



**PINS Ref:
APP/P0119/W/22/3303905**

**ERECTION OF 35 no.
DWELLINGS WITH GARAGES
AND ASSOCIATED WORKS
AT LAND OF THE SOUTH OF
BADMINTON ROAD OLD
SODBURY**

PROOF OF EVIDENCE

OF

**DAVID TINGAY
BEng MCIHT**

ON TRANSPORT MATTERS

Key Transport Consultants Ltd
26 Berkeley Square, Bristol, BS8 1HP

T: 0117 920 9430

www.key-transport.com

CONTENTS

1. INTRODUCTION	1
2. THE COUNCIL'S REASON FOR REFUSAL	2
3. COMPARISON OF OTHER CONSENTED DEVELOPMENTS	21
4. IMPACTS OF CAR TRAVEL	24
5. THIRD PARTY RESPONSES	26
6. CONCLUSIONS	27

APPENDICES (BOUND SEPARATELY)

DRT A	TRAFFIC CALMING
DRT B	TRAVELWEST ISOCHRONES
DRT C	SITE ACCESS DRAWING
DRT D	ROUTE TO CHIPPING SODBURY
DRT E	COLLISION DATA
DRT F	STRAVA IMAGES
DRT G	BUS INFORMATION
DRT H	COMPARISON SITES
DRT I	TRAFFIC CALMING TECHNICAL NOTE

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1. INTRODUCTION

- 1.1 I am David Tingay, a civil and highway engineer and director of Bristol based Key Transport Consultants Limited. I hold a Bachelor of Engineering degree in civil and structural engineering from Sheffield University. I am a Member of the Chartered Institution of Highways and Transportation (CIHT) and Graduate Member of the Institution of Civil Engineers (ICE). I have over 20 years of professional experience in highways and transport.
- 1.2 I was previously a Transport Engineer at Capita in their Bristol office. I was a founding Director Key Transport Consultants Ltd (KTC) in 2006. I have broad experience on projects of a wide range of scales having directed many through planning and design
- 1.3 Of relevance to this inquiry, I lived on the eastern edge of Chipping Sodbury as a child until the age of 18 and walked to the playground at Old Sodbury (north-east of the proposed site), as well as undertaking walks on local Public Rights of Way north of Badminton Road.
- 1.4 My parents still live in Chipping Sodbury, and I have regularly travelled along Badminton Road for the last 30 years. I have also cycled past the site on Badminton Road several times over the years.
- 1.5 The evidence that I have prepared and provide for this appeal, reference APP/D0121/W/21/3285343, in this proof of evidence is true and has been prepared and is given in accordance with the guidance of my professional institutions. I confirm that the opinions expressed are my true and professional opinions.

Format of Proof of Evidence

- 1.6 In this proof of evidence, I consider the second reason given by South Gloucestershire Council (SGC) for refusal of the application in section two and the issue raised by the Inspector in his pre-conference note, i.e. "*whether occupants of the proposed development would have reasonable access to facilities and services;*". Section three considers other consented residential developments in South Gloucestershire. The impacts of any resultant car travel are discussed in section four I then consider the representations made by third parties in section five and finally, I draw conclusions in section six.

2. THE COUNCIL'S REASON FOR REFUSAL

2.1 SGC refused application number P21/03344/F on 28th January 2022 for seven reasons, with the full reasons for refusal (RFR) available elsewhere. Of the reasons for refusal, five relate to the absence of an agreed S106 legal agreement. It is understood that a S106 has been agreed with SGC in draft and will be signed imminently and it will be agreed that RFR 3-7 are no longer valid.

2.2 Of the remaining reasons, reason two relates to transport matters and reads as follows:
“The development would fail to provide safe, useable walking and, or cycling routes to the majority of key services and facilities as set out within Policy PSP11. Furthermore, the site would be inappropriately distanced from many of these facilities and the bus service is very restricted/limited. For these reasons the site is unsustainable as future occupants would have to rely heavily on travel by private car. The development is therefore contrary to Policy PSP11 of the South Gloucestershire Policies, Sites and Places Plan (Adopted) November 2017; Policy CS1 of the South Gloucestershire Local Plan Core Strategy (Adopted) December 2013 and the provisions of the National Planning Policy Framework 2021”

Policy

2.3 Policy PSP 11 of the SGC Local Plan: Policies, Sites and Places Plan (adopted November 2017) sets out transport impact management. It sets out where development which will generate a demand for travel should be located to be acceptable.

2.4 PSP11 states: *Development proposals which generate a demand for travel, will be acceptable where:*

3 residential development proposal(s) are located on:

i. safe, useable walking and, or cycling routes, that are an appropriate distance to key services and facilities

and then

ii. where some key services and facilities are not accessible by walking and cycling, are located on safe, useable walking routes, that are an appropriate distance to a suitable bus stop facility, served by an appropriate public transport service(s), which connects to destination(s) containing the remaining key

services and facilities; and

- 2.5 The PSP plan then goes on to provide appropriate walking and cycling distances relevant to the consideration of PSP11 in the supporting text to the policy, stating:

The distances do not consider route quality and are set out based on an “as the crow flies” basis from the proposal site to services and facilities. Individual circumstances on the ground, including route safety, direction and lack of any dedicated cycling or walking facilities, may result in key services and facilities becoming inaccessible despite falling within the appropriate walking and cycling distances. Conversely high quality, safe routes or dedicated walking and cycling routes may facilitate access to key services and facilities from proposal sites, which are beyond the appropriate distances below. Therefore in applying the policy, consideration will also be given to distances as travelled and any evidence submitted in support of longer walking or cycling distances to access services and facilities.

- 2.6 The key services and facilities and appropriate distances are set out in PSP11, and I review them later in my evidence.
- 2.7 The distances referred to in the table below paragraph 5.23 of the supporting text to Policy PSP11 are overly prescriptive, but it is noted that there is some reference in paragraph 5.23 to these distances being applied flexibly.
- 2.8 While the distances may be too far for some people to walk/cycle, there are not too far for everyone. The recent Travelwest travel to work survey showed that in South Gloucestershire, 10% of employees cycle to work, with an average distance of 11 miles (8.8km each way). Some 6% of respondents walked with an average walk distance of 3 miles (2.4km each way).
- 2.9 For example, I walk and sometimes cycle the 3.7 km to work in the centre of Bristol where other options like bus, electric scooter or driving are available to me. Similarly, my wife walks some 2.2km to work and occasionally gets the bus home. Everyone's travel patterns and behaviour are different.

Location of Facilities

- 2.10 The nearest Town Centre is Chipping Sodbury, some 2.15km walk/cycle from the site, and the closest supermarket is Waitrose in Chipping Sodbury, some 2.78km

walk/cycle. Whilst this distance would be too far for a weekly food shop which is unlikely to be undertake on foot in any event, it is still walkable. As a family (11-year-old and 7-year-old children) we have walked/scooted the 2.75km from our house to the centre of Bristol and back for shopping and leisure activities.

- 2.11 The shop at Cotswold Service Station provides a range of food, snacks, cleaning products etc, and is open from 06:30 to 19:30 Monday to Friday and 08:00 to 18:00 on Saturdays and performs the role of a day-to-day shop. It is around 250m from the site via an uncontrolled crossing with pedestrian refuge island. The proposed S106 includes the provision for a signal-controlled crossing in the centre of the village. Whilst the crossing is not on the pedestrian desire line from the site to the shop or school, it does provide a safe crossing point. It would also offer a safe crossing for users of the Cotswold Way leisure walking route that crosses Badminton Road in the village, and the location is included in Appendix DRT A.
- 2.12 There are no doctors' surgeries in Old Sodbury, and none in Chipping Sodbury. The closest is the Kennedy Way/Courtside surgeries in Yate, some 3.9 km from the site. The nearest pharmacy is in Chipping Sodbury some 2.6km from the site. It is not uncommon for houses to be more than 800m from a doctor's surgery, for example, most of Chipping Sodbury is over 800m walk, and large villages such as Charfield and Alveston have no doctors' surgeries at all.
- 2.13 Old Sodbury Village Hall is some 470m walk from the site. Looking at their website, <https://oldsodburyvillagehall.com/> it does offer regular events for all age groups as well as special events. From their website, the hall includes a bar with premises license, kitchen, disabled access and WC, projector screen, hearing loop and seating for 100.
- 2.14 A new Post Office has opened in the Spar shop in Chipping Sodbury and is some 2.6km from the site.
- 2.15 Chipping Sodbury School is the closest secondary school, and includes a 6th Form, and is some 2.34km walk from the site.
- 2.16 Old Sodbury Church of England Primary School is just under 700m walk from the site. Additionally, there is Overndale Nursery, some 430m walk from the site.
- 2.17 Opposite the proposed site access is the vehicular access to Old Sodbury Playing Fields, home to Old Sodbury Football Club, which also includes a children's play area.

- 2.18 Whist there are employment opportunities within 2km of the site, the nearest site set out in PSP11 is Chipping Sodbury Town Centre, some 2.15km away, just over the 2km limit.
- 2.19 In the following Table 2.1, I compare these distances to those set out in PSP 11. From the above, it is clear that routes to day-to-day shopping, primary school, public house and the village hall are all within the walking distances PSP refers to as being acceptable and along safe lit routes with footways. The distances are summarised below, and a simple colour coding used to show where they comply, with green showing it complies with the suggested distances set out in PSP11, and red where it does not.

TABLE 2.1 – PSP11 Distances – Appeal Site		
Key Services and Facilities	Appropriate Walking and Cycling Distances (PSP11)	Actual Distance from Appeal site main entrance
Retail (comparison) shops and services and/or Market towns and Town Centres (Defined in policy CS14 of Core Strategy)	1,200 Metres	Chipping Sodbury 2.15km
(Weekly) Superstore or supermarket		Chipping Sodbury -2.78km
(Day to day) Smaller food (convenience) shops		Cotswold Service Station – 250m
Local health services	800 Metres	Yate – 3.9km
Pharmacy		Chipping Sodbury – 2.6km
Dedicated community centres (defined by South Gloucestershire Council)	800 Metres	470m to Old Sodbury Village Hall
Post Offices	800 Metres	Chipping Sodbury 2.6km
Public Houses	800 Metres	The Dog Inn – 330m
Secondary School	3 Miles	Chipping Sodbury

		School – 2.34km (1.45 miles)
Primary School	2 Miles	690m (0.4 miles)
Major employers Designated Town Centres and Safeguarded Employment Areas (Defined in Policy CS12 of Core Strategy)	2.000 Metres.	Chipping Sodbury – 2.15km

- 2.20 I would comment that based on the Travelwest data presented at paragraph 2.8 of this evidence, the 2km recommended distance to an employment area underplays the fact that on average commuters walk on average 2.4.km, and cycle 8.8km each way. The 2.4km walk would put the main shopping area of Chipping Sodbury within reach as well as the employment area of Hatters Lane.
- 2.21 It also needs to be borne in mind that most shopping trips, apart from picking up every day/forgotten items like newspapers, milk, bread etc are undertaken by car due to volume and weight of the food shopping, or are delivered to the door, something which became more prevalent during COVID-19 restrictions, and have become more common.
- 2.22 The food and goods that are available within the Petrol Station are typical of everyday items that would be picked up on foot. The local supermarkets are not a significant distance from the appeal site, so if residents choose to undertake their shopping trips by car, and not at part of a linked journey, the corresponding journey is short.
- 2.23 Chipping Sodbury High Street also lies just over the recommended distance set out in PSP11, but I do not consider the additional 150m walk would deter many people who would otherwise undertake that walk or cycle to visit butchers, bakery, bank etc. and certainly not via cycling as that represents just a 7-minute journey by bike, on average.

Travelwest Isochrones

- 2.24 I have plotted the accessibility of the site to non-car modes, with isochrone plots provided by the SGC supported www.travelwest.info. This is provided on the plans contained as Appendix DRT B

Walking

- 2.25 The walking plot, attached as Appendix DRT B shows the distance someone could walk in 10, 20 and 30 minutes. It shows that most of Old Sodbury is within a 10-minute walk and Chipping Sodbury School and Chipping Sodbury town centre is within a 30-minute walk, and just includes the Hatters Lane employment area.

Cycling

- 2.26 The cycling plot shows Chipping Sodbury town centre and Chipping Sodbury School are both within a 10-minute cycle. The main shopping area of Yate is within a 20-minute cycle and all parts of Yate within a 30-minute cycle, which includes the large main employment area to the west of Yate as well as the two smaller designated employment areas that lie to the east and west of Chipping Sodbury Town Centre.

Public Transport

- 2.27 The colouring on the public transport plot appears to exclude 30-minute travel distances. The plot was set to leave Old Sodbury at 08:00, so leaving at other times may alter the plot
- 2.28 The plot shows Yate and Chipping Sodbury within a 10-minute bus journey, which broadly corresponds with the timetable details I discuss later

Safety/Qualitative Nature of Pedestrian/Cycle Routes

- 2.29 RFR 2 refers to the routes to key facilities not being 'safe and usable'.
- 2.30 We have broken this down into facilities to the east of the appeal, within Old Sodbury and sites to the west in Chipping Sodbury and Yate.

Eastern Routes

- 2.31 In my view, all of the destinations within Old Sodbury are within a suitable distance and safe walking route from the site, being serviced by appropriate footways with streetlights along the entire length of all routes to key facilities and services.
- 2.32 The northern footway opposite the site is some 1.4m wide. It is separated from the carriageway by a 1.6m wide grass verge, see photo below.



Photo taken 22/09/22 07:44 – Northern Footway of Badminton Road looking west – Site access after yellow wall on left.

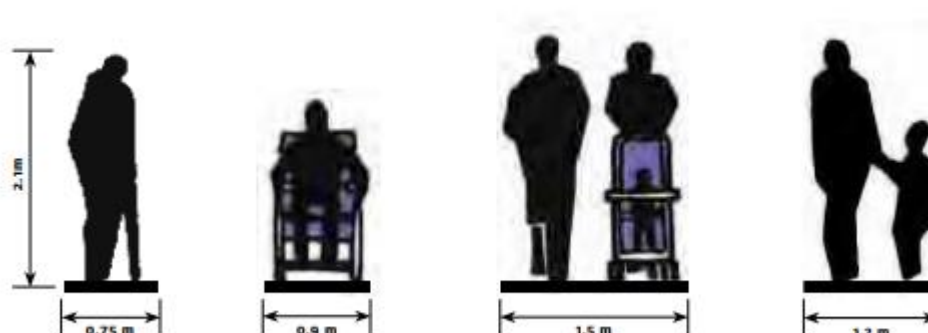
- 2.33 The route from Badminton Road to the school, church and village hall is subject to a 20mph speed limit, has a continuous footway and as it only carries local traffic, has very low traffic flows.
- 2.34 The S106 includes for the provision of a signal-controlled crossing within the village, which although a longer distance, provides an alternative crossing point for those who prefer a pedestrian priority crossing, rather than the existing or new proposed uncontrolled crossing points.

Western Routes

- 2.35 The route to Chipping Sodbury School is 2.34km away from the site and along a relatively flat route, so within the 3 miles guidance in PSP11. The route is via the footway on the northern side of Badminton Road to Smarts Green Roundabout. For comparable reference, my eldest son has just started secondary school and walks just

under 2km to school and walks with his friend who walks some 2.5km.

- 2.36 Given the length of the route, and its proximity to Badminton Road, an audit of the route was undertaken.
- 2.37 The proposed highway works included as Appendix DRT C includes for a new pedestrian refuge island to the west of the site access, which connects to the site access via a new section of footway as the plan shows. This provides a safer crossing point for pedestrians to both the northern footway and the eastbound bus stop. Badminton Road is subject to a 30mph speed limit at this location and is illuminated with publicly maintained street lighting.
- 2.38 Whilst the 1.4m width is less than that commonly used on new development schemes, it does allow a pedestrian, a wheelchair user or parents to walk with a child or push a buggy, based on the diagram included within Manual for Streets (Figure 6.8). The grass verge allows pedestrians to pass others easily without having to stray close to the road carriageway.



- 2.39 The route to Chipping Sodbury crosses Commonmead Lane (a lightly trafficked lane serving Little Sodbury/Chopping Sodbury Common), and this crossing is served with dropped kerbs and tactile paving. Some 100m to the west of Commonmead Lane the speed limit of Badminton Road changes from 30mph within Old Sodbury to 40mph, and the street lighting stops at the Commonmead Lane junction. The unlit stretch of footway is some 550m in length. This is all depicted on the plan provided at Appendix D.
- 2.40 In the Road Safety GB document “Assessment of Walked Routes to School”, it states

“On its own the absence of street lighting does not make a route unsafe”.¹

- 2.41 The section of unlit route is relatively straight, and the road alignment allows users to see lit areas in the distance. The large areas of verge provide visibility between pedestrians and road users and unlike an urban environment, there are less potential places where someone could hide from view. Therefore, I don't consider this small, section of illuminated highway would significantly deter usage.
- 2.42 In the location of the change in speed limit and street lighting, the footway is some 1.2m wide with a 1.4m verge and a grass verge to the north.
- 2.43 Street lighting starts again at Colts Green (a Cul-de-Sac serving some 15 dwellings), with the road remaining at 40mph speed limit. To the west of Colts Green, the footway runs alongside Badminton Road, and a hedge to the north narrows the footway to 1.2m at its narrowest point, shown in the photograph below. There could be potential for widening the footway if the hedge was trimmed.

¹ <https://roadsafetygb.org.uk/wp-content/uploads/2018/01/Walked-Routes-to-School-2016.pdf>



Photo taken 22/09/22 07:57– Northern Footway of Badminton Road looking east – Colts Green on the left after the hedge.

- 2.44 Further to the west the footway is some 1.1m wide, although there is a large level grass verge to the north, which would allow two pedestrians to pass, shown in the photograph below.



Photo taken 22/09/22 08:03– Northern Footway of Badminton Road looking east – End of 30mph speed limit.

- 2.45 The route approaches Smarts Green Roundabout and there is an uncontrolled crossing of the St Johns Way arm with dropped kerbs and tactile paving.
- 2.46 There are no pedestrian facilities across the Horse Street arm, although as a secondary school pupil, I crossed via the grass verge on my route from school and at lunchtimes, which based on some Google Street View images appears to be still occurring. The route then follows Cotswold Road and then via a subway to the school.
- 2.47 Horse Street would be the route to access Chipping Sodbury and its facilities and avoids the need to cross the grass verge at the Smarts Green Roundabout.

Safety

- 2.48 The council's reason for refusal suggests they consider that the walking/cycling routes from then site are unsafe. In my opinion and experience they are not.

- 2.49 UK Government guidance on Travel Plans, Transport Assessments and Statements (<https://www.gov.uk/guidance/travel-plans-transport-assessments-and-statements>) states that: *“an analysis of the injury accident records on the public highway in the vicinity of the site access for the most recent 3-year period, or 5-year period if the proposed site has been identified as within a high accident area”*
- 2.50 For the avoidance of doubt, although the A432 is not considered to be a “high accident area”, in response to SGC during the planning determination stage, we considered accident data for 5-years from the roundabout junction at Smarts Green, some 1.5km to the west and the junction with the A46, some 2km to the east.
- 2.51 Summaries of the collision data and a plan showing location of collisions is attached to this evidence at Appendix DRT E. It has been confirmed by an SGC officer that there have been no new reported collisions since the information was obtained.
- 2.52 If it is assumed from the guidance that the stretch of road is not in a high accident area,, only 4 reported injury collisions occurred in the last 3 years, with the closest occurring some 300m from the site access.
- 2.53 It should be noted that there are no pedestrian collisions, and only one pedal cycle collision that occurred in 2017 some 1.5km from the site access. The data therefore shows no collision history for the route to Chipping Sodbury, and therefore no existing recorded safety issues in respect of the walking and cycling routes from the appeal site

Cycling

- 2.54 The site was visited most recently on the morning of 22nd September between 07:40 and 09:00. A child cyclist was witnessed cycling towards Chipping Sodbury on Badminton Road, see photo below. Another child was witnessed walking closer to Chipping Sodbury, but their origin is not known and could have been from Colts Green.



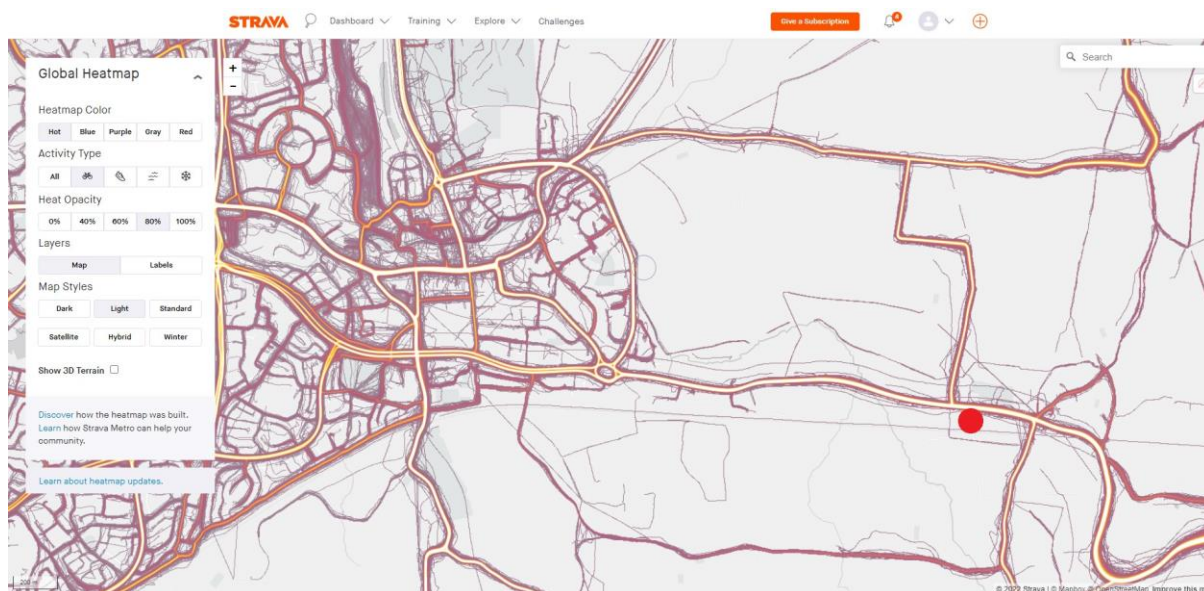
Photo taken 22/09/22 08:33– Northern Footway of Badminton Road looking west – site access after yellow wall.

- 2.55 Two cyclists were separately observed cycling east on Badminton Road closer to Chipping Sodbury, one on the footway at around 08:00 and one on the carriageway at around 08:15. Both were dressed in “normal” clothes, so potentially commuting.
- 2.56 The section of Badminton Road towards Chipping Sodbury is typical of roads in the area between built-up areas, which are used by cyclists.

Strava

- 2.57 Strava is an online utility for cyclists, runners and walkers to record their journeys using GPS to allow them to compare times/speeds with previous journeys and others. Strava produces a “heatmap” which shows popularity of routes taken by users, with the most used routes shown in wider brighter lines.
- 2.58 The data it provides is skewed towards keener cyclists, walkers and runners who record their efforts, but does show which routes are more popular amongst those users. I know from experience that many commuters also record their journeys using this software. The image below and included at a larger size as Appendix DRT F shows cycle journeys. The wider and brighter the line, the more journeys have been recorded. A key is not available to show numbers on each route, but Badminton Road could be compared to other roads in the area, which may be considered more cycle friendly, such as Chipping Sodbury High Street, which has a 20mph speed limit.

2.59 It clearly shows the Badminton Road is a popular cycle route.

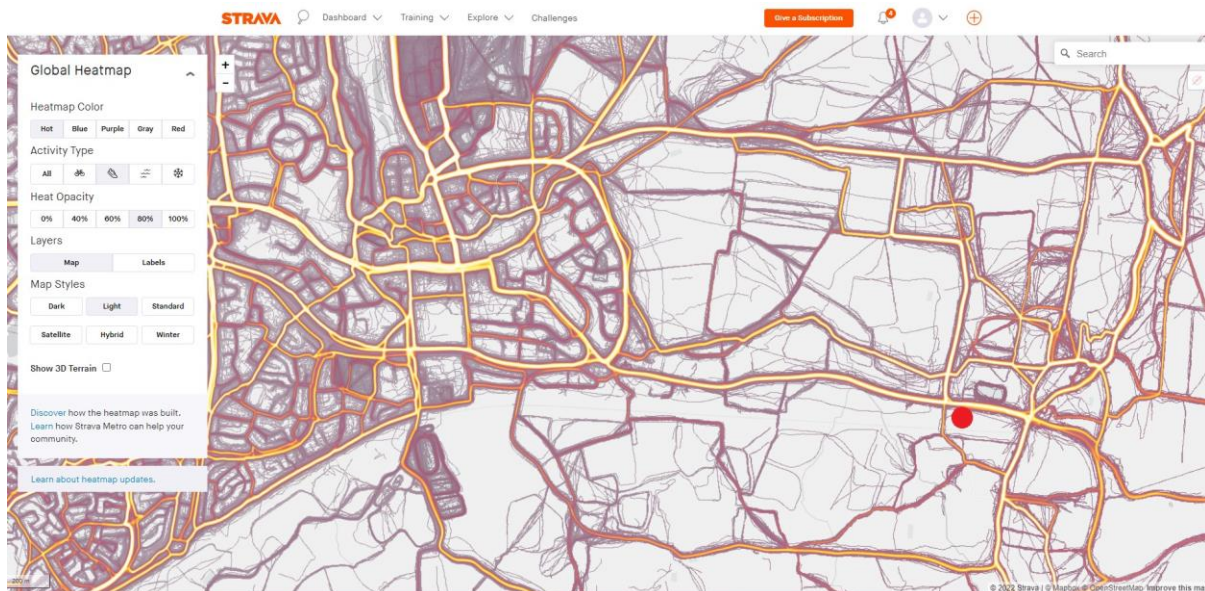


Extract of Strava Heatmap – Cycle journeys

2.60 A “Strava Segment” is a section of road/roads over which times/speeds are recorded to allow comparison with other people and previous rides. The Strava Segment “OS to CS” which covers Badminton Way from just west of the petrol station in Old Sodbury to just before the 30mph speed limit on the approach to Chipping Sodbury has been ridden some 38 thousand times by almost 6,000 people. And 1,121 people this year to date. The segment in the other direction (“Final Smash Home”) has been ridden 26 thousand times by 4,813 people and 846 this year to date.

2.61 With over 65,000 cycle trips being recorded over time, and no cycle related collisions in the vicinity of the site, it demonstrates that there are no existing cycling related safety issues.

2.62 The walking/running map from Strava below also shows Badminton Road as a popular route for runners and walkers. It also shows the Frome Valley Walkway to the north of Badminton Road is a popular leisure route, this is likely to be used by walkers travelling between Old Sodbury and Chipping Sodbury, during the daytime and when a quieter, less direct route is preferred.



Extract of Strava Heatmap – Running/walking journeys

- 2.63 It is important to note that the data only shows pedestrians, runners and cyclist who track their journey and upload to Strava, so is likely to be skewed towards more active people and might not pick up all commuters. However, as I have said it gives a good snapshot of the likely intensity of usage and does not show that people are deterred from using Badminton Road for cycling or walking, in fact it seems to be used more regularly than many of the other nearby routes in the area which is not surprising to me given its directness and availability of footways and wide carriageways, with collision data showing that it is not particularly unsafe.

Buses

- 2.64 It is acknowledged that not all facilities and services are walkable/cyclable for everyone from this site, which is always the case with development because some people are less physically able to walk or cycle. Therefore, section ii of PSP11 becomes relevant, which states that developments will become acceptable if

"served by an appropriate public transport service(s)".

- 2.65 PSP11 then goes on to provide a definition of appropriate public transport service as:

An "Appropriate public transport service(s)" as a minimum means:

- i. Individual or combined services, total journey time under 1 hour; and*
- ii. at least 5 services a day during the week, 3 at weekends, to and from the*

destination; and

iii. during the week; one service arriving at the destination before 9am, and one leaving after 5pm

2.66 A bus stop lies just 45m from the site access to the east for westbound services (Chipping Sodbury, Yate) and 50m to the west for eastbound services. Which is very conveniently located and meets the PSP11's requirement that development be located within 400m of a bus stop.

2.67 Using the above criteria, and the latest bus stop data (Appendix DRT G) the information is as follows (note that latest bus stop information has been updated from that in the Transport Assessment that accompanied the planning application as the TA was produced in May 2021, so timetables are out of date).

"i" Individual or combined services, total journey time under 1 hour

2.68 The journey time from the stop closest to the site is 4-10 minutes (depending on bus service) to the Clock Tower bus stop in Chipping Sodbury (stop closest to shops and services) and 7-8 minutes to the stop at Yate Shopping Centre.

2.69 In the opposite direction, the journey to Malmesbury, in Wiltshire (Market town with a range of shops and services), is 41 minutes. The journey time to Wootton-under-Edge is 35 minutes.

2.70 Therefore, the journey times for the services are compliant with section I, as they provide a service that in most instances takes well under an hour.

"ii" at least 5 services a day during the week, 3 at weekends, to and from the destination

2.71 During the week there are 11 services in each direction, so significantly above the five required by PSP11. On Saturdays there are eight services in each direction, and none on Sundays, and therefore compliant with frequency requirement in section "ii".

"iii" during the week; one service arriving at the destination before 9am, and one leaving after 5pm

2.72 There are three services in the morning where the bus leaving from Old Sodbury arrives at the destination before 09:00. The 620 service departs from the stop at 06:18, arriving at Chipping Sodbury at 06:23, Yate at 06:26 and Bath at 07:22. A later service

leaves at 07:18 arriving at Chipping Sodbury at 07:23, Yate at 07:26 and Bath at 08:27.

2.73 In the other direction, the 85 leaves the stop at 07:15 and arrives at Wootton-Under-Edge at 07:50, although there is no return service in the evening directly to Old Sodbury.

2.74 In addition, the C82 runs on Cirencester College days and leaves at 07:20 and arrives at Malmesbury at 07:57.

2.75 In the evening, the 620 service leaves Yate at 17:40 and Chipping Sodbury at 17:45 arriving back at Old Sodbury at 17:48. The later 620 service leaves Bath at 17:45, Yate at 18:40, Chipping Sodbury at 18:45 before arriving back at 18:48.

2.76 On Cirencester College Days the C62 leaves Malmesbury at 17:00 and arrives at Old Sodbury at 17:35.

2.77 The above service information is summarised in Table 2.2 below.

TABLE 2.2 – Bus Services – Appeal Site	
Requirement	Results
Journey time under an hour	4-10 minutes to Chipping Sodbury, 7-8 minutes to Yate, 41 minutes to Malmesbury
5 Services a day, 3 at weekends	11 weekday, 8 Saturday
One service arriving before 09:00, one leaving after 17:00	06:18 arrives at Chipping Sodbury 06:23, Yate 06:26 and Bath 08:27. 07:18 arrives at Chipping Sodbury at 07:23, Yate at 07:26 and Bath at 08:27. 17:40 from Yate and 17:45 from Chipping Sodbury arrive at 17:48. 17:45 Bath, 18:40 from Yate and 18:45 from Chipping Sodbury arrive at 18:48.

2.78 The above demonstrates that the services are fully compliant with Section “iii.”

2.79 In summary, the bus services not only meet the minimum requirements of PSP11, but go further, with double then number of services a day than the requirement, and double the number of services before 09:00 and after 17:00

2.80 This confirms the location is sustainable under PSP11, as confirmed by SGC who stated in their response “*Although numerically the number of daily services could be*

argued to be policy compliant in PSP11 terms of the minimum for a rural area implied in the PSP'. (Page 10 of CD4.1) I cannot see how non-compliance with PSP11 can be evidenced in this context, on the contrary the bus service available far exceeds PSP11's minimum requirements

- 2.81 In this context, PSP11 makes it clear that Residential development can be considered to be acceptable, even where access to all everyday facilities do not lie on safe and useable routes, or within the distances set out in table 2.1.

Need to Travel

- 2.82 The following paragraphs address the need to travel for residents. Whilst it is accepted that some residents would need to drive for education, health, shopping and employment purposes, changing work and shopping patterns are reducing the need for car travel.

Working from Home

- 2.83 With the investment by companies in technology and change in working practices during COVID-19 restrictions, working from home for some employees has become more common, with less employees travelling to their workplace 5-days a week.

- 2.84 Data from the most recent National Travel Survey <https://www.gov.uk/government/statistics/national-travel-survey-2021/national-travel-survey-2021-working-from-home> shows:

- Increase of working from home once or more a week has almost doubled from 11% in 2019 to 21% in 2021.
- Working from home 3 or more times a week has increased from 3% in 2019 to 11% in 2021.

- 2.85 With working from home becoming easier and proved viable during the COVID-19 restrictions, the need to locate residential developments close to employment opportunities has fallen for some employees, and trip rates have fallen in line with the increased volume of home working that is identified above.

Home Deliveries

- 2.86 Home deliveries for food and non-food purchases have increased post COVID-19. During the COVID-19 restrictions, some shops were shut or had limited access, households moved towards online shopping for both food and non-food goods, and retailers improved their online shopping experience. In 2019 31% of households ordered items for home delivery at least once a week which rose to 46% in 2021. Only 9% of household did not order any goods online in 2021.
- 2.87 The following list of home deliveries local to the site is not exhaustive but is provided to indicate the range of home delivery options available.
- Milk and More (Milk deliveries, as well as bread, fruit and vegetables)
 - Morrisons (Supermarket)
 - Sainsburys (Supermarket)
 - Asda (Supermarket)
 - Ocado (Supermarket)
 - Tesco (Supermarket)
 - Waitrose (Supermarket)
 - Iceland (Supermarket)
 - Riverford Organic (Fruit, vegetables and meat)
 - Abel and Cole (Veg boxes)
 - Forbidden Fruit and Veg (Veg boxes).
 - McColls (Newspaper)
 -
- 2.88 In addition, there are nationwide home delivery from the likes of Amazon, as well as other retailers who offer online shopping.
- 2.89 It demonstrates that for some households, the need to live close to supermarkets or town centres has decreased.

3. COMPARISON OF OTHER CONSENTED DEVELOPMENTS

- 3.1 The instructing planning consultant has directed me to recently consented residential developments in South Gloucestershire, and review their accessibility, particularly with regard to PSP11, and comment relative to the appeal site.
- 3.2 The following planning applications have been considered:
- P19/14956/F – Tytherington
 - P20/06928/O – Rangeworthy
 - PK17/4552/O – Wickwar
 - PT17/4800/O - Falfield
 - P19/2575/F – Yate/Engine Common
- 3.3 These applications are considered against PSP11, using a simple comparison table based on the PSP11 distances in table 3.1 below. Further details and layouts showing the site and local facilities are included as Appendix H.
- 3.4 Given PSP11's reference to the distances that its supporting text identifies as a 'starting point' for assessing accessibility, and paragraph 105 of the NPPF reference to opportunities for maximising sustainable transport solutions will vary between urban and rural areas, I think a more nuanced assessment is needed. Therefore, in this comparison I have applied a Green/Amber/Red rating to each distance, green where it fully complies, amber when the facility is within 20% of the target distance and red when it exceeds this.
- 3.5 It should be noted that the Falfield site does have a primary school within walk distance of the site being Tortworth Primary School some 2.4km/1.5 miles away. However, the route from the site to the school is along a road with no pedestrian footways, and the junction with the M5 motorway has no pedestrian facilities.
- 3.6 The Yate/Engine Common site has a mobile post office some 770m walk from a site access but is only open for one hour on a Friday afternoon, so not deemed to be a viable option for all residents.

TABLE 3.1 – PSP11 Distances – Appeal Site and Comparison Sites							
Key Services and Facilities	Suggested distance	Appeal Site	Tytherington	Rangeworthy	Wickwar	Falfield	Engine Common
Retail & Town Centres	1,200m	2,150m	3,800m	5,400m	5,300m	7,200m	2,600m
Superstore or supermarket		2,780m	3,800m	5,400m	5,300m	7,200m	2600m
Smaller food shops		250m	350m	4,700m	4,400m	480m	560m
Local health services	800m	3,900m	3,600m	4,500m	5,200m	6,600m	2,100m
Pharmacy		2,600m	3,500m	4,500m	5,200m	6,400m	2,100m
Village Hall/ Community Centres	800m	470m	300m	350m	1,000m	500m	2,100m
Post Offices	800m	2,600m	350m	4,900m	6,000m	480m	2,800m [#]
Public Houses	800m	330m	250m	190m	1,200m	750m	770m
Secondary School	3 miles	1.45 miles	2.7 miles	0.2 miles	3.4 miles	3.9 miles	0.9 miles
Primary School	2 miles	0.4 miles	1.9 miles	2.4 miles	0.8 miles	1.5 miles*	0.5 miles
Major employers, Town Centres	2,000m	2,150m	3,600m	3,300m	1,400m	7,200m	950m

* Not on a safe walking route

[#] Mobile post office within walking distance, but only open for 1 hour a week in the afternoon

- 3.7 All of the sites have bus services compliant with PSP11 of a similar provision to the appeal site.

Summary

- 3.8 Checking the above development against PSP11, it is clear that some recent residential applications have been permitted where their compliance is less clear than that apparent when assessing the accessibility of the appeal site, and some application sites have far worse accessibility than the appeal site at Old Sodbury. In the Wickwar example, only the primary school and safeguarded employment site is within appropriate distances set out in PSP11.

4. IMPACTS OF CAR TRAVEL

4.1 If residents do travel by car for work, shopping and other services, the impact of their travel is not as severe as other locations as the distance to Chipping Sodbury (Waitrose) is only 2.8km and 3.9km to Yate.

4.2 The difference in sustainable travel between urban and rural areas is recognised in NPPF 105 which states:

“The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”

4.3 Within Paragraph 111 of the NPPF, under the heading considering development proposals that:

“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

4.4 There is no traffic capacity or congestion issues associated with the site, which was agreed by SGC in their comments **(Page 11 of CD4.1)** which stated:

“We accept that in terms of traffic generation without necessarily agreeing with the TRICS generation figures, that there would be no severe impact in terms of added congestion and queueing on the highway. “

4.5 In 2021, 18% of new cars sold had a plug ² (includes electric only and plug-in hybrid cars). The most recent data for September 22 showed that some 22% of all new cars registered were electric/plug-in hybrid.

4.6 The residents who do choose to drive, with improvements in technology in modern vehicles, and the move towards the end of sales of new petrol and diesel cars and

²

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1090420/Decarbonising-transport-one-year-on-review.pdf

vans, the impact of the travel will result in lower CO2 emission than previously occurred and will only reduce in the future as full electric cars become more prevalent.

4.7 The proposed development helps the move towards electric vehicles, with all dwellings having a charging point.

4.8 Within Paragraph 111 of the NPPF, under the heading considering development proposals that:

“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

4.9 The collision data and the acceptance of the proposed layout from SGC show that there is no highway safety risk with the proposed development. And it is also acknowledged by SGC there would be no severe impact (in terms of added congestion or queueing) on the highway.

5. THIRD PARTY RESPONSES

- 5.1 A range of representations received in connection with the application refer to off-site highway and transport issues.
- 5.2 The representations relate to volumes of traffic generated by the site and road safety issues that are related to speeding on the Badminton Road.
- 5.3 Traffic generation is addressed in section 4.4 where SGC confirms that the proposed development would not have a severe impact on congestion or queueing in the highway.
- 5.4 The road safety data presented at Appendix DRT E shows that there is no significant collision history for the road, and no highway safety issue This is agreed with the Council.
- 5.5 The proposals include traffic calming both at the site access and to the west to reduce vehicle speed, which are part of the S106 and have been agreed with SGC. The technical note setting out the proposals and potential reduction in vehicle speeds is included at Appendix DRT I.
- 5.6 The provision of a signalised crossing within the village will provide a safer route for future residents of the appeal site, existing local residents and users of the Cotswold Way leisure route and would also have a traffic calming effect on vehicle speeds within the village.

6. CONCLUSIONS

- 6.1 The site is within easy and safe walking distance of a number of facilities including a primary school, shop, public house and village hall. The route to the local secondary school is within the appropriate distance and is judged to be safe. These are day to day journeys for some local residents.
- 6.2 Small scale employment uses also lie within walking distance of the site, which Mr Kendrick identifies. The nearest major employment areas lie just 2,150m distant, which is both a walkable and cyclable distance from the site in light of the average walking and cycling commuting distance I have identified as being prevalent in the area (See paragraph 2.8).
- 6.3 Shopping and working habits are changing, with more households shopping online for food and other goods, and working from home, either full or part-time becoming more common.
- 6.4 Therefore, it is my experience and opinion that the site offers access to a good range of everyday services and facilities within sustainable travel distances. This will ensure that non-car modes of travel are maximised
- 6.5 The bus service in the village far exceeds the requirements of PSP11 offering several buses that could be used for commuting to Chipping Sodbury or Yate or further afield.
- 6.6 I therefore consider that the appeal site meets favourably with policy PSP11.
- 6.7 We have looked at recent residential applications that have been permitted by South Gloucestershire Council, and many have been approved in similar locations to Old Sodbury.
- 6.8 It has been accepted by SGC that the development would not give rise to a severe impact on the road network, or an unacceptable safety risk.
- 6.9 In my professional opinion the highway and transport objections are all appropriately dealt with by the appeal scheme.
- 6.10 In light of the above, I consider that there are no reasonable highway or transport grounds not to allow the Appeal.