

## 2018 Supplementary Planning Document consultation

### Consultation statement – Sustainable Travel and Development SPD (2018)

The Council consulted statutory and other consultees on the draft Sustainable Travel and Development SPD in line with the approved Statement of Community Involvement (<https://www.sefton.gov.uk/sci>). The consultation period ran from mid-February to 13<sup>th</sup> April 2018.

A total of 8 comments were received from:

- Canal and Rivers Trust
- Emerson Group
- Highways England
- Jigsaw Homes
- Natural England
- Network Rail
- Cllr Roche
- Taylor Wimpey UK

Consultee	Summary of comment	Response
<b>Canal and Rivers Trust</b>	The Trust support the thrust of this SPD, but is disappointed that there appears to be no specific mention of the Leeds & Liverpool canal as a sustainable transport route and contributions towards towpath improvements (where appropriate).	Noted. It is considered that accessibility assessments would consider the role of the Leeds and Liverpool Canal, where appropriate. Improved accessibility to the canal or its infrastructure (e.g. towpath) may also play a role when applicants to consider and include measures that will mitigate recreation pressure to less than significant on the Sefton Coast, if required under policy NH2 'Nature' and the Habitats Regulations.
<b>Emerson Group</b>	The Emerson Group support the need for the provision of guidance for developers and broadly support the suggested scope of the emerging SPD. However, the Council should avoid any overly prescriptive policies that could constrain development and the SPD is considered to be inflexible in relation to the detailed information that is required for the preparation of a Transport Assessment/Statement for a planning application submission. The NPPF is clear at paragraph 153 that <i>'any additional development plan documents should only be used where clearly justified. Supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development.'</i>	Disagree. Policies IN2 'Transport' and EQ3 'Accessibility' and their explanations are clear that the SPD provides guidance on undertaking accessibility assessments (Transport Assessments or Transport Statements). It is proposed to add a new paragraph 1.1.4 to clarify that: "1.1.4 The Sustainable Travel SPD replaces, for Sefton, the Merseyside-wide Ensuring Choice of Travel SPD (2009). For Sefton this 2009 SPD has now been revoked. Therefore the references to the 'Ensuring Choice of Travel' SPD in paragraph 9.23 of the Local Plan in relation to part 3 of policy IN2 'Transport' (regarding Transport Assessments or Transport

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Emerson Group	<p>The SPD should provide guidance on existing planning policies that form part of the recently adopted Sefton Local Plan and should not reinvent existing policies. The SPD should also take into consideration the viability and deliverability of schemes and should include a degree of flexibility depending on the individual circumstances of a proposed development. Differing levels of information are relevant to different types of planning applications and the requirement for detailed information that is not justified could delay development coming forward.</p>	<p>Statements), and in paragraph 10.21 in relation to policy EQ3 ‘Accessibility’ now apply instead to this Sustainable Travel SPD”.</p> <p>The Council considers that the SPD and its role is consistent with paragraph 153 of the National Planning Policy Framework and the glossary definition of Supplementary Planning Documents in the revised draft NPPF (March 2018). The Council considers that the SPD provides guidance on existing Local Plan policies and does not reinvent them.</p> <p>However, to clarify that the scope and content of Transport Assessments and Transport Statements is not the same for every planning application, it is proposed to amend the first part of paragraph 5.3.1 to say:  “For all developments, developers are encouraged to engage in pre-application discussions with the Council to determine the need for a Transport Assessment or Transport Statement and what information they should contain. <b><u>Transport Assessments and Transport Statements should be proportionate; the factors listed in paragraph 5.2.2 as well as those set out in paragraphs 5.3.2 and 5.3.3 are also relevant here. ...</u></b>”</p>
Emerson Group	<p>The SPD also sets out the form of development that may be required for an air quality assessment to be submitted as part of a planning application. This sets out that any developments that may result in increased congestion and lower vehicle speeds than at present on the existing road network such that adverse air quality impacts may arise, and air quality assessment could be required. This checklist for air quality assessments is unclear and it is suggested that this section is reworded to avoid any possible delays to the validation and determination of a planning application.</p>	<p>Paragraphs 7.1.2 and 7.1.3 make clear that the Institute of Air Quality Management and Environmental Protection UK guidance on Planning for Air Quality provide guidance on when an air quality assessment is required and that developers should contact the Council to discuss whether an air quality assessment is required. Paragraph 7.1.2 also indicates that the Council may provide further guidance in a future air quality SPD or Information Note. It is currently intended that such an Information Note will be produced in the near future, and it is</p>

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		considered that it would be premature to include detailed requirements in this Sustainable Transport SPD.
<b>Highways England</b>	<p>Paragraph 5.3.1 of the Sustainable Travel and Development SPD (Draft February 2018) document refers to the need to consult with Highways England where a proposal would affect the trunk road network. We would like to recommend the following amendment to that paragraph:</p> <p>5.3.1 For all developments, developers are encouraged to engage in pre-application discussions with the Council to determine the need for a Transport Assessment or Transport Statement and what information they should contain. For development proposals that affect the trunk road and <u>motorway network</u>, applicants will need to consult with Highways England about the content of the Transport Assessment as soon as possible. <u>Further details regarding how Highways England will engage in the application process can be found in ‘The Strategic Road Network and the Delivery of Sustainable Development, DfT Circular 02/2013’</u> (<a href="https://www.gov.uk/government/publications/strategic-road-network-and-the-delivery-of-sustainable-development">https://www.gov.uk/government/publications/strategic-road-network-and-the-delivery-of-sustainable-development</a>).</p> <p>Our request to include “motorway” is to avoid any ambiguity that may arise from referring to the SRN as “trunk road”. We also request the inclusion of a link to DfT Circular 02/2013 where applicants can find more information.</p>	<p>Agreed. It is proposed to amend the end of paragraph 5.3.1 to say:</p> <p>“.....For development proposals that affect the trunk roads <b>and motorway network</b>, applicants will need to consult Highways England about the content of the Transport Assessment as soon as possible. <b>Further details regarding how Highways England will engage in the application process can be found in ‘The Strategic Road Network and the Delivery of Sustainable Development, DfT Circular 02/2013’</b> (<a href="https://www.gov.uk/government/publications/strategic-road-network-and-the-delivery-of-sustainable-development">https://www.gov.uk/government/publications/strategic-road-network-and-the-delivery-of-sustainable-development</a>)”.</p>
<b>Jigsaw Homes</b>	<p>The comments below are based on recent experience of delivery of projects and in other Local Authorities adopting similar principles where Adactus HA and Chorley Community Housing (part of the Jigsaw Homes Group) operates.</p> <p>3.2 – It is important to note that contributions to infrastructure and off site works are not eligible for grant funding for affordable housing schemes which will affect the viability. Flexibility for sites that may be a high priority for affordable housing, or to bring forward stalled sites should be considered.</p> <p>4.1.5 – Implications for costs for electric vehicle charging points to parking courts should be considered, our research on recent developments has found</p>	

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<b>Jigsaw Homes</b>	<p>that whilst residents pay the cost of the charging themselves there are ongoing charges for maintenance and servicing of these points which would then need to be placed within a service charge for residents.</p> <p>Service charges affect the affordability of products such as Shared Ownership and viability of affordable rent schemes (where the service charge is included in the rent).</p> <p>If this policy is adopted for communal parking courts we would recommend there is a higher number of minimum spaces per charging point - Including 1 charging point per 4 properties would create a charge shared between a very small number of residents.</p>	
<b>Natural England</b>	<p>Natural England welcomes the production of the Sustainable Travel SPD. Whilst we have no further comments to make on the detail within this SPD, we recommend that reference to the importance of Green Infrastructure is also included along with any biodiversity enhancement opportunities associated with transport infrastructure. The SPD is a good opportunity to highlight sustainable transport not only for residents, but also for visitors and perhaps there are opportunities to increase public awareness of sustainable travel and promotion of Mersey Travel.</p>	
<b>Network Rail</b>	<p>Consideration should be given in Transport Assessments to the potential for increased footfall at Railway Stations as a result of proposals for residential development, employment areas within the council area. Location of the proposal, accessibility and density of the development, trip generation data should be considered in relation to the station. Where proposals are likely to increase footfall and the need for car parking at Railway Stations, the council should consider developer contributions (either via CIL, S106) to provide funding for enhancements.</p> <p>Any proposed development at this location should include a Transport Assessment that takes into consideration the level crossing with the developer fully funding any mitigation measures.</p>	

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<p><b>ClIr Roche</b></p>	<p>I would like the phrase "and those with limited mobility" deleted and the bullet point demoted to line two  Insert as bullet point 1. * Ensure safe and easy movement into, out of, and within the site for those with limited mobility"</p> <p>To Read as follows  2.1.3 In relation to site design, layout and access, development must:  * <b>Ensure safe and easy movement into, out of, and within the site for those with limited mobility</b></p> <ul style="list-style-type: none"> <li>• <b>Ensure safe and easy movement into, out of, and within the site for pedestrians and cyclists.</b></li> <li>• Integrate well with existing street patterns</li> <li>• Protect the amenity of those within and adjacent to the site</li> <li>• Ensure the safety and security of those within and outside the development through natural surveillance and the creation of active frontages</li> <li>• Create well-connected attractive outdoor areas which fulfil their purpose well.</li> </ul> <p>This is in-line with the unanimous vote of Council where "the council should do everything possible" to protect those with limited mobility.</p>	
<p><b>Taylor Wimpey UK</b></p>	<p>Whilst TWUK generally does not object to the guidance in the SPD, in relation to the Accessibility Checklist, the SPD should also state that “where necessary and appropriate, financial contributions to transport improvements should be subject to a viability assessment so to not unnecessarily impact upon the viability and/or deliverability of housing schemes”.</p>	
<p><b>Taylor Wimpey UK</b></p>	<p>TWUK broadly supports the proposed requirements for disabled parking, motorcycle parking and cycle parking, which are considered to be reasonable. However, the proposed car parking standards set out are too onerous, particularly when compared against the standards within the current SPD. TWUK disputes the requirement for an additional 0.3 unallocated spaces for 1 bed flats as there is no robust evidence for this, other than being based on</p>	

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	<p>onerous and out of date standards. The requirement should be for 1 allocated space, as per the standard in the current SPD, with no reference to unallocated spaces.</p> <p>It is unclear and illogical why a 1 bed house should require more parking than a 1 bed flat as per the standards above. The additional, unallocated spaces for 1 bed flats and 1 bed houses would appear to assume that at any time, 30% to 40% of apartments/houses in a development would have visitors requiring a parking space which does not encourage sustainable travel. It would seem more logical for there to be a distinction between 1 bed houses and 2 bed flats.</p> <p>Furthermore, it is fair to assume that the 2-4 bedroom houses will be served via standard adopted highways which will have sufficient width for some additional on-street car parking. For all of the dwelling types, the inclusion of additional unallocated parking spaces serves to discourage sustainable travel, thus conflicting with Policy EQ3 of the Local Plan which requires new development to be designed to encourage walking, cycling and use of public transport and Policy EQ1 which expects that development should help maximise opportunities to improve quality of life and promote healthy, active lifestyles. TWUK therefore proposes that the figures for allocated spaces be retained but the additional unallocated spaces be deleted.</p> <p>As such, the table at page 42 of the SPD should be amended as follows:</p>	

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	<table border="1"> <thead> <tr> <th data-bbox="405 236 813 284">Dwelling type</th> <th data-bbox="813 236 1084 284">Min no. parking spaces</th> </tr> </thead> <tbody> <tr> <td data-bbox="405 284 813 341">1 bed flats</td> <td data-bbox="813 284 1084 341">1 allocated spaces</td> </tr> <tr> <td data-bbox="405 341 813 399">1 bed houses / 2 bed flats</td> <td data-bbox="813 341 1084 399">1 allocated spaces</td> </tr> <tr> <td data-bbox="405 399 813 456">2 bed flats</td> <td data-bbox="813 399 1084 456">2 allocated spaces</td> </tr> <tr> <td data-bbox="405 456 813 513">2 bed houses</td> <td data-bbox="813 456 1084 513">2 allocated spaces</td> </tr> <tr> <td data-bbox="405 513 813 571">3 bed houses / 3 bed flats</td> <td data-bbox="813 513 1084 571">2 allocated spaces</td> </tr> <tr> <td data-bbox="405 571 813 624">4+ bed houses</td> <td data-bbox="813 571 1084 624">3 allocated spaces</td> </tr> </tbody> </table>	Dwelling type	Min no. parking spaces	1 bed flats	1 allocated spaces	1 bed houses / 2 bed flats	1 allocated spaces	2 bed flats	2 allocated spaces	2 bed houses	2 allocated spaces	3 bed houses / 3 bed flats	2 allocated spaces	4+ bed houses	3 allocated spaces	
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<p><b>Taylor Wimpey UK</b></p>	<p>The SPD states at paragraph 4.2.1 that the dimensions of all new car parking bays will be 2.5m x 5m. It is not necessary to increase the size of any existing marked out bays. Disabled parking bays should measure 3.6m x 6m. Further clarification from Sefton Council on how these dimensions for car parking bays have been formulated should be provided. The Council needs to ensure that the parking bay sizes are based on robust evidence in order for the SPD to be adoptable and enforceable.</p>															
<p><b>Taylor Wimpey UK</b></p>	<p>Section 5 of the SPD also sets out when a Transport Assessment or Statement is required. For residential development, a Transport Statement and Travel Plan are required for developments of between 50 to 79 dwellings, and a Transport Assessment and Travel Plan are required for developments of 80 dwellings and above. The SPD goes on to outline what information is required to be included in a Transport Assessment, Transport Statement and Travel Plan.</p> <p>TWUK supports the SPD's requirements relating to Transport Assessments, Transport Statements and Travel Plans which expand upon Policy IN2 of the Local Plan. Any further requirements in addition to those specified would be unjustified.</p>															
<p><b>Taylor Wimpey UK</b></p>	<p>TWUK broadly supports the categories of development which may require an Air Quality Assessment (paragraph 7.1.3), however greater clarification is needed on how an 'area of poor air quality' is defined. This should then be</p>															

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	clearly stated within the SPD. TWUK reserve the right to comment further when clarity has been provided.	
<b>Taylor Wimpey UK</b>	<p>It is stated within the SPD (paragraph 7.2.1-7.2.4) that proposals which require new parking spaces must incorporate electric vehicle charging points to facilitate the use of electric vehicles in accordance with Local Plan policies IN1 'Infrastructure and developer contributions', EQ3 'Accessibility' and EQ7 'Energy efficient and low carbon design'. The SPD states that every new dwelling built on site with one or more dedicated parking space should be provided with one outdoor, weatherproof electric vehicle charging point readily accessible from one of the dedicated parking spaces. Whilst TWUK supports the Council's aim to encourage energy efficiency and reduce greenhouse gas emissions through the encouragement of alternative fuels in accordance with Local Plan policies, the requirement for developers to provide electric vehicle charging at the standards it is proposing needs to be justified and based on robust evidence, which it does not appear to be. The requirement for electric vehicle charging points should be subject to viability testing so as not to have a detrimental impact on the delivery and viability of housing. Furthermore, where the Council intends to use planning conditions to secure this provision, the SPD must be sufficiently robust and detailed to ensure that any conditions are enforceable and meet the necessary tests in the NPPF.</p>	