

Town and Country Planning Act 1990, Section 319A

Planning Inspectorate Inquiry Reference:

APP/P0119/W/22/3303905

South Gloucestershire Council Planning Reference:

P21/03344/F

Appeal by Grassroots Planning on behalf of Redcliffe Homes Ltd

Site Address: **Land South of Badminton Road, Old Sodbury, South Gloucestershire.**

Proof of Evidence of Myles Kidd
Transport

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1 Introduction

1.1 Qualifications and Experience

- 1.1.1 My name is Myles Andrew Ferguson Kidd, a Transportation Planner and Engineer with over 30 years' experience in transportation planning including economics and highway engineering. I have an Honours Degree in Transportation Engineering, and have memberships of the Chartered Institution of Highways and Transportation, the Chartered Institute of Logistics and Transport, and the Transport Planning Society.
- 1.1.2 My experience includes development planning for the majority of the last 20 years, concentrating on major developments whilst in the public sector, as well as a mixture of developments in the UK and around the world in the private sector.
- 1.1.3 I manage the Transport Development Control team for South Gloucestershire Council, commenting on planning applications on behalf of the Local Highway Authority as consultee, as well as detailed negotiations to enable appropriate development.
- 1.1.4 Prior to working for South Gloucestershire Council I have held senior positions at a number of consultancies.
- 1.1.5 I have prepared written evidence at public inquiries and at planning appeals and have presented as expert witness at scrutiny panels, planning Examination in Public inquiries and at foreign ministries.
- 1.1.6 I am familiar with the site and have visited Old Sodbury on three occasions, the last two times relating to this development.

1.2 Scope of Evidence

- 1.2.1 My role at this Inquiry is to provide evidence in connection with the Council's objection to this proposed development on travel sustainability grounds.
- 1.2.2 My evidence deals with the transport reasons for refusal from the decision notice of 14th May 2021, namely reasons 2 and 3. Reason 3 can be overcome with an agreed legal agreement S106.
- 1.2.3 The description of the application P21/03344/F which seeks full planning permission is:

Erection of 35 no. dwellings with garages and associated works

1.3 Pre-Application Advice

- 1.3.1 Pre application advice for this development site was sought in 2019 (PRE19/0180) with a layout proposing 28 dwellings. South Gloucestershire Council's Transport Development Control team reviewed the proposals and highlighted concerns over the travel sustainability of the site; and highway safety concerns over the proposed access to the site where visibility splays were problematic.

- 1.3.2 The appeal application for 35 dwellings was validated and uploaded to the planning portal in May 2021

1.4 Transport Reasons for Refusal

- 1.4.1 For this wholly residential development of 35 dwellings there are two transport related refusal reasons: 2 and 3. There are set out below:

Refusal Reason 2

- 1.4.2 Refusal Reason 2: *“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.”*

Refusal Reason 3

- 1.4.3 Refusal Reason 3: *“In the absence of a S106 legal agreement to secure necessary traffic calming/speed reduction measures on the wider highway network there is an objection in principle to the access design which would need to accommodate visibility splays for the excess speed on the A432 past the site, resulting in a contrived build out on the southern side of the road. This asymmetrical design would reduce the ability to introduce future safety infrastructure such as cycle lanes which is a Council objective across the District, and in officers' view is considered detrimental to highway safety. It is therefore contrary to Policy CS8 of the South Gloucestershire Local Plan: Core Strategy (Adopted) December 2013; Policy PSP11 of the Policies Site and Place Plan (Adopted) 2017; and the provisions of the National Planning Policy Framework 2021 [para 110 (d)].”*
- 1.4.4 Refusal Reason 2 is explored in detail in this evidence.
- 1.4.5 Reason 3 relates to the non-completion of a S106 agreement, and it is anticipated that this will be overcome through the provision of a completed legal agreement. Further information has been submitted and mitigation has been agreed with the Appellant, the details of which are set out in the Statement of Common Ground.

2 Policy and Guidance

2.1 National Planning Policy Framework and Guidance

National Planning Policy Framework (NPPF)

- 2.1.1 The NPPF became national policy for England when it was introduced in March 2012, and sets out the context for enabling sustainable development through the planning system.
- 2.1.2 The NPPF has been updated three times, together with an amendment removing paragraph 209(a) relating to oil, gas and coal exploration and extraction. The current version issued in July 2021 includes transport guidance which essentially follows the same guidance as the original, that is for significant development to focus on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. As for the March 2012 NPPF, the glossary in the updated framework defines **Sustainable transport modes** as:
- “Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra low and zero emission vehicles, car sharing and public transport.”*
- 2.1.3 No weighting is applied within the NPPF glossary to these sustainable modes, but it is noted that paragraph 104 part c of Section 9 (Promoting Sustainable Transport) states that: “...*opportunities to promote walking, cycling and public transport use are identified and pursued...*”; and that elsewhere in the document there is on-going reference to promote and encourage walking, cycling and public transport, with very limited reference to car sharing and ultra-low emission vehicles.
- 2.1.4 In transport terms, the NPPF [CD 1.6] offers relevant guidance in a number of its paragraphs, extracts of which are included in **Appendix A**. Sustainability forms the main thrust of the document, suggesting that in transport terms developments need to be located sustainably with good access to facilities and travel choice that will encourage the use of public transport, walking and cycling.
- 2.1.5 The following extracts are considered relevant to the determination of the travel sustainability credentials of this development:
- 2.1.6 Within its *Achieving Sustainable Development* section it includes:
- Paragraph 9 [extracts] *“Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area”*;
 - Paragraph 10 [extracts] *“a presumption in favour of sustainable development...”*
- 2.1.7 Within its *Promoting Healthy and Safe Communities* in Section 8:

- Paragraph 92 “...*Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:*

a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;

b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas; and

c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling. ...”

2.1.8 within its *Promoting Sustainable Transport* in Section 9, (from paragraph 104 to 113) includes many travel sustainability related guidance extracts of which include:

- Paragraph 104 c) “...*opportunities to promote walking, cycling and public transport use are identified and pursued ...”*
- Paragraph 105 “...*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...*”;
“...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...”
- Paragraph 111 “...*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...*”
- Paragraph 112 “...*Within this context, applications for development should:*
a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;...”
- Paragraph 113 “...*All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed...*”

2.2 Local Policy

- 2.2.1 Local policy consists of the South Gloucestershire Local Plan Core Strategy (CS) [CD 1.1], adopted in December 2013, and South Gloucestershire Policies, Sites and Places Plan (PSP) [CD 1.3], adopted in November 2017.

South Gloucestershire Local Plan Core Strategy (Adopted December 2013)

- 2.2.2 The most relevant Policies and quoted extracts of the Core Strategy relating to this development and transport are:

Policy CS8 “Improving Accessibility”, which includes:

“...Developments which are car dependent or promote unsustainable travel behaviour will not be supported...”;

“...All new development proposals of sufficient scale will be encouraged to reduce greenhouse gas emissions, travel demand and support travel by means other than the private car, particularly to significant destinations such as educational establishments, hospitals, rail stations, bus interchanges and employment areas...”;

South Gloucestershire Local Plan: Policies, Sites and Places Plan [PSP] (adopted November 2017)

- 2.2.3 The South Gloucestershire *Local Plan: Policies, Sites and Places Plan* (PSP) replaces the saved policies from the Local Plan of 2006 as well as the 2002 Minerals and Waste Local Plan.

- 2.2.4 Policy *PSP 11: Transport Impact Management*, has nine subsections of which seven are relevant to this application. These are as follows:

“...Development proposals which generate a demand for travel, will be acceptable where:

- 1) appropriate, safe, accessible, convenient, and attractive access is provided for all mode trips arising to and from the proposal; and*
- 2) any new or improved bus stops meet the Council’s adopted standards and the appropriate national guidance; and*
- 3) residential development proposal(s) are located on:*

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

and then

- b. 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*

- 4) It would not generate traffic that would:*

- a. *create or contribute to severe congestion;*
 - b. *severely impact on the amenities of communities surrounding access routes (local network to strategic road network);*
 - c. *have an unacceptable effect on highway and road safety;*
 - d. *harm environmentally sensitive areas; and*
- 5) *any new transport related infrastructure provided in relation to the proposal would not create or exacerbate traffic congestion or have an unacceptable effect on highway and road safety; and*
- 6) *unobstructed emergency vehicle access is provided; and*
- 7) *potentially significant transportation impacts are accompanied by an appropriate Transport Assessment and where necessary a Travel Plan...*”

2.2.5 **Table 1** sets out the appropriate walking distances from PSP11.

Table 1 PSP11 Appropriate walking and cycling distances

Key Services and Facilities	Appropriate Walking and Cycling Distances
Retail (comparison) shops and services and/or Market towns and Town Centres (Defined in policy CS14 of Core Strategy)	1,200 Metres
(Weekly) Superstore or supermarket	1,200 Metres
(Day to day) Smaller food (convenience) shops	1,200 Metres
Local health services	800 Metres
Pharmacy	800 Metres
Dedicated community centres (defined by South Gloucestershire Council)	800 Metres
Post Offices	800 Metres
Public Houses	800 Metres
Secondary school	3 Miles
Primary school	2 Miles
Major employers Designated Town Centres and Safeguarded Employment Areas (Defined in Policy CS12 of Core Strategy)	2,000 Metres

2.2.6 Relevant to the interpretation of PSP 11 for this development are paragraphs 5.18 through to 5.35 of the PSP, these are copied in **Appendix B**.

2.3 Relevant Guidance

2.3.1 The Government, through the Department for Transport and other departments and ministries produce technical guidance to help guide developers and local authorities.

2.3.2 For sustainability in transport terms, the following guidance is considered relevant:

Manual for Streets: Department for Transport, March 2007

2.3.3 Manual for Streets (MfS) [CD 3.1], was published by the DfT in March 2007 and provides national guidance on residential street design. In Section 4.4 (attached in **Appendix C**) it sets out guidance on the walkable neighbourhoods which are fundamental in achieving sustainable patterns of movement to reduce people's reliance on the car. It states that "...*walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes (up to 800m) walking distance of residential areas which people may comfortably access on foot....*" It goes on to say that "...*this is not an upper limit and PPG13 states that walking offers the greatest potential to replace short car trips, particularly those under 2Km...*". Planning Policy Guidance 13 (PPG 13) referenced in MfS was withdrawn following the introduction of the National Planning Policy Framework and guidance in March 2012.

2.3.4 The paragraph concludes with "...*MfS encourages a reduction in the need to travel by car through the creation of mixed used neighbourhoods with interconnecting street patterns where daily needs are with walking distance of most residents...*"

2.3.5 When compared against the Manual for Streets guidance on walkable neighbourhoods it is clear that the Appeal site does not accord with the guidance within the site itself or in its connections to neighbouring residential areas and as such promotes a reliance on the private car.

Providing for Journeys on Foot: IHT, 2000

2.3.6 Guidance provided by the Chartered Institution of Highways and Transportation (CIHT / formerly IHT) in their "Providing for Journeys on Foot" [CD 3.2], highlights the on-going trend of reduced walking noted in its paragraph 1.18:

"...Despite the importance of walking, the amount of walking has declined. In the twenty years prior to 1995/97, the number of walk journeys per person fell by 10% whilst the average distance walked fell by 24%. The trend has been steepest over the past ten years. This reduction is despite – or perhaps because of – the fact that the average person's total travel mileage has increased by 38% over this same period..."

2.3.7 A similar conclusion is shown in their "Planning for Walking" guidance document from April 2015, and government statistics further highlight this trend of an ongoing reduction in walking as a mode of choice.

- 2.3.8 In terms of walking distance, paragraphs 3.31, 3.32 and Table 3.2 [copied as **Table 2** below] from the twenty year old guidance highlight the desirable, acceptable and preferred maximum walking distances for the different purposes of retail /town centre; commuting / school travel and sight seeing; and leisure. These copied in **Appendix D**, show desirable walking distances from 200m to 500m depending on journey purpose, with preferred maximums of 800m for walking to town centres, to up to 2km for commuting or school or site seeing, with other purposes a preferred maximum of 1,200m.

Table 2 Suggested Acceptable Walking Distance (IHT, 2000)

Table 3.2: Suggested Acceptable Walking Distance.			
	Town centres (m)	Commuting/School Sight-seeing (m)	Elsewhere (m)
Desirable	200	500	400
Acceptable	400	1000	800
Preferred maximum	800	2000	1200

Planning for Walking: CIHT - April 2015

- 2.3.9 Paragraph 2.1 onwards of *Planning for Walking* [CD 3.3], provides a more recent update on walking distance trends. This confirms that from NTS statistics, across Great Britain in general about 80 per cent of journeys that are shorter than 1 mile (1.61 km) are made wholly on foot:

“...In 2012 walkers accounted for 79 per cent of all journeys shorter than 1 mile, but beyond that distance cars are the dominant mode (DfT, annual). In contrast, in 1972/73, 85 per cent of journeys shorter than 1 mile were made on foot...”*

“...For journeys that are 1 to 2 miles long, 26 per cent are made on foot (NTS 2012), more than by bus; beyond 2 miles, trips on foot are few and are outnumbered by bus trips...”

- 2.3.10 The guidance suggests that the main reason for the decline in pedestrian journeys is that fewer journeys can be accomplished on foot as the destinations people want to reach are now further apart. This conclusion has been mirrored in other articles and is a function of development on the fringes of towns and cities, and in this case villages.
- 2.3.11 In its paragraph 6.4 onwards, the guidance (extracted from *Building Sustainable Transport into New Developments* : DfT - 2008) gives the following advice on pedestrian catchment areas:

“... Traditional compact town layouts: walking neighbourhoods are typically characterised as having a range of facilities within 10 minutes’ walking distance (around 800 metres). However, the propensity to walk or cycle is not only influenced by distance but also the quality of the experience; people may be willing to walk or cycle further where their surroundings are more attractive, safe and stimulating. Developers should consider the safety of the routes (adequacy of surveillance, sight lines and appropriate lighting) as well as landscaping factors (indigenous planting, habitat creation) in their design...”

“... The power of a destination determines how far people will walk to get to it. For bus stops in residential areas, 400 metres has traditionally been regarded as a cut-off point and in town centres, 200 metres (DOENI, 2000). People will walk up to 800 metres to get to a railway station, which reflects the greater perceived quality or importance of rail services...”

Walking and Cycling Statistics: DfT – 2021

- 2.3.12 Government statistics originally published in 2013 and updated most recently in August 2022 <https://www.gov.uk/government/collections/walking-and-cycling-statistics> shows that walking has been affected by COVID, and 2021 walking levels were similar to 2020 levels. The National Travel Survey (NTS) in 2018 stated that “...people walked less often but cycled further compared to 10 years ago...” and the latest figures show marginal changes in walking.
- 2.3.13 The generally reduced walking levels trends are of interest, including the suggestion that 80% of journeys less than 1 mile ¹are by walking. In fact, data collection for the NTS is from approximately 16,000 individuals in 7,000 households in England carried out annually over 7 days. In South Gloucestershire for example it represents 0.31% of the population so its information has to be viewed as helpful for a year on year trend but as a sample cannot guarantee what happens in reality.
- 2.3.14 It suggests that one of the key factors is access to a car, as people without access are more reliant on walking as a mode of transport, and from the travel diaries shows that people in households without access to a car made 55% of all their trips and 13% of their distance travelled by foot, which compares to 27% of trips and 4% of distance travelled for those in households with access to a car. There do not seem to be statistics on location (urban / semi-rural / rural).
- 2.3.15 **Appendix E** provides extracts from the Government’s Walking and Cycling statistics.

2.4 Other Guidance

- 2.4.1 There is a wealth of documentation including reports, studies and articles provided by government departments; technical institutions; interest and pressure groups; academics; and individuals on the travel sustainability aspects of new developments. These include elements within the below reports which is a small sample of the documentation available.

¹ <https://www.gov.uk/government/statistics/national-travel-survey-2021/national-travel-survey-2021-mode-share-journey-lengths-and-public-transport-use#:~:text=Walking%20was%20the%20most%20frequent,most%20frequent%20mode%20of%20travel.>

- Better Planning, Better Transport, Better Places - CIHT - Aug 2019
- Decarbonising Transport - A Better Greener Britain - DfT - July 2021
- Routes to Net Zero 2050 - CILT - Feb 2021
- Routes to Net Zero 2050 – Rural Communities – CILT – May 2021
- Building Car Dependency – Transport for New Homes – 2022
- Transport Deserts: absence of transport choice – CfBT – February 2020

2.4.2 The main themes include the need to alter travel behaviour from a climate change perspective; travel containment through local facilities; good quality walking and cycling infrastructure and attractive routes that further encourage that use; the need to ensure genuine travel choice; and so on.

3 Transport Case

3.1 Transport Refusal Reason 2

3.1.1 Refusal Reason 2: *“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 [CS8] of the South Gloucestershire Local Plan Core Strategy (Adopted) December 2013 and the provisions of the National Planning Policy Framework 2021.”*

3.1.2 This refusal reason relates to the lack of sustainability of the site in relation to its location in the context of walking and cycling distances to key services and facilities elsewhere, noting that the layout in my view encourages car based travel; the pedestrian infrastructure is poor on routes outside of the site; and there is no cycling infrastructure local to the site or the village of Old Sodbury.

3.1.3 **Policy CS8** “Improving Accessibility” [CD 1.1D], sets out the principle of locating new development near to public transport infrastructure and existing services and facilities, and specifically states that *“Developments which are car dependent or promote unsustainable travel behaviour will not be supported”*

3.1.4 **Policy PSP11** [CD 1.3A], of the Policy Sites and Places Local Plan Policy adds further detail to the direction of Policy CS in parts 1 and 3 as follows:

“...Development proposals which generate a demand for travel, will be acceptable where:

- 1. appropriate, safe, accessible, convenient, and attractive access is provided for all mode trips arising to and from the proposal; and...*
- 3. residential development proposal(s) are located on:*

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

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;...”

Distance to facilities

3.1.5 The site is located south of the A432 Badminton Road, approximately 350m west of the crossroads where the A432 meets Chapel Lane and Cotswold Way.

- 3.1.6 There are very few key services and facilities as set out within the policy within the village of Old Sodbury: a local convenience store (which is located at the petrol station); a public house; and a primary school. Within the appropriate policy distances there is a further primary school and two secondary schools within the 2 and 3 mile radius. The safeguarded employment area at Ladden's Road in Chipping Sodbury is technically beyond the 2km threshold, but as only slightly beyond the crow-fly distance has been included as policy compliant, noting the opportunities for employment will be limited.
- 3.1.7 Paragraph 103 of the NPPF [CD 1.6], recognises that “*opportunities to maximise sustainable transport solutions will vary between urban and rural areas*” and states that this should be taken into account in decision-taking. The guidance from PSP 11 must also be considered in this context and is close to the village of Old Sodbury, argued to be part of it, and close to the edge of Chipping Sodbury so could be considered to be semi rural.
- 3.1.8 A comparison of the actual walking distances and the appropriate distances set out in PSP Policy PSP11 and compared with both Manual for Streets (MfS) and the Institute of Highways and Transport's distance recommendations within “Providing for Journeys on Foot” is shown in **Table 3**. The distances are measured from the site centroid and show both as the “as the crow flies” and the actual measurements based on google maps routing.
- 3.1.9 The overwhelming majority of key facilities and services are beyond the PSP11 thresholds as well as beyond the 2km walking distance set out within Manual for Streets as the distance within which walking is most likely to replace short car journeys. The IHT preferred maximum distance is also shown and highlights the facilities which are beyond this.
- 3.1.10 In my view, the long distances to the majority of key facilities would encourage the use of car travel in preference to other modes.

Table 3 Walking distances to key local facilities

Service / Facility	Nearest facility to the Appeal site	PSP11 Appropriate Distance	Crow Fly distance from site (Actual distance*)	MfS compliance <800m or <2km	IHT preferred Maximum
Comparison shops	Chipping Sodbury High Street	1,200m	2.3km (2.6km)	>2km	>1.2km
Town Centre	Chipping Sodbury High Street	1,200m	2.3km (2.6km)	>2km	>800m
Superstore	Waitrose (Chipping Sodbury)	1,200m	2.5km (2.8km)	>2km	>1.2km
Convenience shop	Cotswold Service Station	1,200m	320m (320m)	<800m	<1.2km

Service / Facility	Nearest facility to the Appeal site	PSP11 Appropriate Distance	Crow Fly distance from site (Actual distance*)	MfS compliance <800m or <2km	IHT preferred Maximum
Local Health Centre	West Walk and Courtside surgeries, central Yate	800m	3.6km (4km)	>2km	>1.2km
Pharmacy	Chipping Sodbury High Street	800m	2.3km (2.6km)	>2km	>1.2km
Dentist	Chipping Sodbury High Street	800m	2.3km (2.6km)	>2km	>1.2km
Community Centre	Chipping Sodbury High Street	800m	2.2km (2.3km)	>2km	>1.2km
	<i>Old Sodbury Village Hall*</i>	800m	500m	<800m	<1.2km
Post Office	Post Office, Yate centre	800m	3.6km (4km)	>2km	>1.2km
Public House	The Dog Inn	800m	400m (400m)	<800m	<1.2km
Primary	Old Sodbury CoE Primary School	3,200m	722m (750m)	<800m	<2km
Secondary	Chipping Sodbury School	4,800m	2.3km (2.7km)	>2km	>2km
Major employers / designated town centres and safeguarded employment areas	Hatters Lane and High Street Chipping Sodbury	2,000m	2.03km (2.4km)	~2km	~2km

Note * The *Old Sodbury Village Hall* is within the PSP11 appropriate distance for a community centre, however at the time of assessment in 2020 it was not considered a Dedicated Community Centre as defined by South Gloucestershire Council and therefore should not be included.

3.1.11 Dedicated Community Centres are defined in Annex 2 of the Design and Access Profiles Methodology Paper dated November 2020, extracts including the Design and Access Profile (DAP) for Old Sodbury are included in **Appendix J** [CD 3.5].

- 3.1.12 There is potential for the village hall to become a recognised Dedicated Community Centre in the future, but at present it is not shown on the DAP for Old Sodbury and has been included in my assessment for reference purposes only. Were the village hall to be included and therefore add this facility within PSP11 appropriate walking and cycling distance, it would not sufficiently alter the balance in travel terms to make this development sustainable.

Walking Infrastructure

- 3.1.13 The poor quality of the footway provision (narrow widths, with varying surface quality) would further discourage walking as the mode of choice.
- 3.1.14 The walking infrastructure is limited on the south side of A432 Badminton Road (on the development side) to be towards the village centre only, and is poor in terms of its generally narrow width (approximately 1.4m at its widest parts and narrower further east to 1.1m, and with surfacing that is variable including slightly raised and sunken utility covers, surfacing with undulation and cracking rather than a smooth surface; and vegetation from hedges etc. that require regular upkeep to allow the footway to be more usable.
- 3.1.15 On the north side of Badminton Road there is also a footway leading to the village centre which is also relatively narrow (1.4m) in places. Towards Chipping Sodbury and Yate, there is a continuous footway that is initially separated from the carriageway by a grass verge for the first 700m or so before walking alongside the trafficked A432. The footway itself is particularly narrow at 1.1m, meaning pedestrians may have difficulty walking side by side without walking on the grass.
- 3.1.16 There is street lighting within the village from the site from Commonmead Lane eastwards. The footway westwards towards Yate is unlit for approximately 550m west of Commonmead Lane till Colts Green
- 3.1.17 The proposed island crossing next to the proposed access will make the use of the northside footway and its bus stop easier, and the proposed signalised pedestrian crossing in the village will help local residents as well as those from this development cross the road in relative safety.
- 3.1.18 **Appendix F** provides some images of the footways close to the site.

Cycling Infrastructure

- 3.1.19 There is a Public Right of Way network including a path that crosses the site and railway line to connect with Chapel Lane to the southeast, as well as the Frome Valley walkway north of the A432 and a network of other field paths in several directions, including towards Chipping Sodbury; Little Sodbury and Combe End.
- 3.1.20 There is no local cycle specific infrastructure, and none planned in the locality of Old Sodbury in the West of England *Local Cycle and Walking Infrastructure Plan* 2020 to 2036 ([LCWIP²](https://www.westofengland-ca.gov.uk/wp-content/uploads/2022/04/Full-LCWIP-Jan-2021.pdf)) [CD 3.4]: overview pages 26 and 27; Yate & Chipping Sodbury pages 78, 79, 134 to 137. This means that all cycling would need to be on the road and would therefore only attract confident cyclists.

² <https://www.westofengland-ca.gov.uk/wp-content/uploads/2022/04/Full-LCWIP-Jan-2021.pdf>

- 3.1.21 The A432 is part of the Major Road Network and has a locally strategic function and is signed for traffic including commercial lorries. Towards Yate the road is relatively flat and is lit and has a westbound cycle lane west of the Smart's Green roundabout, approximately 1.6km to the west of the site. To the east the road is reasonably flat till just beyond the village, where the road begins to rise sharply up the hill towards the A46. There is a climbing lane to the east of the village for eastbound traffic climbing the hill. The eastbound climbing lane includes a couple of cycle roundel markings, though there is no demarked cycle lane.
- 3.1.22 In summary the A432 is suitable for experienced and confident cyclists. It is unlikely to encourage general cycling to and from the proposed development.

Public Transport

- 3.1.23 Policy PSP11 requires that “...*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 goes on to recommend as a minimum that:
- 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.*
- 3.1.24 The above are minimum provisions and the sort that would be expected for in-fill small scale rural developments. In paragraph 5.25 of the PSP to reflect larger developments, the guidance states “...*the larger the development proposal and, or the larger the reliance on public transport to access key facilities and services, the more frequent and extensive a bus service will be required, in order to avoid a reliance on private car journeys...*”.
- 3.1.25 This is a major development of 35 dwellings that would be reliant in policy terms on bus services for the majority of key facilities and services, and therefore requires more than the minimum service provision.
- 3.1.26 It is agreed that the bus stops are nearby the access to the development and meet the proximity criteria and that the current bus routes that serve Old Sodbury meet the minimum criteria, noting that this minimum excludes any evening services or Sunday services. **Table 4** summarises the bus services and **Appendix G** provides the detailed timetables.
- 3.1.27 For a major development the opportunity for bus travel is very limited by the provided services. Whilst Yate and Bath are achievable as work destinations, the few buses remove flexibility in working hours. Similarly for shopping and leisure uses, whilst there are connections to Yate and Bath, the services are infrequent and limited on Saturdays, and without any services on Sundays.
- 3.1.28 From my perspective, the services are not sufficient to encourage day to day choice of bus travel and will naturally lead to private car travel being the mode of choice from the development.

Table 4 Local Bus Services

Service	Mon-Fri	Saturday	Sunday
41 Sopworth to Malmesbury			
first departure to Chipping Sodbury and Yate	10:37	10:37	-
last arrival from Chipping Sodbury and Yate	17:19	16:56	-
services per day	4	4	
first departure to Luckington; Sherston and Malmesbury	10:56	10:51	-
last arrival from Luckington; Sherston and Malmesbury	17:02	16:37	-
services per day	3	3	
Not PSP11 compliant - less than five services, none before 9 am			
Service 620 Old Sodbury to Yate and Bath			
first departure to Chipping Sodbury, Yate and Bath	06:18	07:18	-
last arrival from Chipping Sodbury, Yate and Bath	18:48	18:48	-
services per day	5	4	
PSP 11 compliant (minimum)			
84/85 Chipping Sodbury Wotton-Under Edge			
School service only			
departure towards Wotton	07:15	-	-
arrival from Wotton	15:35	-	-
Not PSP11 compliant			

Subsidised Public Transport and Future Changes

- 3.1.29 All of the bus services all subsidised – that is they do not attract the patronage and related comfort of potential profit that would encourage a bus operator to provide a commercial service. The 41 service has financial support from Wiltshire Council with additional funding from WECA for its spur to Yate. The 620 service is a WECA subsidised contract, as is the 84 and 85 orbital services which pass through Old Sodbury as part of a school service once a weekday.
- 3.1.30 This subsidy and the at risk provision of services is relevant and included in paragraph 5.28 of the Policy Sites and Places Local Plan “...*In assessing access to public transport consideration will be given to the viability of existing services...*”
- 3.1.31 It is understood that with ongoing local government financial pressures, the West of England Combined Authority is reviewing the services across the region and is proposing to significantly alter provision with [Dynamic, Demand-Responsive Transport](#)³ [CD3.5] and **Appendix I**, instead of a traditional service. The outcome of this change is likely to be known in the next few months and hopefully before 2023. If bus services are replaced by a Mobility as a Service provision – dial-a-ride type requests, in my view it is unlikely to make public transport a more attractive alternative than as a traditional timetable led service.

³ <https://www.westofengland-ca.gov.uk/what-we-do/transport/future-transport-zone/dynamic-demand-responsive-transport/>

Car Parking Provision

- 3.1.32 The car and cycle parking provision within the development notionally accords with Policy PSP16 of the Policies Sites and Places Local Plan. The original plan (drawing number 13351/5013 revision C) showed 91 car parking spaces plus a space for the substation, where policy PSP16 suggested a minimum of 69 spaces, inferring 22 additional spaces or 32% more than minimum. The initial response requested that the parking quantum be justified, and instead of justification a notionally reduced car parking provision of 76 spaces is shown in revision F. This is still higher than the minimum recommended (10% more provision), but a reduced increase, on the face of it. These plans are copied into **Appendix H**.
- 3.1.33 However, it is apparent when comparing plans, is that for many of the spaces that are apparently removed, the plans show no difference in layout – merely not identifying a parking space that was shown before, with the hardstanding area. It is clear to me that these areas will be used for car parking in practice, and the availability of this additional space will promote and facilitate car ownership and car use. In my view this reflects the direction of the development which is to appreciate its location will encourage car use more than any other mode, and it has been designed to provide for that dependency.

4 Summary

- 4.1.1 Achieving sustainable development through promoting sustainable transport are key elements of the NPPF, key elements of Government technical guidance, and are reflected in South Gloucestershire Council's policies including Core Strategy Policy CS8 and Policies, Sites and Places Local Plan Policy PSP 11.
- 4.1.2 The policies and guidance are designed to encourage integrated development that minimises the number and length of journeys, encourages sustainable transport options including high quality walking and cycling networks.
- 4.1.3 When comparing the Appeal Site scheme to guidance (*Manual for Streets; Providing for Journeys on Foot etc.*), it is clear that the walking distances to facilities the majority of which are beyond local guidance recommendations, and the quality of those walking routes are likely to discourage people from walking, and therefore promote the use of the private car. There is no cycling infrastructure local to Old Sodbury, so requires cyclists to be confident to use the main road, noting it is part of the major road network and therefore a road that traffic is directed towards to reach the Strategic Road Network.
- 4.1.4 There are limited bus services that serve Old Sodbury, and those that do are subsidised. There is a West of England Combined Authority review of bus services and their public finance, and these services and routes are not guaranteed in the future.
- 4.1.5 It is my professional opinion that, because of the few local amenities, the infrequent and at risk bus services, and the poor quality of the walking routes and lack of cycling infrastructure on routes linking the Appeal Site to the key facilities, the Development is inconsistent with national guidance and the Development Plan Policies. If taken forward in its current form it will lead to a car borne development, adding to on-going traffic growth and surrounding congestion with its social and environmental, and climate change consequences. It is in an unsustainable location in travel terms for this scale of development, and that location has no clear prospects of improvement.