

APPENDIX 2

Transport & Development Supplementary Planning Document: Consultation Statement

1. Introduction

This Consultation Report has been prepared to document the consultation process for the emerging Bath & North East Somerset (B&NES) Transport and Development Supplementary Planning Document (SPD). It provides details of the consultation process, details of those responding, a review of the quantitative and qualitative responses received, and areas for review and potential update to the SPD.

This Report follows a presentation and briefing given to Members of the LDF Steering Committee in February 2022 to provide a high level summary of the consultation outcomes, and to receive comments on the proposed way forwards.

2. The Consultation Process

A public consultation exercise was undertaken in Summer 2021 alongside the consultation on the Local Plan Partial Update (LPPU). The T&D SPD covers the following topic areas:

- Walking and cycling;
- Ultra-Low Emissions Vehicles (ULEV);
- Travel Plans; and
- Parking.

The public consultation exercise included a questionnaire which asked people's views on key aspects of the SPD, both in the form of discrete questions (quantitative), and free text comment boxes (qualitative) for each topic area. Additionally, we have received written submissions which have been reviewed alongside the questionnaire responses.

3. Characteristics of the Respondents

Just under 200 individuals or organisations responded to the online questionnaire, with feedback being generally positive. The majority of respondents (85) were local residents with no specific additional interest. Over 60 respondents had an interest in either transport or the environment, and/or were a member of a related group. Fewer than 10 respondents declared themselves as either developers or built environment professionals (e.g. architects).

4. Review of Quantitative Answers

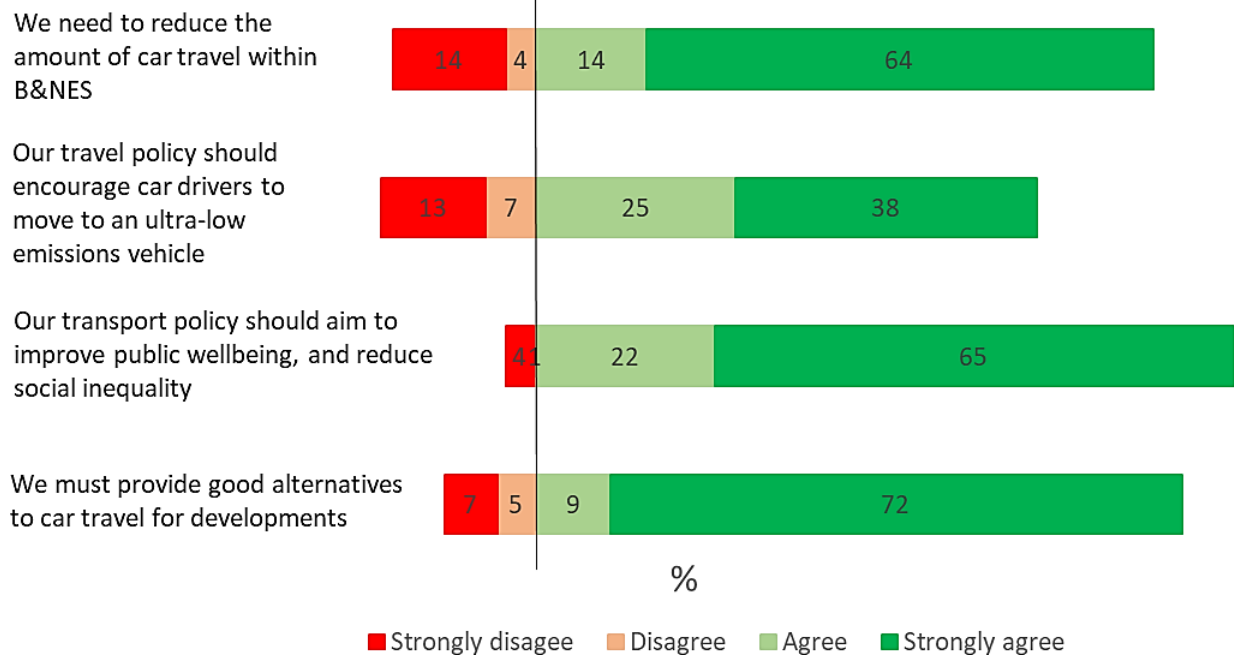
General

A number of general questions on transport policy were asked. Figure 1 sets out the responses which shows that:

- 78% agree we need to reduce car travel in B&NES;
- 63% agree we should encourage ULEVs;
- 87% agree we should aim to improve public wellbeing and reduce social inequality; and
- 81% agree we must provide good alternatives to car travel for new developments.

Overall the responses are considered to show that there is strong "in principle" support for the overarching aims of the transport update to the LPPU and this T&D SPD.

Figure 1 - General Transport Policy Question Responses



Walking and Cycling

Responses in relation to walking and cycling are presented in Figure 2. This indicates that more people disagree than agree that recent developments in B&NES have provided good active travel facilities, suggesting that there is scope for improvement. There is strong support for developments providing walking and cycling routes to key destinations, both within and outside of the development boundaries. 69% agree that developers should prioritise active travel over cars, whilst 24% disagree. 89% agree that walking facilities should be accessible to all (pushchairs, mobility aids etc.) 71% agree that cycling facilities should be accessible to all types (e-scooters, adapted cycles, trailers etc.)

Figure 2 – Walking and Cycling Question Responses

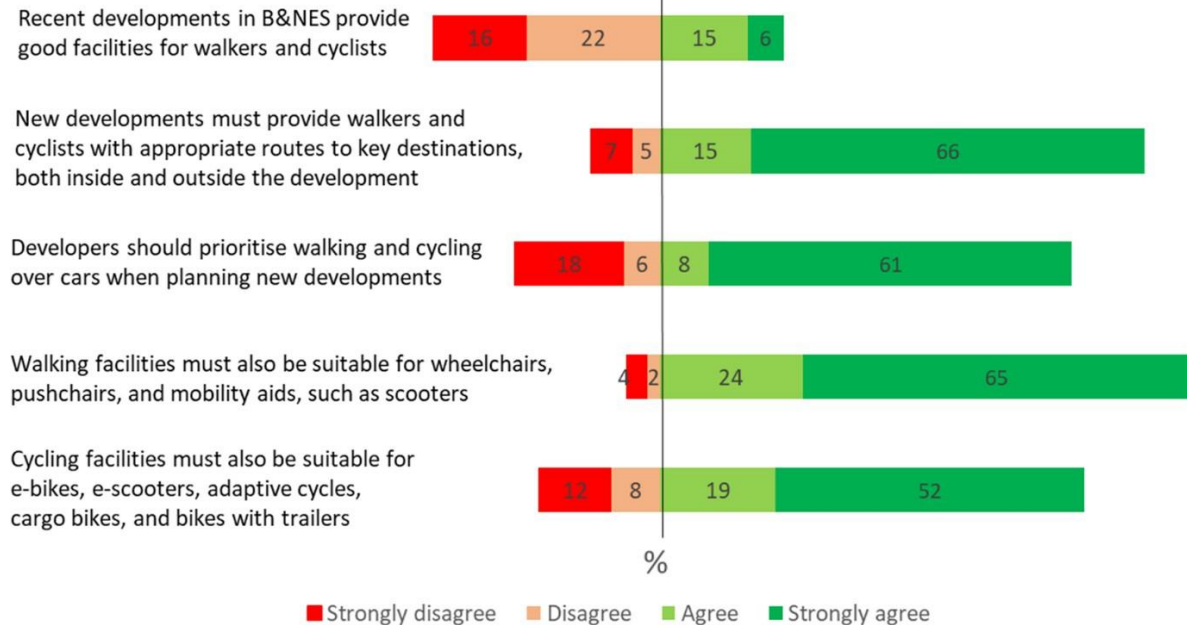
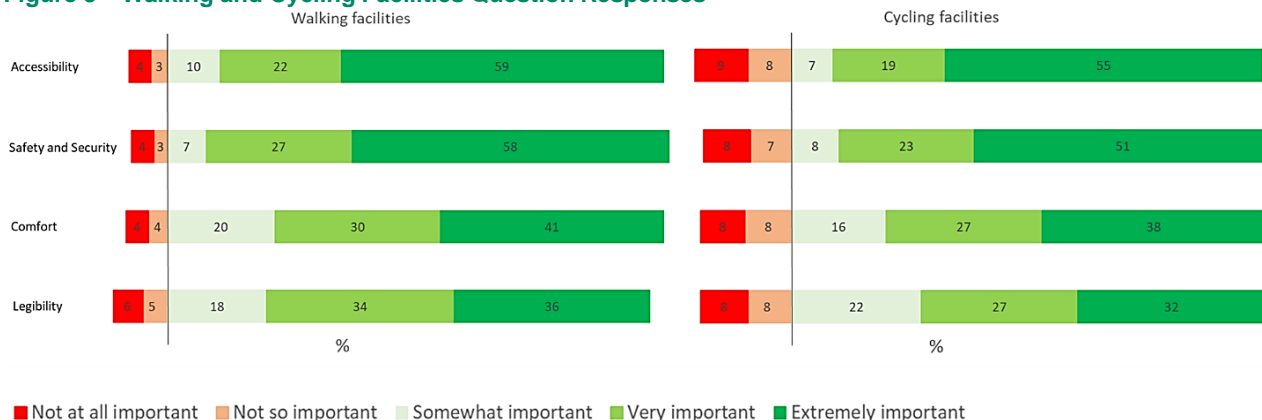


Figure 3 sets out the responses with regard to walking and cycling facilities. A high proportion, c.90% for each category, support the proposed requirements for walking facilities. There is still a high degree of support for the proposed requirements for cycling facilities, albeit lower than walking, at approximately 80% per category.

Figure 3 – Walking and Cycling Facilities Question Responses



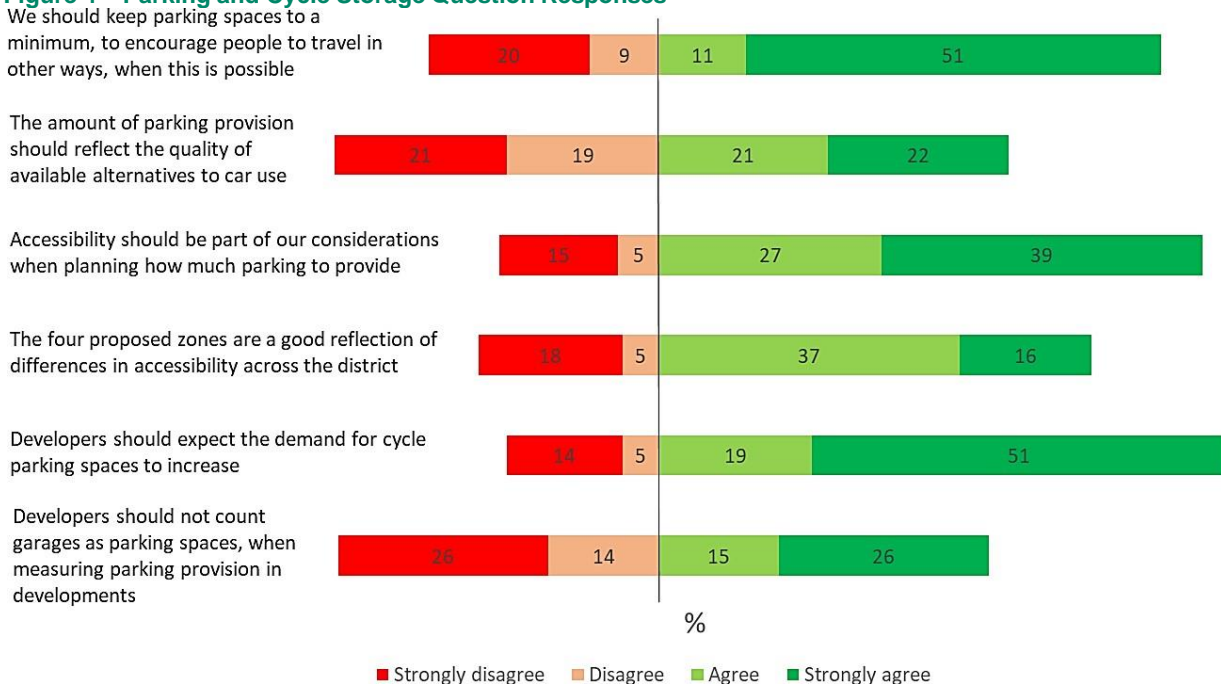
Parking and Cycling Storage:

Figure 4 sets out the responses to questions in relation to parking and cycle storage. 62% of respondents support minimising numbers of parking spaces, compared with 29% that disagree. Whilst this is a clear majority, it is not as high as the proportions of respondents that support policy aims to reduce car travel.

Respondents were split on some issues, 43% agree that parking provision should reflect the quality of available alternatives to car use, and 40% disagree. 41% agree garages should not count as parking spaces, whilst 40% disagree.

53% of respondents considered that the proposed parking zones, i.e. zones for calculating parking standards, were a good reflection of accessibility within B&NES, whilst 23% disagreed. 70% of people consider that demand for cycle parking will increase and should be planned for.

Figure 4 – Parking and Cycle Storage Question Responses



Ultra-Low Emission Vehicles (ULEV):

Figure 5 and Figure 6 present the responses to questions regarding ULEV. Respondents were supportive of measures to ensure developers should provide access to ULEV charge points. A significant majority (67% compared with 23%) consider that walking/cycling/public transport should be prioritised over ULEV drivers. However, a higher proportion of respondents disagreed with this compared with other responses in this section.

A very high proportion of people consider that avoiding obstructions or trip hazards for pedestrians and cyclists, and minimising street clutter and maintaining a high quality of public space, are important design requirements. Priority locations for ULEV charge points are also strongly supported, but not to the same extent.

Figure 5 – ULEV Question Responses

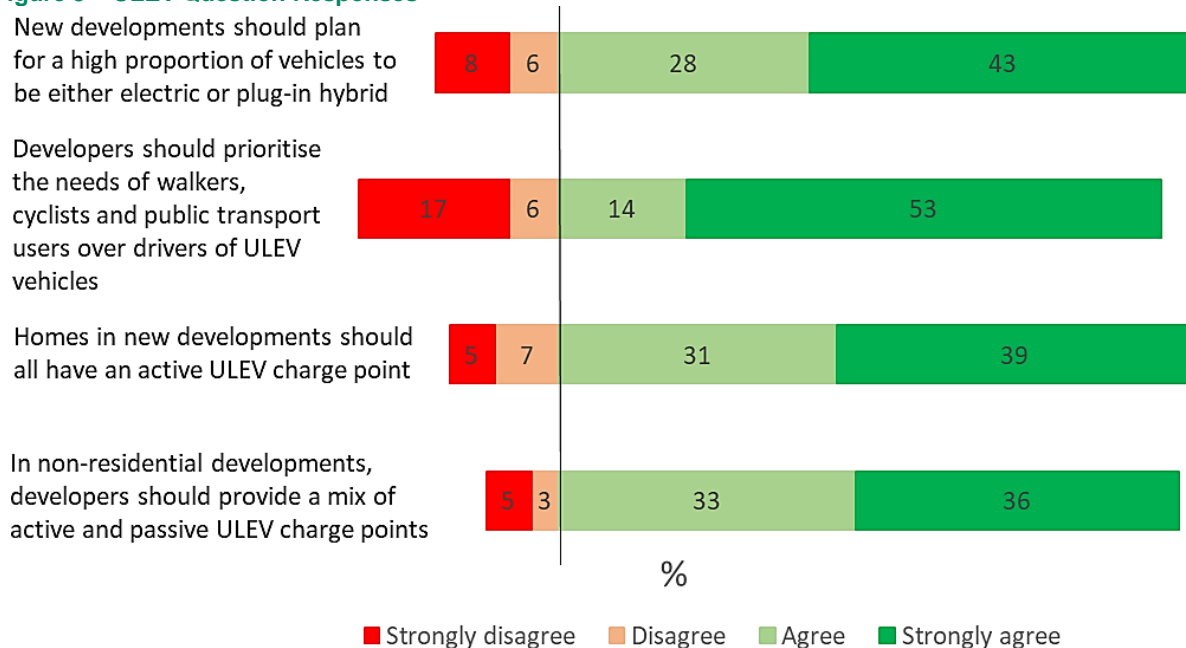
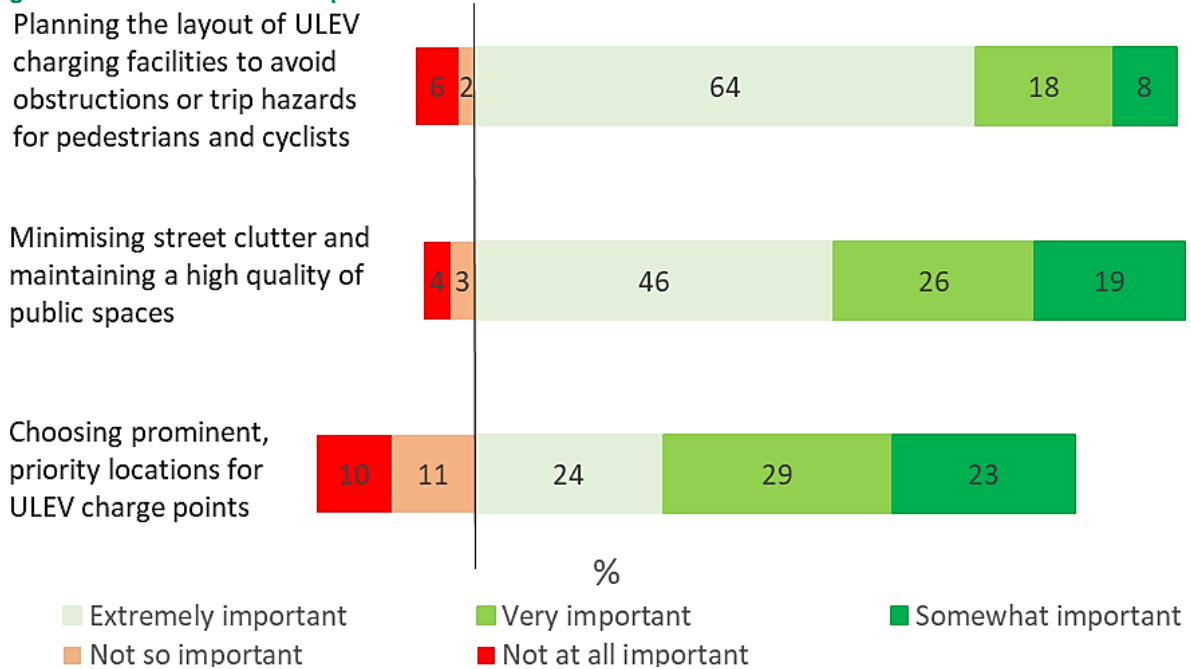


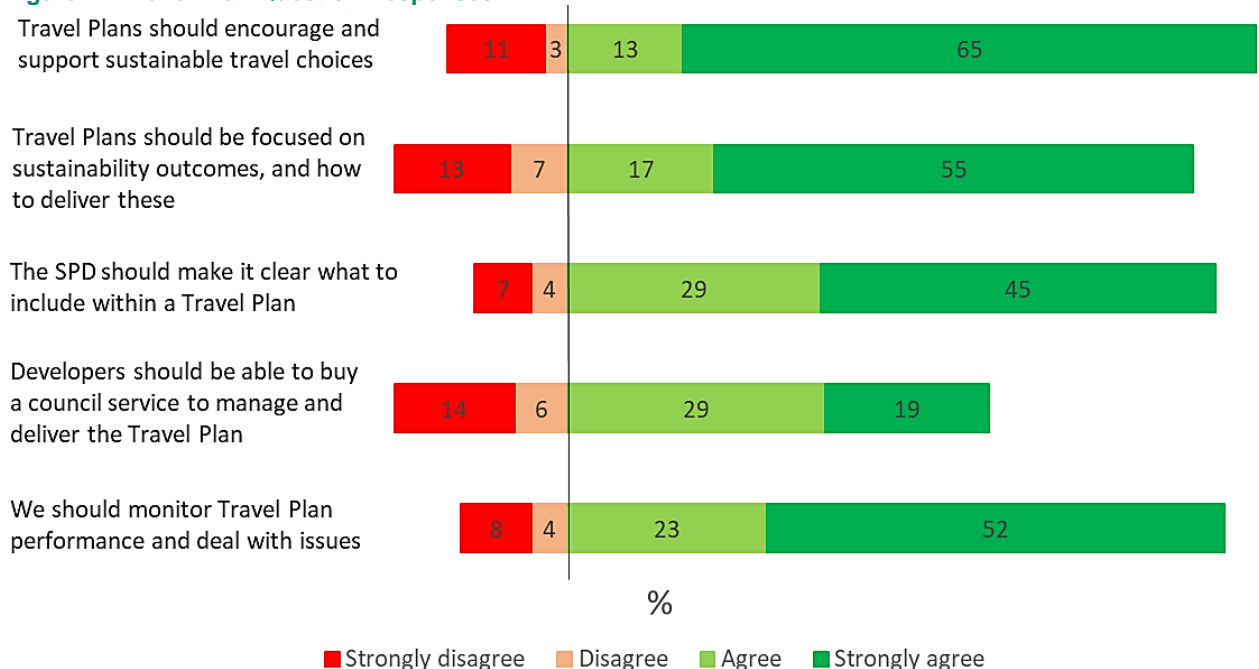
Figure 6 – ULEV Question Responses



Travel Plan:

Figure 7 sets out the responses from consultees in relation to Travel Plans. Approximately three quarters of respondents agreed with the key elements of the Travel Plan chapter, i.e. supporting sustainable travel choice, focus on outcomes and delivery, clarity on requirements, and monitoring and enforcing. A majority support the Council providing a service to deliver the Travel Plan, however, at 48% for and 20% against, this is less supportive than other areas.

Figure 7 – Travel Plan Question Responses



5. Review of Qualitative Answers

The consultation exercise elicited a wide range of feedback through written submissions and free text answers. All responses have been noted as potential considerations for the SPD and wider transport

policy and programmes work. For the purpose of the SPD, responses have been grouped and summarised, and allocated into four categories:

- Out of scope of the SPD;
- Already included within the SPD. To reference in the Consultation Report as included within the SPD;
- Requires a response but no change proposed to the SPD; and
- Requires further investigation and potential amendment.

The T&D SPD provides guidance on how new developments will be treated through the planning process, in relation to the topics covered within the SPD. A number of comments related to areas which cannot be influenced by the SPD, and were thus considered out of scope. Many of these comments relate to wider B&NES and West of England Transport Policy i.e. items which would apply to the Joint Local Transport Plan or other local transport programmes or projects. Some comments related to government policy or legislation. These comments have been noted, and will be considered where relevant in preparing future plans, but not taken forwards for the SPD.

Comments relating to items already included within the SPD are noted as supportive. This includes support for the following:

- Minimising car parking, improving cycle parking, and the zonal approach to parking standards;
- Avoiding compromising pedestrian/cycle facilities, or creating street clutter, with ULEV charging;
- Separating pedestrians, cyclists and vehicles, and prioritising active travel over cars;
- Importance of active travel routes being part of a network and connecting to key destinations;
- Improving the pedestrian experience;
- Accommodating a wider range of “wheeling” types, e.g. e-bikes, cargo bikes, adapted bikes, mobility devices;
- Not compromising nature or biodiversity;
- Travel Plans being site specific and making people aware of travel options;
- Supporting the Council offering the TP delivery service;
- Ensuring that we provide for older and disabled people, including undertaking an EqIA; and
- Ensuring that differences in accessibility across the District are accounted for.

A range of comments were presented that were either not supportive or required a response, but no change to the SPD is recommended. These are summarised or paraphrased in Table 1, with responses provided where it is considered appropriate.

In summary, a non-exhaustive list of the key topic areas is set out below:

- Comments relating to the inclusion of parking standards in an SPD, as opposed to in the LPPU, and the levels parking standards are set at;
- Principle of supporting Electric Vehicles, both in favour and against, in terms of fuel type, affordability, grid capacity, level of charging, and degree to which a shift to ULEV is or is not sufficient to address the Climate Emergency;
- Objections to supporting cycling, and concern about the speed of cyclists, particularly in relation to the potential conflict with pedestrians, but also comments about effect of parked cars on the ability to deliver cycling infrastructure;
- Objection to B&NES offering the service to deliver Travel Plans;
- Detailed design points beyond the scope of an SPD;
- Objection to “anti-car” measures or perceived bias;
- Concern about the impact on disabled people; and
- Comments about the format of the consultation exercise.

Table 1 Consultation Written Comments and Responses, not requiring SPD changes

Topic Area	Consultation Comment (Summarised / Paraphrased)	Response	
Parking	Parking should be in LPPU, not SPD	The SPD is considered to be the suitable place for parking guidance, in the context of B&NES' legislative framework. It is recognised that the LPPU carries greater weight, but inclusion in the SPD allows more detail to be provided and affords greater agility to update the standards.	
Parking	Provide more parking to remove vehicles from roads	The level of parking is evidence based to provide an appropriate level of parking within each parking zone, along with the ability to respond to local factors via the accessibility assessment. This provides a balanced approach to both facilitate parking demand whilst striving to tackle the ongoing climate emergencies.	
Parking	Provide less parking and more alternatives		
Parking	Cap parking at 2 per property, even in rural areas		
Parking	Prioritise residents over visitors		
Parking	Concern about overspill parking		
Parking	Only accessible parking should be provided at destinations		
Parking	Parking is important to business viability		
Parking	Importance of parking for disabled people		
Parking	No high standard cycle infrastructure in Zone B		The SPD states that "Cycle parking standards should be provided in accordance with the design requirements outlined in Section 4.15". This is applicable to all zones.
Parking	Concern about flexibility and need to agree parking with Council		This is part of the planning process.
Parking	Disabled parking for homes should be addressed by Building Regulations M4, therefore inclusion is unnecessary.	It is considered that inclusion of disabled parking standards within the SPD demonstrates its importance in planning development proposals and as such remains appropriate.	
Parking	Object to m/c, blue badge and car club. Generally support change in parking standards, but want opportunity to deliver car free where it can be justified.	Car free developments are covered within the SPD; however these developments should continue to provide access, parking and mobility for disabled persons. The accessibility assessment provides a mechanism to demonstrate clear evidence where reductions in other parking provision are proposed.	
ULEV	Considers hydrogen will be the predominant alternative to EV	The SPD has been prepared in line with both Government publications and Building Regulations. Hydrogen is not currently a predominant alternative to EV, nor is it likely to be in the near future. The T&D SPD will be regularly reviewed and updated to reflect changing context, potentially including the emergence of alternative fuel sources.	
ULEV	Swapping ICE car to EV is not good enough	ULEV guidance forms one part of B&NES' wider planning framework, with air quality and sustainability being key planning considerations. Adoption of a ULEV guidance within this SPD introduces progressive measures to make a positive contribution to air quality and provide other socio-economic benefits across the B&NES District. Guidance should 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.	
ULEV	Standards too low		
ULEV	ULEV mean that there is no need to restrict parking		
ULEV	ULEV is for rich people not poor. General comments on affordability		
ULEV	Grid cannot cope with EV	The SPD does not aim to determine who will utilise ULEV, or the specific suitability of overall infrastructure to cater for it, but provides guidance on this emerging technology in line with local, regional and national policy, with the aim of supporting fleet transition from ICE to EV.	
ULEV	Assume 100% electric – all parking spaces		
Walking / Cycling	C&RT do not promote lighting of towpaths		Suitable lighting is considered a key driver for encouraging mode shift, through providing an attractive and perceived level of safety on all recommended routes.
Walking / Cycling	Cyclists need to be slowed down		

Walking / Cycling	Too many parked cars mean adding infrastructure is difficult.	The SPD supports measures which improve the safety of cyclists and pedestrians, including recognising potential conflict between modes. The SPD recognises delivery challenges for infrastructure, including the balance of road space between modes.
Walking / Cycling	Too much emphasis on cycling – just a leisure mode, not replacing car trips.	It is B&NES' ambition to support mode shift to more sustainable modes, including cycling. As such, it is considered appropriate to have a strong focus on cycling, along with other sustainable modes of travel, within the SPD. There is significant potential to increase utility cycling. Furthermore, as set out in the SPD, there are health and wellbeing benefits of active travel, which also apply to leisure trips.
Travel Plan	B&NES should not have the powers to require developers to provide Travel Plans	The requirement for Travel Plans is set out within the National Planning Policy Framework (NPPF, para 113). The SPD provides comprehensive guidance to assist developers to produce Travel Plans that will be considered acceptable in planning terms, in line with the Council's expectations.
General	Don't be anti-car.	
General	People need to drive, making it less attractive to do so is discrimination.	
General	General view that people won't shift to other modes and will carry on driving anyway.	B&NES Council has declared a Climate and Ecological Emergency, which provides the corporate basis for enhancing opportunities for sustainable travel. The SPD aims to balance the ongoing need for car use, whilst encouraging mode shift to more sustainable modes.
General	Universal car ownership is unsustainable.	
General	People need cars, transition to EV solves climate emergency whilst supporting people who need cars. Also opposite view.	
General	Too Bath focused.	As the main urban centre, it is to be expected that there will be significant mention of Bath. However it is acknowledged throughout the SPD, and through the respective guidance, that over 90% of the District's land area is rural, with 47 rural parishes. The SPD provides guidance for the whole district, recognises the varied characteristics of the different areas, and differentiates the approach to transport accordingly.

6. Areas for Review and Potential Change to the SPD

Some consultation feedback has been taken forwards for further review and potential amendment to the SPD.

Comments have been received in terms of the **Parking Standards Zones**, and whether some areas should be in a different zone. This includes Bathavon Villages and Whitchurch Village, and whether they should be in Zone B (Outer Bath, Keynsham and Saltford) rather than Zone C (Towns and Villages), as well as general comments about villages close to Bath and locations on cycling routes.

The zones have been created based on areas with similar accessibility characteristics, including car ownership. To account for this being at a broad scale, individual site accessibility assessments are required to accurately determine the most suitable parking levels for the proposed development. The accessibility characteristics of these areas will be reviewed to ensure that they are in the most appropriate overall zone. It should be noted that there is significant scope within the methodology to account for the local accessibility of each development proposal once the parking zone has been applied.

Further analysis of the LSOAs within zone C, presented in Table 2, show that those containing Bathavon Villages and Whitchurch Village (Bath and North East Somerset 010A, 010E, 010B and 020E) do not fall at the lowest extent of cars per household for Zone C. 010E, 010B and 020E data shows cars per household to be higher than the average for the zone, indicating they are correctly placed within Zone C.

010A cars per household is below the average for Zone C; however it falls above the majority (13 out of 17) within Zone B. Given the adjacent 010E and 010B, it is considered suitable for 010A to fall in Zone C also.

Table 2 Zone C Cars per Household Analysis

Zone 3 - LSOAs	Total No. Vehicles	Total No. Households	Cars / Household
E01014449 : Bath and North East Somerset 024B	739	637	1.16
E01014450 : Bath and North East Somerset 024C	786	642	1.22
E01014373 : Bath and North East Somerset 010A	604	490	1.23
E01014420 : Bath and North East Somerset 025A	815	656	1.24
E01014470 : Bath and North East Somerset 026B	854	681	1.25
E01014469 : Bath and North East Somerset 026A	854	679	1.26
E01014439 : Bath and North East Somerset 023C	780	614	1.27
E01014424 : Bath and North East Somerset 027A	934	713	1.31
E01014442 : Bath and North East Somerset 022B	717	533	1.35
E01014471 : Bath and North East Somerset 026C	935	691	1.35
E01014426 : Bath and North East Somerset 027C	1163	829	1.40
E01014421 : Bath and North East Somerset 025B	937	656	1.43
E01014451 : Bath and North East Somerset 024D	927	645	1.44
E01014444 : Bath and North East Somerset 022D	830	568	1.46
E01014472 : Bath and North East Somerset 026D	1034	705	1.47
E01014377 : Bath and North East Somerset 010E	764	520	1.47
E01014422 : Bath and North East Somerset 025C	1011	658	1.54
E01014443 : Bath and North East Somerset 022C	847	546	1.55
E01014448 : Bath and North East Somerset 024A	966	622	1.55
E01014440 : Bath and North East Somerset 023D	963	618	1.56
E01014425 : Bath and North East Somerset 027B	1226	761	1.61
E01014445 : Bath and North East Somerset 022E	972	588	1.65
E01014423 : Bath and North East Somerset 025D	1100	664	1.66
E01014374 : Bath and North East Somerset 010B	843	499	1.69
E01014447 : Bath and North East Somerset 020E	918	528	1.74

Average:	1.43
Maximum:	1.74

Some comments have been received in relation to the importance of **Car Clubs** in reducing car ownership, and requesting that there is a greater requirement. The SPD has been reviewed in terms of areas where this can reasonably be strengthened. This includes the introduction of standards for provision of, or contribution to, electric Car Club spaces, vehicles and/or memberships.

Comments have been made about the clarity of the wording of the **ULEV vehicle parking standards**. The wording accurately conveys how the standards are intended to be applied. However, some of the consultation responses have misinterpreted some aspects of the standards, suggesting that there is scope for misinterpretation. The wording has been reviewed to ensure clarity. This is important as it needs to be clear for the application and understanding of policy for a wide range of people.

Since the publication of the T&D SPD Consultation Draft, the Government has published the long-awaited update to the Building Regulations to include ULEV charging requirements, following its original consultation in 2019. The T&D SPD is “future-proofed” for changes to Central Government standards by requiring the developer to apply whichever is the higher of local or national standards. However, we have

taken the opportunity to make edits to the SPD to make it clear that the document has been prepared with knowledge of the Building Regs, and to weave in aspects to demonstrate alignment. It should be noted that the Building Regs are Design Standards, whereas the SPD covers wider policy aspects and inter-relationships with other policies. Thus, the SPD therefore remains a valuable tool for establishing the B&NES requirement for ULEV provision.

Some comments requested more clarity on requirements for disabled parking to have access to ULEV charging, have been incorporated in the updated SPD. Some comments requested that the T&D SPD included requirements for renewable energy. Whilst supported in principle, this is considered beyond the scope of a Transport SPD and any requirements relating to electricity sources would be better situated in Energy and Sustainability Policies.

Some consultation responses related to the potential impact of the SPD on **disabled people**. An EqIA was prepared for the SPD at an early stage and reviewed with the B&NES Equalities Officer. Equalities has been a key consideration in the production of the SPD, and has been discussed with Officers through internal consultation workshops and document review, and also discussed with the LDF Group.

In response to the comments, a meeting has been held with the Equalities Officer to discuss the feedback. The Equalities Officer has subsequently reviewed the SPD, and proposed some minor edits and clarifications to strengthen the document. These have been included in the updated SPD.