**Transport Statement and Transport Assessment – Report of Consultation**
**October 2015**

**Introduction**
Public consultation was undertaken via the council’s e-consult website, which is the council’s recognised consultation protocol. Some 4000 consultees who have registered an interest in transport consultations were notified of the consultation. The consultation was open between 11\(^{th}\) February and 27\(^{th}\) March 2015 (six weeks and 2 days).

17 consultation responses were received. These are listed below with officer recommendation of further action.

The ‘council recommendations’ were placed before North Somerset Executive Committee for approval on 20\(^{th}\) October 2015.

<table>
<thead>
<tr>
<th>Name</th>
<th>Comment</th>
<th>Council Response</th>
<th>Document Changes</th>
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</thead>
</table>
| Network Rail    | Network Rail has been consulted by North Somerset Council, on the Transport Statement and Transport Assessment Supplementary Planning Document. Thank you for providing us with this opportunity to comment on this Planning Policy document.  

**Level Crossings**

Development proposals affecting the safety of level crossings is an extremely important consideration for emerging planning policy to address. The impact from development can result in a significant increase in the vehicular and/or pedestrian traffic utilising a crossing which in turn impacts upon safety and service provision.

As a result of increased patronage, Network Rail could be forced to reduce train line speed in direct correlation to the increase in vehicular and pedestrian traffic using a crossing. This would have severe consequences for the timetabling of trains and would also effectively frustrate any future train service improvements. This would be in direct conflict with strategic and government aims of improving rail services.

In this regard, we would request that the council considers including within “Other Consideration” within the threshold based on other criteria section within the SPD, the following: | All points are noted and will be addressed on an application by application basis. | No change |
Any development that is likely to result in a material increase in volume or a material change in the character of traffic using a level crossing over a railway (public footpath, public or private road).

Please note the Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway:

- **Schedule 5 (f)(ii) of the Town & Country Planning (Development Management Procedure) order, 2010** requires that... “Where any proposed development is likely to result in a material increase in volume or a material change in the character of traffic using a level crossing over a railway (public footpath, public or private road) the Planning Authority’s Highway Engineer must submit details to both Her Majesty’s Railway Inspectorate and Network Rail for separate approval”.

Any planning application which may increase the level of pedestrian and/or vehicular usage at a level crossing should be supported by a full Transport Assessment assessing such impact and the developer is required to fund any required qualitative improvements to the level crossing as a direct result of the development proposed.
| Transport Planning Associates | Transport Planning Associates (TPA) writes in order to provide our comments and feedback on the draft Transport Assessment and Transport statement Supplementary Planning Document (SPD).

It is noted that the consultation draft document is primarily based on the now archived Department for Transport Guidance on Transport Assessment (GTA). This has now been superseded by the ‘Transport Evidence Bases in Plan Making’ Guidance referred to within NPPG March 2014.

Whilst TPA broadly welcomes the SPD, we would highly recommend, that as with the GTA, the SPD is applied in the same practical manner when considering schemes, with particular reference with NPPG.

Of particular note, TPA suggests that the SPD needs to be applied in the context of the proposed development, in terms of the location of the site, local characteristics, topography and scale of the proposed development. Scopes of assessments should be considered on a site by site basis to reflect this.

We also note that the GTA and the SPD document both refer to the preparation of Environmental Statements and Accessibility analysis of individual applications. These are only appropriate for large scale schemes.

We consider that the above comments are logical, practical, we would urge a flexible approach to facilitate development where there are constraints provided the arrangements are safe. We trust that they are received, reviewed and incorporated into further draft amendments of the SPD and we look forward to receiving an updated copy in the near future. |

| Environment Agency | Thank you for referring the Transport Statement and Transport Assessment SPD, which was received on 5 February 2015.

The Environment Agency has no comments to make concerning this SPD. |

| Natural England | Thank you for your consultation on the above dated 13 February 2015 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. |

Agree. Recommend that the suggested text is included. Thus:

Add “The actual requirements will be determined having regard to the scale, nature and location of the development.”

Remove references to ‘as a minimum’ | update text

Noted | No change

Page 3 of 15
We have considered the draft Transport Statement and Transport Assessment Supplementary Planning Document, which appears to provide clear and helpful guidance regarding the thresholds and requirements for these that will be expected by the Council to support planning applications for relevant developments.

We would however encourage the Council to consider including a reference in the Supplementary Planning Document to the North Somerset Rights of Way Improvement Plan (ROWIP). This would help to ensure consideration is given in future Transport Statements and Transport Assessments to enhancing the rights of way network and to achieving the aims and objectives of the ROWIP where possible.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

Agree. Make reference in the Highway Development Design Guide where it is more appropriate

None in this document. Refer to HDDG.

David Lock Associates
I write on behalf of Hallam Land Management in respect of the consultation draft of the above statement.

I do not propose to comment in any detail on the document but would make the general observation that it is set out in onerous terms.

For instance, and in particular, in section 4 in relation to both Existing Conditions and Proposed Development, the SPD sets out a list of requirement of the descriptions as minimums: “The description should include as a minimum…”.

This is not helpful in that it appears to require the comprehensive list of information for all developments irrespective of scale or circumstances and without exception in terms of either the site or that piece of information or analysis. Whilst this would matter less if the information sought was expressed in more limited or generic terms. Instead the list is detailed and extensive and includes a number of items that for many developments would not be required or which would be identified as being required through scoping or even the EIA process. A number of items are onerous and not likely to be required in many instance such as baseline carbon emissions by mode, detailed public transport assessments etc.

The document should include early in the document a reference as follows or similar: “This SPD sets out the range of potential requirements in relation to the possible content of a Transport Assessment. The actual requirements will be determined having regard to the scale, nature and location of development and the particular circumstances of the application”.

Agree. Recommend that the suggested text is included. Thus:
Add “The actual requirements will be determined having regard to the scale, nature and location of the development.”
Remove references to ‘as a minimum’

update text
Where the requirement for information is set out this should be done more flexibly for instance as follows: “The description should may need to include as a minimum…”.

<table>
<thead>
<tr>
<th>Steven Kerry</th>
<th>Persimmon Homes Severn Valley</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>Persimmon Homes Severn Valley has significant land holdings within the North Somerset area and therefore the emerging guidance within this document is of particular interest to us and will have an impact on the deliverability of our developments. With regards to the emerging Transport Assessment and Transport Statement Supplementary Planning Document produced by North Somerset Council Persimmon would like to make the following comments:</td>
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<tr>
<td></td>
<td><strong>General Comments</strong></td>
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<td></td>
<td>The document has no page or paragraph numbers so it is difficult to specify which sections our comments relate to. This should be rectified in the final document.</td>
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<tr>
<td></td>
<td>We consider that the emerging Supplementary Planning Document is comprehensive and does adequately address the thresholds and requirements for either a Transport Statement or Transport Assessment and Travel Plan. With some minor revisions we believe these criteria can become the basis to assess the content of future Transport Assessments or Transport Statements.</td>
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</table>

| Agree. | Add page and paragraph numbering. |
Section 2 Indicative Thresholds

We agree with the proposed thresholds however we feel the second table ‘Thresholds based on other Criteria’ is unnecessary. The majority of the criteria outlined in this table would in any case fall within the criteria in table one, and since the thresholds are indicative the more specific criteria in the second table will not be required.

We disagree with the first threshold in the second table ‘Any development that is not in conformity with the adopted development plan’ should require a Transport Assessment and Travel Plan. Small developments not in conformity with the development plan should adhere to the indicative thresholds outlined in the first table and not automatically govern a Transport Assessment if not required.

Section 4 Guidance on preparing a Transport Assessment

Under the pre-application engagement heading there is a reference to thee ‘above tables’. However there are no tables ‘above’. If this is reference to the tables on previous pages it should state as such (this is where page numbers would prove beneficial), or re-structure the document so that the table stating when a Transport Assessment is required precedes or follows the text describing it.

Under the ‘Economy’ heading for description of the proposed development we question the need for including Government regeneration objectives (e.g. use of brownfield sites) within the Transport Assessment, rather this should be a matter addressed in the Planning Statement.

Do not agree, but officers are to ensure requirements are proportionate to the scale of the development.

Agreed.

Add page number

Agreed

Remove ‘government regeneration objectives (eg brown filled sites)’
Under the ‘Environment’ heading for description of the proposed development we question the assessment of ‘journey ambience’. This is a very subjective concept and journey ambience has more to do with comfort than being strictly an environmental issue.

The last sentence under the ‘Analysis Period’ heading should be amended to read ‘The analysis period should be agreed with the Council Officer at the pre-application stage where possible’.

We agree with the principle of reducing single occupancy private car trips through development proposals and the Transport Assessment preparation.

The third paragraph under the ‘Promoting smarter choices via Travel Plans’ subheading should also make reference to the indicative thresholds in the table.

We also feel this section is lacking a paragraph on management of the Travel Plan. In practice a Travel plan has to be implemented to be effective and we have experienced issues previously whereby there has been difficulty surrounding who manages the Travel Plan and how to implement it. We feel a paragraph or a standalone section on this would prove beneficial.

Under the ‘transport impacts and mitigation measures’ subheading we recommend adding to the final sentence of the first paragraph the need to meet condition tests.

<table>
<thead>
<tr>
<th>Agreed</th>
<th>Remove ‘journey ambience’</th>
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<tbody>
<tr>
<td>Agree. The analysis period should be agreed with the council officer pre-application.</td>
<td>Agreed – change as shown</td>
</tr>
<tr>
<td>Noted</td>
<td>Add ‘indicative’</td>
</tr>
<tr>
<td>Agreed</td>
<td>No change</td>
</tr>
<tr>
<td>The document refers to the Travel Plan SPD. Don’t wish to replicate the SPD here.</td>
<td>No change</td>
</tr>
<tr>
<td>Believe the paragraph is clear</td>
<td>No change</td>
</tr>
<tr>
<td>Wrington Parish Council</td>
<td>This is a comment from Wrington Parish Council in response to NSC’s consultation on the Transport Assessment and Transport Statement SPD, March 2015. We are pleased to have been given the opportunity to comment on the draft SPD. However, while we have carefully read through the consultation document, in this case we will just highlight two relatively minor points in the text, as follows: Section 1 – Introduction There appears to be the potential for confusion between the fourth paragraph and the first line of the following paragraph, where it might be thought ‘the plan’ referred to on the latter line is the ‘Travel Plan’ referred to in the previous paragraph. The ‘plan’ latterly referred to should of course be the SPD. It may therefore be appropriate to clarify this potential for misinterpretation so the first line of the fifth paragraph reads: ‘The programme for preparation of the Supplementary Planning Document is set out below.’ On the following page, the last line refers to ‘…the Agency..’ whereas earlier in the paragraph it is explained that the former Highways Agency has been replaced by Highways England (HE). The final line should therefore read: ‘…. provides details on how HE considers planning applications.’ We have no further comments to offer on this occasion.</td>
</tr>
<tr>
<td>Highways Agency</td>
<td>Thank you for consulting the Highways Agency on the draft SPD relating to Transport Statements and Transport Assessments. We have reviewed the draft document and have the following comments which are shown by chapter.</td>
</tr>
</tbody>
</table>
Chapter 1 – Introduction

The document makes reference to Highways England (HE), which the Highways Agency becomes on 1 April 2015, on page four and correctly recognises that HE’s requirement for assessment of the Strategic Road Network may be different to that of the Local Highway Authority as set out in the SPD. It is therefore clear that the detailed requirements for Transport Statements and Transport Assessments as set out in the SPD only apply to the assessment of the local highway network.

The SPD recommends early engagement with us but only where development is likely to impact on the SRN. This suggests that the developer should make their own assessment of the likelihood of a development impacting on the SRN. This could lead to inconsistencies in approach. In some cases, where a developer’s view on the potential for impact differs from that of ours, necessary engagement with us could be delayed. It is recommended that the document includes relevant words to ensure that where a development is of such a scale such as to warrant the preparation of a Transport Assessment in accordance with the thresholds contained within the SPD, the developer should contact HE to determine if the SRN should be included within the scope of the Transport Assessment.

Reference is also made to DfT Circular 02/2013 ‘The strategic road network and the delivery of sustainable development’. It should be noted that with the change to HE, the circular is due to be replaced and allowance should be made for this in the wording of the SPD.

Noted

Agreed

Noted

… it is recommended that where at Transport Assessment has been determined necessary, or where a new highway access is proposed in close proximity of a M5 junction, early engagement is sought with HE.
Chapter 2 - Indicative thresholds for Transport Statement or Transport Assessment

The SPD states that the requirement to provide a Transport Statement or Transport assessment is determined by the scale of development, and guidance is set out. Irrespective of the thresholds for Transport Statement and Transport Assessment contained within the SPD, HE would also require a Transport Assessment to be provided where any development proposes a new access onto the strategic road network or the local highway network in close proximity to the strategic road network. Suitable wording should be included within the SPD to ensure that this is the case.

Chapters 3 to 5

On the basis that the detailed requirements for Transport Statements and Transport Assessments as set out in the SPD only apply to the assessment of the local highway network, no further comment is made on Chapters 3 to 5.

Summary Comments

The document correctly recognises that HE’s requirement for assessment of the Strategic Road Network may be different to that of the Local Highway Authority as set out in the SPD. It is therefore necessary for developers to consider early engagement with HE. Further guidance should however be provided within the SPD to ensure that such engagement takes place. In all matters the message to developers should be - if in doubt ask in order to confirm the requirements of HE in order to avoid potential delays.

It is recommended that the document includes relevant words to ensure that where a development is of such a scale such as to warrant the preparation of a Transport Assessment in accordance with the thresholds contained within the SPD, the developer should contact HE to determine if the SRN should be included within the scope of the Transport Assessment.

With the change from the Highways Agency to Highways England on 1st April, a number of the documents referenced in the SPD will need to be updated. References of the new documents are not yet available however.
| Clevedon Town Council | Following consideration of the above document Clevedon Town Council would like to highlight the problems of access to Yatton Railway Station by public transport. It was noted that the SPD highlights 'reducing the need to travel, especially by car' and sustainable accessibility by 'promoting accessibility by all modes of travel in particular public transport and the development of appropriate measures to influence travel behaviour'.

Yatton Railway Station provides direct access to the centre of Weston Super Mare and Bristol for employees working in these towns and residents accessing leisure pursuits. The buses to Yatton from Clevedon have now been reduced to three hourly intervals which means residents have to drive to the station. Clevedon Town Council therefore request the reinstatement of a regular bus service from Clevedon to Yatton Railway Station

Another concern raised by local residents and considered by the Town Council is the lack of public transport from Clevedon to Bristol airport. How could this be progressed?

I look forward to reporting your observations to the Council. | Noted however this document relates to new proposals. | No change |
|---|---|---|
| English Heritage | Thank you for consulting EH on this draft planning document.

In May of last year the DOT issued Transport Analysis Guidance that included the methodology for assessing townscape, landscape and the historic environment. Might this perhaps be used to amplify and clarify how the historic environment might be considered and assessed?


Also might the Manual for Streets II and Streets for All be referred to within the document as guidance to inform appropriate practice? | This guidance and MIS2 is referenced in the Highway Development Design Guide. This guidance is now an appendix to the HDDG. | No change in this document |
| Backwell Parish Council | Backwell Parish Council would like to thank North Somerset Council for inviting comments on the above document. It seems correct that the developer should prepare the impending traffic assessments on their application, but bearing in mind they obviously tend to tone down the effect, should North Somerset Council have their own up to date assessment carried out periodically by themselves for comparison? | Officers can and do satisfy themselves that base data and projected effects are reasonable. | No change |
### Key Transport Consultants

<table>
<thead>
<tr>
<th>Question</th>
<th>This is covered in the Highway Development Design Guide.</th>
<th>No change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Should there be a formula or is there one in place with reference to the number of access points in relation to the size of the proposed development?</td>
<td>Noted.</td>
<td>No change</td>
</tr>
<tr>
<td></td>
<td>Noted. These are indicative thresholds. Officers can consider the impacts on a case by case basis.</td>
<td>No change</td>
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<tr>
<td></td>
<td>Agree. Remove row 2 (any development generating 30 or more two-way vehicle movements in any hour) and row 3 (any development generating 100 or more two-way vehicle movements per day)</td>
<td>Update table ‘thresholds based on other criteria’</td>
</tr>
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<td></td>
<td>Agreed, however this relates to section 4 (not section 3). Developers will still be required to state if the location is within or near a AQMA (such may be in a neighbouring authority area). The need for this baseline data is challenged, especially as we</td>
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<td></td>
<td>From section 4 ‘Baseline transport data’ remove the last two sub-bullet points.</td>
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</table>
understand that North Somerset currently has no Air Quality Management Areas. If relevant it is considered that these matters should be addressed by a separate Air Quality Assessment.

Section 3 also sets out the need to identify the spare capacity on the public transport network to accommodate trips generated by proposed development. This may only be achievable in practice by undertaking bus passenger surveys and in our experience this has never been required and we are not aware of bus capacity issues occurring in North Somerset.

council will always reserve the option to require such.

Again this relates to section 4 (not 3). It is noted this relates to rail as much as bus. NSC officers can assist in establishing capacity constraints, and have done so recently. It is considered to be a matter that should be agreed at the scoping stage should such circumstances apply.

<table>
<thead>
<tr>
<th>Portishead Town Council</th>
<th>The above consultation was discussed by Portishead Town Council at its meeting of 11th March 2015 under Planning &amp; Regulatory PL345. In response to the consultation Portishead Town Council has no comment to make.</th>
<th>noted</th>
</tr>
</thead>
</table>
| Yatton Parish Council   | It is comprehensive with plenty of guidance.  
In the guidance section of the transport statement should it state the timescale for the analysis of traffic, i.e.: we know from recent experience that one day count is not enough, it says later in transport assessment section - hours and months when to do the counts but no proof to us as parish councillors as this is presented at pre-application stage, depth of assessment and accountability is to planners at NSC  
Where would a "description of functional classification" of roads affected by a development be?  
Does a parish council see documentation at pre-application stage?  
By the time applications are at outline stage, for the public to see, misrepresentations are often present.  
Footways and Cycle Tracks | Monitoring and analysis periods are establish at scoping stage on a case by case basis as appropriate.  
Agreed poor choice of words.  
Change to ‘a description of the highway network and how it functions.  
We offer no view in the context of this document.  
We offer no view in the context of this document. | No change | No change | Update text | No change | No change | No change |
In rural areas where new cycle tracks and pedestrian ways are encouraged, it can become problematic where they have to link into old infrastructures as they don’t have the capacity to absorb increased use. The narrow rural roads are more dangerous than urban roads, particularly when HGV’s are part of the traffic flow. It should form part of the design process to incorporate appropriate measures to make the entire route safe not just new sections.

General Highways.

How do HGV’s manage to travel through Yatton High Street when there are clear rules around the impact of HGV’s and long vehicles travelling through narrow residential areas?

Car parking on footways. This is occasionally enforced and in the future footway design should incorporate measures to mitigate this parking problem.

TRO Implementation and enforcement (Weight Restrictions) these are never enforced and they need to be.

Road Safety Audit - Developers should not be undertaking the Road Safety Audit, it should be undertaken by an independent group

Road Safety Audit is addressed in the Highway Development Design Guide.

Agreed. Road Safety Audit is addressed in the Highway Development Design Guide.

The need for and timing of off-site mitigations are addressed via S106 agreements, see the Highway Development Design Guide.

Agreed but not directly pertinent to this document.

Agreed but not directly pertinent to this document.

General point not pertinent to this document.

General point not pertinent to this document.

General point not pertinent to this document.

General point not pertinent to this document.

Ingrid Reinbach. Individual

The indicative threshold for A1, B1, B2, B8, C1, C2 for no assessment are too high.

Disabled parking should be in the spots closest to the entrance, not in a neat little row with miles to go

Noted however thresholds are considered realistic.

No change

No change

No change

No change

No change
| Hugh Pratt. Individual | Transport Assessments are expensive and could be used by LPA to punish or deter applications.  
\[\text{The catch-all conditions "Any development that is not in conformity with the adopted development plan." OR} \]
\[\text{"Any development proposed in a location where the local transport infrastructure is inadequate. – for example, substandard roads, poor pedestrian/cyclist facilities and inadequate public transport provisions."} \]
\[\text{could be used to target unwelcomed planning applications and should be removed.} \] | TAs are required, where appropriate, to determine the impacts of development and define appropriate mitigations. | No change |
| Bri Symonds. Individual | Thank you for the opportunity to respond. Majority seems very logical and sensible. Just two thoughts for the day.  
\[\text{Firstly a lay person like me does not have the ability to convert square metres into meaningful statistics. Taking Nailsea for example, what are the statistics for the Waitrose and Tesco sites and were Statements obtained from each developer. Similarly, have you obtained one in relation to Lidl's application. It is quite inappropriate to let them steal 50 existing car parking spaces, when there are at least two redundant buildings - the long closed Weston College building and now the closure of the police station with its own parking space which could be enlarged.} \]  
\[\text{With Elections coming up, it is vital that NSC listens to public views and those of the town and parish councils} \] | No points pertinent to this document. | No change |
| End | | | |