Cotswold District Local Plan 2018 – 2031 Update

Town and Country Planning (Local Planning) Regulations 2012

Regulation 18 "Issues and Options" consultation/participation

Evidence Paper: Sustainable Transport and Air Quality

1.   Introduction

1.1   This paper considers access to key services, facilities and employment for those who live, work in or visit Cotswold District, and how sustainable accessibility can be encouraged and enabled by effective planning.

1.2   In 2019, an update to the Climate Change Act committed the UK to 100% reduction in carbon emissions (relative to 1990 levels) by 2050. In June 2021 a further interim commitment of 78% reduction in carbon emissions by 2035 passed into law. These commitments apply to emissions from all domestic UK sectors, but they are particularly challenging in the case of transport. Transport is currently the largest emitting sector in the UK, generating around 27% of domestic greenhouse gas emissions, most of which are generated by road transport, particularly private cars. The sector has proved resistant to change, with policy efforts and technological advances only delivering a 5% reduction in emissions over the last 30 years[1]. This is particularly true in Cotswold, where our dispersed rural communities and limited public transport network have contributed to a reliance on private vehicles to access employment and services[2].

1.3   Against this backdrop it is possible to appreciate the scale of change in transport behaviour that will be required to meet our statutory climate change commitments. Recent guidance indicates that this cannot be achieved by changes to the transport system alone, but must be part of a holistic approach that integrates transport and spatial planning[3].

1.4   In addition to carbon, road traffic also generates other pollutants, such as nitrogen oxides (NOx) and particulates. These are harmful to both human health and to plant and animal wildlife. Where pollution levels are at, or close to, legally defined limits, Air Quality Management Areas (AQMAs) are declared and a plan developed to bring emissions down. Cotswold DC only has two AQMAs. One is at the Air Balloon roundabout on the A417 at Birdlip, where nitrogen dioxide levels are above acceptable levels mostly due to traffic congestion and high levels of HGV traffic. The Management Plan for this area identifies that HGV speeds and volumes must be reduced to resolve the problem. Switching vehicles to less polluting fuels, such as hydrogen or electricity, will also improve the situation, though some particulates from tyre wear will remain. The second AQMA is in Lechlade and is also due to exhaust fumes from queuing vehicles. Measures to reduce petrol and diesel vehicle volumes will also help to reduce these pollutants throughout our district.

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[1] 2019 UK Greenhouse Gas Emissions - Final Figures, BEIS (2021)
[2] Gloucestershire Local Transport Plan 2020-2041
[3] Decarbonising Transport: Getting Carbon Ambition Right, Local Government Association (2021)

2. Objectives

2.1 The current Local Plan contains an objective to reduce car use by:

   a. Locating most developments in sustainable locations where there is better access to jobs, services and facilities and public transport.

   b. Supporting improvements in public transport, walking/cycling networks.

2.2 This could be extended by the addition of two further sub-objectives to reflect firstly the importance of on-site infrastructure and design (as well as connections to the wider network) in supporting walking and cycling, and secondly the growing emphasis on more flexible working practises, particularly in the wake of the COVID pandemic:

   c. Designing sites that prioritise access to and through by sustainable modes, and that facilitate the use of electric and shared vehicles.

   d. Providing opportunities to work locally.

3. NPPF, NPPG and other material considerations.

3.1 Sustainable Transport is considered explicitly in Chapter 9 of the NPPF, and is referenced frequently throughout other sections. Paragraph 102 calls for the effective integration of transport and spatial planning, stating

3.2 "Transport issues should be considered from the earliest stages of plan-making and development proposals", while paragraph 103 recommends that "(s)ignificant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes."

3.3 The Planning Policy Guidance *Transport Evidence Bases in Plan Making and Decision Taking* (2015) further sets out the need for local planning authorities to undertake an assessment of transport implications when developing or reviewing their Local Plan so that transport can be included in the evidence base. Delivery mechanisms for sustainable transport infrastructure through the planning process are also made explicit here:

3.4 "The transport evidence base should identify the opportunities for encouraging a shift to more sustainable transport usage, where reasonable to do so; and highlight the infrastructure requirements for inclusion in infrastructure spending plans linked to the Community Infrastructure Levy, section 106 provisions and other funding sources."

3.5 These chapters (and others) in the NPPF and PPG documents make links to other, more specific, transport-focused policies that sit outside the NPPF but which form material considerations in the development of Local Plans. The recent government strategy *Gear Change: A bold vision for walking and cycling* (2020) makes this link explicit:

3.6 "We will ensure that all new housing and business developments are built around making sustainable travel, including cycling and walking, the first choice for journeys....We will work with the Ministry of Housing, Communities & Local Government and the Local Government

Association to place cycling and walking provision at the heart of local plan making and decision taking for new developments."

This national vision is carried through to Gloucestershire County Council's recent (2021) revision of the Local Transport Plan (LTP), which acknowledges the need for profound changes to the way we travel coming over the next two decades and the "integration of strategic land use, infrastructure and transport planning" that will be necessary to support this transformation.

4. Background evidence and Sustainability Appraisal – setting out the issues

4.1   The Sustainability Appraisal (SA) Scoping Report for the Local Plan Review lists transport as "out of scope", considering that policies INF3 and INF4 of the existing local plan are sufficient to support sustainable modes and that wider transport concerns are more properly addressed through Gloucestershire's Local Transport Plan. The SA Scoping Report notes that the Local Plan should be reviewed if and when the Local Transport Plan is updated. Since the SA was produced, the County Council has indeed adopted an updated version of the Local Transport Plan, which places greater emphasis on the requirement to switch to more sustainable modes of travel. Furthermore, in 2019 Cotswold District Council declared a climate emergency and committed to carbon neutrality by 2045; the resultant Climate Emergency Strategy (2020) highlighted the need for a Sustainable Transport Strategy to help achieve this aim. Over the same period, a suite of government guidance papers have been published (summarised above) that stress the need for greater integration of spatial and transport planning to achieve vehicle emissions reduction targets commensurate with our statutory commitment to carbon neutrality by 2050.

4.2   These recent developments point to a need to re-consider the role of the Local Plan in supporting the delivery of transport objectives. Stage 1 of the SA should also be revised to take account of these changes and their implications for sustainability objectives.

5. Current Local Plan Policy

5.1   The current Local Plan explicitly considers sustainable transport under Policy INF3 Sustainable Transport

5.2   Policies DS1 and DS2 seek to contain most residential and employment development to sites in and around the district's Principal Settlements, which helps to ensure that key services can be accessed by walking, cycling and public transport, reducing the need for car use. Conversely, policies DS3 and H3 allow for developments outside the Principal Settlements in certain circumstances; these must be considered carefully to ascertain whether they are designing in a reliance on routine car use.

5.3   Elements of sustainable transport policy are also referenced in:

- INF2 (Local and Community Infrastructure), which requires community infrastructure to be well-linked and accessible by foot, bicycle or public transport;

- INF4 (Highway Safety), which requires that developments create safe, secure layouts that minimise conflicts between traffic and cyclists or pedestrians and that they provide safe and suitable access, including, where appropriate, designs that

incorporate low speeds. This policy also references *Manual for Gloucestershire Streets*, which itself contains substantial guidance on the design of sustainable transport infrastructure;

- Development policies for individual areas, several of which specify improvements to sustainable transport infrastructure or the protection of routes for this purpose. This is also implicit in wider policies protecting former canal and railway routes, which also have the potential for use by walking and cycling;

5.4 Taken in combination, the existing Local Plan policies support many of the principles of sustainable transport provision. However, the formulation of those policies needs to more directly meet the demands of our growing need to reduce car use. The frequent use of "where appropriate", "if possible" and other qualifying phrases in the policy wording inadvertently creates ambiguity and opportunities for exemptions from adequately planning for sustainable modes of transport, which is now out of step with the Council's declaration of a Climate Emergency and corporate commitment to making the Local Plan "green to the core".

5.5 While Policies DS1 and DS2 seek to concentrate development in areas that are close to essential services, the Plan could better recognise the link between spatial planning and transport choice - in particular that walking, cycling and public transport become viable first-choice options for journeys mostly when people's homes are sufficiently close to their destinations or to a regular public transport service to take them there. The Plan should therefore seek to join up these planning elements by explicitly considering sustainable access to key services when allocating sites for development and identifying access issues that must be resolved before development can proceed. Such resolutions could come through improvement to sustainable transport infrastructure or service level, through the provision of new/enhanced local services or through new models of service provision that reduce or eliminate the need to travel to access them.

5.6 This enhanced requirement will also require a balanced re-evaluation of policies DS3 and H3, to reduce the risk of development taking place in areas with very poor access to essential facilities and services.

6. Potential Policy Responses

6.1 Bringing transport objectives into the heart of a Local Plan will ensure an integrated approach to place making and growth that will ensure that residents and businesses are better able to access the facilities and services they need as we move into a new era of reduced reliance on private vehicles. As transport and spatial planning have historically been developed independently (albeit with regard for each other) this will be a new evolution in local planning. The options below are therefore presented as a basis for discussion on how best to achieve this.

Option 1: Introduce minimum accessibility requirements for new development sites.

6.2 This option would see the introduction of an accessibility scoring system for potential development sites based on ease of access to key services and facilities by foot, bicycle or public transport. Except in exceptional circumstances, where access to such services is poor,

development should be prohibited unless the developer can commit to sufficiently improving such access either by the provision of more local services, or by improvement of the sustainable transport network/services to enable people to reach existing services.

Option 2: Introduce mode share targets for new development sites

6.3   This approach would incorporate the approach outlined in Option 1, but further embed the commitment to reducing car dependency in new development areas by mandating maximum vehicle journey generation targets for each site. An appropriate target would be determined for each site based on a transport assessment/statement and an associated travel plan/travel plan statement for each site, with each contributing to the overall objective of achieving net zero carbon by 2045.

6.4   It would also require a more rigorous implementation (and potentially an update) of the existing Travel Plan requirements currently provided for in Gloucestershire's *Travel Plan Guide for Developers (July 2011)*, to ensure travel plans are robustly assessed, vehicle trip mitigation measures are identified and secured through s106, CIL etc., and that such measures are delivered early in the development process so that new residents/employees have sustainable transport opportunities available from day one of occupation. Delivery of travel plan measures would also be robustly monitored and financial provision made for the implementation of reparation measures in the event that the developer fails to meet maximum trip generation targets.

6.5   This follows the approach recommended in [CIHT (2019) *Better Planning, Better Transport, Better Places.*](#)

Option 3: Develop a Sustainable Transport Strategy for Cotswold

6.6   The current Local Plan links with the Gloucestershire Local Transport Plan. This sets the context for highways and transport priorities and policy across the county and provides a broad evidence base and material consideration for the Local Plan.

6.7   While the Local Transport Plan is important in establishing an overall policy context and strategic approach to transport provision in Gloucestershire as a whole, in practise it is limited in its ability to provide localised direction on sustainable transport measures that should be implemented at each strategic development site. A Cotswold District Sustainable Transport Strategy (STS) will identify walking, cycling and public transport infrastructure improvements within and between key settlements: new developments can then contribute effectively to their delivery. In addition to infrastructure, the STS will identify "soft measures" - such as information, incentives, promotion, training and support - that can encourage and enable people to use sustainable modes of transport. Again, new developments should accord with, and contribute towards, such measures.

6.8   The Local Plan should give weight to the STS to ensure it is a material consideration in the determination of planning applications.

Option 4: Adopt the Hierarchy of Road Users, LTN1/20 and the principles of "filtered permeability" and ensure they are used to guide the design of new

developments and their links to the wider travel network. Provide for electric and shared vehicle use within the design of new developments.

6.9 The concept of a "hierarchy of road users", which prioritises provision for more vulnerable and less-polluting travellers, has been a feature of transport design guidance since 2007's *Manual for Streets*[4] and will soon be incorporated into the latest revision of the Highway Code.

Table 3.2: User hierarchy

Consider first	Pedestrians
↓	Cyclists
	Public transport users
	Specialist service vehicles (e.g. emergency services, waste, etc.)
Consider last	Other motor traffic

6.10 The hierarchy encourages engineers to consider the needs of pedestrians (including mobility impaired) first in any scheme design, followed by cyclists, horse riders, public transport users, motorbikes/mopeds and finally cars and other larger vehicles. This approach ensures that conditions are as attractive, safe and inclusive as possible for those choosing more sustainable (but also more vulnerable) modes of transport, supporting the widest possible uptake.

6.11 Local Transport Note 1/20: Cycle Infrastructure Design provides guidance on the design of routes and spaces for cycling, both on and off the highway. It ensures new developments feel safe and secure for cycling for all, and are well-linked into the surrounding environment in a way that makes cycling feel like a viable option for local journeys. Many inexperienced cyclists feel vulnerable cycling on the road, and poorly-designed cycle routes can cause conflict with both vehicles and pedestrians, so good design, planned in right from the start, will be essential to meet the government's target of doubling cycling by 2030.

6.12 The principles of LTN1/20 and the Hierarchy of Road Users are incorporated into Gloucestershire County Council's *Manual for Gloucestershire's Streets*[5] highway design guidance, and thus already forms a material consideration for planning applications, but bringing it directly into the Local Plan will help to give additional weight and prominence to the concept of prioritising travel on foot, by bicycle and by public transport.

6.13 *Manual for Streets* also introduced the concept of permeability - later refined to "filtered permeability" or "modal permeability" - which aims to ease the movement of pedestrians and cyclists by ensuring those modes have a finer grained network of paths and access points to sites and the wider transport network than the road network alone. This again promotes

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[4] Manual for Streets (2007) - DfT/DCLG
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/341513/pdfmanforstreets.pdf
[5] https://www.gloucestershire.gov.uk/media/2099344/2020-july-mfgs.pdf

the movement of pedestrians and cyclists to and through a site, recognising that adding additional distance to self-powered journeys significantly reduces their uptake.

6.14   *Manuals for Streets (2007)* and its companion edition *Manual for Streets 2: A wider application of the principles (2010)* are due to be updated in 2022. The resultant document - a collaboration between the Department for Transport and the Ministry for Housing, Communities and Local Government - will form the best available guidance on design of new residential streets. As such, we will look to bring new or additional principles through into our planning policy as they emerge.

6.15   Switching from petrol and diesel vehicles to electric (EV) forms a major part of the government's strategy to reduce transport carbon and the most recent version of the NPPF (July 2021) requires that new development are "designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations". *Manual for Gloucestershire's Streets* "strongly requires all properties to be equipped with Ultra Low Emission Vehicles (ULEV) charging points including provision where communal parking is provided. All new dwellings which provide car parking should be fitted with electric vehicle charging infrastructure to BS EN 62196 Mode 3 or 4 charging and BS EN 61851."

Policy Approach	Discussion of impacts, effectiveness etc - justification
(A) Preferred Option: All	Our preferred option is to implement all of the proposals above, as evidence suggests that a concerted effort across all possible sectors will be necessary to meet our climate change commitments. However, there are potential implications for the scale and cost of future housing delivery (and associated infrastructure) which must be further investigated and quantified.
(B) Alternative Option: Partial implementation	This consultation - and evaluative work that proceeds alongside may help us shape a partial implementation of the proposals in this paper, taking forward those for which there is most support and/or which offer the greatest benefits at the most acceptable costs. We would also be grateful to hear other suggestions for alternative actions and approaches that we may not yet have considered.
(C) Rejected Option:	Do nothing. The demands of the climate emergency require us to take action.