting Economic Growth** This section should also recognise that protection of the natural environment is important for the local economy, and in particular tourism, and therefore the natural environment needs to be protected from any transport impacts.	This has been added to para 6.3 and the SWOT analysis.
	Page 69 It is also important to maintain the performance of the existing transport networks whilst improving those parts which are showing signs of congestion and unreliability. We would suggest there is a need to manage demand placed on the road networks, it will not always be possible to match demand with the necessary improvements, as this not consistent with DfT objectives, particularly in relation to achievement of carbon reduction targets and reducing growth in private car usage.	Managing & Maintaining the network is discussed in Chapter 5, (para's 5.11 & 5.12). This is recognised and the need to reduce the demand for travel is included in the LTP. (Chapter 9 para's 9.31 to 9.35).
	Page 69 Managing and Maintaining the Existing Transport Networks We suggest the list should also ensure management of the rights of way network, and green infrastructure network in line with the ROWIP and emerging Green Infrastructure Strategy.	Public rights of way have been added to the list under paragraph 6.10
	Page 70 Signage strategy. There is a need to ensure sensitive design and integration of signage and other transport infrastructure into the natural environment (and in particular in nationally important landscapes). For example hard engineering, lighting schemes and highways signage can all have an adverse impact through urbanising effects.	Paragraph 6.13 has been revised to include this issue.
	Page 70/71 Transport Asset Management The rights of way network and definitive map should be recognised as part of the Transport Asset Management Plan and agreed service levels	Management of the public rights of way network is currently set out in the Rights of

	established. We note that sustainability is one of the criteria for service levels on the transport network within the TAMP, which we welcome. Sound design principles for new transport infrastructure and innovative management of the existing transport network could achieve multiple benefits for both the natural environment and for network resilience to climate change. The TAMP should consider positive opportunities for creative design to improve the environmental performance of existing and new transport infrastructure in all landscapes – for example 'green' bridges and tunnels to reduce habitat fragmentation and the removal, reduction or better design of signs and lighting, environmentally friendly roadside verge management etc.	Way Improvement Plan. The issue of good design enhancing the environment is included in paragraphs 6.58 and 10.20.
	Page 71/Page 75/76 Increasing Network Capacity/ New Schemes The provision of detailed location maps on proposed improvements/schemes would have made it easier to assess the potential impacts of these proposed schemes on the natural environment and for us to provide more detailed comment. In general any schemes proposed should seek net environmental gain from necessary transport development whilst avoiding, mitigating or compensating for negative impacts. In progressing transport proposals, consideration needs to be given to potential impacts on the landscape character, biodiversity, geodiversity, soils, the coast and green infrastructure (along with air and noise pollution (loss of tranquillity) as well as impacts on the townscape (locality or streetscape). There is a need to ensure the highest level of protection for designated landscapes, habitats, sites and species. Policies and decisions about major transport proposals should safeguard important natural assets.	Noted. The impacts of schemes will be assessed as part of the design process. This has been added to Chapter 10 – Quality of Life.
	Page 72/74 The rail and the bus strategy should both consider any improvements required to walking and cycling routes to interchange facilities and any associated infrastructure requirements to enable active travel, such as cycle storage etc.	This has been added to the lists under paragraphs 6.27 and 6.36.
	Page 75 Improving Walking and Cycling for Tourists . This section is too narrowly defined. The importance of providing and improving local active travel opportunities to access employment and other facilities for residents should also be covered. Links should be made to delivery of the Rights of Way Improvement Plan and Green Infrastructure Strategy. This approach would be consistent with the approach to bus and rail strategies in previous sections.	Paragraph 6.38 has been revised to include residents as well as tourists and refers to the RoWIP. The Green Infrastructure Strategy is currently too draft to be included. Walking & Cycling are covered in more detail in Chapter 8.
	Page 78 We welcome the priority list of proposals. We would add the need to maintain and improve walking, cycling and green infrastructure networks due to their contribution to allow local access to employment opportunities and the broader role they play in sustainable tourism	This section has been revised.

	opportunities (including for example in the protected landscapes, the Pennine Way National Trail and Hadrian's Wall Path, and other regionally important walking routes such as the Northumberland Coast Path and St Cuthbert's Way along with the National Cycle Routes).	
English Heritage	In respect of the Strategy for Supporting Economic Growth, I am pleased that there is a clear call for standards of maintenance and management to be upheld, especially in historic towns and sensitive areas.	Noted.
	This section of the document refers to the intention to produce a *Transport Assets Management Plan*, dealing with, amongst other things, the maintenance of transport structures. A good number of these assets will be of heritage value and many will be statutorily designated as such. Ensuring that they remain free from risk of harm or loss is fundamental to safeguarding local character and distinctiveness.	Noted. Protection of the historic environment is included in Chapter 10 – Quality of Life.
	Under the heading of *Improving Rail Travel* I am pleased to note the inclusion of reference to the rail link from Blyth and Ashington to Tyneside. This I believe is crucial as a means of reducing road congestion in SE Northumberland.	Noted.
	In the list of priorities we are advised that in the longer term the Network Rail compound at Berwick railway station will be relocated. I regard this as a planning enforcement matter which can and should be acted upon now. The compound is situated on a Scheduled Ancient Monument and does not have the necessary Scheduled Monument Consent. This offence is prosecutable. The planning situation is also questionable. English Heritage has written to the former district Council on this matter but has yet to see any satisfactory progress.	This section has been revised. This issue is a planning enforcement matter.
Northumberland Tourism	p73+ - Northumberland Tourism welcomes the emphasis to improve the provisions on our rail lines and stations which many of our visitors enjoy and which will provide us with an excellent marketing and sustainable transport management option. Similarly, the emphasis on improving coach travel provision is also welcomed.	Noted.
	p75 – improving walking and cycling for tourists – this section appears very 'lean'. Our public rights of way network is a vital part of our visitor offer, outdoor activities being one of our key draws to visitors, and an essential element identified in the ATMaP. However, the recognition to roll out the cycle hub approach being piloted in Haltwhistle and Wooler is very welcome. There is an opportunity to link the visitors requirements with the walking and cycling resident use potential (p94)	Paragraph 6.38 has been revised to include public rights of way.
NSP Place Shaping Partnership	P67 – second paragraph beginning "Good transport links" the statement "The government has never been more committed to encouraging economic growth" is a political statement not suitable for inclusion in the plan. Removal of this sentence would leave the rest of the paragraph and the point being made in tact.	Sentence removed from paragraph 6.2.
	P67 – Key Issues - Bullet Point 2 road congestion has already been cited as a not being a major	Congestion is an issue at certain locations

	challenge on p35 so why is it a key issue going forwards?	and this is forecast to get worse.
	P68 – Key Issues – We would ask that a further bullet point is added: "Changing weather patterns are likely to cause more frequent disruption to transport routes and peak oil is threatening the future of our fossil fuel reliant transport systems which will affect business prosperity, visitor numbers and the ability of residents to access employment, services and leisure.	Changing weather patterns added to bullet points. The issue of peak oil will be considered as part of the LTP refresh.
	P68 – supporting 'Economic Growth swot analysis'. Peak oil should be added to threats.	The issue of peak oil will be considered as part of the LTP refresh.
	P70 – The Northumberland Parking Strategy – could promote sustainable transport choices by encouraging free parking at transport interchanges, town centre vitality by reversing car-parking charges to allow free parking in suitable town centre sites and payment for parking in out of town sites and promote low carbon transport options by permitting free parking for electric/biogas and other low carbon vehicles across the County.	Noted. The Parking Strategy is currently being prepared.
	P70 – 71 – section on transport asset management. If Highway Maintenance Plan is the only end product of demonstrating how Transport Asset Management Plan is delivered then the focus and capital spend looks solely to be on road infrastructure. If the goals of the LTP3 are to be met this will need to incorporate other forms of transport assets and mainstream funding.	The paragraph referred to has been deleted.
	P71 - The assumption that this will deter sustainable forms of transport and bus journeys is based on there being no provision made to except such forms of transport such as bus lanes/congestion charging/cycleways etc. Is this an assumption we want to make explicit? In actual fact this will also deter private car usage probably more so, especially if such provisions to encourage sustainable transport are put in place but this is not mentioned. A certain level of inconvenience to private car usage whether through congestion, traffic calming measures, tolls or parking charges will be essential to the move to sustainable transport systems this is not addressed in the plan.	Not clear what is being referred to.
	The bullet points detailing the bus strategy on P72-73 are very encouraging though the text on P72 "Recognising the role that buses can play….users of bus services" appears very beaureaucratic. Surely the role of the LTP is to expand modal shift and so when written, it is suggested that the final bus strategy is incorporated into the LTP. A particular concern is the loss of evening and late evening services especially on core services such as the 505/515, which act as a deterrent for more general bus use.	Noted. The Bus Strategy is currently being developed.
	Re Train station parking p74 paragraph 3 free parking at train stations is essential to encouraging the modal shift especially for commuting journeys into urban centres.	Noted. Some station car parks are not controlled by the County Council.
	P75 first paragraph under Extend the reach of Existing Networks – it would appear from this that	Paragraph 6.41 refers to cross-boundary

	the inter-urban connections within Tyne and Wear are causing the difficulty not the road or rail networks within Northumberland. Rather than increase private car provision it is suggested that partnership solutions are sought with North Tyneside about park and ride or parking at metro interchanges etc. The single ticketing initiative will also be helpful here. Further, freight is not covered in this introduction – the changing patterns of freight highlighted above may lead to need for increased infrastructure along new routes. This should be mentioned here and expanded upon on P77	links with Tyne & Wear. It does not suggest that the problems are just within Tyne & Wear. Northumberland's contribution to congestion in Tyne & Wear is an important issue. Para 6.42 has been added to include the issue of changing freight patterns. Para 6.51 refers to potential improvements at the Port of Blyth for the BEREZ.
	There is an absence of expanding rail, bus, cycle and walking infrastructure here. If the vision and goals of the LTP3 are to be met, there will need to be significant investment in expanding provision.	Improving bus and rail infrastructure is addressed in paragraphs 6.43 to 6.45 and is also addressed under the previous objective. Improving walking and cycling is addressed in paragraph 6.38 and is discussed more fully in Chapter 8.
NECTAR	**Context** Page 67 Good transport links can *support* economic growth but the evidence does not suggest that they can *stimulate* it. Although agriculture and other land-based industries are much reduced employment terms, they create the landscape on which tourism depends. The dependency of the tourism sector on the agriculture was proved in the FMD crisis. The commentary should reflect the issues raised at Page 25 above. In the coming 'knowledge economy', the 'goods and services' will be transported over a broadband network, not the road or rail network.	Paragraph 6.2 amended as suggested. Paragraph 6.3 amended to include this issue. There will still be a need to transport goods and services by road or rail.
	Key Issues Page 67, 68 These brief extracts should be changed to reflect and relate to the previous parts of the chapter, as amended by the above comments.	To be revised as part of the LTP refresh.
	SWOT Analysis *Strengths* Add bullet from Page 35 '*highway congestion is not considered to be a real problem in*	This has been added to the SWOT table.

	Northumberland.' *Weaknesses* Northumberland is not geographically isolated; it is well placed between the economic capitals of England and Scotland. Page 69 paragraph 4 states *'The evidence base has demonstrated that Northumberland is already well connected in terms of its transport network.'* The evidence (A1MMS, DaSTS evidence base study) makes clear that the capacity of the A1 North of Newcastle is entirely adequate. Add: The capacity and capability constraints of the ECML and its passenger services e.g. lack of early morning arrival in London, Birmingham etc. *Opportunities* Reference to Growth Point should be confirmed or deleted (see Page 20, 26 above). Reference to improvements is not an opportunity supported by the evidence (see Page 6 above). There is some confusion between independent opportunities and dependent interventions arising as part of LTP3. o Add: Revise the rural road network, identifying the core routes and quiet lanes. *Threats* o Add: Failure to reduce peak traffic demands through an integrated approach to housing, transport, parking, service delivery and the driver-only occupancy of cars.	This has been deleted. Amended to remove reference to capacity. Rail overcrowding is already included. The Growth Point Programme of Development remains our long tem vision and general statement of intent regarding new housing growth in South East Northumberland. The improvements referred to are supported by the Economic Strategy. There are no current plans to revise the rural road network.
	P69 The Objective at mid page should be amended to read: '… Increasing *Overcrowding,* Congestion and Unreliability' **Managing and Maintaining the Network** The sub-heading should read *Managing and Maintaining the Road and Active Travel Network* with other references to 'Network' amended appropriately. Bullet 4: Reference should not be to 'free-flowing' traffic but to 'unobstructed' traffic as essential speed restrictions also prevent 'free-flow'. **Bullet 5: Delete '…particularly in …'; the point is as important everywhere**	Overcrowding is included in congestion. It is considered that the use of 'network' is fully inclusive of all modes. Bullet 4 amended to remove 'free flowing'. Bullet 5 has been deleted following advice from Asset Management.
	Page 70	

	○ *New Bullet 9:* Use civil enforcement powers to eliminate pavement parking and parking in proscribed areas around schools. ○ *New Bullet 10:* Develop the Rights of Way Improvement Plan. ○ *New Bullet 11:* Revise the rural road network, identifying the core routes and quiet lanes Elimination of pavement parking will also improve safety, by allowing pedestrians to keep to pavements, by clearing obstructed lines of site and by allowing the condition of the pavements to be maintained more effectively. **Traffic Asset Management** As most cycle journeys are on road, it is vital that the roads are kept in a safe condition. This must not just apply to key economic corridors, but also to roads most used by utility cyclists. Cyclists also tend to avoid certain off-road routes due to their poor surface and lack of maintenance. Under carbon emissions (page 87) there is a longer term action to *Assess and improve the condition of highway infrastructure where funding allows*. Much higher priority should be given to removing the maintenance backlog and increasing investment in maintenance. A report by YouGov for the Asphalt Industry Alliance entitled "The Economic Impact of Local Road Condition" revealed that badly maintained local roads are costing the economy £4.1bn a year in wasted staff time, production delays and damage repairs. With regard to cycling, the report found that nearly 20% of the public would either take up cycling or cycle more if roads were better maintained; while over half thought their local roads were not fit and safe for cycling. CTC set up the website "Fill that Hole" in order to make it easier for local authorities to locate and fix potholes and other road defects quickly as nearly 20% of cycling crashes amongst CTC members have been caused by road defects.	The CPE application has yet to be submitted by the County Council. The RoWIP exists but is currently a separate document. There are no current plans to revise the rural road network. Noted. This section is to be revised to include maintenance, including for cyclists, as part of the LTP refresh.
	Increasing Network Capacity Page 71 It is agreed that *'congestion is not a major problem in Northumberland at the present time'*. Therefore there is no need to refer to upgrading single to dual carriageways within the plan period. *A19 (T) Junction Improvements* These schemes were cancelled by the DfT on 20 Oct 10 and reference to them should be removed from LTP3. Alternative solutions based on travel planning and smarter choices as at	Paragraph 6.20 as written simply states that upgrading from single to dual carriageway is a potential improvement that could be considered. The DfT/Highways Agency has stated that they will develop plans to deal with these junctions within the LTP period. These

	Darlington should be fully evaluated in the public domain before road building solutions are re-introduced or revived. *A193 Cowpen Road Corridor, Blyth* The problem described illustrates the breakdown of a coordinated approach by planners, traffic managers etc (see Key Challenges at Page 60, 61 above). Alternative solutions based on travel planning and smarter choices as at Darlington should be fully evaluated in the public domain before road building solutions are pursued. *Telford Bridge, Morpeth* The traffic analyses carried out for the Morpeth Northern Bypass scheme suggest that only some 8-10% of the current Telford Bridge traffic will use the new road, which will itself generate significant new traffic. NECTAR is also concerned by the traffic likely to be generated by the proposal for a new food store on Dark Lane, and will be interested to see the impact of traffic light coordination on Dark Lane, Bridge St and Castle Square as proposed by the developer. However, implementation of effective workplace and school travel plans in and around Morpeth (including car share schemes) – including County Hall – could do much to relieve localised and sporadic congestion on Telford Bridge. In addition future road improvements should be designed to take into account active travel modes as well as the perceived needs of motorists. Junction improvements should make it easier for pedestrians and cyclists to cross. There is no point in taking cyclists off the road and then not providing adequate provision at crossing points i.e. signal controlled crossings. This can be a major deterrent to cycling.	junction improvements are considered important to the local economy and are included in the Economic Strategy. Noted. Sustainable travel options, as set out elsewhere in the LTP, are promoted in Blyth, particularly through the Active Travel Town. This is a development control issue. School travel plans are in place at all Morpeth schools. Noted. This is part of the design process.
	Improving Local Bus Travel Page 72 It would be useful to have the Council's criteria for 'non-commercial but socially necessary [bus] services' spelled out. Previous policy has led to near viable services, which support access to employment being funded, whereas other arguments could lead to weekend and bank holiday services bringing visitors to tourist centres being supported.	This will be more appropriately included in the Bus Strategy.
	Page 72-73 Amend bullet 6: *'…* priority given to bus *and rail* stations, *…'* Schematic route maps as well as timetables would be useful.	Noted.

	Amend bullet 9: ' … Smart Cards *and PlusBus rail tickets*. **Improving Rail Travel** The number quoted for the combined annual total is incorrect; it was 1 744 792 in 2007/08 as shown on Page 30. The figures for 2008/09 are now available and should be used. They show a further increase in the combined total to 1 845 024, a 6% growth in the year. The list of Partners should include the Train and Freight Operating Companies and their trade organisations. The introduction of additional rolling stock to reduce overcrowding is vital. There also needs to be support for an increase in the number of cycles carried on-board trains. As provision for cycles on most trains is currently very limited, it is often suggested that commuters leave a cycle at stations at both ends of the journey. As cycles are left overnight secure undercover cycle parking is essential if this method of integrated transport is to be encouraged. Ease of access to transport interchanges by cycle is also important.	Amended. Paragraph 6.28 amended to show correct figure. Operators added to paragraph 6.29. Noted. Cycle access and parking is included in the bullet points under para. 6.36.
	Page 74 The 'rail strategy framework' should be published in time for public comment to be incorporated before LTP3 is published. The vision of the 'new rail strategy' should be amended to include rail freight explicitly, as well as passenger services implicitly. *Bullet 4* in the list is already included in Bullet 2; bullet 4 can be deleted. Add bullets to: o Cross-refer to the Ashington, Blyth & Tyne line o Refer to the amenity and car-parking project at Berwick. **Improving Facilities for Coach Travel** A broader review appears to be necessary as facilities may become essential to protect rural attractions such as Holy Island, the National Park and National Trust and similar properties. Planning policy (in the emerging LDF) may also be needed to manage provision of coach facilities at the edge of towns.	The rail strategy framework is being developed. Bullet 4 deleted. Ashington, Blyth & Tyne added. Noted.

	P75 **Improved Walking and Cycling for Tourists** Despite its title this sub-section makes no reference to walking! A walking strategy has become an essential component of LTP3 if the overall goals and objectives are to be met. Such a strategy should be developed in conjunction with the Rights of Way Improvement Plan and published separately for public consultation. The key priority to *Develop sustainable travel options for major planned events* is interesting. Taking Kielder as an example, it would be very interested to learn how this can be achieved for those travelling with a cycle, especially as there is no rail link or regular bus service to the area, while trains to Hexham currently have extremely limited cycle carriage capacity. Unless visiting cyclists are cycling through the area they are more than likely to continue to arrive by car. This is one of the downsides of mountain biking centres located in remote areas. This may also apply to some of the proposed Cycle Hubs. Speed limits are often too high on links between towns and villages where direct alternative routes for cyclists are not available, and can be a deterrent to cycle touring. **South East Northumberland Public Transport Corridor** As above, (page 20) reference to the growth point should be removed until its support by the County is confirmed. In the meantime, this section would be more appropriate in the section on Improving Rail Travel as the core of the scheme is the Ashington, Blyth & Tyne Railway (Note to bullet point list on Page 74 refers) and it should include reference to the improved air quality, not just reduced carbon emissions that would result.	Paragraph 6.38 has been revised. This has been deleted. Travel options for major events should be planned by the event organiser, with assistance from the County Council were appropriate. Noted. Noted Commitment to the Growth Point has been confirmed. This scheme also includes bus links. Reference to Carbon Emissions relates to the National Transport Goal.
	Page 76 **Morpeth Northern Bypass** As funding for this scheme has not been secured and DfT have asked for a re-evaluated business case to be submitted (see Page 72) it should not be included as receiving unqualified support in LTP3. Note should be taken of the DfT Guidelines (see Page 6 above) and of the Key Challenge at Page 60, 61 above to: o Challenge long favoured road schemes, making reference only to those for which options have been developed in collaboration with housing, environmental health and other functions. In fact, this scheme illustrates the breakdown of a coordinated approach by planners, traffic managers etc. Alternative solutions based on travel planning and smarter choices as at	On 4th February 2011 the DfT announced they have moved the scheme into the Development Pool and hope to fund it subject to an acceptable business case.

	Darlington should be fully evaluated in the public domain before road building solutions are pursued, See also comments on Telford Bridge, Morpeth (Page 71). **Blyth Central Link Road** As above, (page 20) reference to the growth point should be removed. As a consequence, this scheme should be reviewed in the way noted for the Morpeth Northern Bypass, above. **A1 Improvements** No coherent case has been made for including any actions in respect of the A1 in the plan period. Indeed if the action proposed at bullet 2 were to succeed, this road would be removed from the County's sphere of influence. As noted at Page 30 above: The DfT consultation document *Promoting Connectivity between the Capital Cities of the United Kingdom; A consultation on Revising the Strategic National Transport Corridors* spells out that '*The primary effect will be to change the way in which decisions as to the priority given to future investment are made. Decisions will be made **entirely** by the Secretary of State, without the formal involvement of local stakeholders.'* Comment made at Pages 6, 14, 32, 60 and 68 also refer. **Inter-modal Freight Transport** Reference should be made to improving the rail link into the Port of Blyth	The County Council remains committed to the Growth Point. Improvements to the A1 are an aspiration of the County Council and are also included as a priority in the Economic Strategy and regional guidance which still remains relevant. Reference to rail has been added to paragraph 6.51.
	Our Priorities Page 78 The goals and objectives should be amended in accordance with the foregoing analysis. To the 'Next three years activities' should be added o Develop a walking strategy in parallel with a Rights of Way Improvement Plan. o Revise the rural road network, identifying the core routes and quiet lanes. o Implement the TAMP. And by transfer from the longer term list: o Secure approvals and funding to re-locate the Network Rail compound and provide additional car parking at Berwick railway station o Secure approvals and funding to construct a new railway station at Belford o Develop a major scheme business case for the SE Northumberland Public transport Corridor It is noted that 7 of 10 longer term objectives involve road schemes despite the recognition that over the 15 year plan, modal shift away from road transport and carbon emissions need to be reduced, and the impact of peak oil will make road transport far less economic. For these and	This section has been fully revised.

	the reasons outlined in the foregoing analysis the following schemes should be amended to require re-evaluation or deleted from the plan list: o Secure approvals and funding for the Highways Agency to deliver grade separated junction improvements to the A193 Cowpen Road Corridor o Secure approvals and funding to construct the Morpeth Northern Bypass o Develop a major scheme business case for the Blyth Central Link Road. o Continue to lobby for the A1 to be improved to dual carriageway standard o Secure approvals and funding to deliver sections of the A1 from Morpeth-Felton and Adderstone-Belford o Secure approvals and funding to deliver the remaining sections of dual carriageway on the A1.	
NCC Countryside Support	Page 68 Table – last row, final bullet point – replace "road" with **"highway"**	Amended as suggested.
	Page 75 **Improving walking and cycling for tourists** I do not understand why this section is limited to tourists or why it focuses mainly on the Glendale Gateway Trust. Should this be a more general section on improving the infrastructure for walking and cycling and encouraging uptake – cross references to the RoWIP and health strategy perhaps.	Paragraph 6.38 has been revised to include residents and reference to public rights of way.

Chapter 7 – Reducing Carbon Emissions

Cyclists Touring Club	**page 82. Travel Plans** The key priority (page 87) to *Develop a Supplementary Planning Document to ensure that travel plans for all new developments meet the approved thresholds* is welcome, and we look forward to being consulted on this. **page 82, School Travel Plans** There is a key priority (page 87) to *Provide support for schools to deliver schemes and initiatives set out in their travel plans.* What is meant by *support*? **page 83, Residential Travel Plans** New housing, including apartments, needs to be designed with provision for cycle storage. Without somewhere secure to store a cycle, residents are unlikely to consider cycling for even the shortest of journeys. There is a key priority (page 87) to *Secure funding to develop travel centres in major residential development sites.* What are the criteria for a major residential development site? **page 83. Active Travel Choices** Off-road provision is unlikely to cater for most cycle journeys so it is vital that the roads are made safer and that cycle training is provided on a much wider basis i.e. to adults. There is a key priority (page 87) to *Promote active travel choices such as walking and cycling.* Whilst we support this, this needs to be targeted on areas where very good sustainable transport options already exist. **Page 85. Low Carbon Vehicles** What about electric bikes? These provide a much cheaper transport option than electric cars and also enable exercise to be taken.	The priorities have been fully revised. This section has been revised. Support can be advice and guidance or financial support with capital projects. This is a development control issue. The priorities on page 87 have been fully revised. Noted. This section has been fully revised. The section refers to electric vehicles in the context of the regional 'Plugged in Places' project.
ONE NE	We welcome the LTPs recognition of the need to address the role of electric vehicles and charging points. More particularly we welcome the Council's intention to request that developers consider including facilities for charging electric vehicles in new development.	Noted.
Campaign for National Parks	At present the majority of visitors to the National Park are reliant on private cars to get there. People should have the opportunity, and be encouraged, to visit by public transport. We also want to see car dependency reduced for the resident population of the National Park. Successful initiatives such as the Hadrian's Wall bus service, should be extended.	Noted. The LTP promotes sustainable access to and within the National Park.

Morpeth Town Council	Relieving congestion in town centres is consistent with reducing carbon emissions. The Town Counc recommends the following: Introduction of enhancements to delivery vehicle access. eg co-ordination of shared deliveries to sho use of rail freight services for retail deliveries. Note: Tyneside operates a very successful 'shared frei strategy initiated by the Tyne and Wear Freight Partnership; Raise standards of rail and public transport so as to make these more attractive to people rather thar the car: ➢ Convenience – better timetables and frequency of services ➢ Lower costs but improved quality; ➢ Easily integrated rail and 'bus services; ➢ Provision of adequate parking for cars and cycles; Improvements to and increased maintenance of cycle routes/networks and pavements Extended parking provision for cycles in the town and places of work; More information regarding cycling and walking routes. The Town Council is happy to assist with the provision of signage, etc; Promote teleworking/homeworking; Encourage schools to promote cycling proficiency testing – and also offer a parallel scheme for adult	Noted. The measures listed are all currently promoted by the County Council.
Natural England	**Page 79 Reducing Climate Change** Climate change is likely to have fundamental impacts on the natural environment and we encourage transport policy to have an integrated approach to climate change, addressing both adaptation and mitigation measures. Extreme flooding events also cause damage to the natural environment.	Noted.
	Page 80 Please note that some of the biodiversity sites within Northumberland are being adversely affected by air quality issues, as highlighted in the SEA Environmental Report. **Weaknesses** – the current levels of walking and cycling could also be considered as a weakness.	Noted. This is referred to in Chapter 10.

	Page 81 We would welcome the LTP3 including a commitment to reducing transport carbon emissions in line with national carbon reduction targets.	This will be considered when targets and indicators are finalised.
	Page 82/87 Travel Plans/Priorities We welcome the focus on travel plans. This section could also be extended to cover the opportunity to provide visitor destination/attractions travel plans. Evidence shows that smart measures such as travel plans and personalised journey planning can be extremely effective at increasing walking, cycling and public transport uptake, and thereby cutting car use. These smart measures can however only go so far and need to work alongside other hard measures such as bus priority lanes and cycle routes. The rights of way network and green infrastructure network should be considered as part of travel planning and safe routes to school initiatives. Given the location of employment in Tyne and Wear for a number of Northumberland residents, cross boundary working with Tyne and Wear transport authorities on Travel Plans should also be encouraged. It is not clear what the Sustainable Modes of Travel Strategy is and how it relates to other strategies. It should be cross referenced in policy context sections and the evidence base.	Noted. The measures raised are currently considered as part of travel planning. Paragraph 7.15 has been extended to describe the Sustainable Modes of Travel Strategy.
	Page 83/87 Active Travel choices/priorities We welcome the commitment to continue to develop walking and cycling routes. We would recommend that these actions are supplemented by other interventions to encourage behaviour change (such as Smarter Choices work, travel planning etc) and schemes such as health walks, green exercise programmes etc, working in partnership with the health sector, and promotion and marketing of walking and cycling initiatives and routes. Further details can be found at : http://www.wfh.naturalengland.org.uk/ http://www.naturalengland.org.uk/ourwork/enjoying/health/default.aspx	Noted.
	Page 84 Travel Awareness Campaigns We welcome the proposals for travel awareness campaigns. We consider that information on sustainable transport provision should also cover access to the natural environment, as well as access to services, and should be targeted at under-represented groups in appropriate style and language. Given the travel to work patterns in the area, it would be useful to know if there are any existing or proposed links/integration/co-ordination of travel information with Tyne and Wear.	Noted. Travel for tourists is included in this section.

	Page 85/87 Adaptation Measures/Priorities The key proposed actions from the Climate Change Strategy to be delivered should be listed in this section (as in sections on bus and rail travel for consistency) . This section should recognise the opportunities the transport networks and their associated green infrastructure have to assist the natural environment in adapting to climate change. Sound design principles for new transport infrastructure and innovative management of the existing transport network and green infrastructure could achieve multiple benefits for both the natural environment and for network resilience. Transport networks and green infrastructure can provide valuable ecosystem services that assist in the management of , and adaptation to climate change (for example, carbon storage, drainage, SUDS and water conservation, and cooling urban heat islands, biodiversity role of highway verges). There is also a need to consider the effects of climate – proofing transport schemes on the natural environment. There is a need to ensure that the implementation of these measures does not reduce the ability of wildlife to adapt or impact on the character of rural footpaths (page 86 hard surfacing proposals). The impacts of climate change on the rights of way network and green infrastructure also need to be considered.	The bus and rail sections set out what the proposed strategies will consist of. The climate change strategy exists as a separate document. There is no need to duplicate it in the LTP. This has been included (paragraph 7.31)
English Heritage	Under the heading of *Key Issues* we are informed that they are arrived at by analysis of the evidence. The document contains no 'evidence' of climate change as such. I welcome the intention to encourage more movement by means other than by motorised transport, ie walking and cycling. I welcome too the intention to aid the switch from private transport to public transport.	Paragraph 7.4 has been revised. Noted.

NSP Place Shaping Partnership	P79 – Suggested rephrasing of Context **" Climate Change is one of the most pressing environmental concerns of today's society. It is a natural phenomenon whereby changes in the earth's atmospheric composition bring about a change in climate; this can take place over many tens, hundreds, thousands or millions of years. Concern over climate change has increased in recent years as scientific research suggests that human activity is exacerbating the process, causing these changes to happen on a much shorter timescale and creating changes which are causing major repercussions in the patterns of climate outside of and on top of these natural changes.** **Greenhouse gas emissions have been identified as a major cause of climate change. Whilst greenhouse gases exist naturally in the earth's atmosphere, biosphere, hydrosphere and geosphere, the actions of humans are altering the balance of these gases between these systems, which is affecting the regulation of surface temperatures and leading to a complex set of climatic changes including global warming and increased frequency of extreme weather events. Increasing levels of carbon dioxide (CO_2) in the atmosphere are considered to be the primary source of global warming. Scientists warn that unless action is taken now to reduce greenhouse gas emissions, we may set in place changes that will threaten the ability of humans and other species to continue to live on Earth.** **The Stern Review issued in 2007 emphasised the pressing need to address the environmental and economic consequences of not addressing climate change on the UK. This review identified transport as one of the market sectors where attention should be focussed since it is the fastest growing source of emissions. It is for this reason that reducing carbon emissions to tackle climate change is a key component of Northumberland's third Local Transport Plan."**	Paragraph 7.2 has been revised to include reference to "increased frequency of extreme weather events". The remaining section is considered appropriate. Suggested wording offered here is considered too wordy and detailed.
	P79 - Analysis of 'the evidence' – what evidence? Has there been an analysis of the evidence? Is there a need to frame the introduction in this way – suggest alternative **"We have identified the following key issues which need to be addressed to reduce carbon emissions in Northumberland"**	Paragraph 7.4 has been revised as suggested.

	P79 Key Issues – Extreme Flooding events needs to be moved to economic resilience chapter 6 and it would be useful if this was more generic to cover storm damage, flooding, landslides, heavy snowfall and extreme heat. Suggested wording **" Extreme weather events have already caused significant damage to local communities and transport infrastructure and the incidence of these events is predicted to increase".** Last bullet point beginning "Tourists are reliant on the private car……reputation for clean air and contributing further to CO_2 emissions.	Amended as suggested. Amended as suggested.
	P80 the SWAT on carbon emissions is good, bullet point two under strengths does appear to conflict with several of those under weaknesses. Perhaps adding 'minor incidences of air pollution' to those under weaknesses would resolve this. It could be recognised in threats that adherence to a traditional model of economic growth threatens the emergence of a low carbon economy divorced from rising carbon emissions.	Air pollution has been moved to Chapter 10 – Quality of Life, as this Chapter is specifically about Carbon Emissions.
	P81 first paragraph under deliver sustainable low carbon travel choices, last sentence… "rather than mitigating the impact". Shouldn't Northumberland's approach be two-fold? Influencing transport choices is absolutely vital but mitigating the impact of private car emissions may also have a role. For example through speed restrictions or driver training.	This sentence has been revised (para. 7.8)
	P82-85 good points included re travel planning car clubs and car sharing etc Where walking and cycling is mentioned there is no mention of mainstreaming funding to increase cycling infrastructure vis a vis similar comments re P75. This could be expanded to look a interchanges eg train stations and the facilities and ease of integrating cycling with other forms of public transport eg trains and metro. Negotiations with operators to secure more flexibility on the carriage of bicycles should be a priority to encourage modal shift. Much of what is included on P94-6 could be referenced here.	Paragraph 7.17 refers to walking and cycling infrastructure.
	P87 In the next three years/longer term. There needs to be consideration of the impact of every transport proposal in relation to its impact on carbon. It is not enough to have business as usual with 'sustainable transport' ambitions added on. We need to move Northumberland's transport provision to a state where mainstream provision is emitting much less carbon, this will require a culture shift and holistic consideration of how behaviour and provision work together. Practical and desirable low carbon and active transport options will be important for some journeys but will not be possible for everyone nor in all locations. We need to ensure that where private cars need to be used to access services or employment from rural areas, users are as quickly as possible attracted to modal change eg park and ride or free train station parking. Transport also needs to work closely with local service delivery teams (as well as planning as stated on P100) to minimise the need to travel and this could lead to innovative models of local service delivery as referenced in chapter 9.	This section has been revised.

NECTAR	**Context** Page 79 The work under this section should be given high priority as the carbon imperative, including peak oil may make some of the alternative options impractical.	Noted.
	Key Issues Page 79 These brief extracts should be changed to reflect and relate to the previous parts of the chapter, as amended by the foregoing comments. Air quality relates to nitrogen oxides, sulphur oxides, carbon monoxide and PM10 particulate levels. It is confusing to include it in a section dedicated to carbon emissions and climate change. Some careful editing and sub-editing is essential.	Air quality has been removed from this chapter.
	Page 80 **SWOT Analysis** *Strengths* Bullet 2 is incompatible with the preceding *Key Issue* bullet 2, *weakness* bullet 10 and *threats* bullet 3. Clearly there are air quality problems and they are set to get worse over the plan period. *Weaknesses* Bullets 4 & 6 are effectively the same The poor air quality at Blyth is noted at bullet 10. *Opportunities* Add: o Promote active travel o Promote smarter choices and the sustainable travel town agenda as at Darlington. o Plan and provide services to reduce the need to travel. *Threats* The threat of possible AQMA imposition is noted at bullet 3.	These have been deleted. These have been deleted. Active travel has been added to Opportunities. Reducing the need to travel is referred to in terms of Planning.

	Page 81 Reducing the need to travel is by far the most effective way of reducing transport-related carbon emissions and should be reviewed in a separate section. Again, as at Page 29, we note that carbon emissions do not include the contribution from Newcastle Airport - both flights and airport operations – which is possibly the most damaging source of carbon in the County, certainly the most damaging transport source. This omission should be rectified in the final version of LTP3. And, while not purely a transport issue, economic growth including international trade which effectively exports and increases carbon emissions elsewhere in the world instead of eliminating them runs counter to an objective to reduce carbon emissions. Business as usual is not an option.	Reducing the need to travel is set out in Chapter 9, para's 9.31 to 9.35. This is an LDF issue. The LTP cannot influence emissions from aircraft. It can help to address surface access to the airport, however, the majority of traffic arrives from the south, which is within the scope of the Tyne & Wear LTP.
	Page 82, 83 **Travel Planning** It would be useful to have a means of evaluating implementation not just the adoption of travel plans. The concept of residential travel plans is welcome. For new developments, public transport provision needs to be in place when the first residents move in not when the development is completed. Consideration should be given to extending the concept to existing residential areas.	Monitoring and evaluation of travel plans is referred to. Noted.

	Active Travel Choices Page 83 In it's study *"Improving Health in the North East through Transport Solutions"* (2009), Public Health NE promotes the concept of 'designing in active travel' eg footpaths, cycle paths through estates in new developments. There is the potential that this can clash with police-promoted 'design out crime' priorities which seek to eliminate 'cuts' and 'hidden access' to properties. These two priorities need to be assessed and incorporated into design statements and an emerging LDF Design SPD. New housing, including apartments, needs to be designed with provision for cycle storage. Without somewhere secure to store a cycle, residents are unlikely to consider cycling for even the shortest of journeys. The timing of pedestrian and toucan crossings must ensure that pedestrians take priority. **Influencing Demand** For staff to work routinely from home requires a culture shift in management, a different understanding of what work is about and managers trusting staff - which opens up a wide range of potential partners for the LTP3 within the Council itself. It's not just the technology that has to be in place.	Noted. This is an LDF issue. Noted. Noted.
	Page 84 **Sustainable Car Use** A trial scheme of excluding non-resident cars from Holy Island and operating a shuttle bus access plan for visitors should be developed as a prototype for access to other areas that are at risk from excessive tourist 'pressure'.	Noted.
	Page 85 **Low Carbon Vehicles** Electric bikes provide a much cheaper transport option than electric cars and also enable exercise to be taken. They can also be used in bike loan or hire schemes in hilly towns.	Noted.

	Page 86 **Highway infrastructure** Capital Programme to Strengthen Infrastructure It should be made clear that the flooding problem relates to short intense outbursts of rain (flash floods) as well as long periods of rainfall and that flash flooding can be exacerbated by poor design of infrastructure eg large expanses of asphalt. **Maintenance and Resurfacing of Roads** It would be helpful to include an article about the 'Highways in Winter' in successive Autumn issues of the County Magazine, together with a website reference to the full text. **Hard Surfacing** While hard surfacing for vulnerable footpaths and cycleways would be helpful, the surfacing needs to be porous enough to allow natural drainage and minimise the likelihood of flash flooding. The planting and retention on trees along footpaths, roads and in car parks can also reduce flooding risk. New schemes and refurbishments should be designed to retain and include trees.	Paragraph 7.28 amended to refer to 'intense' rainfall. Comment is not clear. Paragraph 7.30 has been revised to include the need for sensitive design and to avoid flash flooding.
	Page 87 **Our Priorities** The longer term should include reference to o Securing funding and approvals for further electrification of the railway in the County o Replacement of diesel fuelled trains with electric trains on electrified routes. o Securing funding and approvals for the introduction of electrically powered buses on town routes.	This section has been revised.
NCC Countryside Support	Page 83 Active Travel Choices – insert **"and public rights of way"** after cycle paths in line 6	Paragraph 7.17 amended as suggested.
	Page 84 2nd bullet point – add **"and more accessible"** after "improved"	List under Paragrapgh 7.19 amended as suggested.

	Page 87 Last bullet point add **"and public rights of way"** after "highway"	This section has been revised.

Chapter 8 – Safer & Healthier Travel

Cyclists Touring Club	**We welcome the following statements:** Council will continue to make the existing transport network as safe as possible by maintaining the highway to safe standard (page 91) We need to make the highway a safer place for people to walk and ride (page 92) **However we would have liked to have seen stronger statements such as:** Walking and cycling are the most effective ways of making local journeys in a healthy and sustainable way, particularly as low levels of funding in the future will mean this is a cost effective approach. Tackling the entrenched attitude to use of the private car and reducing even a proportion of the work trips by this mode has to be treated with priority (especially as Census data shows that 21% of the population of Northumberland live within 2km of their workplace).	Noted.
	page 91, Safer speeds We would support more rigorous enforcement of speed limits, along with reduced speed limits, in order to encourage more walking and cycling. **page 92, Safer Pedestrians, Cyclists and Horse Riders** 20 mph limits are an inexpensive and popular way to improve safety, cut pollution and encourage active travel. DfT Guidelines (1/06) relaxed requirements for 20 mph limits in residential areas. It is no longer mandatory to impose physical measures such as humps. Portsmouth's 20 mph limit cost just £333 per street. **Economic Impact -** Lowering urban and residential limits to 20 mph (excluding arterial roads)	Noted. Noted. 20mph zones without traffic calming are being trialled and may be rolled out across the county, subject to public consultation.

	increases the average car journey time by just 40 seconds. At 20 mph the gap between vehicles shortens, leading to improved traffic flow. **Health Improvements -** Reduced local emissions, improved air quality and increased likelihood of a shift to active modes of transport like walking or cycling. **Better Quality of Life and Reduced Inequalities -** Slower speeds benefit large numbers of non-car users, reducing noise and allowing better urban design standards for quality places. Those currently suffering the greatest inequalities tend to live nearer to busy roads and therefore benefit more from 20 mph limits. 20 mph reduces health inequalities by extending the life expectancy of disadvantaged people. This is also relevant to *Chapter 10 - Quality of Life.*	
	There is a key priority (page 97) to *Review the effectiveness of 20mph zones outside schools and roll out across the County as appropriate.* Why can't this simply be to "Roll out 20mph zones across the County"?	This section has been revised.
	page 94, Promote Walking Is a revised Rights of Way Improvement Plan being produced for LTP3 and if so will there be consultation on this? Shouldn't the implementation of the Plan be a key priority?	Rights of way are included in the list under paragraph 8.36.
	page 95, Promote Cycling The document refers to "cycleways" in several places. *Cycle Infrastructure Design (LTN 2/08)* does not refer to such, but only to cycle tracks (off- provision) and cycle lanes (on-road provision). A cycleway is normally a named route e.g. Hadrian's Cycleway, which has both on and off-road provision. To avoid confusion it would be appreciated is the following changes could be made: page 31 last sentence. Change to: The majority of local **cycle route** networks are in the south east …. page 64 … 6th bullet. Change to: Maintenance of footways and cycle **tracks** ….. page 70 Transport Asset Management, end of 1st para. Change to: … structures, footways and **cycle tracks** … page 86 Change title to Hard Surfacing and Improved Drainage on Footpaths and **Cycle Tracks** 2nd line, change to ... on key footpaths and **cycle tracks** …. The Implementation Plan, page 5, does refer to cycle tracks (under maintenance). If there is a reluctance to use the word cycle track, cycle path is acceptable, as already used on page 83.	Changes made as suggested.
	The principles of the new Northumberland Cycling Strategy listed are acceptable, and we look forward to commenting on the new Strategy sooner rather than later. In the meantime we would add the following.	

	Most cycle journeys will continue to be made on the road as this provides the most extensive network of routes that are direct and available at all times of the day and in all weathers. The emphasis should be to provide a cycle friendly road environment, which is safe and comfortable for cycling, rather than a limited network of cycle routes. When catering for cyclists the first option should be reducing the number of motor vehicles on the roads and the speed of these, followed by junction treatment and redistribution of carriageway space. Cycle lanes can also help and are popular, but if designed badly they can be a source of danger and conflict. Off-road infrastructure should be to a high quality and well maintained but should not be seen as an alternative to addressing the problems for cyclists on the road. Roadside footway conversions do NOT create suitable conditions for cycling unless built to a high standard. They generate conflict with pedestrians and encourage antagonism towards those who continue to cycle on the road. Many off-road cycle routes are isolated and unlit. All facilities for cyclists must be designed and built to best practice guidance e.g. cycle lanes 1.5m min wide, kerbs fully flush; cycle parking stands correctly spaced and positioned. There is no excuse for getting it wrong, and then having to go back and re-do work at additional cost, or leaving cyclists with a poor facility. It's often not new cycling infrastructure that is needed for utility journeys but (1) a commitment to the Hierarchy of Road Users i.e. pedestrians, followed by cyclists then public transport in order to make the roads safer for all users and (2) upgrading the existing provision. As cycling to towns and villages increases, so does the need for secure cycle parking. Many Council run multi-storey car parks have secure parking awards and there should be a commitment to providing cycle stands and luggage lockers in such even if it means removing car parking spaces. Operators of privately run multi-storey car parks should also be encouraged to provide such. New developments currently fail to provide high quality cycle parking and this needs to be rectified. As well as major office developments and supermarkets, this also applies to smaller developments e.g. hotels, garden centres, farm shops and visitor attractions. These smaller developments tend to have tea rooms and toilet facilities and provide welcome stops for touring cyclists. Over the last few	

	years we have highlighted the need for such when commenting on numerous planning applications, but there is still reluctance from planners to take on board the cycle parking standards in the current Cycling Strategy. This needs to be rectified quickly, possibly by including the standards in a statutory planning document. The actual risk of cycling is tiny compared with the 50,000 people killed annually by heart disease, and the health benefits of cycling outweigh the risks involved by around 20:1. *Increasing Personal Safety and Security* (page 103) is relevant as the more people cycling the safer cycling becomes. This is a major reason for investing in cycling, and cycle training. We are very pleased to see the key priority (page 97) to *Secure funding to deliver Bikeability cycle training.* It must also be remembered that cycling is not a specialist activity for the very fit and that the young, the elderly and those with disabilities can also benefit from cycling. On page 102, *Increasing Accessibility for the Mobility Impaired,* mention is made of public transport and on foot. However, many mobility impaired people can cycle, but off-road routes need to be designed without access controls in order to accommodate tandems, tricycles and other adapted cycles. Constant stopping, or worse still having to dismount, prevents them from using purpose built facilities. Under key priorities for the next 3 years, cycling is mentioned on page 97, *Provide the facilities for and encourage cycling (Safer and Healthier travel)* page 104, *Develop a core network of walking and cycling routes (Improving Access to Services)* Will a three year plan of detailed proposals be included in the Cycling Strategy?	
British Horse Society	The danger faced by horse riders forced to use roads because of a lack of suitable alternatives is not made clear. Horse riding accidents are not included in the table 3.4. The dangers faced by vulnerable road users, including horse riders, should be tackled in a more proactive manner.	The number of horse riding accidents is too low to be included. Road safety improvements are tackled proactively, through the Local Safety Schemes Programme, using accident data.
Morpeth Town Council	Morpeth Town Council would encourage the introduction of: Civil parking enforcement; Cycling proficiency testing, for both children and adults – and also driving re-training opportunities for drivers;	Noted. The County Council is progressing an application for CPE. Cycle training and road safety education is currently carried out in schools.

	More use of Road Crossing Patrol Management for schoolchildren, etc. Encourage road safety awareness in schools, such as the 'Tufty Club'; Discourage the "dropping-off" of schoolchildren by encouraging the use of school transport. ***(Note: Northumberland County Council should bear in mind the great benefit of school transport when considering Budget cuts, especially in the light of the abolition of the Educational Maintenance Allowance);*** Pedestrian-activated crossings; Implementation of previously-requested traffic management and road safety programmes for the Back Riggs 'Bus Station; A 20 mph speed limit within the town centre and included in all traffic calming measures; Promotion of active travel as a means of reducing the risk of obesity and respiratory-related diseases Installation of points at filling stations and car parks for use by electric car owners and also for electric *Velo Cycles.* The Town Council would like to see a pilot trial of the 'Shared Space Principle' as an effective way of managing safe interaction between pedestrians, cyclists and motorised transport	This is too detailed to be included in the LTP strategy document, but can be considered for the Integrated Transport Programme. Noted. This can be considered for inclusion in the Integrated Transport Programme if it is a community priority.
Natural England	**Page 88 Key Issues** This should also include any safety issues on public transport, walking and cycling routes	There are no significant safety problems on these routes.
	Page 89 Travel planning initiatives should be an opportunity not a threat!	Amended as suggested.
	Page 90 Whilst disadvantaged areas may be an initial priority for increasing walking and cycling levels, the overall approach to encouraging active travel through walking and cycling should be County wide.	Reference to disadvantage areas removed from paragraph 8.4
	Page 92 Safer Pedestrians, Cyclists and Horse Riders Delivery of the Rights of Way Improvement Plan and Green Infrastructure Strategy should also be identified as actions within the LTP.	Rights of Way have been added to paragraph 8.19. The Green Infrastructure Strategy is still at a very early draft stage.
	Page 93 Driver training can also provide education about efficient driving techniques that can also help to reduce carbon emissions. Active modes of travel are not necessarily only appropriate for short journeys, specific routes are available for long distance travel for tourism and recreational purposes such as the National Trails, the National Cycle Network, and coastal access routes. It is important that high standards of management and maintenance are retained on such routes.	This has been added to paragraph 8.22 Paragraph 8.23 has been amended - removing the statement that active travel is only appropriate for short journeys.
	Page 93/94 We welcome the existing schemes described which help to deliver walking and cycling routes in the growth point area. Their links to and contributions to the delivery of the South East	The Green Infrastructure Strategy is currently being drafted.

	Northumberland Green Infrastructure Strategy should be made clear.	
	Page 94/Page 95/Page 97 Promote Walking/Cycling/Priorities We welcome recognition of the need to promote walking and cycling in the LTP , however consider that the role of the rights of way network and green infrastructure network as an integral part of the sustainable transport network has not been properly recognised and integrated into the LTP3 as a whole. Whilst welcoming recognition that rights of way provide access to the countryside, that is only one element of their functions and role. The plan should also recognise the role of the Northumberland local access forum as an opportunity for partnership working on access issues and to advise further on local transport plan and ROWIP integration.	Public rights of way have been added to this section.
	LTP3 also needs to recognise the role of multi functional green infrastructure and the emerging Northumberland Green Infrastructure strategy. Multi functional green infrastructure can deliver a range of benefits for the natural environment and local communities, including health and recreation, climate change adaptation, flood alleviation and water management, sustainable transport and biodiversity. A green infrastructure network of existing and new RoW, quiet lanes and greenways, and other green spaces and corridors provides an essential framework for an effective non motorised transport network threading through an urban area, linking homes for schools, places of employment, recreational areas and the countryside.	The Green Infrastructure is currently being drafted.
	We welcome the development of a Cycling Strategy for the County as part of the LTP3 and proposed actions. This complements the proposals for a Rail and Bus Strategy in the LTP3. It also provides a clear case that as a minimum actions from and linkages to the ROWIP should be clearly integrated within the LTP3, and if required a more comprehensive Walking Strategy should be produced.	Noted.
	We welcome the commitments to continue to provide improvements to the facilities and routes for and promote walking and cycling. A package of measures should include also encourage behaviour change (such as Smarter Choices work, travel planning etc) and schemes such as health walks, green exercise programmes etc, working in partnership with the health sector, and promotion and marketing of walking and cycling initiatives and routes. Further details can be found at : http://www.wfh.naturalengland.org.uk/ http://www.naturalengland.org.uk/ourwork/enjoying/health/default.aspx	Noted.

English Heritage	Slower travel speeds improve safety but also assist with carbon reduction targets.	Noted.
NSP Place Shaping Partnership	P88 Key issues – Safety on rural roads for pedestrians (as well as the drivers) is a serious issue in some areas of the county where roads are narrow and twisty.	This is not borne out by the casualty figures. In the last three years 33 pedestrians were injured on roads with speed limits higher than 40 mph. Therefore slightly over 10 per year. On all roads we are presently averaging about 100 injuries per year for pedestrians.
	P90-91 – many of the safer driving initiatives and driver training also support carbon reduction and vice versa, the two agendas could be used to mutually support each other.	This has been added to paragraph 8.22
	P97 – it is appreciated that capital investment for the cycling infrastructure provision is unlikely to be available in the next three years but development work towards the identification of a core cycle infrastructure could be included such that when funding opportunities do materialise in the future there are proposals ready to develop.	This section has been revised.
NECTAR	***Chapter 8 Safer and Healthier Travel*** **Context** Page 88 The second paragraph should include visitors as well as residents *' … encouraging residents and visitors alike to use modes …'.*	Paragraph 8.2 amended as suggested.
	It would be useful if the second paragraph contained county statistics on obesogenic, cardiopulmonary and respiratory diseases, all of which can be alleviated by active travel modes. Data should be readily available from Northumberland InfoNet.	Paragraph 8.2 has been expanded to include health information.
	Key Issues These brief extracts should be changed to reflect and relate to the previous parts of the chapter, as amended by the foregoing comments. The second bullet would be less ambiguous and more consistent in presentation were it to start with 'Reducing'.	'Reducing' added as suggested.
	Inclusion of statistics, in absolute as well as relative terms, for each of the bullet points – not just the one referring to motorcyclists – would enable a better assessment of relative priorities. This may be important in identifying partner organisations and using limited resources most effectively.	Roads safety statistics are discussed in Chapter 3.

	Page 89 **SWOT Analysis** *Weaknesses* Add o Actual road dangers in rural villages including inconsistent speed limits and unmanaged traffic. *Opportunities* Add: o Extend pedestrian zones and shared spaces. o Extended pedestrian priority at signal controlled crossings. o Implementation of right of way improvements. *Threats* o Extensive incidence of the pavement-parking scourge. o High incidence of mobile phone use when driving	Data shows the majority of accidents are on roads with a speed limit of 50mph or greater. The section refers to improving rights of way and development of walking and cycling networks, which can include the solutions suggested. There is no evidence that pavement parking is a safety issue. Roadside parking often slows down traffic.
	Strategy for Safer and Healthier Travel Goals and Objectives Page 90 This section must be revised in accordance with the foregoing analysis. Specifically, Objective bullet 1 must be revised to read: o Improve safety of the *road and active travel* network, particularly for vulnerable road users. Under Objective 1 it should be noted that the adoption of Civil Parking Enforcement is intended to curb pavement parking and reduce (un)loading in restricted areas. This will improve the safety of pedestrians not only because they will be able to keep to the pavements, but also because the condition of the pavements themselves will remain less hazardous. Overall it should be noted that safer and healthier travel demands that priority be given to pedestrians not vehicles.	The distinction is not considered necessary. The term 'transport network' is all inclusive. The County Council has not yet decided whether it wishes to proceed with an application for CPE.
	Page 91 **Safer drivers** Reference in this section should be made to County-wide campaigns to eliminate the scourge of pavement parking and the dangerous practice of driving whilst using a hand-held telephone. **Safer Infrastructure**	There are no current plans to run a campaign about pavement parking.

	Engineering measures to prevent pavement parking should be mentioned in this section. **Safer Speeds** The aspiration to create 'free flowing traffic' and faster traffic flows stated at various points in this draft is in conflict with the weakness noted on Page 89 *'High traffic volumes and speeds particularly in urban areas causing community severance … '.* The protection of people should always be of higher priority than journey time achieved. This can be partially resolved by amending objectives relating to 'free flowing traffic' to refer instead to 'unobstructed traffic' as suggested at Page 69 above. The concept of the 'open realm' or shared space approach allowing free intermixing of pedestrians, cars etc was discussed in stakeholder focus groups. The County should pursue a pilot scheme in a suitable local community at an early stage in the implementation of LTP3.	Measures to prevent parking would be implemented in response to a specific problem if justified. The term 'free flowing' has been removed as suggested. Shared space schemes can be included in the Integrated Transport Programme in response to an identified issue.
	Page 92 **Safer Motorcycling** In view of the unsafe record of motorcyclists, it is perverse of the County to promote motor cycling to increase accessibility and reduce carbon emissions; the price is too high. It should be made clear in this section that the safety schemes are contributed simply to support those who choose to travel by this high-risk mode. **Safer Pedestrians…** We note that DfT Guidelines (1/06) relaxed the previous requirements for 20 mph limits in residential areas. It is no longer mandatory to introduce physical measures such as humps. Slower speeds benefit large numbers of non-car users, reducing noise and allowing better urban design standards for quality places, benefiting quality of life for everyone (Chapter 10, below). Those currently suffering the greatest inequalities tend to live nearer to busy roads and therefore benefit more from 20 mph limits; 20 mph reduces health inequalities by extending the life expectancy of disadvantaged people.	This section is in line with the Governments Motorcycling Strategy, which states that motorcycling has benefits for accessibility, congestion, affordability and emissions. It seeks to facilitate motorcycling as a choice of travel. 20mph zones without traffic calming are being trialled and may be rolled out across the county, subject to public consultation.
	Page 93 **Deliver the Sustrans' Connect2 Project** While the Connect2 scheme is welcome, it is disappointing that the County is limiting funding to a scheme affecting only a couple of communities. Support should be sought from tourism and public health (soon to be part of the County Council) sources for cross-sector joint-funded schemes promoting cycling across the County.	LTP funding is used for cycling schemes across the county. The County Council works with partners, such as Sustrans, to deliver cycling infrastructure.

	Page 95 It is presumed that the first line reference should be to the *third* LTP. The list of bullet points should be extended to include: o Extend the number and scope of designated pedestrian, shared space and traffic free zones in towns and villages o Consolidate the walking initiatives into a County Walking Strategy to ensure the overall goals and objectives of LTP3 are met (See also Page 75, 78). The walking strategy should be developed in conjunction with the Rights of Way Improvement Plan and published separately for public consultation.	First sentence has been amended (paragraph 8.36). Pedestrian/shared space schemes can be considered for inclusion in the Integrated Transport Programme if they are a community priority. The need for a walking strategy will be considered.
	Page 97 **Our priorities** Amend Objective 1 as at page 90 above In the 'Next three years' list; Amend bullet 10 by deleting 'and confidence'; many motorcyclists are killed because they were too confident. Add: o Deliver a County walking strategy to ensure the overall goals and objectives of LTP3 are met (See also Page 75, 78). 17. Deliver the County cycling strategy noted on Page 95	This section has been revised.
NCC Countryside Support	Page 89 Weaknesses – last bullet point add **"and public rights of way"** after "local road"	Amended as suggested.
	Page 89 Opportunities – 2nd last bullet point add **",maintenance and improvement"** after "Development" Insert new bullet point **"Improving the accessibility of the rights of way network"**	Amended as suggested.
	Page 90 Add to the end of the 2nd sentence **"..utilising the public rights of way network and other promoted cycle routes"**	Paragraph 8.4 amended as suggested.
	Page 94 Promote Walking – 3rd paragraph insert **", improvements to public rights of way"**	Paragraph 8.34 amended as suggested.

	Page 95 1st sentence replace "second" with **"third"** 2nd bullet point – add **"and with young children"** after "disabilities" 5th bullet point – add **"and public rights of way"** after "networks" 6th bullet point – amend to **"Ensuring that adopted footways and public rights of way are adequately maintained"** 7th bullet point – amend to **"Improving accessibility of the public rights of way network for all"**	Amended as suggested.
	Page 97 Insert a bullet point above "Provide the facilities for and encourage walking which says **"Continue to implement the RoWIP Action Plan"**	This section has been revised.

Chapter 9 – Improving Access to Services

NCC Regeneration	**Page 103** NCC's Commercial Strategy will have an impact particularly with regards to new ways and models of service delivery.	The Commercial Strategy is concerned with procurement.

Morpeth Town Council	Three of the elements of the IMD (access to services, health, income levels) should be treated separ and not merged as this obscures specific issues. Community and secondary travel should are not only required for remote, rural areas in the County: t are outlying estates and nearby small settlements in Morpeth where there are inadequate bus service this facility is needed, too. The proposed Northumberland County Council – Morpeth Town Council tr 'shared taxi service' is potentially a good pilot for this sort of provision in market towns - and will be a asset for town centre access from some of the outlying locations of residential estates; Reasonable costs for public transport; Junction improvements, as previously specified; Increased and enhanced public transport services (both 'bus and rail) to: ▪ Theatres etc in Newcastle, especially in the evenings; ▪ Train station improvements as specified in the LTP draft are strongly supported by the Town Realtime information should be made available for 'bus and rail travel within the next three ye note that Tynedale already has this in place; ▪ Cemeteries; ▪ The Mount Integrated Health Centre and the New Care Centre at Cramlington (if the latter go ahead). In addition to the above, adequate linked transport facilities should also be available.	This will be considered as part of the LTP refresh. This section refers to 'rural' areas. Small settlements near towns are considered 'rural'. The need for community transport is assessed according to the criteria set out in the Joint Community Transport Strategy. The cost of public transport is a commercial decision made by the operator. The County Council is working with operators to improve bus and rail services. Real time information is being progressed.
Natural England	**Page 98 Context** There should also be equal access to the natural environment and recreational opportunities. **SWOT analysis** Any accessibility issues/barriers to use of walking and cycling routes should also be identified such as missing links, safety concerns etc Threat - Deterioration in condition of walking and cycling networks too.	Recreation has been added to paragraph 9.1 Public rights of way issues have been added to the SWOT Table.
	Page 100 There should also be a focus on increasing access to services through the use of cycling and walking routes.	This is referred to in paragraph 9.8.

	Page 102 Welcome improvements to travel information.	Noted.
	Page 103 Provision of multi functional green infrastructure can also support sustainable transport objectives in new developments such as South East Northumberland and the SW Sector Cramlington, through provision of walking and cycling routes.	Walking & cycling has been added to paragraph 9.32
	Page 104 Welcome priorities identified.	Noted.
NSP Place Shaping Partnership	Chapter 9 access to services is very good, but many of the actions suggestions are not reflected throughout the other chapters in a holistic fashion.	Noted.
	We welcome the explicit statement that private car ownership cannot be assumed.	Noted.
NECTAR	***Chapter 9 Improving access to services*** **Context** Page 98 'Rurality' has been adopted by some councils as a 7th element of their Equality & Diversity Policy Exclusion and isolation are two different things – they can be better distinguished by separating out the access and income themes from the combined IMD data A new model for integrated service provision is needed – it may be that the Big Society model or its derivatives may help here. Certainly the County 'localism' agenda especially through Street Scene could contribute. **Key Issues** These brief extracts should be changed to reflect and relate to the previous parts of the chapter, as amended by the foregoing comments.	This will be considered during the LTP refresh.

	Page 99 **SWOT Analysis** *Strengths* Add to built 1 '… and community transport'. *Weaknesses* o Amend bullet 2 to 'Rural isolation within the County' *Opportunities* Add: o Increase decentralisation of services, supplement with mobile services and facilities	Community transport is in bullet 2. Amended as suggested. This is included in bullet 7 "Reducing the need to travel…."
	Page 99 Strategy for improving Access to Services 'Other organisations' should include school transport, post-buses, NHS transport, mobile libraries etc as well as community transport and community car clubs or pools or travel plans and taxi companies. The primary objective should be to make access easier through decentralisation measures.	The current wording is inclusive. It is not necessary to list every organisation.
	Page 100 The emphasis on access to leisure facilities and evening or weekend travel is a significant improvement in County policy and should carry through into all aspects of transport policy.	Noted.
	Page 101 It is vital that this section sets out clearly the cost of car travel, rather than implying yet again that car travel is cheaper than public transport. As noted above (Pages 38 & 39): When projecting comments about the cost of bus travel the reference cost should be based on the mileage allowance that the County pays for the use of private cars on its business. This would work out at some £15 or more per day for the Blyth/Ashington Newcastle journey cited on Page 38, which would seem to be significantly more than the bus fares quoted of £3 to £4 per day (5 day week) without any allowance for parking charges (journey to work statistics show that typically only the driver travels in the car).	Paragraphs 9.16 to 9.19 discuss the cost of public transport in terms of those who do not have a car. There is no implication that car travel is cheaper.

	Our Priorities Page 104 In the 'Next three years' list; Add new bullet point o Achieve a significant improvement in the decentralisation of services and provision of mobile facilities. o Amend bullet 10 to include reference to: Parish Plans or other existing Community Planning exercises to advance the development of local accessibility action plans *In the longer term* list o Amend second bullet to read "… are served by local bus services provided before the first development is occupied…" Add new bullet: ▪ Give planning priority to developments that are within walking distance of or include key service facilities.	This section has been revised.

Chapter 10 – Quality of Life

Natural England	**Page 61 Quality of Life /Page 105 Chapter 10** **Healthy Natural Environment** A clear objective for protecting and enhancing the 'Healthy Natural Environment' should be included as part of the Quality of Life objective (see earlier comments), key issues identified and supporting text provided in Chapter 10. Clear actions relating to transport and the natural environment should be included on Page 106. In relation to biodiversity and landscape, local authorities have a duty to have regard to the conservation of biodiversity in exercising their functions and to have regard to the purposes of AONBs when making decisions or carrying out activities that affect land within these areas. Protection of the natural environment is important for the local economy, and in particular tourism. In progressing transport proposals, consideration needs to be given to potential impacts on the landscape character, biodiversity, geodiversity, soils, the coast and green infrastructure (along with air and noise pollution (loss of tranquillity) as well as impacts on the townscape (locality or streetscape). There is a need to ensure the highest level of protection for designated landscapes, habitats, sites and species. Policies and decisions about major transport proposals should safeguard important natural assets. Transport schemes should not only avoid and reduce impacts on the natural environment but also consider/provide opportunities for enhancement such as habitat restoration and creation schemes. Schemes should seek net environmental gain from necessary transport development whilst avoiding, mitigating or compensating for negative impacts. There are positive opportunities for creative design to improve the environmental performance of existing and new transport infrastructure in all landscapes – for example 'green' bridges and tunnels to reduce habitat fragmentation and the removal, reduction or better design of signs and lighting, environmentally friendly roadside verge management etc. There is a need for the plan to address any adverse transport impacts on nationally important landscapes including the North Pennines AONB, Northumberland Coast AONB and Heritage Coast, and Northumberland National Park and protected sites including SAC/SPA/Ramsar and SSSI. We advise that in particular, National Parks, AONBs and Heritage Coasts need environmentally sustainable, integrated and well designed transport networks both within and to these areas, that cater for both residents and visitors and in turn should become exemplars of such networks. This requires strategic planning, involvement of all key partners and long term investment to aid delivery. Our LTP3 guidance provides further details: **Natural England Guidance note on Local Transport Plans and the Natural Environment.** **http://www.naturalengland.org.uk/Images/local-trans-plans_tcm6-15159.pdf** The SEA Report should provide further evidence as to the key issues which should be included within the Strategy. (Page 106)	This chapter has been revised to include the natural environment and a new objective (*Protect the natural environment, heritage and landscape)*, has been added.

	Page 105 Chapter 10 See earlier main comments. Suggest amend the term ' widespread natural environment and rolling landscapes ' with a high quality natural environment including National Park, and two AONBs and a diversity of landscape character ranging from uplands, river valleys, agricultural and urban landscapes, to the coast.	Paragraph 10.1 has been revised. To include this.
English Heritage	Quality of life can be adversely affected by poorly conceived and executed transport related schemes which show little respect for the character and appearance of their locality. Where schemes are likely to have an effect upon the historic environment and any associated heritage assets appropriate in-house conservation, design, and archaeological advice should be sought, as well as the views of those who might be directly affected. English Heritage advice is also available by visiting www.helm.org.uk where you will find information on, for example, reducing the impact of transport schemes on historic landscapes, reducing street clutter, and historic surfaces.	Chapter 10 has been revised to include this issue.
NECTAR	***Chapter 10 Quality of Life*** **Context** Page 105 Specific reference should be made in paragraph 3 to extending the number and scope of designated pedestrian, shared space and traffic free zones in towns and villages	Reference to removing vehicular traffic has been added to paragraph 10.4. This can include shared space schemes where appropriate.
	Page 106 **Key Issues** These brief extracts should be changed to reflect and relate to the previous parts of the chapter, as amended by the foregoing comments. **Strategy for Quality of Life** Add new bullet points o Ensuring that residents and visitors alike have sustainable access to the attractions of the County o Developing a culture through shared spaces, pedestrian priority, traffic free zones and similar measures that ensure 'people take precedence'. o Recognising that the quality of life in Northumberland is a major contributor to the visitor economy and ensuring transport provision, management and control protects the 'goose that lays the golden eggs'	Chapter 10 has been revised and includes the issues referred to.

NCC Planning Strategy	The document ends abruptly. The final chapter on Quality of Life seems to end before exploring in any detail on how the objective is to be achieved. It is understood that this is likely to mean a significant policy shift regarding design of urban highways; this needs to be expanded in line with the previous chapters which address each of the goals.	Chapter 10 has been revised.

Implementation Programme

NCC Regeneration	**Delivery – structures and funding** • The LTP should be clear about the new structures for sub-national working, namely through the network of LEPs, and the new channels of funding, including Regional Growth Fund. • Further consideration could be given to communication, within and additional to these processes, which may facilitate utilisation and maintenance of Northumberland's transport network whilst at the same time enabling growth of key sectors. • Is Northumberland CC seeking to maximise the funding drawn into the county through Government-lead or other initiatives (e.g. the Community Transport Association's Local Transport Development Fund)?	The Implementation Plan has been fully revised. Regional Growth Fund is included under "Available Funding".
NSP Place Shaping Partnership	Draft Implementation Plan – core comment would be that the proportionality of funding allocated does not reflect the goals and ambitions stated in the LTP. Given that this may be a product of block grant and other funding regulations and the new Local Sustainable Transport fund might provide new opportunities to balance the funding, if the range of ambitions in the LTP are to be delivered, it will be important that internal decisions over funding allocations over which there is control, reflect the diversity of priorities identified and not just capital road expansion schemes.	The Implementation Plan has been fully revised to more accurately reflect the LTP strategy.

NECTAR	**Draft Implementation Plan** The draft Implementation Plan appears not to be readily available as part of the public consultation. However, it is essential that the expenditure profile in the Implementation Plan be linked transparently to the priorities set out in the finally agreed 'Transport Strategy for Northumberland'. In stark contrast to this requirement, the funding levels indicated in Tables 3.1 and 3.2 of the Draft implementation Plan suggest an expenditure pattern that is diametrically opposed to the rhetoric, challenges and 'Our Priorities' identified in the Strategy. While we recognise that the absolute level of funding is not yet known, the relative proportions of the provisional allocations suggest 'business as usual', which is recognised in the Strategy as not being a viable option. The allocation of just 0.5% of the capital budget to rights of way is nowhere near adequate to encourage walking at the levels aspired to, even if part of the road network budget were allocated to a review of the network as suggested. Similarly just 17% of the integrated transport budget is allocated to active travel, with a mere 2.2% allocated to walking. A review of the distribution of funding across the priority needs established in the Strategy has consequently become an urgent necessity.	The Implementation Plan has been fully revised and more accurately reflects the LTP strategy. Allocations for public rights of way, walking and cycling have been increased.
NCC Planning Strategy	The LTP is presented as two documents as recommended in national guidance: the Strategy; and the Implementation Plan. There is concern regarding the level of detail given in the Implementation Plan which is intended to show the short term (3 year programme) priorities. There is virtually no detail in the Implementation Plan in terms of a programme of works or interventions/investment to be funded through LTP monies or other sources. The short term priorities are set out in some detail in the Strategy document under each of the Goal chapters. It would perhaps be more appropriate to set out potential or aspirational actions in the Strategy and identify a delivery programme in the Implementation Plan (in as much detail as is available bearing in mind funding uncertainties).	The Implementation Plan has been fully revised. The short term priorities set out in the draft LTP strategy under each goal chapter have also been revised and do not include specific schemes.
	The Implementation Plan should also identify potential future funding sources in addition to transport related funds, for example opportunities will arise from the New Homes Bonus and the Community Infrastructure Levy if the council adopts that approach to securing developer contributions.	The Implementation Plan has been fully revised.

	Finally, the Implementation Plan Delivery Programme (Chapter 3) sets out some indicative funding for different types of scheme. There is concern that, whilst walking and cycling is probably the cheapest and healthiest change in transport mode likely to be made by people for short journeys, the funding attributed to walking schemes is limited to only £50,000 per year for the next 3 years. Given the Strategy's focus on achieving healthy travel options and reducing congestion etc, a key opportunity may be lost here to demonstrate commitment to provide key improvements to footpath networks particularly in the urban areas. The funding commitment to cycling schemes (£1m over 3 years) should be supported, but there is concern that this is a diminishing budget showing year by year reduction of at least £100,000. This does not demonstrate commitment to mode shift. The budget bias in this case appears to be in favour of rail and bus schemes which have an increasing budget over the 3 year period (which together comes to approx £2.4m). If these budgets are to be included, they should be project-specific and should be identified through a transparent selection process based on established priorities for financial intervention. In the same way, given limited resources, there is concern that general funds appear to have been included for the categories of Traffic management, local road network, and miscellaneous – all of which benefit from £100,000 per year. There should be no need for what appear as 'slush funds' for transport schemes provided clear priorities for investment are established – this is the purpose of the LTP in relation to investment decisions being made based on the Strategy set out in LTP; it should be a clearly defined programme and Table 3.2 of the document does not give that impression.	The Implementation Plan has been fully revised. Funding for walking and cycling has been increased. 'Slush funds' have been removed.

General Comments

Highways Agency	A clear link should be established between the spatial planning and transport planning process to ensure that development is located in the most sustainable locations in the first place. Evidence from spatial planning should be used to inform the LTP3 strategy. Future development sites should be facilitated so as not to impact detrimentally on the strategic road network.	References to the LDF are included in paragraphs 2.30 to 2.35. Reducing the need to travel through the planning process is discussed in paragraphs 9.31 to 9.35, including reference to the role of the LDF.
	There is a strong connection between Northumberland and Tyne & Wear. Full consideration should be given to the traffic impact of policies on the links between the two, particularly on the strategic road network.	The County Council has worked with the Tyne & Wear LTP Team to address this issue.
ONE NE	The agency welcomes the weight given to port related activity in the document, including NaREC.	Noted.
Natural England	We welcome the overall strategic approach in the LTP3 with its focus on delivering the national transport goals at local level and a commitment to reducing carbon emissions.	Noted.

	However we are concerned that the need to deliver the national goal of promoting a healthy natural environment is not clearly defined and carried through to the local level, and we would like to see objectives or policies to protect and enhance the natural environment included in the final Plan.	A new objective: *"Minimise the impact of transport on the natural environment, heritage and landscape"* has been added. Chapter 10 has been updated to reflect this.
	We are also concerned that the role of the public rights of way network and green infrastructure network are rarely considered within the draft Plan. These are an important part of an integrated, environmentally sustainable transport system for Northumberland, and should be expanded upon in the final Plan.	The role of public rights of way has been added throughout the LTP. The Green Infrastructure Strategy is currently being drafted.
Banks Group	There is a great opportunity for the Council to work with private sector developers to 'lever in' funds for infrastructure which would otherwise go un-provided. For example, the Morpeth bypass could be part funded by new housing development.	Noted.
	We strongly support the proposal to focus short term funding on increasing capacity on Cowpen Road, Blyth, and Battleship Wharf in Cambois.	Noted.
English Heritage	The document reads as being thorough and workmanlike in its coverage of the various transport related matters affecting the county, but it fails for all that to convince the reader that it signals a fundamental shift in delivery in response to the very pressing need to tackle overarching climate change and sustainability issues. Although the Sustainable Community Strategy (SCS) and the Core Strategy are referenced in the Plan, I do not get a clear sense that LTP3 is intrinsically linked to, and is an unequivocal response to, the social, economic, environmental and spatial imperatives of those documents. This may be a consequence of the fact that (although recently updated) the SCS is nevertheless somewhat skeletal in form and the Core Strategy is not yet sufficiently progressed for its key messages to inform other plans and programmes. I believe more needs to be done to make the Plan more positive and directional in relation to climate change and sustainability. More could also be done to reinforce the relationship between transport interventions and the quality of the built, historic, and natural environment of the county.	The LTP has been updated to reflect the latest position regarding the SCS and LDF. The LTP will be revised when the SCS has been adopted. The sections on climate change have been revised following stakeholder comments. The natural & historic environment has been referred to throughout the LTP, particularly in Chapter 10.
Northumberland Tourism	Our main comments would be around the apparent lack of reference to recent (2009) Market Town Welcome visitor surveys which clearly identify that traffic congestion and management issues are at the forefront of visitor concerns in our key attractor towns. During the LTP development / evidence stage, this information was provided, and Northumberland Tourism is happy to provide this evidence again in order to ensure that it remains a high priority for the County Council and its partners.	Market Town Welcome Surveys are now referred to in paragraphs 3.9 and 3.53 and in Table 5.1
	The other significant issue relates to the potential conflict of trying to balance a desire to increase sustainable transport with an equal desire to grow the visitor economy. It needs to be recognised	Recognition of this fact has been added to paragraphs 3.9 and 3.53 and Table 5.1

	that detailed research shows that the visitors we do – and want to – attract tend to prefer the independence that car use brings. We can do work to encourage more sustainable travel, however we must take care that projects and programmes which support the growth of the visitor economy (such as new developments in rural areas away from economically viable public transport routes) are not prevented from meeting the market requirements.	
NSP Place Shaping Partnership	The Place Shaping Partnership welcomes the preparation of the LTP3 particularly in terms of the role defined for considering spatial planning and transport provision, delivering economic prosperity and the references made to carbon reduction and climate change adaptation. The overall impression of the plan is that each chapter is focussed and methodical in serving the interests it outlines which it does quite well but, as a whole the plan does not work in unison, with various elements acting in opposition to others. In going forwards there will be significant challenges to overcome in resolving these potential conflicts which will require a cultural change in its delivery as well as important opportunities for complimentary agendas to re-enforce each other. These challenges and opportunities are not currently well articulated in the plan which does not sufficiently relate to the vision and flavour set out in the Sustainable Community Strategy.	The conflict between some of the transport goals is recognised. These goals are set by the Government and the LTP must respond to them. The conflict between economic growth and reducing carbon emissions is addressed by amending economic growth to "Sustainable economic growth" as in the Economic Strategy. The LTP supports the Economic Strategy's priority to develop a low carbon economy. The section on the SCS has been updated to reflect the latest draft. The LTP will be revised following the adoption of the new SCS.
	There does not appear to be a golden thread between the LTP and the Sustainable Community Strategy, which as the Tier 1 Strategy for the County should provide the strategic guide for specific areas of policy development. English Heritage have already provided input to this effect and we would like to echo these comments here.	The section on the SCS has been updated to reflect the latest draft. The LTP will be revised following the adoption of the new SCS.
	Adherence to the drive for 'Economic Growth' and subsequent use of the term throughout the document causes direct conflict with principles of sustainability and with the need to reduce carbon emissions. Economic prosperity and equality of economic opportunity are important issues and we would suggest that the term "Economic Prosperity" better reflects the emphasis of both the Sustainable Community Strategy "Rebalancing our prosperity" and Economic Strategy "diverse and balanced economy" be used throughout the document instead of 'economic growth' to reflect this. Other authorities have similarly identified alternative terms to that of 'economic growth' in recognition of the inability to conduct a business as usual approach - examples include: Economic Regeneration (Nottingham), Sustainable Economic Growth (Hartlepool) and so we believe this to be an acceptable interpretation of the governments key priorities. The subtle difference that this	Throughout the LTP, economic growth has been changed to "sustainable economic growth". This is in line with the Economic Strategy.

	wording implies is outlined in more depth in the Sustainable Development Commission's Prosperity without Growth (2009).	
	Climate change adaptation is not about reducing carbon emissions. Both adaptation and mitigation are really important issues but Climate Change Adaptation is primarily about business resilience. The transport networks in Northumberland are vulnerable to the effects of extreme weather and in order to safeguard the community livlihoods and business prosperity of the county it is essential that the transport infrastructure of the county is made resilient to the predicted changes in climate. The potential for climate change to have a major impact on the country's transport networks is recognised in the Climate Change Act (2008) which gives the Government the power to direct reporting authorities (public sector bodies and statutory undertakers) to report to Parliament on the predicted impacts of climate change on their organisation and their proposals for adapting to build resilience to the identified risks. Although local authorities are exempt from this requirement, a number of selected transport operators and organisations such as Network rail and the Highways Agency have been asked to report by January 2012 Transport is also a key theme for the government's own national climate change risk assessment, whose findings will also be available by January 2012. Local transport authorities now have a duty under the Local Transport Act 2008 to have regard to government policies and guidance on climate change adaptation. This feeds through to the preparation of Local Transport Plans. The current guidance states that: "*it is important that local authorities put in place measures to improve the resilience of local transport to the impacts of climate change, such as flooding and the deterioration of roads, in line with the Government's Adapting to Climate Change Programme"* To reflect this it is strongly recommended that references to adaptation should be separated out from Chapter 7 and included in Chapter 6 instead.	Climate change adaptation has been moved to Chapter 6. This is also in line with Government Guidance.
	It is recommended that the important comments made at last Place shaping Partnership Meeting about changing directions for freight especially in the biomass industry is considered. This resonates particularly with the text under local transport links about rural forestry and agriculture. This is an important point being raised by members of the industries involved and it is important for the LTP3 to incorporate sufficient flexibility to respond to these changes in the direction and volume of freight movements as the changing patterns may run contrary to existing functional road hierarchy definitions and the expected maintenance etc that is allocated to each route.	The potential changes to freight movements have been added at paragraphs 3.40 (and subsequent emerging challenges), and 6.39
	There is also some concern among partners that issues of rural deprivation are not captured fully enough. The document acknowledges low incomes in rural areas and increased costs of travel and later refers to rural areas as being more expensive and less affordable. However, it doesn't pick up	The LTP recognises that there are deprived areas outside the south east of the county, (Table 3.1 and para 3.17). The

	the issue around inadequate thermal comfort, off gas mains and increased fuel bills which compound the lower incomes and increased journeys to work- all in all making it more expensive to live in rural areas and having less disposable income. Although recognised that this is not directly a transport issue, it will impact on the transport choices that people can make in rural areas and the (sometimes different) service needs required in a number of complex ways. The way transport and travel planning responds to this can contribute to objectives on health and well being and quality of life etc.	cost of fuel is an issue which can affect everyone across the county.
	It is suggested that the document should recognise the effect of complex road junctions and infrastructure on the quality and character of place. Some recent developments in the county have changed the character of settlements often giving a much more standard and generic urban feel. It is therefore requested that the document makes stronger reference to the importance of quality of place and provides a policy steer to require assessment of the impact of new transport infrastructure upgrades on quality of place.	This issue is addressed in Chapter 10 – Quality of Life.
	It is important to ensure that the strategy operates as a whole. At present different parts of the document do not sufficiently reflect priorities and actions identified in other chapters and so there is a need to be careful not to speak of one goal whilst undermining it with other actions in the plan. An example here is concentration on road expansion in respect of both carbon reduction and access to services but this is common to a number of themes throughout the report.	The wording of the LTP is to be reviewed to ensure that any contradictions are removed. Road schemes will be reviewed to ensure they are fully justified.
	There is a strong dominance of road-based transport in the first half of the report. An example is the list of key issues arising from the consultation listed in the bullet points on p9 are all road based. This may well have been the case but this should not be accepted at face value, questions arise such as 1) were sufficient questions/prompts asked in relation to other forms of transport 2) what is the role of LTP3 in culture change away from dependence on the private car if this is truly reflective of the only transport priorities in the county.	These were the main issues that arose from the Issues Paper consultation. Further issues have arisen from this consultation on the draft LTP.
	There are contradictions within the report for example despite the identification that congestion and air quality is not a serious problem in Northumberland and the ambition of achieving multi-modal change, much of the rhetoric in the text is focussed on justifying road improvements based on addressing congestion and air quality. Granted there are some future scoping concerns here, but there are a number of ways to resolve these concerns, close attention to the evidence base and full range of options is essential.	Congestion is a problem at some points on the network and this is forecast to increase. Road improvements are only advocated where they are necessary to help achieve the LTP and wider objectives. For example, the Economic Strategy promotes a number of road improvements to benefit the local economy.
	Regarding the structure of the report, the division between chapters 3 and 4 appears muddly and chapter 4 is not sufficiently future scoped. It would seem be preferable to combine chapters 3 and 4	Chapter 4 will be reviewed and the possibility of merging with chapter 3

	to state existing statistics and then how this is forecast to change directly after each factor. There could also be much more interpretation following this as to what challenges this will pose for transport and travel needs even if the possible responses are left to the options section. A good example of this is given on P25 in relation to age distribution (third paragraph). There is scope for a section at the end of P54 to provide understanding of projected climate impacts for future proofing and there is the offer of consultancy support from UKCIP to do this (paid for without cost to Transport Team).	considered. UKCIP will be reviewing the LTP.
	If we are to move to a more sustainable transport system, a certain level of inconvenience to private car usage whether through congestion, traffic calming measures, tolls or parking charges will be essential to the behaviour change process. Although unpopular this will be necessary in changing peoples' transport decisions. This is not addressed in the plan.	Measures such as traffic calming are implemented in response to specific concerns such as road safety, and not simply as a way of influencing travel decisions.
	In the next three years/longer term. There needs to be consideration of the impact of every transport proposal in relation to its impact on carbon. It is not enough to have business as usual with 'sustainable transport' ambitions added on. We need to move Northumberland's transport provision to a state where mainstream provision is emitting much less carbon, this will require a culture shift and holistic consideration of how behaviour and provision work together. Practical and desirable low carbon and active transport options will be important for some journeys but will not be possible for everyone nor in all locations. We need to ensure that where private cars need to be used to access services or employment from rural areas, users are as quickly as possible attracted to modal change eg park and ride or transport interchange free parking. Transport also needs to work closely with local service delivery teams (as well as planning as stated on P100) to minimise the need to travel and this could lead to innovative models of local service delivery as referenced in chapter 9. We welcome this suggestion but stress that this needs to be reflected throughout the whole plan not just chapter 9.	The sections at the end of each Chapter in Part 2, (Our Priorities) have been revised.
NECTAR	In accordance with established government policy, the terms economic growth and economic development used on this page and throughout the document should be prefaced by 'sustainable'.	"Sustainable" has been added to this term throughout the LTP.
	As a concluding paragraph LTP3 should be signed up to by a wide range of partners, who can help contribute to delivery by realigning their own funding and objectives appropriately. Specifically in the context of the ongoing spending review, LTP3 should recognise that the County should not be solely responsible for delivery of travel improvements, still less the County Highways department.	Noted.
NCC Planning Strategy	The document is much shorter and more concise than LTP2. However, this does not necessarily make it easier to read and digest or to comment on. The document generally would benefit from being laid out as numbered paragraphs which would give a simple means of commenting on	Paragraphs are now numbered and the format of headings, objectives, etc has been improved.

	individual statements in the LTP. This approach would also benefit users of the document in future when it is adopted and used to inform relevant decision making and plan preparation where evidence can be linked back to specific statements, objectives or actions identified in LTP3. The layout and presentation, particularly of Part Two, is very important in directing the reader to the purpose of the policy contained in the LTP. Essentially there are five goals and nine objectives. The document should be revised to clearly set these goals and objectives as obvious headings – the objectives in particular, despite being in bold text, appear to be lost in the text at times.	
	The document should adopt common terminology throughout. It should be decided whether this document is to be called 'LTP3' or 'the third LTP'. References should be amended throughout to reflect the decision.	The document is referred to as the "LTP" as it will be the current strategy.
	Reference is made particularly in part one of the LTP to various documents which inform the context for transport planning in Northumberland – in particular other local strategy documents. It would help to have these fully referenced in a bibliography, as footnotes or in the text and it would further help to include hyperlinks to the documents where available.	This is to be added.
	The document presents a number of statistics. These all need to be properly referenced by setting out their source and preferably giving a link to their source document. The County Council is adopting a common statistical source accessed through the Local Knowledge website. This source should be used in preparing the LTP.	References are to be added.
	The document is prepared having regard to an evidence base. Where this is referred to it is done in generic terms. It would be helpful to have direct links to the appropriate part of the evidence base when this is being used to justify some course of action through LTP3. Statements such as *"the evidence base has demonstrated that….."* would be more convincing if linked clearly to the relevant part of the evidence base.	A link to the Evidence Base is to be added.
	Reference is made to how the document has been prepared following stakeholder engagement. It is not clear at all how that engagement activity has been undertaken or where the results are to justify any particular course of action. There has been no clear and direct engagement with the council's Planning Strategy Service.	The section on engagement in Chapter 1 will be updated for the final document.
	There are concerns that the tone of the document is unnecessarily negative in parts in that it presents a number of issues as seemingly huge problems – ageing population; poor public transport access due to rurality; lack of local jobs leading to out-commuting to Tyneside; and traffic congestion causing problems for drivers and public transport. Whilst the LTP needs to highlight issues, it could be done in a more positive manner that recognises deliverable solutions where issues have been identified through the evidence base rather than appearing to dwell on problems.	The wording of the 'emerging challenges' will be reviewed.
	In general terms Planning Strategy supports the preparation of the LTP as a means of informing the preparation of the LDF. The Goals and Objectives as they are set out in LTP3 should also be	Noted.

	supported, subject to several detailed comments set out in the accompanying schedule. The Goals and Objectives are all appropriate and relevant, but, as indicated above, would benefit from greater clarity of expression/presentation.	
	There are a number of references within the LTP which relate to climate change and the move towards a low carbon economy, including the commitment to carbon reduction targets through the Covenant of Mayors. However, there is no reference to the Low Emission Strategy ('Low Emission Strategies: Using the planning system to reduce transport emissions'), a Good Practice Guidance document adopted by Defra and published in January 2010. The implications of this document should be considered in the preparation of the LTP.	This document was not published when the draft LTP was being prepared. It will be considered during the LTP refresh.
	Key Priority Schemes We were asked to provide a list of transport schemes that we thought were priorities for the council (in terms of delivering or influencing the spatial strategy). The following are key to delivering the existing and emerging spatial strategy: • Morpeth Northern Bypass – this will have the effect of opening up land for long term future residential and employment development which will deliver housing and employment growth for the town and will help in addressing capacity issues for transport through the town centre. Should consider the possibility of securing a phased development of the road link starting with a new junction to the A1 at Fairmoor, then completion of the link from Fairmoor to Whorral Bank; • Ashington Town Centre SPD (2010) sets out a framework for redevelopment in the town centre. This is to be delivered partly through revisions to the transport network by constructing a new road (Reiverdale Road) to link Woodhorn Road with Rotary Parkway to the eastern edge of the town centre. Other public realm improvements could flow from this including further pedestrianisation, revisions to public transport routes through the town centre and the creation of a new bus station/terminus; • Improvements to the A19/A189 junctions – specifically at Seaton Burn and Moor Farm. These are needed to provide greater capacity to allow development at Cramlington – including the south west sector; new hospital; and employment development at West Hartford and in and adjacent to the town centre; • Reopening of the Ashington Blyth & Tyne railway line – a long standing aspiration which could deliver significant public transport accessibility improvements from south east Northumberland into Tyneside (and provide access to jobs in Northumberland from Tyneside; • Dualling of the A1 north of Morpeth – long standing ambition to improve connectivity	These priorities are all included in the LTP.

	through the county on the main trunk road to improve economic competitiveness and to address road safety issues; ▪ The extension and improvement of safe cycling links within south east Northumberland should be encouraged, to link the main towns and to link residential areas with town centres and employment sites.	