

# Report



## Cabinet Member for City Services and Cabinet Member for Sustainable Development

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### Part 1

Date: 22 July 2020

**Subject** Sustainable Travel Supplementary Planning Guidance to support the Adopted Local Development Plan

**Purpose** To formally adopt the Sustainable Travel Supplementary Planning Guidance documents to support the LDP

**Author** Planning Policy Manager

**Ward** All Wards

**Summary** The Newport Well-being Plan includes Sustainable Travel Intervention Proposals. The creation of a Sustainable Travel SPG was identified as part of these proposals.

The Local Development Plan (LDP) was adopted by Council on 27 January 2015 and is the development plan for Newport. The Sustainable Travel Draft Supplementary Planning Guidance (SPG) has been prepared to promote sustainable travel in new developments and to provide additional detail and guidance on policies in the LDP. It will encourage place makers to integrate sustainable travel as a foundation component of new development and its surrounding areas.

The SPG has been through a six-week public consultation. Comments have been received and the Council has made a number of minor amendments. It is now proposed that the Sustainable Travel SPG is formally adopted by the Council.

**Proposal** That Cabinet Members note the comments received and the proposed amendments the Council is seeking to make. The Cabinet Members agree for the Sustainable Travel SPG to be formally adopted

**Action by** Head of Regeneration, Investment and Housing

**Timetable** Immediate

This report was prepared after consultation with:

- All Council Members
- Head of Law and Regulations – Monitoring Officer
- Head of Finance – Chief Finance Officer
- Head of People and Business Change
- Internal Council Departments
- Community Councils
- Neighbouring Authorities
- General Public

**Signed**

## Background

The Newport Well-being Plan sets out the Public Services Board's priorities and actions for Newport for the next 5 years to improve the economic, social, cultural and environmental well-being of Newport. The Plan sets out local well-being objectives, priorities and steps that the Board proposes to take to meet the objectives. Five interventions have been selected by the PSB in order to achieve their goals and objectives. These are:

- The Newport 'Offer'
- Strong Resilient Communities
- Right Skills
- Green and Safe Spaces
- Sustainable Travel

The Sustainable Travel intervention has a set of priorities. The creation of a Sustainable Travel SPG being one of these. The Draft Sustainable Travel SPG has been prepared to provide new guidance in consultation with the PSB (Sustainable Travel Intervention Group).

It sets out how new development should incorporate sustainable travel into their schemes. The document was subject to a 6-week public consultation from 18<sup>th</sup> October 2019 to 29<sup>th</sup> November 2019.

Comments have been received and considered by officers. The tables noting all comments received and the Council's proposed responses are available to view in Appendix 1. A summary of the main proposed changes to the SPG are below.

### Key Issues Raised and Councils proposed response

The key issues raised as part of the consultation process is the objection to the wording of paragraph 4.2 and Guidance Note 3 *"that a development should be acceptable in transport terms WITHOUT the need for a travel plan."* It was noted this does not reflect the guidance contained in Technical Advice Note (TAN) 18 paragraph 9.13 which states *"... Development that is unacceptable should never be permitted because of the existence of a travel plan if the implementation of that plan cannot be enforced."*

The aim of paragraph 4.2 and Guidance Note 3 was to ensure that developers did not rely on a travel plan to make an unacceptable development, acceptable in transport terms, but once the development is built, the measures within the travel plan are not implemented. It is accepted that the SPG must be in line with national planning policy and therefore an amendment to paragraph 4.2 is proposed, but the general position will remain the same. The developers will not be permitted to rely on overly ambitious and unrealistic travel plans to get unacceptable developments through the planning system.

There were several comments received which were seeking points of clarity within the SPG. Some have been addressed in the amendments, others were considered to already have been addressed elsewhere in the SPG or in other Welsh Government policy documents (the links to these documents have now been included within the SPG).

### Summary of Proposed SPG Changes

Page 4 Paragraph 1.3: Clarity added on ultra-low emission vehicles in line with PPW 10. This now includes "Travel by ultra-low emission vehicles can also have an important role to play, particularly in rural areas with limited public transport".

Page 15 Paragraph 3.12: Link added to The 'Design Guidance – Active Travel (Wales) Act 2013'.

Page 15 Paragraph 3.13: Reference made to paragraph 3.9 added.

Page 16 Paragraph 3.15: Clarity added on priority given to pedestrians and cyclists.

## Financial Summary

There will be no cost associated with adoption. Following adoption, it might be desirable to print hard copies of the SPG as office copies, but this will be a modest fee. The majority of users will download the SPG electronically from the Council website.

## Risks

Risk	Impact of Risk if it occurs* (H/M/L)	Probability of risk occurring (H/M/L)	What is the Council doing or what has it done to avoid the risk or reduce its effect	Who is responsible for dealing with the risk?
Clarity on the LDP policies is not provided and therefore potentially more open to interpretation and challenge.	L	L	The SPG will help to provide clarity and offer further guidance on LDP policies to aid the planning application determination process.	Head of Development Services/Planning Policy Manager
Draft SPG will carry less weight by Planning Inspectors in the determination of planning appeals.	M	L	The SPG has been through public consultation and are now ready for adoption.	Head of Development Services/Planning Policy Manager

## Links to Council Policies and Priorities

The Local Development Plan is one of the statutory plans the Council has to prepare. It determines Newport's land use policies to 2026. The SPG will supplement and support the overarching principles set out in the LDP, adding more detail and clarification where required.

Newport City Council has a Corporate Plan that runs to 2022. Its primary objective is 'improving people's lives'. It has four commitments; Resilient Communities, Thriving Cities, Modernised Council; and Aspirational People. The SPG will help deliver these commitments by ensuring new development has sustainable transport schemes and initiatives integrated from the planning and design phases right through to implementation.

## Options Available and considered

Approve the draft SPG for adoption.

Make alternations to the draft SPG and then approve for adoption.

Do not approve the SPG for adoption.

## Preferred Option and Why

The preferred option is Option A. The documents have been subject to public consultation and comments have been considered and amendments have been made to the documents. The adopted SPG will assist the Council in determining planning applications.

## **Comments of Chief Financial Officer**

There will be no financial impact in the adoption of these sets of supplementary planning guidance, any associated costs will be minimal and met from existing budgets.

## **Comments of Monitoring Officer**

There are no specific legal issues arising from the Report. The proposed Sustainable Travel SPG will provide more detailed practical and technical guidance regarding the application of the strategic land use policies contained in the LDP, specifically in relation to the promotion of sustainable travel as an integral part of new development proposals. It will provide a consistent approach for the determination of future planning applications. The principle of the sustainable transport is consistent with the sustainable development principle of the Well-Being of Future Generations Act and is also an identified requirement of the sustainable travel intervention within the Well-Being Plan. The draft SPG's has been the subject of public consultation for a period of 6 weeks and the consultation responses are identified within the report. Where appropriate, minor amendments have been made to the draft SPG to reflect the consultation responses. For the most part, the amendments provide further clarification and links to other Welsh Government policies and guidance. The one substantive change is in relation to the wording of paragraph 4.2 and Guidance Note 3 to bring these provisions into line with TAN 18. Therefore, the cabinet member is now able to confirm the adoption of the final SPG, subject to these amendments. The final SPG will then be a material planning consideration in the determination of relevant applications.

## **Comments of Head of People and Business Change**

The Sustainable Travel SPG encourages developers to think about the options for integrated sustainable travel within new developments, and also how they link with the wider area. The SPG also sets out expected standards for cycle parking and provides guidance to developers on producing an effective travel plan. Travel plans will encourage new residents/occupiers to reduce single occupancy private car journeys in favour of more sustainable forms of travel.

This guidance supports the ethos of the Well-being of Future Generations (Wales) Act 2015. In addition, the well-being goals and the sustainable development principle contained in the Act along with the council's well-being objectives and the Well-being Plan well-being objectives have been fully considered when developing the SPG and the cover report. This has been summarised in the appropriate section of this report.

## **Comments of Cabinet Member**

The Cabinet Member for Sustainable Development and the Cabinet Member for City Services have been briefed on the draft SPG and the comments received through the public consultation.

## **Local issues**

The SPG will affect all wards in Newport.

## **Comments from Non-Executive Members**

Cllr K. Thomas

It is recognised that the city of Newport faces considerable challenges to the introduction of Active Travel and other future measures to create a healthier and greener city, which also considers fairness - giving as many as possible, including those in our more deprived areas opportunities to move around that are conducive to their well-being. All measures should ensure that such proposals are consistent and enforceable. It should be welcomed that Travel Plans are used within the planning process.

Recognition should be given to the prevalence of poor health, chronic and long-term disabilities and the unhealthy life-styles of some Newport citizens. (There are also and estimated unpaid 11.7K (figs from 2012) carers supporting them - who face their own individual challenges because of their caring roles.) Substantial areas of the city have steep roads meaning the main activities put forward in Active Living programmes - walking and cycling, are not realistic options for many working adults and are beyond many older citizens. Many residents would choose to have improved provision of public transport. Currently, these services are not comprehensive, perceived as unsafe in some areas and are not environmentally friendly (even with electrified train routes and some electric buses). They are also expensive compared with private vehicle costs per mile.

### Public transport

Identification of safe points along roads within new developments, and adjacent roads, could be mandatory in large scale residential planning applications for the safe positioning of bus stops. Even if such bus services are not currently provided, there should be planning for future expansion of public transport.

### Promotion of walking and cycling

New developments applications should incorporate the provision of footpath and cycles tracks to encourage those able to take-up these pursuits. Planning applications within retail areas could be making provision for the short-term storage of bicycles for shoppers (as if often seen in continental cities), which will make it safer for pedestrians if participation is expanded. These should also promote the city's development of Green Corridors, which are sadly very limited across this city.

### Disability access

Opportunities for people with mobility problems which could have been increased but have been missed in some major projects developments. One which was successful was facilitated, in collaboration with volunteers from the Newport Access Group when they worked with Network Rail, submitted designs for the construction of the Bridge Street railway bridge. The final construction was produced with a gradient compliant with recommended gradients (the proposed designs failed to be compliant) and wider pavement provision.

### Response

The Sustainable Travel SPG aims to promote sustainable travel in new developments. It is recognised that walking and cycling might not be appropriate for everyone, but this SPG will ensure that suitable infrastructure and facilities are provided at new developments to ensure that the opportunities for walking and cycling exist. Hopefully, this will then encourage increased usage which will have significant environmental and health/well-being benefits. The health and well-being advantages of sustainable travel are outlined in the first three chapters of the SPG.

As you have noted, new development applications should incorporate the provision of footpaths and cycle paths and link up with green corridors. This SPG does exactly that and provides clear guidance for how we expect new developments to link up with facilities such as parks/leisure facilities and open green space. These are specifically mentioned in the SPG, along with schools, health facilities and public transport services. The SPG also notes that where cyclists share surfaces with pedestrians, the safety and accessibility of the environment for disabled and older individuals should be assured.

The SPG does not seek to replace public transport with walking and cycling. It recognises the importance of good public transport links and encourages it as per national and local planning policy. The provision of public transport is still a very important consideration in the planning process and key to ensuring sustainable developments. Depending on the scale of the new development, the provision of bus stops is indeed something that the Council has secured in the past and we will continue to do so when there is a justified need. This can be secured through a legal agreement.

Ultimately, this SPG can only apply to new development. Its primary aim is to encourage sustainable travel and reduce single occupancy travel in private motor vehicles. In accordance with national planning policy, increasing walking and cycling is viewed as the top priority, followed by public transport. This SPG sets out clear guidance for developers which will help promote and increase sustainable travel in Newport.

### **Scrutiny Committees**

The SPG has not been through are Scrutiny Committees.

### **Equalities Impact Assessment and the Equalities Act 2010**

The LDP as a whole has been subjected to an Equalities Impact Assessment. The Appraisal is to be adopted as an SPG which supplement the LDP. It is not considered necessary to have separate EIA for every SPG.

## **Children and Families (Wales) Measure**

No consultation has taken place specifically with children and young people. Children and young people were eligible to comment on the Appraisals during the formal 6-week consultation. People replying to consultations are not required to provide their age or any other personal data, and therefore this data is not held or recorded in any way, and responses are not separated out by age.

## **Wellbeing of Future Generations (Wales) Act 2015**

The Well-being and Future Generations (Wales) Act seeks to improve the social, economic environmental and cultural well-being of Wales. Public bodies should ensure that decisions take into account the impact they could have on people living in Wales, in the future. The five main considerations are:

- Long term: This SPG encourages the use of sustainable transport and discourages the use of private motor vehicles. In the long term, this will help to improve air quality by reducing the number of private motor vehicles on the road. It will also relieve congestion. This SPG will have a positive impact on climate change in the longer term.
- Prevention: By supporting the sustainable modes of transport, single occupant car journeys are strongly discouraged. Consequently, this will help to prevent poor air quality in new developments, it will prevent congestion of the roads and it will help to prevent the effects of global warming.
- Integration: This SPG will meet many of the Well-being Goals including “*A prosperous Wales*”, “*A resilient Wales*”, “*A healthier Wales*”, “*A Wales of cohesive communities*” and “*A globally responsible Wales*”. The SPG aims to encourage the integration of secure cycle parking facilities in new developments. New cycle/footpaths will also be integrated within new development as the SPG will encourage developers to consider how their development links to the wider surroundings. Improving the understanding of sustainable travel will help integrate sustainable travel/design/climate change into the psyche of developers and the community. In addition to the environmental benefits, it will also help to integrate good design and make the developments more attractive.
- Collaboration: This SPG has been prepared in consultation with the PSB (Sustainable Travel Group). The group membership includes representatives from the Health Board, Sustrans, Newport City Homes, as well other various Council departments. It has also been subject to public consultation.
- Involvement: This draft SPG has been subject to a 6-week public consultation. This consultation has collected the views of the development and planning industry. The comments have been considered and changes are proposed. As noted above, the PSB (Sustainable Travel Group) were also involved in the creation of this document.

The proposal is in line with the Council's well-being objectives published in March 2017. Specifically, these proposals contribute to the well-being objectives to promote economic growth and regeneration whilst protecting the environment.

## **Crime and Disorder Act 1998**

Section 17(1) of the Crime and Disorder Act 1998 imposes a duty on the Local Authority to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area. It is considered that there would be no significant or unacceptable increase in crime and disorder as a result of the adoption of these documents.

## **Consultation**

Extensive public consultation has taken place and comments have been received from interested parties. Consultation has also taken place within the Council, particularly with Streetscene.

## **Background Papers**

Sustainable Travel (update to existing)



Draft Sustainable  
Travel SPG v0.6 - SK :

Dated: 8 July 2020

## APPENDIX 1 –

### COMMENTS RECEIVED ON THE SPG AND THE COUNCIL’S PROPOSED RESPONSE

#### Appendix A

Respondent	Comment	Council Response
Council Highways Officer	The proposed minimum cycle parking standards within the sustainable travel document differ from those required in the Newport City Council parking Standards SPG. The cycle parking requirements should be the same within both documents.	<p>The intention is the new standards will supersede the ones in the Parking Standards. On adoption, the ones in the parking standards will be superseded and point them in the direction of the Sustainable Travel SPG.</p> <p>No specific amendments to this documents are required.</p>
Natural Resources Wales	<p>We've no comments to make on the draft SPG in terms of our role as a statutory planning advisor. However, NRW generally endorse Plans to promote sustainable travel.</p> <p>In terms of your screening reports for both SEA and HRA, we note you have screened out the Plan. We have considered the reasons given and have no adverse comments on the matter.</p>	We welcome the comments made and note that no specific amendments to the documents are required.
Centre for Radiation, Chemical and Environmental Hazards (Wales)	The SPG supplements policies in the adopted Newport Local Development Plan (LDP) relating to sustainable travel within new development and surrounding links. We welcome guidance that encourages planners and developers to consider all aspects of sustainable travel as there is strong evidence to show that physical activity improves both the physical and mental wellbeing of individuals both in current and future generations. We would concur with the statement in 1.6 that sustainable travel should be a material consideration from the outset of all development initiative and not an afterthought.	Noted and we welcome the comments. No specific amendments are required.
	Paragraph 1.3 would benefit with greater clarity on the basis of Ultra Low Emission Vehicles (ULEV) namely that ULEV public transport is viewed as sustainable, but that ULEV private transport is not sustainable / of limited / minimal sustainability. Similarly, the opening line of paragraph 1.4 further	<p>Part Agree / Part Disagree:</p> <p><b>Paragraph 1.3</b> can benefit from greater clarity with regard to Ultra Low Emission Vehicles</p>



	<p>emphasises the need to clarify this – sustainable travel by public transport and active travel have health and well-being benefits. There are few health and well-being benefits from ULEV private cars. Whilst we concur with Paragraph 1.5 the SPG has the opportunity to encourage developers to install electric car charging points in new build residential developments.</p>	<p>Planning Policy Wales (ed.10) notes: “The transport hierarchy recognises that Ultra Low Emission Vehicles also have an important role to play in the decarbonisation of transport, particularly in rural areas with limited public transport services.”</p> <p><b>AMENDMENT</b>  1.3 ... Walking and cycling are the most obvious forms of sustainable travel, followed by public transport such as buses and trains. Travel by ultra-low emission vehicles can also have an important role to play, particularly in rural areas with limited public transport. Single occupancy travel in private motor vehicles is unsustainable and the general premise of this SPG is to move people away from this type of travel to more sustainable forms.</p> <p><b>Paragraph 1.4:</b> The suggested amendment in paragraph 1.3 clarifies what is sustainable travel and there is no need to repeat this.</p> <p><b>Paragraph 1.5:</b> Noted, and we welcome the comments, no specific amendments are required.</p>
	<p>Regarding linkages with the wider area (3.3 – 3.7) in particular connectivity with the wider sustainable network of Newport and beyond, Guidance Note 1 is useful in considering and demonstrating how applicants approach this. Whilst we agree with the context and content of the Guidance there is no information on considering the various sectors of the</p>	<p>Paragraph 3.12 notes: “The ‘Design Guidance – Active Travel (Wales) Act 2013’ advocates these key principles and provides additional detailed guidance on a variety of specific measures that could be</p>

	<p>population such as the young, the elderly and those with physical mobility conditions. It is important that sustainable travel in whatever context is as much as possible inclusive to all population groups. It would be useful to see the SPG link to wider strategies in particular the Local Well Being Plan<sup>1</sup> which highlights a number of health action priorities for sustainable travel (page 26).</p> <p><a href="http://www.newport.gov.uk/documents/One-Newport/Local-Well-being-Plan-2018-23-English-Final.pdf">http://www.newport.gov.uk/documents/One-Newport/Local-Well-being-Plan-2018-23-English-Final.pdf</a></p>	<p>utilised” and it would be helpful to provide a link to this within the document</p> <p>In particular it is noted the ‘Design Guidance – Active Travel (Wales) Act 2013’ defines “walkers and cyclists” as people who walk; people who use pedal cycles, other than pedal cycles which are motor vehicles for the purposes of the Road Traffic Act 1988; <b>and</b> disabled people not within the last two groups who use motorised wheelchairs, mobility scooters or other aids to mobility.</p> <p><b>AMENDMENT</b>  Footer added to page 15  <a href="https://gov.wales/active-travel-design-guidance">https://gov.wales/active-travel-design-guidance</a></p> <p>Section 2 of the draft SPG “Legal and Policy Context” including how the SPG links with the Well Being of Future Generations (Wales) Act, this overlaps the actions of the Councils Well Being Plan on page 26.</p>
	<p>We welcome the recognition of the need to be demonstrably able to travel to a range of services (Paragraph 3.8), but think it would be advisable to including consideration of access to those services that are planned for the site, along with the services that will need to be accessed in other areas before those services are established. This also links to Paragraph 4.3 and the statement “all journeys” should be considered.</p>	<p>Part Agree / Part Disagree:</p> <p>Paragraph 3.11 notes “Each proposed development site will be different in nature and effectively there will not be a ‘one size fits all’ solution to encourage sustainable travel within and around new developments.” Depending on the phasing of the development this may be relevant.</p>

		No specific amendments are required.
	<p>Paragraph 3.15 may benefit from emphasising that pedestrians and cyclists are <u>prioritised</u>, rather than there is a balance between motor vehicles, pedestrians and cyclists.</p> <p>Paragraph 3.16 – see above – but the wording, particularly “faster”, is not consistent with the sustainable hierarchy being adopted.</p>	<p>Part Agree / Part Disagree: AMENDMENT to Paragraph 3.15</p> <p>... Whereas this is understandable, a balance needs to be struck between calming traffic and creating a layout that gives <b>priority to</b> direct routes to pedestrians and cyclists.</p> <p>Paragraph 3.16, while sustainable hierarchy give priority to pedestrians and cyclists, there will still be instances where there will be higher speed roads adjacent to pedestrians and cyclists. In these instances consideration needs to be given to the safety of the pedestrians and cyclists.</p>
	<p>Regarding specific travel plans (4.1 – 4.8) it is important that the effectiveness is evaluated post development, and would encourage this to be part of planning conditions or obligations in line with the SPG. It is vital that there is continued engagement with local communities to ensure that any plan is fit for purpose and meets the needs of all.</p> <p>Finally, regarding Appendix 1, it would be useful to include an assessment of existing local population demographics along with a projection associated with new developments to ensure any travel plan meets and understands the community requirements to ensure active travel is accessible to all.</p>	<p>Part Agree / Part Disagree: The SPG does not give a set structure for a travel plan as each one will need to be specific to the needs of the site to which it relates.</p> <p>An example is provided in Appendix 1 which includes a monitoring and review section.</p> <p>Section 2 “<i>Site Description and Existing Conditions</i>” could also include an assessment of existing local population demographics along with a projection if this were relevant.</p> <p>No specific amendments to the documents are required.</p>

<p>Caerleon Civic Society</p>	<p>The Society strongly endorses the aims of this guidance as detailed in the 'introduction and background' section. We consider that it would be appropriate in this section to explicitly identify the relationship between this SPG, the SPG on air quality, and the development of the Council's Sustainable Transport Strategy. Such a reference would place planning guidance firmly in the context of the overriding need to improve personal and community health and well-being.</p>	<p>Disagree: While the promotion of sustainable travel can contribute to improved local air quality (as detailed in paragraph 1.6), the benefits of sustainable travel are not limited to just the areas designated as Air Quality Management areas and should be implemented across the whole of Newport. It is not considered necessary to specifically link this SPG to the air quality SPG.</p> <p>No specific amendments to the documents are required.</p>
	<p>Guidance Note 1. We consider that explicit reference should be made, in relation to para. 3.11, to the needs of both disabled people (residents and visitors - with or without electric wheelchairs)) and pedestrians with prams or pushchairs. Guidance should refer to the avoidance of steps/abrupt change of level; steep gradients; junctions and corners in the pedestrian network with limited forward visibility; and the need for dropped safety kerbs and road crossings.</p>	<p>Paragraph 3.12 notes: "The 'Design Guidance – Active Travel (Wales) Act 2013' advocates these key principles and provides additional detailed guidance on a variety of specific measures that could be utilised" and it would be helpful to provide a link to this within the document.</p> <p>In particular it is noted the 'Design Guidance – Active Travel (Wales) Act 2013' defines "walkers and cyclists" as people who walk; people who use pedal cycles, other than pedal cycles which are motor vehicles for the purposes of the Road Traffic Act 1988; <b>and</b> disabled people not within the last two groups who use motorised wheelchairs, mobility scooters or other aids to mobility.</p> <p>AMENDMENT Footer added to page 15 <a href="https://gov.wales/active-travel-design-guidance">https://gov.wales/active-travel-design-guidance</a></p>

	<p>Guidance Note 2. No comments.</p> <p>Guidance Note 3. We agree that it is important to emphasise that a travel plan should only be used to enhance a development which has already been deemed acceptable. We consider that a key component of a travel plan is the utilisation of a Travel Plan Co-ordinator, fully funded for a fixed period at least equating to the development's construction period.</p>	<p>Agree: While the SPG does not give a set structure for a travel plan as each one will need to be specific to the needs of the site to which it relates.</p> <p>No specific amendments to the documents are required.</p>
Redrow	<p>Para 3.2 recognises that "movement and promoting sustainable means of travel are acknowledged as an important objective of good design". The SPG should recognise appropriate street hierarchy, shared spaces, priority of pedestrians over car etc and that designing streets for the car as led by highway authority requirements. Encouraging Active Travel starts at the home. The draft SPG (para 1.5) recognises that people are influenced more when they have a lifestyle change such as moving home. The carriageway immediately outside the front doors should be designed to be welcoming and safe to walk and cycle from.</p>	<p>Paragraph 3.12 notes: "The 'Design Guidance – Active Travel (Wales) Act 2013' advocates these key principles and provides additional detailed guidance on a variety of specific measures that could be utilised" and it would be helpful to provide a link to this within the document</p> <p>AMENDMENT Footer added to page 15 <a href="https://gov.wales/active-travel-design-guidance">https://gov.wales/active-travel-design-guidance</a></p>
	<p>Manual for Streets is referenced in the draft SPG in relation to footpath widths. It should be advocated as a whole and in relation to shared spaces for example.</p>	<p>Paragraph 3.18 states ... The recommended path widths for different types of user and other design features are well documented in Manual for Streets<sup>2</sup>.</p> <p>This would include things like shared surface streets and squares, homezones etc.</p> <p>No specific amendments to the documents are required.</p>
	<p><i>Linkages to the Wider Area (P.12)</i> – It is understood that new designated pedestrian / cycle routes are preferred but sometimes this is not possible. Improving / upgrading existing roadways / footways to make it physically safer for pedestrians/cyclists could be possible e.g. segregations with a</p>	<p>While the SPG does not give a set formula for an active travel routes as each one will need to be specific to the needs of the site to which it relates.</p>

<sup>2</sup> <https://www.gov.uk/government/publications/manual-for-streets>

	<p>fence, kerb line etc. Otherwise, lowering traffic speeds and allowing shared space of an existing carriageway could be used effectively. The SPG could provide further guidance and examples of how active travel routes can look (new routes or upgrading of existing infrastructure).</p>	<p>No specific amendments to the documents are required.</p>
	<p>Para 4.2 and text in Guidance note 3 is not appropriate and contrary to national guidance contained in Technical Advice Note 18. Effective travel planning can be used to make a development acceptable. There are plenty of case studies to prove this. Ultimately each application must be assessed on its merits. Active Travel to schools for examples is recognised in the draft SPG. Having a school or schools within walking distance of an area and introducing new routes or improving older routes (safer, more attractive etc) is known to enable a shift change. This is a change not just to new residents on a new development but also resulting in a shift change to existing residents in the area. The SPG should be updated to reflect the guidance contained in TAN18. This being that existing travel plans can contribute to a baseline of a TA and for new developments to have a TA undertaken and then the travel plan is developed as a component part. The weight afforded to the travel plan is done on a case by case basis and dependant on what is enforceable via the travel plan. This approach is as set out by national planning policy and so an SPG should not contradict this.</p>	<p>Agree: The aim of paragraph 4.2 and Guidance Note 3 is to ensure development will not have a detrimental impact on travel and transport should the objectives and measures within travel plans not be achieved. It is noted TAN18 paragraph 9.13 states “... <i>Development that is unacceptable should never be permitted because of the existence of a travel plan if the implementation of that plan cannot be enforced.</i>” As such an amendment is proposed.</p> <p>AMENDMENT Paragraph 4.2: It is important to note that the Council will need to be satisfied that a development is acceptable in transport terms <b>WITHOUT</b> the need for a travel plan (unless the Council is satisfied that the implementation of an acceptable travel plan is both realistic and enforceable). A developer should not include unrealistic or unachievable measures in a travel plan to get a substandard scheme planning permission. The travel plan should <b>only</b> be used to enhance development which has already been deemed acceptable by the Council.</p> <p>AMENDMENT</p>

		<p>... development is acceptable in transport terms <b>WITHOUT</b> the need for a travel plan (<b>unless the Council is satisfied that the implementation of an acceptable travel plan is both realistic and enforceable</b>). In order to enhance development for its end users and reduce the impact on the environment,...</p>
	<p>Page 27 – a garage of minimum size of 6m by 3m should be recognised as being acceptable to accommodate a car and for bike storage. Garages at this size are advocated by Manual for Streets for car parking and house hold storage provision.</p>	<p>[NB: Redrow confirmed these comments are in reference to page 17.]</p> <p>Disagree: While MFS notes:</p> <p><i>“...larger garages can be used for both storage and car parking, and many authorities now recommend a minimum size of 6 m by 3 m”.</i> (8.3.41) and</p> <p><i>“... In residential developments, designers should aim to make access to cycle storage at least as convenient as access to car parking.”</i> (8.2.1)</p> <p>In the Draft SPG the footer to page 17 notes <i>“... A garage can also be identified for cycle storage, however it cannot also be declared as a car parking space (unless the applicant can provide sufficient justification that it is suitable for both).</i></p> <p>It will be for the applicant to demonstrate the size <b>and</b> design of the garage (e.g. position cycle storage in relation to external doors) is appropriate and make access to cycle storage at</p>

		<p>least as convenient as access to car parking.</p> <p>No specific amendments to the documents are required.</p>
	<p>Setting objectives and measures within travel plans is appropriate. However, the ability to have a remedial measures is not considered appropriate. There are far too many variables to affect people's behaviour outside of a development site and far beyond the control of a developer. Developments can put sustainable travel measures in place to allow people to change their behaviour and indeed make it easier for them to do so. However, enforcing them to undertake the most sustainable form of travel at all times is uncontrollable. If a bus service is altered or stopped for example this could affect the travel movements of many people. If the Council made highway improvements to make a car movement quicker for an individual then they make a different travel movement decision. If a Council or private car park introduced lesser parking charges at a place of work/place of visit then this could result in a different travel movement. There are simply too many variables beyond the control of the developer and that would be understood to make it reasonable for future remedial measures, at financial burden, to be introduced.</p>	<p>The SPG does not give a set structure for a travel plan and notes each one will need to be specific to the needs of the site to which it relates. Appendix 1 provides <u>an example</u>. However, the developer, in producing the travel plan, should set realistic and achievable targets and triggers. Or ensure variables beyond the control of the developer are accounted for in the way the travel plan is monitored.</p> <p>It may be more appropriate to use non-financial measures where targets are not achieved due to changes in circumstance beyond the developer's control.</p> <p>No specific amendments to the documents are required.</p>
Newport City Homes	<p>We welcome the approach of using planning guidance to promote sustainable travel. We recognise the environment and well-being benefits of sustainable travel and the responsibility of developers to work with Newport City Council to ensure that each new development supports the sustainable travel objectives.</p> <p>It is recognised that increasing the responsibility on developers to deliver higher specifications can increase build costs or reduce the number of units that can be developed on a site. We would urge NCC not to compromise on the sustainable travel principles but to also work in partnership with developers to ensure that the additional development</p>	<p>Noted and we welcome the comments. No specific amendments are required.</p>



requirements do not compromise the viability of new developments.

While we recognise the different issues and considerations when developing larger sites compared to smaller sites, we feel it is important to have consistency in intended outcomes in terms of sustainable travel. It is important that planning and developing for sustainable travel does not become a potential barrier to new development but instead becomes a routine consideration that delivers on the required objectives and is supported through consistency in expectations and decision-making. We believe that a partnership approach between Newport City Council and developers with regular dialogue and the sharing of “lessons learnt” and good practice would be the best approach to deliver on shared objectives.

There is a link between the level, cost and convenience offered by public transport and the use of private cars. Under-investment in public transport will make the car an option that is chosen for a major number of journeys. The availability of an extensive, safe, clean and economically advantageous public transport network is required to persuade people out of their cars. It is essential that the public transport options provide frequent and integrated travel so that it delivers a travel option that is at least as convenient as a car.

A public transport network that is unreliable, inconvenient, not integrated and costly will result in a lack of use and generate revenue below the level required to fund future investment. It is important that transport policy includes the right investment at the right time to make public transport a viable and attractive option for current car users.

We support the use of Travel Plans within the planning system. What is important is the overall goals of facilitating sustainable travel. It is important that approved travel plans do not place onerous on-going management responsibility on developers but instead seek to put in place actions to create the environment for sustainable travel to become the norm.

	<p>The provision of secure bicycle storage on new development will do nothing to enhance the uptake of active travel if the “whole city” cycle infrastructure does not support cycle as a fast, safe and viable alternative to other forms of transport. To achieve this Newport must have a network of cycle routes that enable people to get from home to their place of work, school/college, health service locations, retail and social spaces without being disadvantaged by choosing to cycle. Cycle routes need to be: comprehensive, fast, safe and complete, this means that people need to be able to complete their whole journey on a high-quality route.</p>	<p>Paragraph 3.4 notes, “...the Council has produced a number of Active Travel maps which identify existing suitable routes for pedestrians and cyclists and suggest other potential routes that would help create an integrated network of active travel routes across Newport. These maps are produced by the Council and then approved by Welsh Government. They are available to view online at <a href="http://www.newport.gov.uk">www.newport.gov.uk</a>. There is also an interactive version online.”</p> <p>No specific amendments to the documents are required.</p>
	<p>Of equal importance is viable storage at the cycle destination. The barrier to the uptake of active cycle travel can be the lack of conveniently located cycle garages that are extremely secure, weather-proof, with convenient drying/changing facilities. The provision of a cursory and vulnerable bike stand with limited security measures will not make cycling a viable method for city travel. Places of work and retail spaces and social zones such as the city centre must be equipped with storage facilities that people have confidence in. Although the SPG places requirement on new development the majority of these facilities are in existing development and consideration needs to be given as to how new homes with safe cycle storage will have little impact on increasing active travel if similar facilities are not available at the destination.</p>	<p>Agree: Paragraph 3.20 states “Each long-stay cycle parking space for staff and residents should be located in a safe, convenient and accessible place suitable for everyday long-stay use; long-stay parking should be secure, covered, well-lit and have CCTV where practical/ feasible” and 3.21 recommended that “supporting facilities are provided at land uses where long stay cyclists require them, i.e. places of employment. Supporting facilities include lockers, showers and changing rooms.”</p> <p>No specific amendments to the documents are required.</p>
	<p>The level of provision of secure bicycle storage should also be carefully considered (guidance note 2). A solution that does not provide sufficient storage space for all residents in a home will mean that some family journeys cannot be made by bike even if the household desires to. There needs to be a clear understanding of the</p>	<p>Guidance note 2 sets a minimum level of provision and are based on advice from the Council’s Active Travel Officer, and is considered to be a balance between providing a sufficient level</p>

	<p>likely take-up of the bicycle as a potential travel solution and for new developments to have sufficient capacity to achieve this. It should also be considered if the planning guidance can be used pragmatically with the understanding that some developments (the location and the likely occupiers of those developments) are best suited to active travel and the possibility that the bike storage requirements are not exclusively applied based on the size of the development but rather designed for developments where they will achieve the greatest sustainable travel impact.</p>	<p>of storage and being overly onerous. This would not restrict developers providing a higher level.</p> <p>No specific amendments to the documents are required.</p>
	<p>It is important that planning guidance and travel policies recognise that not all journeys will be undertaken via active travel or public transport. With this in mind it is important that the potential of zero emission private vehicles is recognised as one element within transport and planning regulation. Where the car is used it would be desirable to maximise the percentage of vehicles that are low carbon, ideally electric vehicles. The availability of charging points is crucial to the use of electric car, with the ideal solution being charging points powered by renewable sources of energy such as solar PV panels that can be incorporated in to larger new developments including commercial developments. Consideration should also be given to the potential of electric cycles in supporting sustainable travel, they enable longer journeys by bike in areas of challenging topography. Electric cycles have become a popular commute option in many UK and European cities but again uptake will depend on the availability of reliable, secure and convenient storage solutions across the city. The potential role of bike sharing schemes should be explored, these have employ a different bike storage solution but again the security and safety of the journey are paramount to making the approach operate effectively. It is likely that electric bikes sharing schemes will become more common across Europe, these make longer bike commutes more viable, open-up cycle as a travel choice to wider sections of the population and mean that hilly terrain is no longer an issue. Travel policies should consider the potential of electric bike sharing solutions.</p>	<p>Paragraph 1.3 includes refers to Ultra Low Emission Vehicles</p> <p>Suggested amendment:</p> <p>AMENDMENT</p> <p>1.3 Sustainable travel is about moving from A to B, but valuing the environment and looking after our natural resources at the same time. Walking and cycling are the most obvious forms of sustainable travel, followed by public transport such as buses and trains. Travel by ultra-low emission vehicles can also have an important role to play, particularly in rural areas with limited public transport. Single occupancy travel in private motor vehicles is unsustainable and the general premise of this SPG is to move people away from this type of travel to more sustainable forms.</p> <p>PPW already look for new non-residential development, to have “a minimum of 10% of car parking spaces to have ULEV charging points.” (4.1.39)</p>

		<p>Paragraph 3.12 notes: “The ‘Design Guidance – Active Travel (Wales) Act 2013’ advocates these key principles and provides additional detailed guidance on a variety of specific measures that could be utilised”.</p> <p>In particular it is noted the ‘Design Guidance – Active Travel (Wales) Act 2013’ discusses Cycle Parking Layout and Other Requirements, (8.9.15) and Paid-for cycle parking (8.9.21). A link to this document is provided.</p>
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