

SECTION 13 - Chapter D: Access and Glossary

Chapter D - General

2/B35	T2000/Railfutures	D
2/B37	T2000/Railfutures	D

Supporting Statement

686/B122	Bath Preservation Trust	D
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Issues

- i) Whether there should be a sustainable freight policy.
- ii) Whether there should be a policy for the use of the River Avon for freight and passengers.

Inspector's Reasoning

Issue i)

13.1 Policy 57 of the JRSP requires that local plans make provision for safeguarding existing rail freight facilities and for new rail freight infrastructure. Paragraph D5.4 of the plan states that rail freight provision in the District is limited and the Greater Bristol Transport Strategy refers only to the railhead facility at Westmoreland Station Road in Bath. There are no firm proposals for expanding rail freight infrastructure in the District at the present time and as such Policy T.10 seeks only to safeguard the railhead facility. Policy T.1, criterion 3 promotes the enhancement of transport facilities in the area generally. Therefore a satisfactory policy context does exist which is realistic but also allows for improvements and new infrastructure in the event it comes forward. The identification of HGV freight routes is better dealt with in the context of freight quality partnerships between operators and the Council, as advised in paragraph 46 of PPG13, rather than the Local Plan.

Issue ii)

13.2 There are currently no plans for the provision of infrastructure on the River Avon to allow for the transportation of passengers and freight. PPG12 states that only transport proposals that are firm and are likely to be implemented during the course of the plan period should be included in the Plan. Policy T.1, criterion 3 supports improvements to transport facilities, including riverine infrastructure, in the District should proposals come forward.

Recommendation: no change

D1: A Balanced and Integrated Transport System - Policy T1 and Paragraphs D1-D1.4

461/B12	Hinton Blewett Parish Council	D1
578/B71	Norton Radstock Town Council	D1.3
578/B72	Norton Radstock Town Council	D1.3
345/B17	Freshford Parish Council	D1.3
334/B4	Ms P Davis	T.1
686/B126	Bath Preservation Trust	T.1
2682/B2	Chewton Keynsham Neighbourhood Association	T.1

Supporting Statements

3257/C254	Somer Valley Friends of the Earth	D1.2/B
345/B25	Freshford Parish Council	T.1
254/B39	Keynsham Town Council	T.1

Issues

- i) Whether more detail of specific transport corridors and routes should be included in the supporting text.
- ii) Whether the plan penalises rural communities by discriminating against the private car.
- iii) Should Policy T1 (4) focus on reducing congestion rather than being "anti car"?
- iv) Should Policy T1 (1) be more strongly worded in accordance with the LTP?
- v) Is Policy T1 (4) (which promotes the area and corridor approach) at odds with the housing allocation in Policy GDS1 (K2)?

Inspector's Reasoning

Issue i)

13.3 As stated elsewhere in this report, there is an excess of unnecessary narrative within the reasoned justification of the plan which does little to explain the policies. In particular, there is no need to repeat the contents of Government policy documents or of RPG10 and the JRSP, and for that reason I recommend the deletion of paragraphs D1.1 and D1.4. For the same reason there is no need to set out the objectives of the LTP in Table 6B which should be deleted.

13.4 As the Council has stated, the purpose of the text in paragraph D1.3 is to draw attention to the strategic context set down by the JRSP, in particular Policy 4. It would not be appropriate for the Local Plan to redefine the routes identified in the JRSP, or to add to the detail which is currently included. Strategic Transport issues in the Norton-Radstock area will be reconsidered in the forthcoming Greater Bristol Strategic Transport Study.

Issue ii)

13.5 National guidance in PPG13, paragraph 4 cites reducing the need to travel, especially by car, as one of the Government's main objectives. Paragraph 40 of PPG13 acknowledges that the potential for using public transport in rural areas is more limited than in urban areas, however it goes on to state that reducing dependency on the private car in rural areas must also be pursued. Paragraphs 5.8 to 5.10 and Policy 47 in the JRSP reiterate these objectives and set down a strategic context for local plans to follow which encourages alternatives to the car. Given this policy context the approach adopted in the supporting text is the correct one and I do not accept that it unduly discriminates against people living in the rural areas.

Issue iii)

13.6 Paragraph 5.8 in the JRSP explains that there is a direct link between road construction and increased congestion and use of the car. It is widely accepted that the most effective way of reducing congestion is to reduce the need to travel and to improve public transport accessibility. This approach is advocated across all levels of planning policy and is correctly reflected in Policy T.1.

Issue iv)

13.7 Policy T1 reflects the objectives of the LTP. There is no need to repeat the words of the LTP in the Policy.

Issue v)

13.8 Although the housing allocation GDS.1/K2 has been deleted in the RDDLP, I have recommended that it be reinstated as an allocation to meet strategic housing land requirements, on the basis that it best meets the criteria in the JRSP for the release of a site for housing from the Green Belt around Keynsham. I note the concerns about the distance of this site from the main transport corridor, but this does not outweigh the harm to the Green Belt that would result from the release of the alternative sites to which the objector refers.

Recommendations:

R13.1 Modify the plan by deleting paragraphs D1.1 and D1.4.

R13.2 Modify the plan by deleting Table 6B and all references to it in the text.

D2: - Strategic Transport Corridors - Policy T2, Paragraph D2.2 and Diagrams 17 and 17B

340/B7 Wiltshire County Council
564/B15 London Road Area Residents Association

D2.2
D2.2

686/B127	Bath Preservation Trust	D2.2
1830/B6	Highways Agency	D2.2
340/C8	Wiltshire County Council	D2.3/A
2/B20	T2000/Railfutures	T.2
2/B21	T2000/Railfutures	T.2
731/B15	Stowey Sutton Parish Council	T.2
878/B35	The Bath Society	T.2
1830/B9	Highways Agency	T.2
2251/B5	Federation of Bath Residents Associations - Transport Group	T.2
2900/B1	Mrs J M Jones	T.2
2997/B6	London Road & Snowhill Partnership	T.2
578/B39	Norton Radstock Town Council	DIAG17
578/B73	Norton Radstock Town Council	DIAG17
578/C91	Norton Radstock Town Council	DIAG17B/A

Supporting Statements

878/B34	The Bath Society	D2.2
686/B123	Bath Preservation Trust	T.2

Issues

- i) Whether the plan deals adequately with the problems caused by HGVs.
- ii) Should the roles and responsibilities of the Highways Agency be recognised in the supporting text and Policy T.2?
- iii) Should the Policy text refer to all of the partners involved in the Bristol/Bath/South Coast study?
- iv) Should the Council actively campaign for a reduction in the level of through traffic in Bath and implement innovative ideas?
- v) Should paragraph D2.2 refer to the desirability of examining rail freight movements between the south coast and the Bath/Bristol/South Wales areas?
- vi) Should Diagram 17 be updated and show in-commuting?

Inspector's Conclusions

Issue i)

- 13.9 There is no doubt that HGV movement is a significant issue which affects residents in Bath and smaller villages. There are no firm proposals in this plan or the Local Transport Plan (LTP) to alleviate the problems associated with HGV movement in the District. However, it would be inappropriate for the plan to include a policy banning HGVs from the central area of Bath in the absence of an assessment to support such a proposal. The primary focus for dealing with HGV traffic would need to be through agreements between local authorities and freight operators through freight quality partnerships. Proposals for new roads and bypasses to alleviate HGV and through traffic through sensitive areas should be pursued primarily through the LTP and only when funding and a timescale

are confirmed should they be included as proposals in the plan. I am satisfied that the supporting text in paragraph D2.2 which discusses HGV movements is of sufficient detail for the purposes of this plan and that no modification is required in this respect.

Issue ii) iii) and iv)

13.10 The Council has deleted Policy T.2 from the RDDLP and thus detailed objections relating to it have been either met or overtaken by events. The existence of the Bristol-Bath-South Coast Study does not in itself impact upon land use planning in the District and I agree with the deletion of the policy. However, reference to the Study remains in the text, and it is through this Study that the Council may lay the foundations for seeking a means to reduce through traffic in Bath, not by the active campaign suggested by one objector.

13.11 The supporting text provides background information about the strategic transport corridors in the District and some of the problems associated with them. These include both road and rail transport corridors. The involvement of the Strategic Rail Authority is recognised in the RDDLP, although subsequently this is being wound up, and many of its functions are passing to the Department for Transport's new Rail Group. It also sets out the roles and responsibilities of some of the agencies and other bodies which are responsible for maintaining and improving the district's strategic transport corridors. In response to the objection from the Highways Agency the Council has clarified the role of the Agency in relation to the A46 and A36, and in my view this is sufficient for the purposes of the plan.

Issue v)

13.12 As the objector has stated, Diagrams 17A and 17B are based on out of date data from the 1991 census. The Council intends to update them as soon as data from the 2001 census is available, and to provide a diagram to show in-commuting to the District.

Recommendations:

R13.3 Modify Diagram 17A and B by updating with 2001 census data.

R13.4 Modify the plan by inserting a new Diagram to show inward commuting.

R13.5 Modify paragraph D2.3 by updating the reference to the Strategic Rail Authority.

D3: Walking and Cycling - Policy T3, Policy T4 and Paragraphs D3.3 and D3.4

686/B128
689/B25

Bath Preservation Trust
British Horse Society

D3.3
D3.3

120/B26	Ms Helen Woodley	D3.4
2251/B2	Federation of Bath Residents Associations - Transport Group	D3.4
2/B27	T2000/Railfutures	T.3
398/B3	Mr G Hobbs	T.3
2152/B1	Ms K Lovell	T.3
3010/B3	Mr M Grigg	T.3
2682/B3	Chewton Keynsham Neighbourhood Association	T.4
3164/B1	Mr W Houghton	T.4

Supporting Statements

254/B43	Keynsham Town Council	T.3
254/B44	Keynsham Town Council	T.4
120/C211	Ms Helen Woodley	T.4/A
3257/C255	Somer Valley Friends of the Earth	T.4/A

Issues

- i) Does the plan include sufficient detail in relation to the design and location of pedestrian and cycling routes?
- ii) Should a strategy for horse riding be included in the plan?
- iii) Should a sustainable freight policy be added to the traffic management measures within the plan?
- iv) Does Policy T4 fail to deliver its objectives in relation to establishing pedestrian links to allocation GDS1/K2 in south west Keynsham?

Inspector's Reasoning

Issue i)

- 13.13 As the Council has stated in its response, the WHS is already given adequate protection in Policy BH.1 and through other policies in the Access Chapter which seek to control the development of transport infrastructure. Detailed design matters relating to street furniture and paving are more appropriately dealt with as SPD.
- 13.14 The maintenance of pavements and paved areas, and of access to public footpaths, are operational matters beyond the remit of this Local Plan.
- 13.15 The walking and cycling strategies and related policies collectively seek to encourage the enhancement and improvement of cycle and pedestrian paths and facilities throughout the district. Policy T3 is a general policy and is not intended to identify specific schemes or locations for new routes or improvements.
- 13.16 There is currently no proposal for a pedestrian/cycle bridge over the Lower Bristol Road and the Avon, and there are no proposals for a hard-surfaced foot/cycle path between the Broadmead roundabout and the Chandag Estate. National planning guidance in PPG12 states that only schemes which are certain and funded should be included as proposals in a local plan. As such it would be inappropriate to include a policy or

proposal in the plan for these schemes. However, the absence of a specific reference to a scheme would not prevent an improvement scheme coming forward under the existing general policies in the plan, as part of the wider walking and cycling strategies.

13.17 The extent of the improvements to the cycle and pedestrian network in the District depends on funding. The LTP sets down the funding priorities and targets to be achieved in the District. Given the role of the LTP it is not necessary for the Council to "seek funding" for improvements in this Local Plan and as such this text should be struck out of Policy T.3. This also applies to Policies T.5 and T.8 which contain the text.

13.18 The Council has indicated that routes have been identified under the Safe Routes to Schools Scheme. Paragraph D3.4 states that one of the mechanisms which will be employed in implementing the walking strategy is safety training and advice for school children. I consider it would benefit the plan by providing useful information to readers if the supporting text to Policy T.3 makes reference to the safe Routes to Schools Scheme and recommend accordingly.

Issue ii)

13.19 Horse riding is a predominantly recreational activity rather than a means of transport. This is reflected in national guidance which refers to equine-related activities in PPS7, paragraph 32 as a popular form of recreation. The policies in this section of the plan are concerned with means of transport rather than recreation, and therefore it would not be appropriate to include horse riding as an activity. No modification is therefore required in response to the objection.

Issue iii)

13.20 As stated in paragraph 13.1, the identification of HGV freight routes is better dealt with in the context of freight quality partnerships between operators and the Council, as advised in paragraph 46 of PPG13, rather than the Local Plan.

Issue iv)

13.21 Policies T.3 and T.4 are general in their application, and are not intended to set down detailed design guidance and pedestrian routes to new development. The detailed design and extent of pedestrian and cycling links are determined through negotiations with developers at the application stage and the application of the more detailed policies and proposals of the plan.

13.22 In my view the main weakness in these policies is the repetition in their content. The amalgamation of the policies into one would assist in the achievement of a concise and focussed Local Plan.

Recommendations:

R13.6 Modify paragraph D3.4 bullet point 6 by inserting after "school" "through the Safe Routes to Schools Scheme".

R13.7 Modify the plan by deleting Policies T3 and T4 and inserting a new policy:

"To promote walking and the use of public transport, the Council will seek the provision of safe, convenient and pleasant facilities for pedestrians and the mobility impaired, including the extension of a network of pedestrian routes. These requirements should be incorporated in all new developments including traffic management and transport infrastructure schemes."

D3: Walking and Cycling - Policy T5 and Paragraphs D3.5 and D3.6

2306/B12	Mr T W Evans	D3.5
3094/C2	Chew Valley Recreational Trail Associations	D3.6/A
120/B76	Ms Helen Woodley	T.5
685/B37	Batheaston Parish Council	T.5
878/B36	The Bath Society	T.5
2682/B4	Chewton Keynsham Neighbourhood Association	T.5
3265/B1	Mr D E Packman	T.5

Supporting Statements

120/C212	Ms Helen Woodley	D3.6/A
120/B27	Ms Helen Woodley	T.5
254/B45	Keynsham Town Council	T.5

Comments on Suggested Unadvertised Inquiry Change IC13

120/F370-s	Mrs H Woodley	IC13 (D3.6)
3094/F6	Chew Valley Recreational Trail Association	IC13 (D3.6)

Issue

- i) Whether the Policy should be included in the plan and whether the Policy and reasoned justification is appropriately worded.

Inspector's Reasoning

13.23 PPG12, paragraph 5.16 states that development plans should include policies and proposals on the overall development of the transport network. The table on page 31 of the guidance lists those transport plan matters which have land use implications and includes "strategies for cycling and pedestrians". As such, it is entirely appropriate for the plan to seek to control the development of the cycle route network in the district in the interests of a better planned, sustainable environment.

13.24 PPG13, paragraph 80 states that in developing a cycle route network local authorities should "carefully consider the shared use of space with

pedestrians when alternative options are not available". The practicalities of developing a cycle network in an established and historic built environment and street pattern means that it is inevitable that pedestrians and cyclists will have to share some routes. Issues of safety would need to be dealt with in relation to each proposed route. I therefore consider that the reference to shared use of footpaths for cycle ways in the reasoned justification is appropriate.

- 13.25 I consider the reference to the Chew Valley Trail in the Plan and the addition of the further explanatory text (IC13) to be appropriate for the purposes of this part of the Plan. The plan must be read as a whole and as the Council has indicated in Proof 148 (Chew Valley Lake), Policy SR.9 and its supporting text both refer to a commitment by the Council to safeguard and develop this recreational route. I am satisfied that the approach proposed by the Council is pragmatic in seeking the support of the landowner and that the combined use of the trail for cycle and pedestrian use is sensible in seeking to create a community resource for transport and leisure that is available to a wide range of uses and sections of the community.
- 13.26 The Council has confirmed that a cycle route from Odd Down to Combe Down is included in the Council's Strategic Cycle Network and will therefore be shown on the Proposals Map. This meets the relevant objection.
- 13.27 Policy T.5 and the associated text deals solely with the development of the cycle network and facilities in the District. The pedestrian network is dealt with elsewhere and therefore it would be inappropriate to include a pedestrian friendly objective.
- 13.28 Policy T.6 requires secure cycle parking to be provided with new development and Policy T.5 encourages the provision of cycle facilities more generally. The provision of cycle racks on buses is a matter for the operator, not the Local Plan. No further references to cycle parking would be appropriate.
- 13.29 Policy T.5 is a general policy and as such it is not intended to set down detailed guidance on pedestrian routes in specific schemes. These should be achieved through the application of detailed policies elsewhere in the plan.

Recommendations:

R13.8 Modify Paragraph D3.6 in accordance with Inquiry Change IC13.

R13.9 Modify Policy T.5 by deleting "or seek funding for".

D3: Walking and Cycling - Policy T6

246/B13	SUSTRANS	T.6
685/B38	Batheaston Parish Council	T.6
686/B129	Bath Preservation Trust	T.6
2604/B5	Emlor Homes Ltd	T.6

Supporting Statements

120/B28	Ms Helen Woodley	T.6
120/C213	Ms Helen Woodley	T.6/A
120/C214	Ms Helen Woodley	T.6/B

Issue

- i) Whether the Policy should be included in the plan, and whether there is sufficient and appropriate wording.

Inspector's Reasoning

13.30 It is entirely appropriate that the plan should include policies which deal with provisions to encourage cycling. However, the location of covered cycle stands in relation to a building's entrance is a detailed matter that is not appropriate for inclusion in this Local Plan. The location of such facilities will need to be considered on a site by site basis according to the size of facility needed and any other site constraints.

13.31 The choice of design of a cycle rack suitable for use in the Bath WHS is also a detailed design matter which is not appropriate for inclusion in this Policy. The matter is covered by Policy BH.1 which seeks to protect the WHS from unsympathetic development and Policy T.16, criterion (v) which seeks to control the development of transport infrastructure in the interests of the protection of the WHS.

13.32 It would not be appropriate to exclude housing for the elderly from having to provide cycle parking. While the residents themselves may not use bicycles, staff and visitors may do so and as such it would not be unreasonable to require the provision of these facilities in such circumstances.

Recommendation: no change

D3: Walking and Cycling - Policy T7

120/D354	Mrs H Woodley	PIC/D/3 (T.7)
246/D17	SUSTRANS	PIC/D/4 (T.7)
246/B16	SUSTRANS	T.7
731/D23	Stowey-Sutton Parish Council	PIC/D/3 (T.7)
731/D24	Stowey-Sutton Parish Council	PIC/D/4 (T.7)
743/C40	Combe Hay Parish Council	T.7/T
1999/B2	Bristol City Council	T.7
2129/B1	Mr & Mrs T Lawrence	T.7
2854/B1	Monkton Combe Parish Council	T.7

3126/B27	Bath Friends of the Earth	T.7
3126/D66	Bath Friends of the Earth	PIC/D/2 (T.7)
3126/D67	Bath Friends of the Earth	PIC/D/3 (T.7)
3276/B2	Temra of Bath	T.7
120/C254	Ms Helen Woodley	T.7/N

Supporting Statement

120/B29	Ms Helen Woodley	T.7
120/D353	Mrs H Woodley	PIC/D/1 (T.7)
614/D21	Temple Cloud Residents Association	PIC/D/1 (T.7)
1943/D4	Bristol Water	PIC/D/3 (T.7)
3126/D63	Bath Friends of the Earth	PIC/D/1 (T.7)
2854/C2	Monkton Combe Parish Council	T.7/S

Issue

- i) Whether the plan should show additional cycle routes or variations to those already shown?

Inspector's Reasoning

13.33 Policy T.9 safeguards all disused railway lines for future use by sustainable modes of transports, including bicycles. As such there is no need to explicitly set down each route individually. The Proposals Map is amended in the RDDLP to indicate "Sustainable Transport Routes". This will include the former Somerset and Dorset railway. I am satisfied that this is the appropriate approach to take and that it accords with guidance in PPG13, paragraph 6 which states that development plans should seek to protect sites and routes which could be critical in developing infrastructure to widen transport choices.

13.34 The cycle route from Bath to Radstock terminates at Shoscombe due to the development at Single Hill. No modification to the Proposals Map is required.

13.35 The cycle routes through Combe Hay were illustrative in the DDLP; there were no firm plans to implement these routes in the plan. As a former railway route it is safeguarded through Policy T.9, which accords with national guidance which states that it is appropriate for development plans to safeguard routes along disused railway land for use beyond the plan period.

13.36 The Council have re-designated the disused railway line that runs through Withy Mills Farm from a cycle route to a Sustainable Transport Route under Policy T.9. This partially satisfies the related objection, while safeguarding the route for future use. It is the Council's intention to consult fully with the landowners on the future use of the land and as the Council have stated, the use of the route for a cycle path will depend on the co-operation of the landowners.

13.37 The Proposals Map is amended in the RDDLP to show cycle routes into Bristol from Keynsham and Whitchurch. It is also amended to show the

correct route of the cycle route through Monkton Combe. These changes satisfy the related objections.

13.38 There is no master plan for the Western Riverside and as a result it would be premature to designate cycle routes within the development. Policy T.5 is sufficient to ensure that developers make provision for cyclists that is well connected to existing routes, when the proposal comes forward.

13.39 The Council proposes an Inquiry Change (IC13) to the supporting text in paragraph D3.6 to clarify the position regarding cycle routes around Chew Valley Lake, and to highlight the need for consultation with the landowner, Bristol Water. Whilst this does not fully meet the objections raised by the Chew Valley Recreational Trail Association, I support this approach since no progress can be made to designate the route without the co-operation of the landowner. I refer also to my previous response under Policy T.5, and related recommendation.

13.40 The route near the Globe roundabout was amended rather than deleted to show the correct line of the intended route. I have no evidence before me to question this decision and as such no modification is necessary in response to the related objection.

Recommendation:

R13.10 Modify the plan by incorporating Inquiry Change (IC13).

D4: Buses - Policy T8 and Paragraphs D4.2 and D4.3

3010/B5	Mr M Grigg	D4.2
2/B46	T2000/Railfutures	D4.3
2/B23	T2000/Railfutures	T.8
564/B14	London Road Area Residents Association	T.8
685/B39	Batheaston Parish Council	T.8
2682/B5	Chewton Keynsham Neighbourhood Association	T.8
2947/B5	Bath Chamber of Commerce	T.8
3108/B2	Mr R F Fessey	T.8
3273/B5	Bath & District Community Health Council	T.8
3312/B1	Cllr G Dawson	T.8

Supporting Statements

120/B30	Ms Helen Woodley	T.8
254/B41	Keynsham Town Council	T.8
441/B8	Mrs S F Hobbs	T.8
2251/B9	Federation of Bath Residents Associations - Transport Group	T.8
3181/B1	Bath & District Consumer Group	T.8

Issue

- i) Is the Policy and its explanatory text appropriate and sufficiently comprehensive?

Inspector's Reasoning

- 13.41 It is not for this plan to enforce agreements signed between the bus operating companies and the Council. This is a legal/contractual matter which would need to be pursued directly between the Council and the bus operators. The bus quality partnership referred to in the plan is an agreement signed between the local bus operator and the Council. The supporting text and policy does not preclude the Council from undertaking an agreement with national coach service operators and Policy T.8 refers to "bus and coach operations", therefore no change is required to the wording of the policy.
- 13.42 The priority bus routes identified in the policy follow the strategic routes identified in the Structure Plan (Policy 4) as far as they affect the District. The Structure Plan (Policy 9) does not specify which routes between Bath and Keynsham/Bristol should be identified and I have no evidence before me to determine the suitability of the route via Bitton suggested by one objector.
- 13.43 Although bus routes to Chippenham and Trowbridge are referred to in the Structure Plan under Policy 4 (O), I have no evidence before me to determine how other routes referred to by objectors should be taken account of in the Local Plan. The emerging Greater Bristol Transport Plan has set down 10 priority routes as part of its bus strategy. A further route network centred on Bath has yet to be finalised, although a bid for funding the scheme will be submitted in 2006. In these circumstances I have no basis on which to recommend the addition of further routes to Policy T.8.
- 13.44 There is inevitably an element of duplication between the LTP and the Local Plan. It is important that the Local Plan ensures that transport provision is in place or put in place to support new development and to ensure that the district develops in a sustainable way. PPG12, paragraph 5.4 states that the LTP and the Local Plan should support each others' policies and proposals. Development along the identified corridors may have to contribute towards the implementation costs of the traffic management measures and as such it is vital that developers are made aware of the routes and planned infrastructure provision. However, as stated in respect of Policy T.3, given the role of the LTP, it is not necessary for the Council to "seek funding for" improvements through the Local Plan, and therefore these words should be deleted from the policy.
- 13.45 In assessing site K2 for housing, which I am recommending be reinstated in the plan, there are a number of matters to be weighed. I find there are other matters which outweigh the issue of access to the bus priority route through Keynsham such that this is not a matter which should prevent the development of the site.
- 13.46 As the Council has stated it does have a role to encourage the provision of public transport through quality bus partnerships and infrastructure provision such as improvements to the bus station and other transport related infrastructure. It would not be appropriate to use the Local Plan to

lobby central government for funding for an LRT scheme. The LTP seeks to set down priorities for infrastructure development in the district and there is currently no proposal in this LTP for an LRT line in Bath.

13.47 A number of objectors referred to matters such as the use of open top buses, or the organisation of the bus industry and the operational elements of the bus network such as improvements to its efficiency through the increased frequency of services. Such matters are operational in nature and therefore beyond the remit of the Local Plan.

13.48 This section of the Access Chapter includes QG 19. It is my recommendation that all the QGs should be deleted from the plan, with their contents included within the text where necessary to support policy. QG 19 sets out the undertakings within the Quality Bus Partnership. Whilst this may be of interest to some, it is not relevant to the justification or explanation of Policy T.8 and is not a land use matter. I therefore recommend that the text within QG 19 is deleted.

Recommendations:

R13.11 Modify Policy T.8 by deleting "seek funding for".

R13.12 Modify the plan by deleting QG 19.

D5: Railways - Policy T9 and Paragraphs D5.3, D5.5, D5.6 and D5.7

334/C17	Ms P Davis	D5.3/B
3328/C8	Strategic Rail Authority	D5.3/B
3328/C10	Strategic Rail Authority	D5.3/B
3468/C1	North Wiltshire District Council	D5.3/B
3533/C3	Network Rail Infrastructures Ltd	D5.3/B
2686/C8	Norton Radstock Regeneration Company	D5.6/A
3415/C2	North Somerset Railway Company	D5.6/A
2/B45	T2000/Railfutures	T.9
88/B37	William & Pauline Houghton	T.9
246/B14	SUSTRANS	T.9
254/B40	Keynsham Town Council	T.9
1904/B6	Ms B Cohn	T.9
2016/B4	Mr B E Walsh	T.9
2686/B4	Norton Radstock Regeneration Company	T.9
3298/D98	Cam Valley Wildlife Group	PIC/D/7 (T.9)
3324/C2	BRB (Residuary) Limited	T.9/B
3415/C1	North Somerset Railway Company	T.9/B
3611/C1	Homebase Group Ltd	T.9/B
120/C255	Ms Helen Woodley	T.9/L
578/C110	Norton Radstock Town Council	T.9/L
3257/C277	Somer Valley Friends of the Earth	T.9/L
578/C109	Norton Radstock Town Council	T.9/N
2135/C3	Miss G M Bennett	T.9/Q
3116/C125	Bath & North East Somerset Allotment Association	T.9/Q
3262/C9	The PPG Partnership	T.9/Q
3286/C7	BLCT (11680) Ltd	T.9/Q
3394/C2	Cllr A Furse	T.9/Q

Supporting Statements

120/C216	Ms Helen Woodley	D5.5/A
120/C217	Ms Helen Woodley	D5.5/C
120/C218	Ms Helen Woodley	D5.6/A
120/C219	Ms Helen Woodley	D5.7/A
120/B20	Ms Helen Woodley	T.9
120/D322	Mrs H Woodley	PIC/D/7 (T.9)
120/D355	Mrs H Woodley	PIC/D/7 (T.9)
345/B18	Freshford Parish Council	T.9
614/D22	Temple Cloud Residents Association	PIC/D/7 (T.9)
686/B124	Bath Preservation Trust	T.9
3126/D65	Bath Friends of the Earth	PIC/D/7 (T.9)
120/C258	Ms Helen Woodley	T.9/D

Issues

- i) To what extent should the plan refer to the reopening or safeguarding of stations and railway lines?
- ii) Is the safeguarding of former railway lines as Sustainable Transport Routes appropriate?
- iii) How far can the plan influence operational matters?
- iv) Does the change in safeguarding alter the line of cycle routes?

Inspector's Reasoning

Issue i)

13.49 The SRA and Network Rail have stated that there will be no funding available to re-open the lines and stations referred to in paragraph D5.3. The Rail Strategy for the Bristol, Bath and Weston-Super-Mare area was published before the dramatic changes that have occurred in the rail industry in the wake of the Hatfield Rail Crash. These changes have refocused rail spending priorities and as the SRA has commented in their objections there is now great uncertainty about funding being made available to meet the aspirations outlined in the supporting text. To retain the references to possible station and line re-openings would be misleading in the current context and contrary to guidance in PPG12 which states that only those proposals that are firm and likely to be implemented during the plan period should be included in development plans. In addition PPG13, paragraph 74 states that the Council should liaise with the SRA before including proposals for rail improvements in their plan. It is not clear whether the Council has done this in respect of the proposals in the paragraph. It is now very unlikely that the potential station and line re-openings referred to in paragraph D5.3 will be implemented in the plan period and I therefore recommend that the paragraph is deleted.

13.50 Policy T.9 states that development which would prejudice the efficient functioning or future development of the railway network will not be permitted. To some extent this meets the objectors' concerns in respect

of potential new or reopened stations for example at Bathampton and Bathford Halt. (Limpley Stoke is in Wiltshire and is not subject to these plan policies.) Without any firm proposals likely to be implemented during the plan period I consider that no reference to reopening stations such as Twerton Station should be included in the plan.

Issue ii)

- 13.51 In the JRSP, Policy 53 states that Local Plans should safeguard routes of disused and dismantled railways as transport routes, with preference given to cycle/walkways and public transport rather than highways. The text of paragraph D5.6 identifies the routes which are to be safeguarded in the RDDLP, and Policy T.9 provides the safeguarding for those routes.
- 13.52 The deletion of the specific reference to the Radstock to Frome route in the DDLP does not weaken the protection of this particular route; rather the approach taken is to extend the protection afforded to this route to all the disused railway lines in the District. I consider the issue of whether the reinstatement of the railway line and the station at Radstock should be safeguard in the policies of the plan in dealing with GDS.1/NR2, the Radstock Railway Land. I find no justification for such an approach. The safeguarding of the Sustainable Transport Routes provides an appropriate level of protection in the absence of any committed and funded scheme.
- 13.53 I acknowledge the comments made in respect of the Inspector's Mendip Local Plan Report regarding the safeguarding of the Frome to Radstock railway; however I note that the recommendation was not carried forward in the adopted plan. PPG12, paragraph 5.23 states that plans should give better protection to those sites and routes surplus to transport requirements which could be critical in developing infrastructure to widen transport choices, and this is the approach adopted under Policy T.9. However, it is clear from the wording in Government advice and in the JRSP policy that it is disused railway trackbeds and routes which should be safeguarded for possible future transport schemes. I have no evidence before me to suggest that communities and/or individual property owners would be blighted by the safeguarding of the Frome to Radstock railway line as one objector suggests, but the Council should ensure that former railway routes which have been redeveloped and which are now in beneficial use are not included as Sustainable Transport Routes.
- 13.54 The former Midland Rail Line is safeguarded under Policy T.9 as far as the District boundary as a sustainable transport route. That part of the route which goes through the Western Riverside site is not shown on the Proposals Map in order to avoid any prejudice to the master planning of the site as referred to in Policy GDS.1/B1; and there are no proposals in the plan for that part of the route through the Homepage site. I deal with the change in notation on the Proposals Map from "Rapid Transit Route" to "Sustainable Transport Route" in considering Policy T.11 and paragraphs D6.1-6.3 below.

13.55 Dealing with more detailed matters, I make the following comments. The safeguarding of the disused railway network is to ensure that it is kept for alternative transport uses, not only for use as a railway. Matters concerning buses are dealt with under section D4. Policy T.9 does not constitute a proposal to create a cycle route around Temple Cloud. One objector is concerned about the impact on biodiversity of any re-use of the route as a cycle way, but Policy T.1, criterion 1 states that the Council will seek to reduce the adverse impact of all forms of travel upon the natural environment. Biodiversity and the protection of the natural environment are also covered by the NE policies in Chapter C2.

13.56 The policy seeks to safeguard routes for future use, in accordance with guidance in PPG12 and JRSP Policy 53. The demolition of railway structures along the routes is not prohibited by the policy as long as the integrity of the route is retained. Any proposal would have to be considered on its own merits. Changes made to the Proposals Map in respect of Policy T.9 are only in respect of the designation or re-designation of the routes and should not affect the land to the north of Avon Park allotments. The safeguarded route from Bath to Radstock ends at Shoscombe because of the development at Single Hill.

Issue iii)

13.57 The speed of trains is an operational matter which is outside the remit of this land use plan, so is the frequency of service from Freshford Station and the number of local trains on the Bristol to Bath line. The provision of train services is not a planning matter. Furthermore, accessibility concerns within stations are matters for the train operators/network rail, although the Council has indicated that it will pursue the platform height issue at Keynsham with the rail operator.

Issue iv)

13.58 The Council has noted the detailed route description for the Norton Radstock Greenway suggested by the objector, but guidance in PPG12 states that excessive detail of this sort in local plans should be avoided.

13.59 The Council has confirmed that the Bristol to Bath cycle path is protected as an important link in the National Cycle Network.

13.60 Where the Cycle Route is duplicated by the Sustainable Transport Route it has been deleted from the Proposals Map. The Cycle Route has also been deleted where it was shown along a road rather than on the former railway lines. I agree that this is a reasonable approach for the plan to take and make no recommendation for modification.

Recommendation:

R13.13 Modify the plan by deleting paragraph D5.3.

(See also recommendation under Policy T.11 below.)

D5: Railways - Policy T10

2/B16	T2000/Railfutures	T.10
88/B45	William & Pauline Houghton	T.10
88/B49	William & Pauline Houghton	T.10
581/B21	Batheaston Society	T.10
685/B40	Batheaston Parish Council	T.10
2682/B6	Chewton Keynsham Neighbourhood Association	T.10
3312/B7	Cllr G Dawson	T.10

Supporting Statements

120/B124	Ms Helen Woodley	T.10
1999/B5	Bristol City Council	T.10

Issues

- i) Should the Proposals Map safeguard land for new railway stations at Radstock, Bathampton and Newbridge Parkway?
- ii) Would the new station site at Newbridge be better if implemented as part of a scheme for new Council offices.
- iii) Is it inconsistent not to include Keynsham in Policy T.10 when it is the Council's stated intention to implement improvements there?

Inspector's Reasoning

Issue i)

13.61 I deal with the issue of safeguarding for a station at Radstock in Section 7 (Policy GDS.1/NR2).

13.62 In respect of the reopening and construction of new stations at Bathampton and Newbridge Parkway, the LTP (figures 5.1 and 5.2) does not identify that funding is being sought or made available for these suggested proposals and as such it would be inappropriate to include them in the plan. The potential for the opening of a station at Newbridge Parkway is linked to the future of any LRT line between the proposed park and ride site and Western Riverside. Until such time as there are firm proposals supported by funding, it would be inappropriate to make any designation in this plan.

13.63 Furthermore, even though there may be no objection to its allocation, unless a new station at Saltford is a firm proposal likely to be implemented within the life of this plan, T.10 1) should be deleted.

Issue ii)

13.64 I have recommended against any change to the Green Belt boundary in the vicinity of Newbridge (see Section 7, GDS.1/B1A) and it would be inappropriate to allow other uses such as Council Offices in this sensitive location which could prejudice the landscape setting of Bath.

Issue iii)

13.65 The Council has confirmed that the improvements at Keynsham Station, referred to in connection with Proposal K1- Somerdale would not involve the development of any extra land. Policy T.10 seeks only to safeguard land for new stations and rail freight uses and as such it would not be appropriate to refer to Keynsham Station in this context.

Recommendation:

R13.14 Modify Policy T.10 by deleting 1).

D6: Rapid Transit - Policy T11 and Paragraphs D6.1, D6.2 and D6.3

2251/B7	Federation of Bath Residents Associations - Transport Group	D6
162/B2	Trams for Bath	D6.1
3262/C10	The PPG Partnership	D6.1/A
162/B3	Trams for Bath	D6.2
3262/C11	The PPG Partnership	D6.2/A
3550/C1	Second Site Property Holdings & Transco plc	D6.2/A
162/B4	Trams for Bath	D6.3
878/B3	The Bath Society	D6.3
2/B24	T2000/Railfutures	T.11
120/B21	Ms Helen Woodley	T.11
629/B4	FPD Savills Ltd	T.11
3001/B1	Motor Services (Bath) Ltd	T.11
3181/B3	Bath & District Consumer Group	T.11
3262/B1	The PPG Partnership	T.11
3286/B6	BLCT (11680) Ltd	T.11
3287/B5	BLCT (11650) Ltd	T.11
3312/B2	Cllr G Dawson	T.11

Supporting Statements

686/B125	Bath Preservation Trust	T.11
3201/B9	South West Regional Development Agency	T.11

Issues

- i) To what extent should the plan set out detailed proposals for a Rapid Transit facility for Bath?
- ii) Should the route for a Rapid Transit be safeguarded as a Sustainable Transport Route?

Inspector's Reasoning

13.66 In the RDDLP, Policy T.11 is deleted and the Proposals Map is modified to amend the Rapid Transit Route notation to Sustainable Transport Route under Policy T.9.

13.67 The Council has aspirations to provide a network of rapid transit services across the City, but without properly worked-up plans and provision for

funding, it is too early to include any detail of such a network in the plan. The advice in PPG12 is that plans should only include proposals which are firm, with a reasonable degree of certainty of proceeding within the plan period and should be identified as such in the LTP. At the time of the Inquiry, this scheme was not in the LTP. It would be premature for the plan to set down any detailed proposals relating to this route. I therefore recommend paragraphs D6.1 to D6.3 be deleted.

Issue ii)

13.68 Whilst I support the safeguarding of former railway routes as Sustainable Transport Routes under Policy T.9, I do so on the basis that the policy accords with Policy 53 of the JRSP. However, the JRSP policy refers to the routes of disused and dismantled railways and from this I infer that the policy is not intended to apply to former railway routes which have been developed for other uses. As a result I do not agree with the Council's substitution of Sustainable Transport Route notation to the whole of the Rapid Transit Route on the PM. Where this follows a former railway route which has been redeveloped, I consider that it does not accord with the purpose of the JRSP policy which is to safeguard the routes of disused and dismantled railways, and could lead to blight for properties which are so affected. I therefore recommend that the line is deleted in those locations where the former railway route has been subject to redevelopment and is in beneficial use.

13.69 To be consistent, the Council should review the other Sustainable Transport Routes to delete those parts where the former railway route has been subject to redevelopment and is in beneficial use.

13.70 The appropriate time to identify the route for any Rapid Transit facility will be once a scheme has been properly worked up and provision has been made for funding. This would ensure that any properties which may be affected would not be subject to uncertainty and unnecessary blight.

Recommendations:

R13.15 Modify the plan by deleting the heading "Rapid Transit" and paragraphs D6.1 to D6.3.

R13.16 Review all the Sustainable Transport Routes to ensure they do not include land which has been redeveloped and is in beneficial use.

D7: Transport Interchange - Policy T12 and Paragraph D7.1

120/C256	Ms Helen Woodley	D7.1/B
686/C161	Bath Preservation Trust	D7.1/B
2/B28	T2000/Railfutures	T.12
120/C257	Ms Helen Woodley	T.12/A
686/C162	Bath Preservation Trust	T.12/A

Supporting Statements

120/B22	Ms Helen Woodley	T.12
254/B42	Keynsham Town Council	T.12
441/B9	Mrs S F Hobbs	T.12

Issues

- i) Would an interchange at Newbridge P&R site be a waste should oil price rises force people to use their cars less in the future?
- ii) Whether an interchange at Newbridge would be detrimental to the Green Belt.

Inspector's Reasoning

Issue i)

13.71 The main objective of the government's transport guidance as set out in PPG13 is to reduce the need to travel. Park and Ride facilities have an important role to play in reducing the length of journeys made by the private car, as well as reducing congestion in town and city centres. As the Council has stated in their response, in the event that the price of oil fluctuates to such an extent as to bring the viability of P&R facilities into question, then the Plan can be reviewed in order to address this issue. This objection does not justify any change to Policy T.12.

Issue ii)

13.72 The Council has indicated that the extent of the development proposed at Newbridge would compromise the openness of the Green Belt, and therefore the site should be removed from the Green Belt. I consider this issue in detail in relation to GDS.1/B1A in Section 7 of my report, and find that the circumstances are not sufficient to justify the release of the land from the Green Belt. I accept that this site on the urban edge represents a convenient and accessible location for a P&R/transport interchange, and my recommendation does not rule out the possibility of accommodating an appropriately designed P&R/transport interchange on this Green Belt site in the future. I therefore consider that the reference to Newbridge in Policy T.12 should remain.

Recommendation: no change

D8: Traffic Management - Policy T13 and Paragraphs D8.1 and D8.4

3273/B7	Bath & District Community Health Council	D8.1
3269/B6	Ms I Lerpiniere	D8.4
2/B29	T2000/Railfutures	T.13
578/B74	Norton Radstock Town Council	T.13
2965/B15	Morley Fund Management Limited	T.13
3010/B1	Mr M Grigg	T.13

Supporting Statements

2466/B6	Keynsham Civic Society	D8.4
120/B23	Ms Helen Woodley	T.13

Issues

- i) Whether various specific transport management/safety measures should be proposed.
- ii) Should a bypass be shown for the centre of Radstock?
- iii) Should the policy recognise the range of demands on accessibility to the city centre?
- iv) Is air quality measured accurately?

Inspector's Reasoning

Issues i)

13.73 While the plan can take account of future bus priority schemes and safety measures defined through the LTP, and co-ordinate them with the development strategy, it is not the appropriate document to take forward detailed proposals for transport management and road safety schemes.

Issue ii)

13.74 There are no current proposals to construct a bypass around Radstock and as such it would not be appropriate for this plan to propose one without the necessary funding commitment pursued through the LTP. The Council has indicated in their response that the regeneration scheme planned for Radstock will improve traffic circulation and the environment for shoppers in the town centre generally.

Issue iii)

13.75 Policy T.13 refers to the various town centre users including cyclists, pedestrians and the mobility impaired, as well as the servicing needs of commercial users. I am satisfied that the inclusive nature of the policy encompasses a wide enough range of user's access needs.

Issue iv)

13.76 The siting of air quality monitoring stations is a detailed operational matter which is beyond the remit of this Local Plan.

Recommendation: no change

D8: Traffic Management - Policies T14 & T15

88/B50	William & Pauline Houghton	T.14
120/B24	Ms Helen Woodley	T.14
685/B41	Batheaston Parish Council	T.14
686/B132	Bath Preservation Trust	T.14
3010/B2	Mr M Grigg	T.14
120/B13	Ms Helen Woodley	T.15
685/B42	Batheaston Parish Council	T.15
1900/B1	Mr W I Bell	T.15
3265/B2	Mr D E Packman	T.15

Supporting Statements

2251/B1	Federation of Bath Residents Associations - Transport Group	T.14
502/B22	Camerton Parish Council	T.15
689/B26	British Horse Society	T.15
120/C187	Ms Helen Woodley	T.15/A
3257/C258	Somer Valley Friends of the Earth	T.15/A

Issue

- i) Whether various specific transport/safety measures should be proposed?

Inspector's Reasoning

13.77 Policies T.14 and T.15 are general policies which set down the range of measures the Council may employ in order to discourage through traffic and reduce the speed of traffic along unsuitable routes. However, proposals for specific measures such as the design of new street furniture and road calming in Twerton High Street, the location for the introduction of 20 mph zones and the imposition of weight restrictions are too detailed to be included in the plan. Such proposals should be taken forward through the LTP.

13.78 Policy T.15 provides for traffic management in rural areas which is realistic and respects the environment and character of rural areas. Whilst traffic management can have direct or indirect land use implications which should be dealt with in local plans, I am satisfied that the approach adopted by the Council in Policies T.14 and T.15 complies with this guidance.

Recommendation: no change

D9: Transport Infrastructure - Policy T16 and Paragraphs D9.1 and D9.2

689/B27	British Horse Society	D9.1
1830/B7	Highways Agency	D9.1
1427/B137	Environment Agency	D9.2
2/B36	T2000/Railfutures	T.16
502/B19	Camerton Parish Council	T.16
1427/B135	Environment Agency	T.16
3126/B17	Bath Friends of the Earth	T.16

Supporting Statements

120/B14	Ms Helen Woodley	T.16
3257/C259	Somer Valley Friends of the Earth	T.16/A
3257/C260	Somer Valley Friends of the Earth	T.16/C
3298/C72	Cam Valley Wildlife Group	T.16/C
3257/C261	Somer Valley Friends of the Earth	T.16/D
3257/C262	Somer Valley Friends of the Earth	T.16/F

Issue

- i) Whether the policy and its explanatory text covers all relevant matters relevant to the assessment of new transport infrastructure.

Inspector's Reasoning

- 13.79 A number of detailed matters are raised by objectors, and I deal with these as follows. Criterion (vi) states that the needs of horse riders should be taken into account when developing new infrastructure, and this is sufficient to meet the objector's concerns. I find no reason for the role of the Highways Agency and its responsibility for trunk roads to be included within paragraph D9.1 which deals with the Council's responsibilities.
- 13.80 Criterion (iv) states that proposals for transport infrastructure should take account of the water environment. No further reference is required.
- 13.81 Policy T.16 seeks to control the development of transport infrastructure in the interests of promoting sustainable transport and protecting the environment. It is not the purpose of the policy to take account of the commercial interests of road users. The identification of HGV freight routes is better dealt with in the context of freight quality partnerships between operators and the Council, as advised in paragraph 46 of PPG13, rather than the Local Plan.
- 13.82 The objector's reference to "suitable highway infrastructure" is not clear, but Policy T.24 requires suitable access to be provided in new development proposals and the plan should be read as a whole, therefore I consider that highway infrastructure is adequately covered.
- 13.83 The Council has amended the policy by deleting the phrase, "have regard to" in favour of "if adequate account has been taken of". I support the change since it provides a more robust and comprehensive basis upon which to judge adherence of the various criteria.
- 13.84 The Council has amended the Policy so that the words "quality" and "patronage" are added to criterion (ix). This satisfies part of the related objection. I agree with the Council that criterion (ii) already deals with the effects of increased traffic and no additional criterion is therefore required to deal with this issue.
- 13.85 I conclude that no issue raised by objectors needs to be added to the policy or accompanying text.

Recommendation: no change

D9: Transportation Infrastructure- Policy T17

2/B26	T2000/Railfutures	T.17
78/B21	Mr S Osgood	T.17
81/B2	Rosewell Nursing Home	T.17
167/B6	Mr & Mrs M Pickman	T.17
566/B7	Clutton Parish Council	T.17
631/D10	Cameley Parish Council	PIC/D/8 (T.17)
708/B28	The Widcombe Associatio	T.17
731/D17	Stowey-Sutton Parish Council	PIC/D/8 (T.17)
2058/B1	Cll R Nicholl	T.17
2176/B3	Bath & North East Somerset Conservative Group	T.17
2247/B1	Mr & Mrs J Empson	T.17
2331/B2	Mr P V Tainton	T.17
2333/B2	Mr A H Rogers	T.17
2342/B2	Mr M Clifford	T.17
2345/B2	Mr M T Whitton	T.17
2947/B4	Bath Chamber of Commerce	T.17
2959/B4	Mr L F James	T.17
2966/B1	Cllr R Nicholl	T.17
3126/B18	Bath Friends of the Earth	T.17
3268/B1	Ms J Allen	T.17
3278/D34	Persimmon Homes (Wessex) Ltd	PIC/D/8 (T.17)
3298/B7	Cam Valley Wildlife Group	T.17

Supporting Statement

120/D352	Mrs H Woodley	PIC/D/8 (T.17)
614/D20	Temple Cloud Residents Association	PIC/D/8 (T.17)
3126/D64	Bath Friends of the Earth	PIC/D/8 (T.17)
3643/D3	Cllr Steve Willcox	PIC/D/8 (T.17)
3648/D4	Mr & Mrs K Redding	PIC/D/8 (T.17)

Issues

- i) Should the routes identified in Policy T.17 continue to be safeguarded?
- ii) Should the following schemes be included in Policy T.17:
 - the LTP schemes to convert Rossiter Way to two way traffic and to create a pedestrian priority area in Claverton Street.
 - the completion of the A46/A36 link and the creation of a park and ride facility to the east of Bath.
 - the construction of an access link road between Cloud Hill and the A39.
 - the safeguarding of the Welton link road between West Road and Radstock Road.
 - a bypass for Saltford.

Inspector's Reasoning

Issue i)

- 13.86 The schemes listed in Policy T.17 were inherited from the former Avon County Council, the bypasses of Whitchurch and Temple Cloud/Clutton having been included in Development Plans from before 1974. In response to objections, the Council has agreed that the eastern route of the Temple Cloud/Clutton bypass should be deleted in view of the severance of Clutton and the nature conservation issues which it raises. However, the Council is concerned that there is the potential for an urban extension to Bristol in the Whitchurch area which would have implications for traffic movements on the A37. The Council therefore wishes to retain the safeguarding of land for the Whitchurch and Temple Cloud/Clutton bypasses
- 13.87 A joint study was carried out in 2003 in conjunction with Bristol City Council regarding the economic case for the Whitchurch bypass, but it concluded that there was not a strong case at that time. No further evidence has been put before me to support the economic case for either of these bypass routes. The JRSP refers in Policy 4 (P) to "reducing environmental problems in Whitchurch, Clutton and Temple Cloud" which provides a strategic context for considering bypasses as well as other measures for reducing congestion and the impact of traffic on the environment in these settlements. It does not however provide an endorsement for the bypass schemes.
- 13.88 Given that the need for the bypasses has not been fully determined, Policy T.17 does not comply with the provisions of paragraph 5.22 of PPG12 because it seeks to define precise routes on the proposals map without any commitment in terms of definitive studies or financing. PPG12 states that where the precise route of a proposal is not known, but where the proposals are sufficiently advanced, the authority may define the area over which it intends to apply a safeguarding policy. However, this assumes that there is a clear commitment and need for the road scheme. In my view the possibility of a future urban extension is not a good enough reason to retain these safeguarded routes, and gives no indication that the routes are likely to be developed during the plan period. In the event that an urban extension is planned in the Whitchurch area, studies would be required of the traffic implications and proposals for new routes/bypasses should be properly formulated, costed and funded at that time. It is in the context of firm commitments that the routes should then be included in a future DPD. In the meantime I recommend that the Whitchurch and Temple Cloud/Clutton bypass safeguarded routes are deleted from Policy T.17.
- 13.89 I accept the Council's explanation that the route of the Lower Bristol Road through the Western Riverside site should not be defined until such time as the master plan for the development is brought forward. The supporting text in paragraph D9.3 states that the safeguarded section of the Lower Bristol Road is currently also the subject of a review. Given the

uncertainty surrounding the scheme I refer to the advice in paragraph 5.22 of PPG12 and recommend that this safeguarded route is also deleted.

Issue ii)

13.90 The Rossiter Road and Claverton Street LTP schemes do not require additional land and as such no safeguarding is required in Policy T.17.

13.91 The A46/A36 link and the east of Bath park and ride facility are the subject of a separate study (Bristol/Bath – South Coast MMS). As such it would be premature for the plan to include these schemes.

13.92 There are no proposals for the other three schemes put forward by objectors. PPG12 states that only schemes which are firm and likely to proceed during the lifetime of the plan should be included as proposals. The Council indicates that the suggested road schemes are not included in the LTP and where they are subject to the Greater Bristol Strategic Transport Study they are at an early stage in their planning. No modification is therefore necessary in response to these objections.

13.93 In the absence of any schemes which require safeguarding in the plan, I recommend the deletion of Policy T.17 and the supporting text in paragraph D9.3.

Recommendation:

R13.17 Modify the plan by deleting Policy T.17 and Paragraph D9.3.

D10: Car Parking - Policy T18 and Paragraphs D10.1, D10.3 and D10.4

3181/B4	Bath & District Consumer Group	D10.1
3010/B4	Mr M Grigg	D10.3
3263/B2	Bath Football Club Trustees Ltd	D10.3
3116/C109	Bath & North East Somerset Allotment Association	D10.3/A
334/C16	Ms P Davis	D10.3/B
3116/C108	Bath & North East Somerset Allotment Association	D10.3/B
3262/B2	The PPG Partnership	D10.4
120/C278	Ms Helen Woodley	D10.4/D
3257/C263	Somer Valley Friends of the Earth	D10.4/D
120/B16	Ms Helen Woodley	T.18
120/B17	Ms Helen Woodley	T.18
120/B18	Ms Helen Woodley	T.18
2251/B3	Federation of Bath Residents Associations - Transport Group	T.18
2947/B2	Bath Chamber of Commerce	T.18
2965/B16	Morley Fund Management Limited	T.18

Supporting Statements

1999/C21	Bristol City Council	D10.4/B
3257/C264	Somer Valley Friends of the Earth	T.18/A

Issues

- i) Should there be a reference in the plan to the Lambridge Park and Ride site and if so, should more detail be added about the scheme?
- ii) Is the reference to the proposed Park and Ride site at Newbridge sufficient and does the policy support Bath's importance for shopping and business?
- iii) Is the approach to transport provision for workers in the city centre outside public transport operating hours, and for shoppers and short stay visitors appropriate?

Inspector's Reasoning

Issue i)

13.94 The Council confirms in that the Lambridge site has been fully appraised and that they are committed to bringing forward the scheme. I have no evidence that the Lambridge Park and Ride site will not go ahead in the lifetime of the plan, and therefore it is appropriate that it remain in the plan. In the RDDLP text has been added to paragraph D10.3 to clarify that development of the Park and Ride site will require the Council to secure suitable alternative provision for the sports pitches and facilities, and Policy NE.14, which controls development within the floodplain, will apply to the development of the Lambridge site so no further addition to the paragraph is necessary.

13.95 The improvement of bus frequencies and provision of a local distribution facility to reduce HGV movements in the city centre are traffic management related matters which are generally beyond the remit of this plan. In any event they are unlikely to be suitable substitutes for the provision of a park and ride facility at Lambridge.

Issue ii)

13.96 Reference is made in paragraph D10.4 of the RDDLP to the proposal for a Park and Ride at Newbridge and to Policy GDS.1/B1A which sets out development requirements. I deal with the detail of this scheme in Section 7 of my report. However, I recommend the deletion of paragraphs D6.1-D6.3 and therefore the reference should be deleted from paragraph D10.4.

13.97 The supporting text in paragraph D10.7 recognises that the loss of parking which serves a shopping centre can have a detrimental effect on the shopping environment in the city centre. The Council's approach to car parking seeks to strike a balance between meeting the needs of visitors and shoppers to Bath whilst improving the quality of the environment for all visitors to the city centre. Traffic congestion and the resulting harm to the environmental quality of the city centre in the form of air quality and the ease of movement of pedestrians are important

factors affecting Bath's continued role as a major employment and shopping destination, as is the availability of long and short stay parking spaces. There is therefore no tension between the Council's wider strategic policies for the city of Bath and its car parking policies.

Issue iii)

13.98 The final sentence of paragraph D10.1 states that provision will be made for those who have a valid need for long stay off street parking in the city centre, and this could include workers in the city centre who are outside normal public transport hours.

13.99 The viability and vitality of the Bath city centre must be maintained by ensuring that there is enough off street parking provision in the city centre to cater for the needs of shoppers, tourists and other short stay visitors. Therefore the change from "adequate" provision to "some" as suggested by one objector would not be appropriate. Furthermore, while home delivery services and internet shopping are having an impact on shopping culture generally, there is no evidence to suggest that this trend has led to any significant reduction in the demand for city centre parking. In any event is not within the remit of the Council to support home delivery services.

Note

13.100 Although no objection has been raised to the principle of Policy T.18, it seems to me that this is more a statement of intent rather than a policy, and that it largely summarises the preceding text. The Council should consider whether it is necessary to retain this as a policy, or whether its wording could be used to replace much of the preceding text.

Recommendation:

R13.18 The Council to consider whether it is necessary to retain Policy T.18, or whether its wording could be used to replace much of the preceding text in paragraphs D10.1 – D10.4.

D10: Car Parking - Policy T19

120/B19	Ms Helen Woodley	T.19
334/B3	Ms P Davis	T.19
768/B2	Mr C D Noble	T.19
2251/B4	Federation of Bath Residents Associations - Transport Group	T.19
2947/B1	Bath Chamber of Commerce	T.19
3181/B5	Bath & District Consumer Group	T.19

Issues

- i) Does Policy T.19 adopt the right approach with regard to resident parking permits and on-street parking controls?

- ii) Should Policy T.19 be extended to all areas of Bath, not just the city centre, and to other towns in the District?

Inspector's Reasoning

Issue i)

- 13.101 No statistical evidence is submitted as to the effectiveness or otherwise of on-street parking controls, but there is evidence of general support for residents' parking schemes in the areas affected. It is Government policy to reduce the use of the car for journeys to work and therefore it is appropriate to place the needs of residents above those of commuters. However, any restrictions on the number of spaces for each household are an operational matter which is not within the remit of this plan.
- 13.102 I appreciate the concern expressed regarding safety issues in off-street car parks, and clearly with any reduction in on-street spaces in the evenings the use of such car parks is likely to increase. However, this is an operational matter which the Council is addressing through the removal of charges in off street car parks after 7pm which may increase the numbers of on-street spaces available, and may also be addressed through safety measures within the car parks.

Issue ii)

- 13.103 The Council have no plans to extend the scheme more widely than that set out in the plan, although any modification of the residents' parking areas can be done outside the plan process. The boundaries of the residents' parking areas are subject to regular review for residents beyond the resident parking areas who experience problems with commuter parking in their streets.

Recommendation: no change

D10: Car Parking - Policy T20

120/B7	Ms Helen Woodley	T.20
3126/B20	Bath Friends of the Earth	T.20
3243/B4	B&Q plc	T.20

Issue

- i) Is the Policy appropriately worded?

Inspector's Reasoning

- 13.104 Policy T.20 seeks to control the loss or addition of off street parking in conjunction with new development. Other policies in the plan encourage the use of more sustainable forms of development and modes of transport

in order to reduce road traffic. I find no conflict with that objective in this policy.

13.105 The Council's parking standards as modified by PICs are set down in an Annex to Section D. The retail standard is in accordance with the standards set down in PPG13 for developments over 1000 m², however the standards restrict parking for retail developments between 200 m² and 1000 m² to 1 space per 35 m². PPG13 paragraph 53 indicates that local authorities should use their discretion in setting the level of parking appropriate for new developments. Given the extremely constrained nature of Bath I consider that there is justification for the standard set.

13.106 Policy T.20 seeks to control parking provision in existing development in accordance with the wider parking strategy of the Council, whereas paragraph A3.16 (4) seeks to control the design of major developments. Where the scale of major new development would significantly intensify activity, the aim would be to reduce the number of trips arising out of that increased activity as much as possible. I find no conflict between the policy and this paragraph.

Recommendation: no change

D10: Car Parking - Policy T.21

2/B22	T2000/Railfutures	T.21
2/B44	T2000/Railfutures	T.21
581/B22	Batheaston Society	T.21
685/B44	Batheaston Parish Council	T.21
1427/B136	Environment Agency	T.21
1427/B138	Environment Agency	T.21
2947/B3	Bath Chamber of Commerce	T.21
3262/B3	The PPG Partnership	T.21
3263/D7	Bath Football Club Trustees Ltd	PIC/D/14 (T.21)
3312/B5	Cllr G Dawson	T.21
334/C15	Ms P Davis	T.21/A
3116/C107	Bath & North East Somerset Allotment Association	T.21/A
3263/C4	Bath Football Club Trustees Ltd	T.21/A
686/C163	Bath Preservation Trust	T.21/B
3116/C106	Bath & North East Somerset Allotment Association	T.21/B

Supporting Statement

120/B8	Ms Helen Woodley	T.21
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Issue

- i) Is the safeguarding for Park and Ride sites in Policy T.21 appropriate?

Inspector's Reasoning

13.107 I deal with the principle of including the Lambridge Park and Ride site in the plan and flood risk assessment in relation to Policy T.18. Traffic

calming measures along the A4 is a matter of detail which could be brought forward if considered necessary by the Council as highways authority. Safeguarding of recreational facilities is covered by Policy SR.1A which would apply to any development of the Lambridge site. Thus there is no need to cover this matter in Policy T.21.

13.108 I deal with the principle of a Park and Ride at Newbridge in Section 7 of my report, in relation to GDS.1/B1A. I do not recommend the deletion of the proposal, but recommend against removing the site from the Green Belt. With the Green Belt status retained, there is little need to safeguard the site in Policy T.21 since any other development is unlikely to be permitted. The same reasoning applies to the extension of the Odd Down Park and Ride site.

13.109 Paragraph D10.4 of the RDDLP indicates that consideration is being given to the feasibility of developing a Park and Ride site along the A37 and the possibility of providing an all week site to serve the A36. However, it would be premature to include either scheme in Policy T.21 when the study has not been concluded and there is no firm commitment to proceed.

13.110 I therefore conclude that there is no need for ii or iii in Policy T.21, and rather than retain a policy to safeguard just one site at Lambridge, I recommend changes to Policy T.22 to cover this matter. I therefore recommend that T.21 be deleted.

Recommendation:

R13.19 Modify the plan by deleting Policy T.21.

D10: Car Parking - Policy T.22

345/B27	Freshford Parish Council	T.22
581/B23	Batheaston Society	T.22
3126/B21	Bath Friends of the Earth	T.22
3263/B1	Bath Football Club Trustees Ltd	T.21

Supporting Statements

120/B121	Ms Helen Woodley	T.22
42/B8	CPRE	T.22

I deal with the identification of a Park and Ride site to serve the A36 under Policy T.21.

Issues

i) Should the Policy:

refer to the introduction of traffic calming measures to eliminate the affects of additional traffic generated by Park and Ride sites;

seek to reduce "total road traffic";

refer to the replacement of lost recreational facilities?

Inspector's Reasoning

- 13.111 The policy seeks to prevent/avoid detrimental impacts arising from the development of new Park and Ride sites, rather than to mitigate against them through such measures as traffic calming. In any event, such measures could be introduced if appropriate by the Council without the need for a reference in the policy.
- 13.112 Criterion (v) of the policy seeks to ensure that the surrounding road network has the capacity to safely accommodate any traffic generated by the Park and Ride development. The main purpose of the proposed Park and Ride network is to reduce the number of trips into Bath city centre. Increased use of public transport in the city more generally should achieve a reduction in the total level of traffic in all areas of Bath. The plan's policies seek to achieve a wider ranging reduction in traffic across the District by improving public transport infrastructure and generally reducing the need to travel.
- 13.113 Policy SR.1A seeks to control the loss and replacement of recreational facilities. The plan should be read as a whole and there is no need to duplicate the provisions of Policy SR.1A in Policy T.22.
- 13.114 I recommend the deletion of Policy T.21, and in order to maintain the safeguarding of the Lambridge Park and Ride site, I recommend changes to Policy T.22. No other change is required.

Recommendation:

R13.20 Modify Policy T.22 by inserting at beginning:

"The Council will safeguard land shown on the Proposals Map for Park and Ride purposes at Lambridge, Bath, adjacent the A4."

D11: Airports/Aerodrome Safeguarding Areas - Policy T23 and Paragraph D11.1

1880/B1	Civil Aviation Authority	D11.1
334/B2	P S Davis	T.23
1880/B2	Civil Aviation Authority	T.23

Issue

- i) Are Policy T.23 and Paragraph D11.1 appropriately worded?

Inspector's Reasoning

- 13.115 The reference in paragraph D11.1 to “uses -- which would prejudice air safety”, would cover uses which might increase the risk of collision between aircraft and birds. It is not therefore necessary to make a specific reference to such uses. The Council have no control over the amount of air traffic passing over the District so it is not a matter which could be controlled through this plan.
- 13.116 Given that the statutory designated safeguarding areas may be revised during the lifetime of the plan, I consider that they should be deleted from the Proposals Map along with the reference to the Proposals Map in the policy. The text of the policy should instead refer to “the airport/aerodrome safeguarding areas as defined by the CAA”. Policies in the plan should endure for the lifetime of the. Additional text should also be added to the paragraph D11.1 to inform applicants to consult the Council about the current boundaries of the safeguarded areas. I recommend accordingly.

Recommendations:

R13.21 Modify Paragraph D11.1 by adding at the end:

“This includes uses which might increase the risk of collision between aircraft and birds. Applicants should consult the Council about the current extent of the safeguarded areas because they are reviewed and amended from time to time by the CAA”

R13.22 Modify Policy T.23 deleting “shown on the Proposals Map” and inserting “as defined by the CAA”.

D12: The Requirements and Implementation of Development - Policy T24 and Paragraphs D12.1, D12.3, D12.4, D12.5, D12.6 and D12.7

3289/B1	Mr S McCourt	D12.1
696/C85	South West RSL Planning Consortium	D12.3/B
721/C71	Government Office for the South West	D12.3/B
2962/C5	Wm Morrison Supermarkets plc	D12.3/B
3533/C5	Network Rail Infrastructures Ltd	D12.3/B
696/C86	South West RSL Planning Consortium	D12.4/A
721/C72	Government Office for the South West	D12.4/A
3257/C268	Somer Valley Friends of the Earth	D12.4/A
696/C87	South West RSL Planning Consortium	D12.5/A
696/C88	South West RSL Planning Consortium	D12.6/A
696/C89	South West RSL Planning Consortium	D12.7/A
685/B46	Batheaston Parish Council	T.24
696/B27	South West RSL Planning Consortium	T.24
3126/B22	Bath Friends of the Earth	T.24
3318/B3	Stubbs Rich (Developments) Ltd	T.24

Supporting Statements

1999/C16	Bristol City Council	D12.3/B
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3257/C267	Somer Valley Friends of the Earth	D12.3/B
1999/C17	Bristol City Council	D12.4/A
1999/C18	Bristol City Council	D12.5/A
1999/C19	Bristol City Council	D12.6/A
1999/C20	Bristol City Council	D12.7/A
120/B9	Ms Helen Woodley	T.24

Issues

- i) Is the Policy and supporting text appropriate in terms of: the needs of rural dwellers; affordable housing; development in locations with good access to public transport; train station parking; the achievement of car free development; the meaning of “environmentally sensitive areas”; the objective of reducing “total road traffic”?
- ii) Is there significant duplication in Policies T.24 to T.26?

Inspector's Reasoning

Issue i)

- 13.117 Steps are being taken to ensure that Park and Ride facilities cater for rural dwellers wishing to use them outside normal working hours, since the operating hours have been extended. Park and Ride facilities do not cater for evening activities, but congestion within the City is unlikely to be so severe at these times, and parking provision is likely to be available within the city centre. Policy T.15 seeks to promote traffic management measures in rural areas to increase the safety of roads in these areas and to protect the character and appearance of the countryside and settlements. I am satisfied that the plan goes as far as it can in promoting the needs of rural dwellers in relation to parking provision and road safety.
- 13.118 There is no basis in national planning policy for treating affordable housing any differently to other housing in terms of parking standards or plan policy. The Council has indicated that parking standards will be applied flexibly and proposals for affordable housing will be considered on their own merits, according to the nature of the location and the development proposed, and this is an appropriate approach.
- 13.119 There is an objection that the requirements in relation to development in locations with good access to public transport are not sufficiently onerous, whilst another objector finds them to be too onerous. The text of paragraph D12.3 is clear enough in its intent and I accept that it is desirable to maintain a degree of flexibility. This complies with PPG13 paragraph 56 which calls for a balance to be struck between the need to encourage use of public transport and the need to maintain and enhance the vitality and viability of town centres.
- 13.120 With regard to the alternative text suggested by W M Morrison for paragraph D12.3, I consider that the approach taken in the plan to car

parking in areas which are well served by public transport accords with Government advice to seek to reduce reliance on the private car.

- 13.121 The provision of car parking at a railway station would be considered as a proposal for Park and Ride. These fall to be judged against Policy T.22 which sets down the criteria against which to assess Park and Ride proposals.
- 13.122 While it is desirable to encourage car free development in appropriate locations, the Council's parking standards set down the framework in which to consider the level of parking provision. Opportunities for car free development should be explored at the application stage, according to the nature and location of the development. I consider that adding an additional policy to "encourage" this form of development would add very little to the plan.
- 13.123 The phrase "environmentally sensitive areas" is included in criterion 6 of Policy T.24. However, criterion 5 can also be read as being concerned with the effect on the environment of providing vehicular access to a development, and clearly a more stringent approach would be required in a sensitive rural or residential location. To avoid confusion, I recommend criterion 6 is deleted.
- 13.124 The plan's policies generally seek to achieve a reduction in traffic through the improvement of public transport provision, by making it less attractive to travel by private car, and by reducing the need to travel through development in sustainable locations. There is no need for such an intention to be stated in this section of the plan.

Issue ii)

- 13.125 Policies T.24 – T.26 are very detailed, and there is repetition within the criteria listed under each policy such that I consider some rationalisation would be possible which would deliver a more focussed and succinct policy approach. However, the objector puts forward no alternative policies and in the absence of such alternatives, I do not place a high priority on the formulation of a new set of policies in this section.

Recommendation:

R13.23 Modify Policy T.24 by deleting criterion 6.

D12: The Requirements and Implementation of Development - Policy T25

2/B18	T2000/Railfutures	T.25
696/B28	South West RSL Planning Consortium	T.25
1830/B13	Highways Agency	T.25
1830/D28	Highways Agency	PIC/D/15 (T.25)
3098/B39	George Wimpey Strategic Land	T.25
3126/B23	Bath Friends of the Earth	T.25

3257/C265 Somer Valley Friends of the Earth

T.25/B

Supporting Statements

120/B122	Ms Helen Woodley	T.25
3257/D287	Somer Valley Friends of the Earth	PIC/D/15 (T.25)
1830/C14	Highways Agency	T.25/B
1830/C15	Highways Agency	T.25/C

I deal with the issue of car parking for affordable housing under Policy T.24.

Issues

- i) Does the policy take the appropriate approach to requiring a travel plan and for transport assessments?
- ii) Should the policy make clear that the Highways Agency will be consulted where a development affects a trunk road?

Inspector's Reasoning

Issue i)

- 13.126 Travel plans are a matter for negotiation between the developer, the Council and local transport providers and as such I support the Council's position that a degree of discretion is used in determining when one will be required. To require a travel plan for all developments above the thresholds set out in the T.25 Schedule would be too onerous.
- 13.127 The Council added text to the Schedule to Policy T.25 in the RDDLP which makes clear that the cumulative effects of developments which fall below the thresholds set down in the T.25 Schedule but which would have a comparable effect to development above the thresholds will be required to submit a transport assessment. I consider that this amendment satisfies the related objection.
- 13.128 The Government has yet to issue guidance on transport assessments and the standards set out in draft PPG13 were not carried forward into the published PPG13 (March 2001). In the absence of national guidance I consider it is appropriate for the Council to set down thresholds which are suitable for the local context. The threshold figures in T.25 are not onerous and are broadly in line with the local parking standards (Policy T.26) and national standards in PPG13 in terms of retail parking thresholds. Setting down clear thresholds as part of the policy offers developers certainty and as such I support their retention in the plan.
- 13.129 To require a full transport assessment for developments below the thresholds set out in the Schedule would be too onerous a requirement. Subject to issues concerning the cumulative impact of smaller developments I support the Council's approach in the RDDLP which seeks to require a "statement of transport and car parking needs" with smaller developments, rather than a full transport assessment. This strikes the right balance and ensures that developers are made to consider the wider

impacts of their developments, in terms of transport, in all cases without imposing unnecessary costs on developers of smaller schemes.

- 13.130 I acknowledge that the words “comparable impact” are not exacting, however I consider that it is possible to determine in general terms when the cumulative impact of smaller developments will create traffic issues of a similar scale to those of developments over the T.25 Schedule thresholds. As with many things it will be a matter of fact and degree and will require an element of judgement as to what area or routes are the subject of concern, and the proximity of the developments to each other and the subject routes or area. I am satisfied that the words “comparable impact” set a benchmark using the T.25 Schedule as the basis for decisions on this issue.

Issue ii)

- 13.131 I agree with the Council that the Highways Agency, as a statutory consultee, would be consulted as part of the normal procedural requirements of the application process. No modification is therefore required in this respect.

Recommendation: no change

D12: The Requirements and Implementation of Development - Policy T26

2/B19	T2000/Railfutures	T.26
42/B7	CPRE	T.26
120/B10	Ms Helen Woodley	T.26
120/B69	Ms Helen Woodley	T.26
120/D351	Mrs H Woodley	PIC/D/15 (T.26)
564/B13	London Road Area Residents Association	T.26
696/B29	South West RSL Planning Consortium	T.26
721/B41	Government Office for the South West	T.26
1999/B11	Bristol City Council	T.26
1999/B12	Bristol City Council	T.26
3126/B24	Bath Friends of the Earth	T.26
3126/B25	Bath Friends of the Earth	T.26
3273/B6	Bath & District Community Health Council	T.26
721/C70	Government Office for the South West	T.26/A
334/C14	Ms P Davis	T.26/B
721/C73	Government Office for the South West	T.26/B
2987/C8	Royal United Hospital Bath NHS Trust	
T.26/B		
2962/C7	Wm Morrison Supermarkets plc	T.26/C
721/C69	Government Office for the South West	T.26-Reg24(9)

Supporting Statements

3257/C266	Somer Valley Friends of the Earth	T.26/A
2962/C6	Wm Morrison Supermarkets plc	T.26/B

Issue

- i) Does the plan set out an appropriate policy approach to car parking?

Inspector's Reasoning

- 13.132 The Council has added more detail to the parking standards schedule in the RDDLP and by PIC/D/15. The standards reflect and significantly expand upon the national standards. The T.26 schedule also reflects local circumstances in respect of certain forms of development such as retail in which a more rigorous standard is applied in terms of a lower threshold to account for parking at smaller retail developments. PPG13, paragraph 52 states that authorities should adopt the national maximum parking standards set out in the guidance and may adopt more rigorous standards where appropriate. The Council states that it intends to refine the parking standards further and to adopt them as SPD. Apart from the residential standards which I deal with below, I consider that the Council is taking sufficient account of local circumstances in its approach.
- 13.133 PPG3, paragraph 62 states that parking standards that result, on average, of over 1.5 spaces per dwelling are unlikely to meet the government's emphasis on securing sustainable development. However, as a starting point for assessing parking provision in residential developments, the standards set down in the T.26 schedule are too generous and do not comply with national guidance. The standards would meet with national guidance if there were to be a range of maximums which, on average, resulted in about 1.5 spaces per dwelling. Thus for the smallest units the maximum should be less than 1 space per dwelling, whereas 2 spaces might be appropriate for 3 bedrooms and above. Accessibility criteria should only be relevant for example in locations where the development is accessible by public transport and therefore parking should be provided below the maximum in the standard. There is no reason why affordable housing should be treated differently. I recommend that the Council review the residential parking standards to ensure they comply fully with Government policy.
- 13.134 I appreciate the reason for the reference in paragraph D12.4 to the effect of providing secure car parking, but such an approach conflicts with national policy and should therefore be deleted.
- 13.135 In respect of B&B development, paragraph D12.3 states that the standards set out in the Schedule are to be regarded as the starting point in determining what would be acceptable provision in any given location. I am satisfied that there can be flexibility in the application of the standards and therefore there is no reason for the use to not be included.
- 13.136 The hospital parking standards are changed in the PIC to refer to staff and visitors, rather than the number of beds. The Council has also stated that

it is working with the RUH to devise solutions to the current access problems to the hospital.

- 13.137 Since the parking standards are likely to be subject to review and amendment from time to time, I consider it is appropriate to include them within SPD (which now replaces SPG). However, whilst it is appropriate to include reference to the SPD in the supporting text at paragraph D12.5, the reference in Policy T.26 should be deleted since SPD does not form part of the plan's policies.
- 13.138 In the PIC a preamble to the Provision for People with Disabilities Schedule is provided to clarify that a minimum parking standard will be applied to all developments in respect of parking for people with disabilities. In addition, the minimum percentage of parking spaces required for people with disabilities in shopping developments with over 200 parking spaces is now set at 4%. This goes some way to meeting the concerns raised by one objector that too many spaces would result from a requirement of 5%, and recognises that larger developments will lead to an increased supply of disabled spaces, without necessarily a proportional rise in demand.
- 13.139 Policy T.26 seeks to control the level of parking in new development, whilst Policy T.20 seeks to control the loss of off street parking provision and service areas. The plan should be read as whole and there is no need to repeat the provisions of Policy T.20 in this policy.
- 13.140 The plan's policies seek to achieve a wider ranging reduction in traffic across the City and District by improving public transport infrastructure and generally reducing the need to travel. There is no need for this policy to identify the need to reduce total road traffic.
- 13.141 The parking standard for a major new stadium of 1 space per 15 seats is a maximum standard and there is flexibility to allow a lower provision in locations which are physically constrained and which benefit from good access by public transport.
- 13.142 One objector considers that supermarkets should only be allowed to expand onto their existing car parks. However, such a requirement would be too onerous. Each proposal would fall to be determined according to its own merits and factors such as the accessibility of the development to public transport would be taken into consideration. The standards being applied by the Council are maximum standards and it does not follow that an expansion in floor area would automatically result in a proportional expansion in car parking. These are matters which are better left to detailed negotiation at planning application stage.
- 13.143 Bath is a compact and highly constrained city which is not suited to large amounts of traffic, particularly in the city centre. The existence of Park and Ride facilities around the city is intended to cater for visitors and commuters to Bath from the surrounding areas. Bath is highly accessible by public transport from a significant proportion of settlements in the

District. The Council's approach to car parking seeks to strike a balance between meeting the needs of visitors and shoppers to Bath whilst improving the quality of the environment for all visitors to the city centre. There is no case for increasing the parking provision within the centre of Bath.

13.144 In the consolidated version of the plan the Schedule is amended so that the parking standard for restaurants, cafés and pubs is lowered from 1 space per 5m² to 1 space per 10m², and this accords with the need to promote the use of public transport.

13.145 The text which referred to assessing general industrial (B2) and storage, distribution and warehousing development (B8) over 5000m² on individual merits has been deleted. I consider that this satisfies the related objection.

13.146 The text which referred to a more relaxed parking standard being applied to educational facilities used for community or adult education purposes has also been deleted. This satisfies the related objection.

Recommendation:

R13.24 Review the residential parking standards (C3) set down in the schedule to Policy T.26 to ensure they comply with national standards of, on average, no more than 1.5 spaces per dwelling.

R13.25 Modify paragraph D12.4 by deleting the final sentence.

R13.26 Modify Policy T.26 criterion (i) by deleting after "Council".

R13.27 Replace all references in the text to "Supplementary Planning Guidance" with Supplementary Planning Document.

Glossary

3257/D279 Somer Valley Friends of the Earth

PIC/4 (Glossary)

Comments on Suggested Unadvertised Inquiry Change IC20

120/G373-s Mrs H Woodley - support

IC20 (Glossary - floodplains)

Issue

- i) The term "natural resources" should be replaced by the term "ecological resources"

Inspector's Reasoning

13.147 As the Council has stated, the term "natural resources" would include ecological resources. It is more important that the plan is succinct and understood than that it seeks to promote eco tourism through the use of

terminology. Apart from the improvement arising from IC20 (a definition of "floodplain") no modification is necessary.

Recommendation:

R13.28 Modify the Glossary in accordance with IC20.
