**Response to B&NES Transport and Developments Supplementary**

**Planning Document Consultation**

**Bath Preservation Trust**

**October 2021**

**Comments**

BPT broadly welcomes this SPD.

There is huge need to reduce car dependency and travel, and achieve modal shift from private cars. However, the LPPU and SPD the fails to set out measures to discourage private car use to discourage private cars from coming into the city, or traffic management to reduce through traffic both in the central area and the city as a whole.

Reducing traffic coming into and through the historic core is vital, but this will require a comprehensive traffic management plan to reduce overall traffic volumes in the city and avoid simply displacing traffic elsewhere.

In any discussion about solutions for traffic going through central Bath we emphasise the harmful impacts causing deterioration of the historic built fabric. Vibrations caused by HGVs have a profound impact on buildings in central Bath and this should be taken into account in any guidance for the city.

Maximum Parking standards p59:

This significant policy shift is supported. It means that developers can have a “maximum”

of X number of spaces versus a “minimum” of X spaces. If effective it may restrict

developers from developing sites with lots of car parking space, reducing inefficient use

of land area of parked vehicles which don’t move for 97% of their life in favour of

alternative means of transport and car clubs where the vehicles have much higher

utilisation.

EV charging policy p109:

This is a requirement for all new dwellings and major projects on renovations to have at

least one EV charging point, and requirements for non-residential schemes also. However,

there appears to be an ambiguity as to whether this is 1 EV charging point per site or per

parking space which requires clarification.

1. What is the basis of your interest in transport policy for developments in Bath and North East Somerset?

This won't affect how we treat your responses, but knowing this will help us to better understand the concerns of the people we serve

* I am a developer, architect or other built environment professional
* I am a local business owner
* I have an interest in the environment, or am a member of a group or charity related to sustainability (for example, Friends of the Earth or Extinction Rebellion)

**General transport policy questions**

To what extent do you agree or disagree with the following statements?

1. We need to reduce the amount of car travel within B&NES
* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
1. Our travel policy should encourage car drivers to move to an ultra-low emissions vehicle

*Ultra-low emissions vehicle means a vehicle which has hybrid or electric power*

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
1. Our transport policy should aim to improve public wellbeing, and reduce social inequality
* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
1. We must provide good alternatives to car travel for developments

*This means providing good bus services, cycling and walking routes and facilities for people who live on, work at, or visit, large residential or commercial developments*

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree

**Questions about walking and cycling**

To what extent do you agree or disagree with the following statements?

1. Recent developments in B&NES provide good facilities for walkers and cyclists
* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
1. New developments must provide walkers and cyclists with appropriate routes to key destinations, both inside and outside the development

*This means that developers should make sure that walkers and cyclists have safe and attractive routes to places like schools, shops and leisure facilities, whether these facilities are on the new development, or further away*

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
1. Developers should prioritise walking and cycling over cars when planning new developments
* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
1. Walking facilities must also be suitable for wheelchairs, pushchairs, and mobility aids, such as scooters
* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
1. Cycling facilities must also be suitable for e-bikes, e-scooters, adaptive cycles, cargo bikes, and bikes with trailers
* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree

**Questions about the design of walking facilities**

Please rate the importance of the following things when designing walking facilities

1. **Accessibility**

*This includes the following:*

* *Directness - taking a simple, short and direct route*
* *Continuity - having the same level of safety and facility for the whole route, not just part of it (including safe pedestrian crossings at roads, for example)*
* *Inclusivity - making facilities which everyone can use*
* Extremely important
* Very important
* Somewhat important
* Not so important
* Not at all important
1. **Safety and security**

*This includes safety requirements such as the need for the following:*

* *Lighting of paths or routes*
* *Natural surveillance - paths or routes which are overlooked, giving a better sense of safety*
* *Well-designed routeing*
* *Personal security*
* Extremely important
* Very important
* Somewhat important
* Not so important
* Not at all important
1. **Comfort**

*This means the comfort of people using the route, and includes the following:*

* *Providing enough seating*
* *Making paths wide enough*
* *Having a suitable route surface that is easy to use*
* *Quality of the environment*
* Extremely important
* Very important
* Somewhat important
* Not so important
* Not at all important
1. **Legibility**

*This means making it easy to find your way, and includes the following:*

* *Clear routes which are easy to follow on a map*
* *Good signage which is easy to use and located in useful places*
* *Aids to wayfinding, such as indicating landmarks and marking directions to key destinations, such as town centres*
* Extremely important
* Very important
* Somewhat important
* Not so important
* Not at all important

**Questions about the design of cycling facilities**

Please rate the importance of the following considerations when designing cycling facilities

1. **Accessibility**

*This includes the following:*

* *Directness - taking a simple, short and direct route*
* *Continuity - having the same level of safety and facility for the whole route, not just part of it (including safe pedestrian crossings at roads, for example)*
* *Inclusivity - making facilities which everyone can use*
* Extremely important
* Very important
* Somewhat important
* Not so important
* Not at all important
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* *Clear routes which are easy to follow on a map*
* *Good signage which is easy to use and located in useful places*
* *Aids to wayfinding, such as indicating landmarks and marking directions to key destinations, such as town centres*
* Extremely important
* Very important
* Somewhat important
* Not so important
* Not at all important
1. Please add any other comments you have on the walking and cycling proposals in the SPD

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**Questions about planning for parking and cycle storage**

To what extent do you agree or disagree with the following statements?

1. We should keep parking spaces to a minimum, to encourage people to travel in other ways, when this is possible

This means when it's possible to walk, cycle or use public transport

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
1. The amount of parking provision should reflect the quality of available alternatives to car use

This means only reducing parking spaces if there are other ways to travel which are available, convenient, well-designed and well-maintained

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree

Most sites in Bath are in sustainable locations and public transport already exists to reduce dependency on car use. Car free development should discourage car use, and increase public transport demand and therefore better services.

1. Accessibility should be part of our considerations when planning how much parking to provide

This means that it's fair to provide less car parking in areas which are more accessible, or easy to get to, for everyone - including young families and people with disabilities, or special mobility needs

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
1. The four proposed zones are a good reflection of differences in accessibility across the district

The proposed zones, ranked from most to least accessible, are:

Zone A: Bath City Centre

Zone B: Outer Bath, Keynsham and Saltford

Zone C: Towns and villages

Zone D: Rural areas

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
1. Developers should expect the demand for cycle parking spaces to increase
* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
1. Developers should not count garages as parking spaces, when measuring parking provision in developments
* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
1. Please add any other comments you have on the parking proposals in the SPD

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**Questions about planning for the needs of electric and hybrid cars (ultra-low emissions vehicles, or ULEV)**

The statements below describe design principles for developers who are planning provision for ULEV vehicles in their development

To what extent do you agree or disagree with the following statements?

1. New developments should plan for a high proportion of vehicles to be either electric or plug-in hybrid
* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
1. Developers should prioritise the needs of walkers, cyclists and public transport users over drivers of ULEV vehicles
* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
1. Homes in new developments should all have an active ULEV charge point

This means providing one ready-to-use ULEV vehicle charge point for every residential property

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
1. In non-residential developments, developers should provide a mix of active and passive ULEV charge points

This applies to developments such as business or retail parks. It means providing some ULEV charge points which are ready to use now, but also putting in the power supply and cabling to be able to quickly add additional charge points later

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree

Please rate the importance of the following design principles, when planning ULEV charging facilities

1. Planning the layout of ULEV charging facilities to avoid obstructions or trip hazards for pedestrians and cyclists
* Extremely important
* Very important
* Somewhat important
* Not so important
* Not at all important
1. Minimising street clutter and maintaining a high quality of public spaces
* Extremely important
* Very important
* Somewhat important
* Not so important
* Not at all important
1. Choosing prominent, priority locations for ULEV charge points
* Extremely important
* Very important
* Somewhat important
* Not so important
* Not at all important
1. Please add any other comments you have on the ULEV proposals in the SPD

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**Questions about Travel Plans**

To what extent do you agree or disagree with the following statements?

1. Travel Plans should encourage and support sustainable travel choices

This means making it easier for the occupiers or visitors to a development to walk or cycle there, or to reach facilities with public transport

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
1. Travel Plans should be focused on sustainability outcomes, and how to deliver these

This means setting out specific targets, such as reductions in car use, and defining how progress will be measured

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
1. The SPD should make it clear what to include within a Travel Plan
* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
1. Developers should be able to buy a council service to manage and deliver the Travel Plan
* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
1. We should monitor Travel Plan performance and deal with issues

This means having standard ways of measuring if Travel Plan sustainability targets are being reached, and of taking action where necessary to ensure they are met

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
1. Please add any other comments you have on the Travel Plan proposals in the SPD

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1. Please add any comments you have about other areas of transport policy for developments which you feel we should include in this SPD document

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