

Transport & Development Supplementary Planning Document Transport & Development Supplementary Planning Document Consultation

1. Introduction

This Supplementary Planning Document (SPD) defines and outlines Bath & North East Somerset (B&NES) Council's approach and expectations for developments in relation Walking and Cycling, Parking Standards, Ultra Low Emission Vehicles (ULEV) and Travel Plans.

SPDs build upon policies in an adopted Local Plan and provide more detailed guidance and advice for developers on application of policies. This SPD is a material consideration in the determination of planning applications.

1.1. Climate and Nature Emergency

B&NES Council declared a Climate Emergency in March 2019 in recognition that 'business as usual' is not an option in relation to the impacts of climate change and that the Council and all its partners need to review all existing strategies and plans to re-align to the Climate Emergency.

B&NES Council also declared an Ecological Emergency in July 2019, in response to the escalating threat to wildlife and ecosystems. The declaration recognises the essential role nature plays in society and the economy and provides a statement of intent to protect wildlife and habitats, enabling residents to benefit from a green, nature rich environment.

B&NES Council's Corporate Strategy includes the core policy to tackle the Climate and Ecological Emergencies, and this shapes all decisions made by the Council. The Climate and Ecological Emergencies are a major influence on the vision, objectives, standards, and guidance contained in this Transport & Development SPD.

The Climate and Ecological Emergencies commit the Council to providing the leadership to enable B&NES to achieve carbon neutrality by 2030. The Council recognises the scale and speed of ambition needed to achieve this target and has defined three immediate priorities for action for the B&NES area including "a major shift to mass transport, walking and cycling to reduce transport emissions." We are targeting a 25% reduction in vehicle mileage per person and a shift in the types of vehicles in B&NES to comprise 76% ULEV and 14% hybrid vehicles. Only 10% of vehicles can be powered by petrol and diesel, i.e., Internal Combustion Engine (ICE). This SPD has a key role in supporting this agenda.

1.3 Summary

1.3.1 Transport:

- Promotes modal shift to public transport. Low emissions vehicles (LEV). Cycling and walking.
- Notes that this area is a destination for leisure and recreation
- All types of new development would have to have improved lev charging provision.
- Parking space requirements on new dwellings reduced.
- Offers no enhanced public transport for the CV.

1.3.2 Nature:

- Notes area includes valuable habitat and ANOB.
- No mention of improving habitat or conversation measures.
- Lighting provisions for cycling and walking routes might impact dark skies initiatives.

- No mention of light spill mitigation on new developments.

1.3.3 Home Energy:

- Not mentioned existing standards remain unchanged

1.3.4. Sustainable Generation sites:

- Notes there are sites in the planning process.
- Each commercial development to be considered on a case-by-case basis. No change from current status.

1.4 Conclusion.

The proposed measures in total and across B&NEs are helpful in moving toward net zero carbon by 2030. However, "net" is the key and effort, and resources will be directed to urban areas where the biggest carbon reduction can be achieved for £ spent.

This will result in rural areas being disadvantaged as we will not benefit from green initiatives. It therefore seems unlikely that this SPD will deliver carbon neutrality in these rural areas by 2030.

2. Overview of B&NES

B&NES is a richly varied District stretching from the edge of Bristol, south into the Mendip Hills and east to the southern Cotswold Hills and Wiltshire border. It covers a total area of 570 km² and is home to about 178,000 people.

For the purposes of the SPD, it has been split into four primary areas Bath, Somer Valley, Keynsham, and Rural Areas

Over 90% of the district's land area is rural, with forty-seven rural parishes. – Almost a third of the district lies within the Cotswolds and Mendip Hills AONBs. – Smaller settlements are located in the Chew Valley to the west of the district. The Chew Valley lakes are popular leisure destinations for walking and cycling

3. Walking and Cycling

3.1 Vision

Safe, resilient, and universally inclusive walking and cycling infrastructure that enables mass uptake of active travel, has a positive impact on tackling the Climate and Ecological Emergency, supports health and wellbeing, and reflects local needs.

- To develop a high quality, attractive, safe, and integrated network of walking and cycling infrastructure
- Ensure new cycle and pedestrian paths link with existing and wider networks, integrating communities.
- Ensure safety both in terms of road safety and crash reduction, and personal security, is considered throughout the design process. Ensure public realm elements (e.g., benches, bins, public art) and green spaces are incorporated alongside new and upgraded walking routes where possible.
- Deliver secure cycle parking and storage facilities.
- Ensure signage and other way-finding infrastructure is high quality, fit for purpose and sympathetic to local surroundings.

- Ensure fairer access to road space for all users.
- Safeguard, enhance and extend existing cycle routes & Public Rights of Way.

3.2 Objectives and Outcomes

Breaking down barriers to active travel and establish inclusive walking and cycling provision for all users. Barriers include personal safety, topography, distance, availability of cycle parking, access for adapted bikes and other traffic.

Implement wayfinding / signage that helps highlight how easy it is to travel to certain destinations by foot or bike e.g., time to destination to indicate proximity.

Safe, resilient, and universally inclusive walking and cycling infrastructure that enables mass uptake of active travel, has a positive impact on tackling the Climate and Ecological Emergency, supports health and wellbeing, and reflects local needs. Creation of new routes needs to carefully consider habitat loss

Safeguard historic elements whilst ensuring there is no prejudice to providing innovative walking and cycling solutions.

Journey experiences which are enhanced through an integrated and connected transport network.

The impact of the transport network on the built, natural, and historic environment is minimised and / or mitigated. There will need to be joint working with a range of disciplines. This will need to ensure that walking and cycling solutions are delivered and that all issues are considered and proactively addressed in as integrated a way as possible.

Support Climate Emergency priorities by enabling low carbon mobility and reducing harmful impacts of transport on the natural and built environment.

Support and promote measures which reduce the levels of traffic pollution in the interests of improving health and quality of life.

Incorporate green solutions into design.

Reduce dependency on the private car.

5 Deliver a step change in the number of healthy, low carbon walking and cycling trips.

Provide a well-connected sustainable transport network that offers greater, realistic travel choice and makes walking and cycling and the natural way to travel.

Support a broad range of trips, including journeys to work. Trips into and within B&NES will be seamless, faster, cheaper, cleaner, and safer.

Enable residents and visitors to B&NES to improve their health and wellbeing through walking and cycling.

Create better places by delivering development which prioritises the needs of pedestrians and cyclists and enhances the quality of the natural and built environment.

Better health and wellbeing for residents from increased physical activity.

Closer communities supported by quieter, safer streets.

Using natural solutions to minimise impacts of climate change and build in climate resilience.

Fairer access to road space by all users.

Better walking and cycling infrastructure, with more people walking or cycling their short journeys.

3.3 Points of Note.

Para 3.3.3 identified some “flagship strategic routes” these were all Bath centric.

Para 3.3.4 detailed some findings from the TravelWest Travel to Work Survey 2020 reported that

53% of respondents travelled to work by car. By comparison, a Chew Valley survey recently showed 85% of their survey respondents travelled to work by car due to insufficient public transport options.

Para 3.3.5 stated that in rural areas 50% to 60% of pupil journeys **to school** were made by active travel. Sixth form pupil travel to Chew Valley School is 54% by school bus, with 37% using private transport always and an additional 5% sometimes. No student cycles all the time as there is no safe cycle route from most of the villages. Many students struggle to travel to Bristol and Bath as there are no transport services running East to West to take them to the main arterial routes on the A37 & A38. This also prevents them travelling by bus to friends in nearby villages. In the absence of reliable public transport, much sixth form travel falls to parental lifts or young people driving themselves once they are able.

Para 3.4 Looks at issues and opportunities but does not include “lack of provision” as an issue.

Para 3.7.12 Policy ST7 Policy D8 is concerned with planning safe routes and says “lighting should be provided in dark or unlit areas. While we must recognise that while safety for users is paramount it should be balanced with sympathetic consideration for habitats and dark skies.

Para 3.9.1 States “The promotion and delivery of quality cycling infrastructure is a key mechanism in enabling active travel growth. Reinforcement of this statement is provided within LTN 1/20, (Local Transport Note) which states that “we will need to see significant increases in cycling in our cities and towns, and everywhere else. To achieve that, the quality of cycling infrastructure must sharply improve, with the inclusion of properly protected bike lanes, cycle-safe junctions and interventions for low traffic streets to encourage people to cycle.” Para 3.9.3 acknowledges that much of B&NES is rural where there are varying speed limits and adds this as another thing to be considered by developers.

Para 3.9.8 Again with reference to LT1/20 it states that modal interchange points for cycling to other forms of transport should have secure parking.

4. Parking Standards.

4.1, Vision

The overall purpose of this section of the SPD is to set out the parking standards for new residential and non-residential development. The parking policy outlined contributes towards meeting the Council’s environmental targets as well as providing other benefits for the district by:

- Enabling a reduction in vehicle usage, achieved by reducing the convenience of private vehicles in comparison with active travel (i.e., walking and cycling) or public transport, whilst not compromising mobility for disabled persons. This will improve air quality, health and congestion whilst reducing carbon and nitrogen oxide emissions. It will also provide the opportunity to reallocate road space to sustainable transport infrastructure and Green Infrastructure (GI) to the benefit of climate, ecology and health and wellbeing across the district.
- – Creating better places, with less emphasis given over to the parking of private vehicles on street and roads. This will support the provision of GI, social spaces, and sustainable transport infrastructure. This can be achieved with clever design principles, enabling a reduction in the proportion of space allocated to cars and parking, along with measures to enable to reduction in car ownership and usage. A combination of which, could provide the ideal situations for car-free developments.
- – Avoiding haphazard, informal, or inconsiderate parking behaviours and its associated effects (for example, parking on footways as a result of excess demand for on-street parking supply) by providing sufficient parking to promote sustainable travel, controlling on-street parking where appropriate and enabling travel behaviour change.
- Enhancing the accessibility of development sites by raising awareness of the potential improvements to sustainable travel modes that can lead to an increase in walking, cycling

and public transport use in B&NES.

4.2 Climate & Ecological Emergencies

The principles of the parking standards are aligned with the B&NES Council Corporate Strategy objectives to tackle the Climate and Ecological Emergency and to achieve a net zero carbon emissions by 2030 by reducing car usage.

Existing levels of congestion within the district impact on journey times and result in higher carbon and other harmful emissions, which lead to poor air quality, as well as having negative impacts on health and well-being of residents. At present transport contributes 29% of total emissions within the district. B&NES therefore considers that there remains a “clear and compelling case,” in line with the National Planning Policy Framework (NPPF), to use parking standards as a policy lever to positively address these issues throughout the district.

4.3 Points of Note

Para 4.2.7 notes that “most rural areas are typically only served by relatively limited and infrequent public transport provisions.”

Section 4.5 Defines Parking Standard Zones. Rural areas are Zone D with the following characteristics, “small villages or scattered individual buildings. Very few local facilities are available within walking or cycling distance, and often no local facilities within walking distance. There is a prominent level of reliance on private car ownership. Motorised travel is therefore required for most journeys. Public transport services are infrequent or beyond reasonable walking distance. There is no shortage of land for parking provision, but the adjacent highway system offers limited opportunities to park cars due to the highway conditions.”

Section 4.3 Defines the Parking Policy Objectives as “creating better places, supports Climate Emergency commitments by enabling low carbon mobility, improving health and wellbeing and reduces the impact of vehicle usage and storage on our built and natural environment, whilst helping to address inequalities across the district.

Table 4.7 Shows that Chew Valley South has the equal highest level in B&NES of use of the private car as the predominant mode of transport. Chew Valley North is in the top five.

Paras 4.7.3 to 4.7.10 defines Parking standards for Schools and School Streets. This would only impact on our area if a development of an existing school or a new school was constructed

Section 4.10 Defines parking standards for new developments by type of land use. Table C.3 on page 66 define parking standards for Dwellings.

5 Ultra Low Emission Vehicles

5.1 Vision

Air quality and sustainability are key planning considerations. Driven by the National Planning Policy Framework (NPPF), planning policies and decisions are expected to deliver continued improvements for local air quality and sustainable development.

Adoption of a ULEV guidance within the SPD introduces progressive measures to make a positive contribution to air quality and provide other socio-economic benefits across the B&NES District.

It outlines a strategy for determining the provision of charging infrastructure for new residential and business developments

It supports the uptake of ULEV through smart planning and deployment of ULEV infrastructure for sustainable benefit and to deliver:

- Air Quality improvements, by reducing hazardous pollutants originating from road vehicles that have severe impacts on resident’s health.

- Reduction in carbon emissions at the tailpipe and lower the region's contribution to climate change, a
- Opportunities for local economic development, through job creation, reduced transportation costs, increased disposable income for residents as well as advancing the image of B&NES.

5.3. Points of Note.

. Para 5.3.2. States that provision of ULEV infrastructure must be seen in the context of wider objectives to reduce vehicle usage overall and is not intended to promote ULEV over other sustainable forms of transport such as walking, cycling or public transport.

Para 5.6.6 States a minimum 7 kW active and passive provision for both residential and non-residential buildings is required. Some early home installations are 3.6 kW charge points, however, today the majority of the installations are 7 kW and expected increases in battery sizes and technology developments could make charge points less than 7 kW obsolete for future car models

Para 5.6.12 States that provision of ULEV infrastructure could put pressure on local supply capacities. However, unless the cost of providing the additional capacity is "prohibitively unreasonable additional cost for the development."

Para 5.6.16 Supports the sharing of charging hubs between new developments.

Para 5.6.17 Recognises that electric car clubs provide an excellent accessible means to low emission transport but goes on to state in Para 5.6.19 will be "generally located in urban or town centres."

Para 5.6.21 States that ULEV charging infrastructure needs to be available at: Destination Parking, Residential Parking, Transit Locations, Workplaces, Taxi Ranks and Car Clubs.

Para 5.6.32 States affordable homes will have to meet same standards as other housing.

Para 5.9.3. States Non-Residential Developments undergoing major changes will need to comply with ULEV Parking requirements.

Table 5.1 on page 109 shows the ULEV Charging Standards for Residential Development. All plans for ULEV Charging Points will need to be submitted and approved prior to commencement of above ground works.

Table 5.2 page 110 shows the ULEV Charging Standards for Non-Residential Development.

6.Travel Plan Guidance

6.1. Scope

This guidance applies to all development that generates a significant level of travel demand, such as:

- New residential developments.
- New employment development.
- Educational premises; and
- Infrastructure interchanges such as rail stations or transport hubs.

The guidance sets out:

- What a Travel Plan is and what benefits it can deliver, including the several types of Travel Plans.
- When a Travel Plan will be required in conjunction with a planning application.
- What the Travel Plan should include.
- The different Travel Plan delivery options for applicants or developers.

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6.2 How Travel Plans can be secured, monitored, and enforced.

Requirements change over time; therefore, this guidance will be reviewed on a regular basis to ensure that it remains current.

6.3 What is a Travel Plan?

Travel Plans are an essential management tool which deliver sustainable access for an organisation or development site, regardless of the use. They have been defined as “a long-term management strategy for an occupier or site that seeks to deliver sustainable transport objectives through positive action and is articulated in a document that is regularly reviewed.” Travel Plans are not merely a means to gain planning permission, but instead a dynamic process for managing access and improving choices that continues for the life of the development, requiring ongoing commitment from developers and occupiers.

6.4. Why Travel Plans?

When positively prepared and implemented, Travel Plans can provide a wide variety of benefits for developers, occupiers, and communities. These include:

- Encouraging sustainable travel.
- Lessening traffic generation and its detrimental impacts.
- Reducing carbon emissions and the associated impacts on climate change and health of residents.
- Creating accessible, connected, inclusive communities.
- Improving health and wellbeing outcomes and quality of life
- Improving road safety; and
- Reducing the need for new development to increase existing road capacity or provide new roads

6.5 Travel Plans Guidance

This section of the Transport & Development Supplementary Planning Document (SPD) explains the Council’s requirements for Travel Plans, ensuring that developments across the area support sustainable transport and minimise negative impacts.

This guidance applies to all development that generates a significant level of travel demand, such as:

- New residential developments.
- New employment development.
- Educational premises; and
- Infrastructure interchanges such as rail stations or transport hubs.

The guidance sets out:

- What a Travel Plan is and what benefits it can deliver, including the several types of Travel Plans
- When a Travel Plan will be required in conjunction with a planning application.
- What the Travel Plan should include.
- The different Travel Plan delivery options for applicants or developers; and
- How Travel Plans can be secured, monitored, and enforced.

It is acknowledged that best practice and requirements change over time, therefore this guidance will be reviewed on a regular basis to ensure that it remains current.

6.6 Points of Note

Para 6.1.2, States that Travel Plans will apply to all significant developments

Para 6.4.4. There are distinct levels of Travel Plans depending on the scale of the development the thresholds are shown in Table 6.1.

Para 6.7.1. states Travel Plans should define desired travel outcomes, and 6.7.2, states that there should be a costed action plan to show how those outcomes will be met.

Para 6.7.13. States that the Travel Plan should also consider legacy planning to allow for continuation by voluntary bodies or community bodies on completion of the plan.

Figure 6.2 on page 119 shows a flowchart for the Travel Plans process.

As a final point, Stowey Sutton Parish Council would like to highlight the way that the proposed policies, particularly transport, discriminate against & disadvantage rural residents, whilst B&NES acknowledge the lack of alternatives to private car usage for rural residents it makes no provision for such people traveling to urban centres for work, shopping or leisure, requiring use of either expensive (& now by policy reduced) car parking or park & ride facilities, significantly disadvantaging such travellers both in financial and time costs, it could be argued that a reduction in rural rateable values is needed to offset such costs.

There is no indication that this policy has received an equality test to ensure no discrimination, and ensure the policy is equitable. Currently this policy proposal appears discriminatory and inequitable towards rural residents.