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Winchester District Local Plan

Winchester City Council Local Plan Examination

Hearing Statement Matter 13:

Sustainable transport and active travel

April 2025



Winchester
City Council

Matter 13 Sustainable transport and active travel

Issue: Would the Plan’s transport strategy and the individual policies be clear, justified and consistent with national policy and would they be effective?

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Strategic policy T1 Sustainable and active transport and travel

1. Is the Strategic Transport Assessment (ST15) based on a sound methodology and are the conclusions reasonable, in concluding that the quantum and distribution of the development proposed in the Plan, and the resulting transport impacts, are capable of mitigation at the strategic level?

WCC response:

- 1.1 Background to the methodology for this Strategic Transport Assessment (STA) is fully explored in Chapter 6 of the STA and the methodology used is similar to that taken with the STA prepared in support of the Fareham Local Plan, which was scrutinised and found sound by the Examination in Public's Inspector before adoption of their Local Plan in April 2023. The use of the SRTM in particular enables a reasonable assessment of quantum and distribution of the LP allocations within the district as well as demonstrates that the associated impacts on the transport networks can be mitigated at strategic level .
- 1.2 At the time of producing the STA, plan making policy and transport assessment methodology was in accordance with the December 2023 National Planning Policy Framework (NPPF) and its accompanying planning practice guidance (PPG) document. This required STAs to be prepared under the traditional 'predict and provide' methodology. The STA also took account of the emerging vision-led approach to plan-making and incorporated a vision-led approach which aimed to shift demand towards less carbon-intensive forms of travel and to move away from focussing on capacity enhancements to the highway networks for motor vehicles, including to the Strategic Road Network (SRN) to meet the worst-case demand. It is considered this follows National Highway's approach in Circular 01/2022 and which has since been adopted in the December 2024 NPPF version. It is understood that the PPG on transport assessment guidance is currently under review but there is no established assessment methodology to quantify the transport impacts of a vision-led approach other than to provide scenario-testing. The 2023 NPPF does not specifically require reasonable future scenarios (for assessing potential highways impacts).
- 1.3 For this STA, scenario testing was discussed and agreed with the local Planning Authority (WCC) and the highway authorities (Hampshire County Council – HCC and National Highways). These discussions resulted in one scenario being tested using the sub regional transport model (the SRTM) to represent the worst-case transport impacts of the Local Plan on the highway network (Do-Minimum – DM - scenario) in the first instance.
- 1.4 As a result of this requirement to use the SRTM, which is not capable of assessing a full range of sustainable transport mitigation measures, the STA

presents a qualitative assessment of the potential impact of non-highway capacity mitigation measures and policies in line with the objectives of LTP4 and national policy. No changes to the trip rates and modal shares were made to the SRTM to reflect the proposed vision-led mitigation package. Instead, the Do-Something (DS) SRTM results continue to represent the worst-case transport impacts at strategic level of a 'traditional' approach to mitigation, limited to highway capacity and road safety enhancements and/or new public transport services/corridors, since there are no guarantees that the trip rate or modal shift predicted in any local plan or site-specific transport assessment will be achieved in future. Notwithstanding, the implementation of a 'Monitor & Manage' obligation as set out in the STA will ensure that the vision-led transport impacts of development within the Local Plan timeframe are realised or if not, that a revised schedule of transport interventions and behavioural change approaches is available.

2. How has the Strategic Transport Assessment, including its findings in relation to park & ride infrastructure, informed the Plan?

WCC Response:

- 1.5 The NPPF seeks to ensure that sustainable developments consider transport connectivity by all modes of transport. This exercise was conducted as part of Winchester's Strategic Housing and Employment Land Availability Assessment (SHELAA), which established the viability and suitability of proposed site allocations against its sustainable development objectives. As a result, the majority of the Local Plan allocation sites in terms of growth are proposed in or close to existing major urban areas, mainly the Winchester Town Area (WTA), to maximise opportunities for local travel and shift to sustainable modes of transport. Alongside this SHELAA exercise which informed the spatial strategy for the Local Plan, WCC and HCC's Winchester Movement Strategy (WMS), adopted in 2019, identified a package of transport interventions to address three key objectives: reduce city centre traffic, support healthier lifestyle choices and invest in infrastructure to support sustainable growth. Alongside the approval of Hampshire County Council's Local Cycling and Walking Infrastructure Plan (LCWIP) for the District (Note: the LCWIP for Winchester City is still under development) and Bus Infrastructure Improvement Plan (BSIP), the WMS identified ten schemes for future funding, including the need for increased park and ride (P&R) capacity to reduce city centre traffic and support a no car parking provision policy for new developments in the city centre.
- 1.6 The main purpose of the STA has been to present the cumulative transport related impacts of the proposed Winchester Local Plan including the planned infrastructure measures identified in the WMS, LCWIPs and BSIP and to recommend additional mitigation measures as part of a Monitor & Manage approach, as and when necessary. With specific reference to P&R provision, as stated above, the proposals for a new P&R site at the Sir John Moore

Barracks site (LP Policy W2) reflect the outcome of the WMS and, as such, was included as part of the Do-Minimum model and was not considered as mitigation to the Local Plan for assessment in the Do-Something scenario model. While it is accepted that the highway modelling evidence identifies increased P&R demand occurring in the southern part of the WTA of a similar order of magnitude as anticipated in the northern part of the WTA where the new P&R facility is proposed, the DM (and DS) model results support the view that the existing under-utilised P&R facilities in the south will be capable of accommodating the increase in predicted demand in future.

3. The supporting text to strategic policy T1 runs for many pages and is repetitious in places (e.g. the key issues repeat previous text in places). Taken together, would the supporting text and policy be clear, unambiguous, so it is evident how a decision maker should react to development proposals?

WCC response:

1.7 Hampshire Planning and Transport (HPT) and Active Travel England (as part of a pilot project as a new statutory consultee), undertook independent reviews of the transport policies in the Local Plan. While the council acknowledges that Policy T1 contains extensive supporting text, the council have carefully reviewed and refined it to ensure that only the essential elements remain. This text is crucial in establishing the significance of the policy, outlining its objectives, and reinforcing the broader importance of sustainable transport. Given that transport is one of the largest contributors to the district's carbon footprint, and private car use is the least sustainable mode of travel, the council believes retaining this supporting text is necessary to provide context and justification for the policy.

4. How has the concept and principles of '20 minute neighbourhoods' informed the Plan's spatial strategy as set out in strategic policy SP2?

WCC response:

1.8 The concept and principles of '20-minute neighbourhoods' have informed the Plan's spatial strategy as set out in Strategic Policy SP2 by reinforcing the focus on sustainable development patterns that promote accessibility to key services and facilities. The Plan seeks to support the creation of well-connected, sustainable communities where residents can meet their daily needs within a short walk or cycle ride from their homes, reducing reliance on private vehicles.

1.9 Strategic Policy SP2 directs the majority of new development to the most sustainable locations, prioritising settlements that already benefit from a range of local services, employment opportunities, and public transport links. This approach aligns with the principles of 20-minute neighbourhoods by encouraging growth in areas where active and sustainable travel can be maximised. The settlement hierarchy, which underpins SP2, has been informed

by an assessment of service provision, infrastructure, and connectivity to ensure that development is directed to locations where residents can access shops, schools, healthcare, and leisure facilities without the need for long car journeys.

1.10 Additionally, the Plan embeds key aspects of the 20-minute neighbourhood concept through policies promoting active travel (Policies T1-T4), mixed-use development, and the co-location of housing with employment opportunities. These policies work alongside SP2 to create compact, walkable communities while recognising the rural nature of the district, where full implementation of the 20-minute neighbourhood model may not always be feasible. The Plan strikes a balance by ensuring that even in less accessible locations, development contributes to improved connectivity, sustainable transport options, and access to essential services.

1.11 Therefore, while the principles of 20-minute neighbourhoods have shaped the spatial strategy, the Plan applies them in a way that is considered proportionate and appropriate to the district's settlement pattern and geographical context.

5. Would strategic policy T1iii, in seeking development to prioritise the concept of 20 minute neighbourhoods, be clear and unambiguous?

WCC response:

1.12 Strategic Policy T1(iii) seeks to prioritise the concept of 20-minute neighbourhoods, aligning with national objectives to promote sustainable and accessible communities. However, the Council recognises that the application of this concept must take into account the rural nature of the district.

1.13 To ensure clarity and effectiveness, the policy is intended to encourage development that maximises opportunities for residents to access daily services, employment, and transport links within a short walk or cycle ride. The policy is supported by the Local Plan's spatial strategy (SP2), which directs development to the most sustainable locations where these principles can be best achieved.

1.14 Furthermore, the Plan includes supporting policies that complement this approach, such as those promoting active travel (T1-T4), mixed-use development, and the co-location of housing and employment. This ensures that the concept is applied in a manner that is practical and achievable within the local context.

1.15 The definition of 20 minute neighbourhoods in the Plan glossary: 20-minute neighbourhoods is based around the concept of providing people access to most, if not all, of their 'daily needs' within a 20 minute walk or bike ride from their home.

6. Would paragraph 6.4 reflect the current status of the Local Transport Plan?

WCC response:

1.16 PM178 in the Schedule of Proposed Modifications ([SD14a](#)) addresses this point by replacing paragraph 6.4 with updated text explaining the current position.

7. Should the requirements in paragraph 6.5, which set out what development will need to be, be included in the policy? Would it appropriately refer to untested documents such as Hampshire County Council Guidance?

WCC response:

1.17 The supporting text at paragraph 6.5 (last bullet point) of the Local Plan signposts people to a range of documents that have been produced by HCC. It is understood that some of these documents are guidance but they have nevertheless still been agreed through a formal process by HCC. This approach is considered to be sound rather than setting out the range of matters that development proposals would need to address which could result in excessive detail in the Local Plan.

1.18 PM185 in the Schedule of Proposed Modifications ([SD14a](#)) addresses this point by adding a footnote to bullet point 3 of paragraph 6.5 which includes the website which contains all the HCC guidance documents.

8. Paragraph 6.16 refers to ‘... guidance in the NPPF...’. In doing so, would the text clearly set out that NPPF is national policy?

WCC response:

1.19 The city council accepts the above point in relation to the use of the word ‘guidance’ which is not factually correct.

1.20 PM174 in the Schedule of Proposed Modifications ([SD14a](#)) addresses this point by deleting the words ‘guidance in the’ from paragraph 6.16. This amendment will ensure that paragraph 6.16 aligns with the NPPF (2023).

9. Paragraph 6.21 sets out requirements of new development? In so doing would this introduce policy that should properly be included within the policy text?

WCC response:

1.21 The council has amended the supporting text to remove the reference to requirements that are not set out in the policy itself. PM179 in the Schedule of Proposed Modifications ([SD14a](#)) addresses this point by removing the wording ‘significant prominence and’ from para 6.21.

10. Strategic policy T1ii requires development to be in compliance with the Hampshire Movement and Place Framework. Would the policy wording confer the status of a local plan policy on other guidance that is established outside the plan making system?

WCC response:

1.22 The wording of the policy has been developed in collaboration with HPT and Active Travel England through their pilot project which reviewed all of the draft transport policies. Both HPT and ATE requested cross-referencing to relevant documents. It is considered that in view of this it is entirely appropriate to refer to LTP4 especially as it has been adopted by HCC.

1.23 PM192 in the Schedule of Proposed Modifications has addressed this and made it clear through removing 'in compliance with' and replacing it with 'due regard to' in criteria ii of policy T1.

1.24 T1 ii criteria: Development so that it reduces the number of trips made by private motor vehicle as well as maximising opportunities to walk and cycle in with due regard to ~~in compliance with~~ the Hampshire Movement and Place Framework and Healthy Streets approach as set out in the adopted LTP4;

11. Would strategic policy T1, in its requirement for a transport assessment be clear and unambiguous and would it accord with national guidance in this respect?

WCC response:

1.25 Yes, the policy is clear and unambiguous because it sets out specific expectations for developments that would increase travel demand. The policy provides structured criteria that planning applications must meet, ensuring that decision-makers and applicants understand the requirements. Policy T1 aligns with the NPPF, which emphasises prioritising sustainable transport, reducing reliance on private vehicles, and encouraging active travel. The policy references key principles from the Hampshire Movement and Place Framework and the Healthy Streets approach in LTP4. There are no objections from HPT and ATE to the wording of this policy.

12. In all other ways, would strategic policy T1 be clear and unambiguous, so it is evident how a decision maker should react to development proposals?

WCC response:

1.26 Yes, the policy is clear and unambiguous because it sets out specific expectations for developments that would increase travel demand. The policy provides structured criteria that planning applications must meet, ensuring that

decision-makers and applicants understand the requirements. Policy T1 establishes a clear framework for assessing development proposals that are likely to increase travel demand to ensure that sustainable and active transport modes are prioritised. The requirement for transport assessments to quantify travel demand and prioritise sustainable travel choices is in accordance with paragraph 117 of the NPPF, which sets out that all developments generating significant amounts of movement should be required to provide a travel plan and be supported by a transport assessment or statement.

1.27 By promoting 20-minute neighbourhoods and ensuring sustainable transport routes are integrated into developments, the policy supports paragraph 92 of the NPPF, which encourages developments that promote social interaction and create healthy, inclusive places. It also aligns with paragraph 109 of the NPPF, which emphasises the role of transport policies in prioritising sustainable transport and reducing congestion.

1.28 The policy's focus on highway safety is consistent with paragraph 114(d) of the NPPF, which requires developments to mitigate significant transport and highways safety impacts

1.29 Overall, the city council believes that Strategic Policy T1 provides more detail at a local level on the priorities that a development proposal will need to address by ensuring that transport considerations are fully embedded within the design process. This would be in line with national planning policy, it would support sustainable travel, help to reduce car dependency, and integrate transport infrastructure with wider green and blue networks.

1.30 There are no objections from HPT and ATE to the wording of this policy.

Policy T2 Parking for new developments

1. Would policy T2, in providing 'parking provision assessment criteria', instead of parking standards, provide the appropriate level of clarity and certainty for developers and decision makers in relation to parking provision requirements?

WCC response:

1.31 The city council has declared a climate emergency and this policy was developed with that as the lens through which it was developed. As outlined in paragraph 6.26, there is a need for a fundamental shift away from traditional car-centric planning towards prioritising active and sustainable travel options. Instead of prescribing parking standards, this approach requires developers to justify as part of the 'design process' the level of car parking proposed within their developments, ensuring that parking provision is only considered after active and sustainable transport options have been fully integrated. This reflects the Council's commitment to reducing car dependency and promoting more

sustainable modes of transport. This shift away from traditional car parking standards is supported by Active Travel England. The 2023 NPPF does not require local planning authorities to set parking standards; rather, it outlines factors to consider *if* they choose to do so. It specifies that maximum parking standards should only be introduced where there is a clear and compelling justification for their necessity, but it does not require the implementation of minimum parking standards.

2. Would the policy strike the right balance between promoting active travel and sustainable travel modes and delivering good quality development and placemaking, ensuring highway safety?

WCC response:

1.32 Yes, the city council believes that Policy T2 seeks to balance parking provision with the promotion of sustainable and active travel modes. The policy has been developed in collaboration with HPT and ATE and acknowledges that while reducing car dependency is a key objective, some areas within the district have limited public transport access, meaning car travel remains necessary. The policy provides flexibility by requiring parking provision to consider local circumstances, such as development layout, dwelling mix, and proximity to transport links. This ensures that parking is not applied as a rigid standard but is tailored to each location's needs. See response above to question 1.

3. Would policy T2i requirements for a design and access statement, transport assessment and travel plan capture all relevant development proposals? In requiring demonstration of how sustainable transport modes have been prioritised, would the policy provide the necessary clarity and would it be effective in reducing car parking levels and trip generation?

WCC response:

1.33 The policy requires applicants to demonstrate how their development prioritises sustainable travel while ensuring that parking demand is managed effectively. By considering local circumstances in determining parking provision, the policy aims to prevent under-provision, which could lead to overspill parking. Additionally, the council will assess development layouts to ensure that any reductions in parking provision do not create unintended issues, such as parking on verges/pavements congestion or accessibility constraints for emergency and service vehicles.

1.34 By requiring a Design and Access Statement, Transport Assessment, and Travel Plan to justify parking provision, the policy supports paragraph 117 of the NPPF, which states that developments generating significant movement should be supported by an appropriate transport assessment to mitigate any adverse impacts.

1.35 The approach to residential parking provision considers local circumstances, public transport accessibility, and housing mix, aligning with paragraph 112 of the NPPF. This paragraph allows at a local level for a level of parking provision to be agreed that is appropriate for its location in terms of the accessibility of development, the availability of public transport, and the need for electric vehicle charging.

4. Would policy T2ii, in referring to local context accord with NPPF paragraph 9, which refers to local circumstances?

WCC response:

1.36 Yes, the city council believes that the criteria accords with paragraph 9. It ensures that parking provision at a local level is responsive to local circumstances rather than applying a rigid district wide car parking standard across all developments. This approach enables planning policies to guide development toward sustainable solutions while acknowledging variations in site layout, housing mix, local character, and access to public transport. By requiring developers to consider these factors as part of the 'design process', the policy ensures that parking provision is tailored at a local level to the specific needs and opportunities of each area, supporting a balanced and context-sensitive approach to sustainable development.

5. Does the Council anticipate adopting new residential parking standards as suggested in Hampshire County Council comments on the Plan?

WCC response:

1.37 No, the council does not anticipate adopting new residential parking standards. Hampshire County Council's (HCC) comments have been considered; however, the aim with this policy is to ensure that the policy prioritises sustainable and active travel options rather than development that is built around the car. The policy ensures that new developments prioritise sustainable transport modes in the design process, which aligns with paragraph 109 of the NPPF. This paragraph states that developments should prioritise pedestrian and cycle movements, facilitate public transport use, and ensure access for all transport users, including those with disabilities.

1.38 The policy's support for car-free residential development in well-connected areas (such as some of the site allocations in Winchester Town) is consistent with paragraph 109 of the NPPF. This encourages planning policies to promote sustainable transport and reduce car dependency in locations well served by public transport and local services.

1.39 The requirement for secure cycle, e-mobility, and mobility scooter parking aligns with paragraph 116(a) of the NPPF, which states that developments should provide infrastructure to enable sustainable transport choices, including

safe and secure cycle storage. The policy also supports paragraph 110, which encourages the provision of adequate facilities for sustainable travel.

1.40 The case-by-case assessment of commercial parking provision ensures flexibility while maintaining compliance with paragraph 111 of the NPPF, which states that local parking policies should take account of the type, mix, and use of development.

1.41 Overall, it is considered that this policy aligns with the NPPF and at a local level it will ensure that parking provision is sustainable, responsive to local circumstances, and supportive of active travel, while also preventing excessive reliance on private car use.

6. Would the policy provide appropriate requirements and guidance in relation to matters such as assessing car parking demand, on street parking stress, parking and loading requirements for operational vehicles, the requirements for car parking management plans, the role for restriction of resident parking permits, as appropriate?

WCC response:

1.42 Yes, the city council considers that the policy provides clear and appropriate requirements and guidance. The wording of the transport policies were developed in collaboration with HPT and ATE. The policy ensures that planning applications are assessed on a case-by-case basis through the design process, allowing for a flexible and context-sensitive approach to development.

Policy T3 Enabling sustainable travel modes of transport and the design and layout of parking in new developments

1. Given the requirements of policy T2, would policy T3 serve a clear purpose in accordance with NPPF paragraph 16f?

WCC response:

1.43 Following the proposed modifications in SD14a to the policy text, Policy T2 focuses solely on parking for new developments, while Policy T3 now titled 'Prioritising Active and Sustainable Modes of Travel' sets out how development should prioritise sustainable travel options through the layout and design. This ensures a clearer distinction between the two policies, with T2 addressing parking provision and T3 focusing on sustainable transport measures.

- 1.44 PM193 in the Schedule of Proposed Modifications (SD14a) addressed this point. See Appendix A for the changes to T2 and T3 to ensure that both policies serve a clear purpose. The policy ensures that new development prioritise sustainable and active modes of travel, aligning with paragraph 114(a) of the NPPF, which requires developments to prioritise pedestrian and cycle movements and facilitate public transport use.
- 1.45 The emphasis on active and e-mobility travel and car clubs supports paragraph 116(a) of the NPPF, which states that developments should give priority to sustainable transport modes and be designed to enable sustainable travel choices.
- 1.46 The requirement for electric vehicle charging facilities is in accordance with paragraph 116(e) of the NPPF, which states that developments should provide electric vehicle charging infrastructure to enable the transition to zero-emission vehicles. The policy also references compliance with Building Regulations, ensuring consistency with national standards.
- 1.47 The policy's requirement for development to be in keeping with the character of the surrounding area ensures compliance with paragraph 135(c) of the NPPF, which requires developments to be sympathetic to local character and landscape settings. Reference to the High-Quality Places SPD reinforces the expectation that new developments maintain a strong sense of place.
- 1.48 PM193 In the Schedule of Proposed Modifications (SD14a) has addressed this to ensure that T2 and T3 serve clear distinct purposes. See Appendix A to see these changes to the policies.

2. Would it adequately reflect the need to promote active travel modes as suggested in the policy title?

WCC response:

- 1.49 PM180 in the Schedule of Proposed Modifications ([SD14a](#)) addresses this point by renaming policy T3 to 'Prioritising active and sustainable modes of travel.'

3. Would paragraph 6.33 repeat policy requirements in policy T2? What would be the consequence in terms of policy effectiveness?

WCC response:

- 1.50 PM186 in the Schedule of Proposed Modifications ([SD14a](#)) addresses this point by ensuring that paragraph 6.33 is in line with policy T3.

4. Would the policy trigger, (all but householder) be appropriate and justified? Would the policy be effective in this regard?

WCC response:

1.51 Yes, the city council believes the policy trigger (excluding householder applications) is appropriate and justified as Policy T3 would not apply to householder applications. Policy T3 is intended to apply to developments that have a material impact on transport infrastructure and travel patterns, rather than householder applications which for example, include an extension to a property for which it would be challenging to identify transport impacts.

5. Would the policy wording provide the necessary clarity, be clear and unambiguous as to how a decision maker should react to development proposals? In particular in its introduction ‘...to prioritise sustainable and active modes of travel... to demonstrate through the design process..’ and policy T3i, in requiring ‘... priority is given to active and e mobility travel...’?

WCC response:

1.52 PM194 in the Schedule of Proposed Modifications (SD14a) addresses this please see response above to question 1 (paragraphs 1.42-1.47).

6. In the absence of standards for matters such as active and e mobility travel would the policy be effective?

WCC response:

1.53 The policy references building regulations to allow for flexibility as standards may evolve throughout the plan period. Rather than prescribing rigid standards, the policy ensures that applications demonstrate how they have considered and incorporated appropriate provisions for active and e-mobility travel through the design process. This approach allows for adaptability while ensuring that developments support sustainable travel options in line with up-to-date best practices.

7. Would policy T3iv be effective in requiring ‘...opportunities to be explored through the design process...’?

WCC response:

1.54 Yes, the city council believes it would be effective. Policy T3iv is effective in requiring opportunities to be explored through the design process, as the Local Plan is intended to be read as a whole, ensuring a coordinated approach to sustainable development. The design process is a fundamental aspect of delivering high-quality, well-integrated schemes. Policy T3iv reinforces the expectation that developers will proactively consider opportunities for shared spaces and other design solutions that support sustainable and active travel. Additionally, the policy aligns with other design-related policies in the Plan,

ensuring that developments contribute positively to placemaking and accessibility while maintaining flexibility to respond to site-specific constraints and opportunities.

8. Would policy T3viii be clear and unambiguous in relation to the requirement for permeable parking surfaces unless there are overriding evidenced reasons that prevent their use?

WCC response:

1.55 PM194 in the Schedule of Proposed Modifications ([SD14a](#)) addresses this point. See Appendix A to see changes made to criteria T2, T3 and T4 as set out in Appendix A at the end of this document.

1.56 To ensure the policy is clear and unambiguous the council will add the definition of permeable surface into the Glossary from the Building Regulations.

1.57 PM181 in the Schedule of Proposed Modifications ([SD14a](#)) addresses this point by adding 'permeable surface' to the glossary.

Policy T4 Access for new developments

1. Would policy T4 be clear and unambiguous, so it is evident how a decision maker should react to development proposals? In, particular should it include provisions to control access arrangements?

WCC response:

1.58 Yes, the city council believes the Policy is clear and unambiguous. This policy was developed in collaboration with HPT and ATE as part of their pilot project. The policy aligns with paragraph 114(a) of the NPPF, which states that new developments should prioritise pedestrian and cycle movements. By requiring safe and attractive routes that connect to the Public Rights of Way network and public transport, the policy supports sustainable travel choices and reduces reliance on private vehicles.

1.59 The requirement to address the needs of people with disabilities, children, and those with reduced mobility ensures compliance with paragraph 116(b) of the NPPF, which seeks to create places that are accessible and inclusive for all users. Providing appropriate crossings at suitable locations further aligns with national accessibility and safety objectives.

1.60 The policy's emphasis on low-speed, safe, and efficient movement within and around the site supports paragraph 117 of the NPPF, which encourages development proposals to consider transport and movement early in the design process to ensure sustainable and efficient site access.

- 1.61 The requirement for adequate access for emergency services and service providers is consistent with paragraph 116(d) of the NPPF, which requires development to allow for safe and suitable access for all users, including emergency responders. The inclusion of turning facilities and manoeuvrability considerations ensures compliance with best practice guidance for emergency access.
- 1.62 The policy's requirement for appropriate highway access, visibility splays, and safety measures aligns with paragraph 115 of the NPPF, which states that development should only be refused on highway safety grounds if there would be an unacceptable impact on highway safety. Ensuring access to the adopted highway and accompanying signage reinforces the importance of safe and well-integrated development access points.
- 1.63 The specific provision that sites generating large numbers of HGV movements should be in reasonable proximity to the Major Road Network or Strategic Road Network ensures consistency with paragraph 114(d) of the NPPF, which seeks to ensure that development proposals can be accommodated safely within the existing transport network.
- 1.64 Overall, the city council believes that this policy at a local level will ensure that development provides safe, accessible, and well-integrated transport infrastructure, in accordance with the principles set out in the NPPF and Local Transport Note 1/20. It promotes sustainable and active travel, ensures accessibility for all users, and mitigates the impact of new development on the surrounding transport network.

2. Would policy T4i in requiring connection to the nearest public transport stop be effective in supporting non-car modes of transport and to provide safe and attractive routes to, from and within a site?

WCC response:

- 1.65 Yes, it is considered important to read the Local Plan as a whole, with references to the design process reinforcing the need for well-planned development. Ensuring safe and attractive access to key transport links, such as bus stops, is essential to providing a genuine choice of sustainable travel options.

3. Would the requirements of policy T4i, which requires development to prioritise the needs of walking, wheeling and cycling...be clear and unambiguous?

WCC response:

- 1.66 The wording of policy T4 was written in collaboration with Active Travel England as part of their pilot project. Policy T4(i) is intended to prioritise walking,

wheeling, and cycling in line with national policy and best practice guidance, including LTN 1/20.

4. Would the term ‘..reasonable proximity..’ as used in policy T4v provide the necessary clarity, so as to be effective?

WCC response:

1.67 PM182 in the Schedule of Proposed Modifications ([SD14a](#)) addresses this point by removing ‘in reasonable proximity and’ in criteria v.

Appendix A – showing the proposed modifications to T2, T3 and T4

Policy T2

Parking for New Developments

New development, excluding householder development, will only be permitted where:

i. The applicant can demonstrate in the Design and Access Statement, Transport Assessment/Statement and the Travel Plan, how the needs of sustainable transport modes have been prioritised in the design process and provide justification for the level of car parking provided on the site;

ii. The parking provision on residential development including for visitors shall take account of local circumstances including the layout of the development, the mix of dwellings, the character of the local area and the proximity of public transport;

iii. Residential development proposed with no car parking provision will be supported where it is located in walking distance of a range of services and facilities, or there is appropriate access to non-car based modes of transport, and it is demonstrated that the lack of provision will not be to the detriment of the surrounding area or the need of those with limited mobility;

iv. Secure parking for cycles, e-mobility, mobility scooters or any other form of non-car transport must be provided in a safe and convenient location and should be integral to the building where possible, and if this is not possible should be undercover, with charging points designed according to the relevant standard or locally specific demand and any health and safety requirements; and

v. The design provides attractive, landscaped and safe parking areas which are overlooked by dwellings or other areas of active public use providing surveillance and are accompanied with associated long term maintenance plans;

vi. Includes permeable parking surfaces unless there are overriding evidenced reasons that prevents their use;

vii. Any surfaces used should be appropriate to the site context and expected level of use; and

viii. Parking for commercial uses will be considered on a case by case basis.

Policy T3

~~Enabling Sustainable Travel Modes of Transport and the Design Layout of Parking for New Developments~~

Prioritising active and sustainable modes of travel

In order to prioritise sustainable and active modes of travel planning applications (excluding householder applications) will be required to demonstrate through the design process the need for parking provision. New development, will only be permitted where:

- i. Priority is given for active and e-mobility travel and car clubs;
- ii. ~~Parking is provided on site, it will have there are facilities for charging of plug in and other ultra-low emission vehicles in safe, accessible and convenient locations in accordance with the Building Regulations:~~ **moved to T2**
- iii. ~~The design incorporates parking provision, which has drop off spaces, vehicular access and kerbside space for servicing and loading where appropriate:~~ **moved to T4**
- iv. Opportunities have been explored through the design process to incorporate, where appropriate shared spaces;
- v. As part of the overall design the scheme takes account of the character of the surrounding area in accordance with High Quality Places SPD or its successor; **and**
- vi. ~~The design provides attractive, landscaped and safe parking areas which are overlooked by dwellings or other areas of active public use providing surveillance and are accompanied with associated long term maintenance plans;~~ **moved to T2**
- vii. Signage and lighting is provided in places where it is necessary which are of a high quality design appropriate to the location;
- viii. ~~Includes permeable parking surfaces unless there are overriding evidenced reasons that prevents their use; and~~ **moved to T2**
- ix. ~~Any surfaces used should be appropriate to the site context and expected level of use.~~ **moved to T2**

Policy T4

Access for New Developments

New development, excluding householder applications, will be permitted where it accords with the development plan and where it:

- i. Prioritises the needs of walking, wheeling and cycling safe and attractive routes to, from and within the site which connect to existing Public Rights of Way network outside the site boundary and the nearest public transport stop, minimising the scope for conflicts between all users;
- ii. Addresses the needs of people with disabilities, children and those with reduced mobility in relation to all modes of transport; including the provision of appropriate crossings at appropriate locations;
- iii. Allows for access to, and movement within, the site in a safe, low speed and effective manner, having regard to the amenities of occupiers of the site, and adjacent land and to the requirements of the emergency services and service providers, including turning facilities and manoeuvrability for emergency vehicles as appropriate in accordance with the most current guidance; ~~and~~
- iv. Makes provision for access to the site in accordance with any highway requirements on the grounds of safety, including the provision of gateways, visibility splays, access to adopted highways and accompanying signage that may be required; **and**
- v. The design incorporates parking provision, which has drop off spaces, vehicular access and kerbside space for servicing and loading where appropriate.**
- vi. Any sites that are likely to generate large numbers of HGV movements need to be ~~in reasonable proximity and~~ accessible to Major Road Network or the Strategic Road Network.