

Examination into South Hams District Council's Development Policies Development Plan (DPD)

March 2010

Suggested Changes to Policy DP7 Transport, Access & Parking

Statement
submitted on behalf of
The Highways Agency

1. Context

- 1.1 This statement outlines the Highways Agency's position with the proposed policy and supporting paragraphs covering transportation issues (Policy DP7 and supporting text) as set out within the Development Policies Development Plan Document (DPD). The submission seeks to build upon the previous representations by the Highways Agency to the DPD at the preferred options stage in July 2007, and pre submission version in June 2009.
- 1.2 Further to the submission of the above mentioned representations to the DPD, the Agency has reviewed the 'Proposed minor post publication changes' to the DPD (published in November 2009, and reissued as 'Version 2' January 2010 with clarified paragraph numbers). We note from the post publication changes that a number of the Agency's comments made to the previous versions of the DPD, have been incorporated by the Council into the latest version of Policy DP07 (and supporting text). Whilst these changes are largely welcomed, the Agency seeks further changes, and points of clarification, regarding the final wording of the policy and supporting text.
- 1.3 In light of the brief nature of the suggested amendments, and equal weighting attached to written submissions, the Agency is not attending the Examination. This statement therefore sets out the Agency's proposed wording for DP7 and supporting text.

2. The Highways Agency's Interests

- 2.1 The Agency is responsible for maintaining and managing the Strategic Road Network (SRN). Within South Hams, the Agency's primary interest is in the A38(T), which passes through the north of the District, and connects Exeter to the east, with Plymouth to the west. Strategic level modelling undertaken by the Highways Agency has shown that traffic demand on the Strategic Road Network (SRN) in South Hams east of Plymouth is likely to increase substantially in the period to 2026 due to development growth. Decisions on the location and size of development sites must recognise the need to maintain the SRN's strategic

purpose. Therefore, the Agency needs to be satisfied that the emerging DPD takes into account, the impact of development on the A38, through a robust and appropriate approach to policy.

3. Matter Specific Responses – Policy DP7 and Supporting Text

- 3.1 The Agency's previous representations to the Development Policies DPD cover a range of policies, based on the Agency's fundamental objective of linking land use planning with sustainable transport objectives, in order to reduce the need to travel. Whilst a number of comments relating to non-transport policies have not been incorporated by the Council, the Agency accepts that a robust transport policy can be used to influence all forms of development proposals when they come forward for consideration. For this reason the Agency is only providing comments to the Examination on Policy DP7 and its supporting text.
- 3.2 The Agency largely welcomes policy DP7 as currently worded by the Council, i.e. following the alterations made through the incorporation of proposed change 94 through to proposed change 105 (as listed in the 'minor post publication changes' version 2 issued by email 27th January 2010). A number of the proposed changes are directly as a result of the comments submitted by the Agency (as confirmed within the Regulation 28 Consultation Statement Published Oct 09). However, as noted above, there are number of further amendments which the Agency wish to make, as there has not been a formal opportunity to comment on the minor proposed changes (published in November 2009 / January 2010) to date. For ease of reference, we therefore set out the Council's latest proposed version of the policy below (also clarified by telephone with SHDC Officer James Doxford on 2nd February 2010), with the Agency's further proposed changes / comments provided in **bold** (for new text) or ~~striketrough~~ (for removed text).

"DP7: Transport, Access and Parking

3.73 'The Energy Challenge, DfT, sets out that transport accounts for around 30% of total UK energy use and around 25% of UK carbon emissions. Effective transport planning can help towards mitigation of and adaptation to climate change. More sustainable patterns of transport will also help limit the impact of climate change, as well as provide health benefits for local communities.'

3.74 *Providing access to services and facilities via sustainable modes of transport is difficult in a mainly rural district where the population is dispersed. Those people without access to the private car are at a significant disadvantage particularly in the countryside. There is a need to improve access to services and facilities.*

3.75 *PPG13 Transport provides the national policy guidance and the Devon Local Transport Plan and Regional Spatial Strategy also set out policy to access and transport for the district. The approach is to improve safety, reduce the need to travel and minimise environmental impact through co-ordinated land-use and travel planning. This policy compliments Core Strategy policy CS1 Location of Development which provides for development to be located in sustainable and accessible locations.*

3.76 *Social inclusion, particularly in rural areas, and addressing climate change are main themes of the Community Strategy. These themes can be directly influenced by addressing transport issues through the appropriate location of development to sustainable settlements, reducing the use of cars and in the promotion of more sustainable modes of transport, as well as encouraging walking and cycling.*

3.77 *The Devon Local Transport Plan indicates that pedestrian and cycle routes should link residential areas to main destinations, and investment in the road network should allow for improved public transport. One aim is to improve accessibility for all sections of the community to town and village centres through a choice of means of transport, including walking, cycling and public transport.*

3.78 *A Transport Assessment (TA) or Transport Statement (TS) will need to be prepared for developments exceeding **the indicative thresholds set out within appendix B of the DCLG / DfT Guidance on Transport Assessments (March 2007)**. However, in light of the predominantly rural nature of the District, the Local Authority will require a Transport Assessment for all proposals exceeding 25 dwellings and for some non residential floor space schemes falling under the DfT indicative thresholds at the local authorities request depending on the site's context. This should provide a comprehensive review of all the potential transport impacts of a proposed development, with an agreed plan to mitigate any adverse consequences. The Assessment will need to consider the likely modal split of journeys to and from the site, the impact of the development upon the local and strategic road network and identify any mitigation works to be funded by the developer, together with details of proposed measures to improve access by non-car modes. **Where impacts from proposed developments are expected on the Strategic Road Network, applicants are advised to consult with the Highways Agency at pre-application stage to agree on appropriate assessment criteria, and if necessary, appropriate mitigation measures.** Full guidance on the content is provided in 'Guidance on Transport Assessment' DfT / **DCLG (March 2007)**.*

3.79 *A Travel Plan will be prepared for all major ~~non-residential~~ developments in accordance with the **Good Practice Guidelines: Delivering Travel Plans through the Planning Process, DfT**. This should set out how the impact of travel patterns associated with the ~~enterprise~~ **development proposal** will be*

reduced. Travel Plans are a means by which an organisation or business can manage the transport demands of their staff and any visitors. Their aim is to reduce the environmental impact of travel associated with the enterprise. They contain a package of measures to reduce reliance on the car and promote walking, cycling and public transport use through a consideration of the requirements of staff (commuting to work and travel whilst at work), any visitors or customers to the premises and the management and purchase of company vehicles. A Travel Plan will also be prepared for all major residential developments. The **Council will consult with the Highways Agency Authority when assessing a Travel Plan which relates to a development proposal deemed to ~~will need to accept any Travel Plan which may~~ have an impact on the ~~trunk~~ strategic road network.**

Parking

3.80 Parking is a very contentious issue in the South Hams and it is important that there is flexibility to provide appropriate car and cycle parking according to individual proposals and their locations. National and regional planning policy discourages the use of the car where there are more sustainable alternatives available, particularly public transport and promoting such measures as car pooling or car sharing. This will have associated benefits of reducing fuel usage, pollution and congestion and mitigating climate change. The availability of car parking has a role in improving accessibility to necessary local services and facilities, particularly in rural areas and for certain groups of society such as the disabled.

3.81 A local car parking assessment, based on a design led approach and location specific on the different situations in South Hams, will be undertaken in the future. This, will set clear standards for all uses, including residential standards. Until then, Planning Policy Guidance 13 Transport sets out maximum parking standards in Appendix 5, **further guidance regarding parking for non residential development has also been provided in Policy EC8 of Planning Policy Statement 4 (Planning for Sustainable Economic Growth)**. PPG13 additionally states that for land uses not covered by these standards the most stringent regional standards will apply. Residential parking will be assessed on an individual basis. It is very important that cycle and disabled parking is adequately available in all new development and as such these will be provided according to need and on a site by site basis. Non residential development should provide 5% of parking spaces for use by the disabled.

3.82 The layout and design of car parking should take account of the Manual for Streets, to ensure parking is well integrated with a high quality public realm and takes account of the needs of pedestrians, cyclists and public transport and reduce crime and maximise personal safety.

Related planning policies:

Planning Policy Guidance 13 Transport

Planning Policy Statement 4 - Planning for Sustainable Economic Growth (Policy EC8).

*South West Regional Spatial Strategy (Proposed Changes) policies RTS3
Parking,*

*SD1 The Ecological Footprint
Devon Local Transport Plan
Core Strategy policies CS1 Location of Development, CS7 Design, CS11 Climate Change
Development Policies DP1 High Quality Design*

Further guidance for applicants:

Manual for Streets, DfT/CLG

Secured by Design, CABE

~~*Guidance on Transport Assessment, DfT,*~~

Highways development management advice, Devon County Council,

Circular 02/07 Planning and the Strategic Road Network,

*Guidance on Transport Assessment, **DCLG** / DfT,*

Good Practice Guidelines: Delivering Travel Plans through the Planning Process, DfT' and;

'Transport Assessments, Green Travel Plans and parking guidance, Devon County Council'

Evidence that may be required from applicants to accompany planning applications:

Transport Assessment

Travel Plans

Details of access proposals and cycle, car and disabled parking provision

Policy DP7: Transport Access and Parking

1. Development should:

a. provide priority to pedestrians, cyclists and users of public transport, over the private car. This will be achieved in part through the creation of links between new development and existing pedestrian, cyclist and public transport networks;

b. provide for safe, easy and direct movement for those with mobility difficulties;

c. have safe and adequate means of access, egress and internal circulation/turning arrangements for all modes of transport relevant to the proposal;

d. not materially impair highway safety or traffic movement; ~~and~~

e. not detract or conflict with the transport function of the road.

f. be supported by appropriate means of transport assessment, and travel plans where meeting the criteria discussed in paragraphs 3.78 and 3.79 above; and

g. where necessary, mitigate any detrimental impacts on the Local and Strategic Road Network through measures to be funded by the developer.

2. The level of car parking provided should be in accordance with the parking standards set out in Appendix 5. These, together with residential parking and the level of cycle parking, will be assessed on a flexible site by site basis depending on the provision of public transport and access to local facilities."

4. Conclusion

- 4.1 In summary, the Agency supports the broad thrust of Policy DP7 and its supporting paragraphs, following the publication of the Council's 'Minor Post Publication Changes' (as clarified in version 2 January 2010). However, the Agency hereby requests that the Council and the Inspector considers the above proposed changes to ensure that, in assessing development proposals, due consideration is given to the impact of development on the safe and efficient operation of the strategic road network (SRN).