

Bradford Local Plan

Core Strategy Examination Session Day 10

Matter 7C: Transport and Movement

Date: 19th March 2015

Venue: Victoria Hall, Saltaire

Issue 7.12

Policy TR1 – Travel Reduction and Modal Shift

- a. **Are the measures set out in the policy to reduce the demand for travel, encourage and facilitate the use of sustainable travel modes, limit travel growth, reduce congestion and improve journey time reliability justified with evidence, effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG); does it address the relationship between the location of development, accessibility and travel?**
- b. **Does the policy properly consider the viability and funding of infrastructure requirements, including existing transport “pressure points” and main strategic highway network, and are the highway authorities (Highway Agency/Highway Authority) content with these matters?**

Response

Part a)

- 1.1 The council believes that Policy TR1 is justified with evidence, soundly based and consistent with the latest national guidance. The measures proposed are consistent with standard transport planning practice and reflect existing local and national transport policy including ‘My Journey’ the West Yorkshire Local Transport Plan (to be referred to as the LTP) and NPPF. The policy was deemed to be viable within the Bradford District Local Plan Core Strategy – Viability Assessment. (EB046).
- 1.2 The evidence to support policy TR1 along with the other Transport and Movement Policies can be found in Chapter 3 of the LTP which identifies the evidence and issues for transport locally in West Yorkshire. The LTP has undertaken a rigorous consultation and appraisal process and is subject to annual monitoring through its set of indicators. The approach in Bradford district has been to develop policies within the Core Strategy that provide a synergy with the Local Transport Plan to facilitate a seamless Transport and Land Use planning approach.
- 1.3 The LTP has the development of a low carbon transport system at its heart through the promotion of “informed sustainable travel choices” and the phasing in of “stronger demand management measures to encourage less car use” and also includes Proposal 12 “work with Planning Authorities to ensure that development is concentrated in sustainable, accessible and safe locations and delivered in a way that encourages sustainable travel choices to be made”. Policy TR1 supports these objectives and sets out a variety of potential demand management measures to encourage travel reduction and modal shift, including provision of bus lanes, HOV lanes, cycle routes and the application of parking management. These measures have been implemented in locations around the district and have a proven track record with sustainable transport use on the increase following their introduction.

- 1.4 For example the recent introduction of bus lanes on A641 Woodside Road and Huddersfield Road at Low Moor to the south of the District has reduced bus journey times and increased patronage on that corridor – reference to Bradford South Area Committee Report A641 Bus Lane & Highway Safety Scheme Update 24 July 2014.
- 1.5 Policy TR1 is consistent with NPPF which in paragraph 30 states that “local planning authorities should support a pattern of development, which where reasonable to do so, facilitates the use of sustainable modes of travel” and paragraph 34 also states “plans and decisions should ensure that developments that generate significant movement are located where the need to travel will be minimised”. Policy TR1 states “development should be located to reduce the need to travel and maximise sustainable travel”. This will be achieved through the measures outlined in the policy including application of the Accessibility Standards in Appendix 3, and the requirement for developments to be supported by Transport Assessments and Travel Plans. This is aligned to paragraph 32 of NPPF.
- 1.6 The policy supports the introduction of new vehicle technologies, such as electric vehicle charging points which supports paragraph 35 of NPPF “[developments should]...incorporate facilities for charging plug-in and other ultra low emission vehicles” Bradford Council has successfully enabled the introduction of a large number of electric vehicle charging points through the development process via a general condition that any property with on curtilage parking should provide such facilities. Additional public charging points are being delivered through grant funding.
- 1.7 The West Yorkshire Plus Transport Fund and other recently proposed infrastructure investment have been specifically aligned to support the development planned through the Core Strategy and other Districts’ development plans

Part b)

- 1.8 The Council believes that the viability and funding of infrastructure requirements has been thoroughly considered and are deliverable. Policy TR1 was deemed to be viable within the Bradford District Local Plan Core Strategy Viability Assessment (EB046). Paragraph 5.2.5 of the Plan states that transport infrastructure priorities have been identified across West Yorkshire. These include existing transport “pressure points”. The identified priorities will be delivered through the West Yorkshire Plus Transport Fund (WY+TF) named schemes along with the package of measures to be implemented as part of the £125m West Yorkshire Highways Efficiency and Bus Package, all as approved by the West Yorkshire Combined Authority at its meeting on 12th December 2014. In addition, the Local Infrastructure Plan (LIP) (EB044) identifies key schemes that will be required in order to deliver development and includes a funding gap analysis and model for implementation. Any smaller scale but critical transport infrastructure and initiatives required will be delivered through the LTP.

- 1.9 The Council is the highway authority for the district. West Yorkshire Combined Authority (formerly ITA / Metro) is the Transport Authority for West Yorkshire and they have been engaged with the development of the Local Plan and will continue to be closely involved. They have previously indicated that they are happy with the contents of the Publication Draft. The Highways Agency has indicated that it is content with this approach and has stated that they have “no outstanding concerns about the soundness of Bradford Council’s Local Plan Core Strategy” in a letter dated 07/01/15 (reference PS/C001).

Issue 7.13

Policy TR2 – Parking Policy

- a. **Is the Council’s approach to parking, including the measures set out in the policy, fully justified with evidence effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?**
- b. **Are the parking standards (Appendix 4) unduly onerous and prescriptive, and will the proposed schemes be delivered?**

Response

Part a)

- 2.1 The Council believes that the approach to parking set out in policy TR2 is justified with evidence, effective and deliverable. The policy seeks to manage car parking to help manage travel demand. The policy is a continuation of existing policy on parking within Bradford city and town centres, to provide high quality parking for shoppers and short stay uses and to manage the demand for parking through appropriate charging mechanisms.
- 2.2 The approach to the policy and application of the parking standards in Appendix 4 is consistent with NPPF paragraph 39 and 40. The policy is worded to allow flexibility in response to local circumstances. Specifically the policy follows the principles of NPPF which states:
- ‘If setting local parking standards for residential and non-residential development, local planning authorities should take into account:
- the accessibility of the development;
 - the type, mix and use of development;
 - the availability of and opportunities for public transport;
 - local car ownership levels; and
 - an overall need to reduce the use of high-emission vehicles.’
- 2.3 Paragraph 5.2.25 of the Core Strategy states that the parking standards “will be used in the Local Plan as indicative parking standards allowing flexibility in how the parking standards are employed to maximise sustainable travel”.
- 2.4 The policy reflects the policies within the LTP on using parking as a demand management tool as well as seeking to provide park and ride

facilities at appropriate public transport hubs. The LTP includes Proposal 11 to “Strengthen demand management and enforcement to gain maximum benefit from measures to enable more sustainable choices”. The first phase of this proposal is to “use parking supply and price to discourage long stay commuter parking and encourage short stay visitor/shopper parking”

- 2.5 Policy TR2 also includes references to improving facilities for park and ride this supports Proposal 14 of the LTP which will ‘Improve interchange and integration, including the development of transport hubs’. “The approach to interchange and integration is to expand park and ride provision primarily at rail stations as well as developing a number of clearly identified ‘transport hubs’ with facilities to support interchange”.
- 2.6 A specific example of this is Shipley Rail Station where additional car parking is proposed to complement work already underway to develop Shipley Town Centre as a transport hub.

Part b)

- 2.7 The council does not consider that the parking standards set out in Appendix 4 to be unduly onerous and prescriptive. The parking standards set out in Appendix 4 are indicative and allow for flexibility depending on local circumstances as set out in para 5.2.25 of the Plan. They are consistent with the approach taken by neighbouring authorities and the approach advocated in paragraph 39 of NPPF. There are no schemes proposed to be delivered through the parking standards set out in Appendix 4 and the approach is not considered to prejudice development.

Issue 7.14

Policy TR3 – Public Transport, Cycling and Walking

- a. **Are the measures set out in the policy to safeguard and improve public transport, walking and cycling infrastructure and services justified with evidence, effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?**
- b. **Are the Accessibility Standards (Appendix 3) unduly onerous and prescriptive, and will the proposed schemes identified in the policy be delivered?**

Response

Part a)

- 3.1 The council believes that the measures set out in policy TR3 are justified with evidence, effective and deliverable as well as consistent with the latest national guidance. The measures within the policy are designed to provide improvements to public transport networks and infrastructure as well as the environment for walking and cycling. The policy seeks to do this; both through the development process, where appropriate, and through other plans supported by alternative funding

mechanisms, such as WY+TF, the LTP and direct government grants such as the Cycle City Ambition Grant. The policy was deemed to be viable within the Bradford District Local Plan Core Strategy – Viability Assessment (EB046).

- 3.2 The measures within policy TR3 are directly linked to existing policies and plans within the LTP including Rail Plan 7, WY+TF and the Cycling Prospectus along with the Bradford District Cycling Strategy - Cycling Strategy approved by Exec in Jan 2012. Each of these existing strategies and plans has been subject to their own consultation and appraisal processes prior to their adoption.
- 3.3 The measures proposed support existing policies within the LTP and Bradford's District Cycling Strategy. The measures listed within the policy under TR3 C have proven track records in being deliverable and effective in facilitating increased use of public transport (see example referred to under response to TR1). In addition, where high quality walking and cycling infrastructure has been introduced levels of walking and cycling have increased. As an example the increasing provision of cycling facilities across the District has resulted in cycling levels increasing steadily since 2004 – they are now 69% higher than those recorded in 2004. Additionally, over the past 5 years the numbers of people cycling into the city centre has increased by 20% in the morning peak. A specific example where the provision of high quality cycling provision has resulted in increased cycle use is the walking and cycling bridge across Manchester Road to the south of the City centre. This has resulted in the number of cyclists using the Living Street adjacent to the bridge increasing by 44% in the first year after opening.
- 3.4 There are a number of Proposals within the LTP relating to public transport that are aligned to Policy TR3, these include:
 - P13 Develop a core, high quality, financially sustainable network of transport services.
 - P14 Improve interchange and integration, including the development of transport hubs.
 - P15 Integrated ticketing and smartcard technology to facilitate seamless travel across modes
 - P16 A new framework for local bus services as part of an integrated transport system.
- 3.5 In addition, Proposal 22 of the LTP will “define develop and manage networks and facilities to encourage cycling and walking”
- 3.6 Policy TR3 is aligned with NPPF, Paragraph 35 states “plans should protect and exploit opportunities for the use of sustainable transport modes”, “give priority to pedestrian and cycle movements and have access to high quality public transport facilities” and “create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians. In addition TR3 (E) echoes paragraph 41 of NPPF which is concerned with protecting sites and routes that could be critical to widening transport choice.

Part b)

- 3.7 The council does not consider that the Accessibility standards set out in Appendix 3 to be unduly onerous and prescriptive. The Accessibility standards were developed through the application of accessibility mapping, in co-operation with WY Metro (the ITA at the time, now the West Yorkshire Combined Authority). The mapping used the dataset of emerging Strategic Housing Land Availability Assessment (SHLAA) sites and public transport network to identify thresholds for accessibility that would be appropriate to Bradford district.
- 3.8 Metro undertook some high level analysis of public transport provision across the district looking at the frequency of buses to key towns and cities (Bradford, Leeds, Halifax, Ilkley, Keighley, Bingley or Shipley). Each of the SHLAA sites were categorised as being within one of; Local Service Centre, Local Growth Centre, Principal Town or Regional City. Geographic Information System (GIS) analysis was then undertaken to calculate whether the SHLAA sites complied with each of the accessibility thresholds, of four buses per hour, three buses per hour and two buses per hour.
- 3.9 This exercise revealed that the majority of sites would fall within the thresholds set out in the Accessibility Standards. (70% of the Local Service Centre SHLAA sites would meet the standards and 79% of the other settlement type SHLAA sites would meet the standards). The Plans Accessibility Standards states that employment sites and sites for Social Infrastructure will be concentrated within the existing urban areas or extensions to urban areas and located within walking distances of bus stops and rail stations therefore within reach of sustainable transport points.
- 3.10 Where sites do not fall within the Accessibility Standards criteria there will in some cases be the opportunity for mitigation measures to be proposed by developers that address the accessibility issues to a degree that will be considered acceptable by the Council. These measures would come into effect at the time of the initial occupation of the site.
- 3.11 There are no 'proposed schemes' in the Accessibility Standards, the policy sets out examples of types of intervention that could be delivered dependent on local circumstances and funding mechanisms being in place.

Issue 7.15

Policy TR4 – Transport and Tourism

- a. **Are the measures set out in the policy to support sustainable access to tourist destinations, heritage and cultural assets and leisure uses justified with evidence, effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?**

Response

Part a)

- 4.1 The Council believes that the measures set out in Policy TR4 are justified with evidence, effective, deliverable, soundly based and consistent with national guidance. The policy was deemed to be viable within the Bradford District Local Plan Core Strategy – Viability Assessment. (EB046).
- 4.2 Policy TR4 is concerned with tourist and leisure destinations, it aims to protect those destinations from the impact of transport (noise, air quality etc) as well as enabling and encouraging sustainable transport trips to those destinations (both existing and new).
- 4.3 Section A of TR4 states that “areas of tourist, cultural and heritage significance should not be adversely affected by the impact of transport”, this is linked to the locational policies and TR1 which aim to reduce the need to travel and encourages the use of sustainable transport modes. Para 29 of NPPF recognises that “transport policies have an important role to play in facilitating sustainable development, but also in contributing to wider sustainability and health objectives. One of the overarching objectives of the LTP is Quality of Life, within Chapter 3 (pg 36) on evidence and issues it states that “transport provides access to leisure opportunities and the natural environment, but it is important to minimise any potential negative impact that it may have on the environment”, it also states that “the impacts of transport on the historic natural environment include the visual effect of street clutter, high traffic levels, vibration and salt damage to buildings and noise issues in rural areas”.
- 4.4 Tourist and leisure destinations can be large trip generators and Policy TR4 is consistent with paragraph 32 of NPPF policy around major trip generators, in that “all developments that generate significant amounts of movement should be supported by Transport Statement or Assessment” and paragraph 36 “all developments which generate a significant amounts of movements should be required to provide a travel plan”. In order to ensure that new tourist and leisure destinations are accessible by sustainable transport modes they will be subject to assessment against the Accessibility Standards in Appendix 3.
- 4.5 Policy TR4 also recognises the role of transport infrastructure as being a tourist and leisure destination in itself, for example cycle and walking routes and heritage railways, and provides the framework for protecting and developing this infrastructure. It is linked to Policy TR3 which protects walking and cycling routes and therefore is aligned to paragraph 41 of NPPF “local planning authorities should identify and protect where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice.

Issue 7.16

Policy TR5 – Improving Connectivity and Accessibility

- a. **Are the measures set out in the policy to improve connectivity and accessibility, particularly by public transport, justified with evidence, effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?**
- b. **Does the Policy provide a clear, effective and soundly based strategy to promote sustainable transportation, manage the demand for travel and provide transport infrastructure, which is justified, positively prepared, appropriate for Bradford and consistent with the latest national policy?**
- c. **Does the Policy properly consider existing traffic congestion and “pressure points”?**

Response

Part a)

- 5.1 The Council believes that the measures set out in Policy TR5 are justified with evidence, effective, deliverable, soundly based and consistent with the latest national guidance. Policy TR5 is primarily concerned with supporting communities across the district to access key services and sustainable transport opportunities, whilst recognising that in some areas access by private car will remain a primary mode of travel. NPPF paragraph 29 states that “the transport system needs to be balanced in favour of sustainable transport, giving people a real choice about how they travel. However, Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas”.
- 5.2 The policy supports the strategic approach to Connectivity within the LTP which is backed up by evidence in Chapter 3. The policy supports LTP Proposal 12 to Work with Planning Authorities to ensure that development is concentrated in sustainable, accessible and safe locations and delivered in a way that encourages sustainable travel choices to be made. Policy TR5 is aligned with a number of proposals within the LTP which are concerned with accessibility and improving connectivity in isolated communities including:
 - Improve interchange and integration including the development of transport hubs
 - Introduce a new framework for local bus services as part of an integrated transport system
 - Develop a new model for transport planning at a community level to enhance local accessibility.
 - Address barriers to travel, including the use of concessionary fares schemes
- 5.3 Policy TR5 also makes reference to improving connectivity to local airports which is supported by the evidence provided in the LTP in Appendix F “improved international connections through Leeds

Bradford and Manchester Airports". This element is included in the LIP and other strategic plans.

Part b)

- 5.4 Policy TR5 provides a clear, effective and soundly based strategy to promote sustainable transportation, manage the demand for travel and provide transport infrastructure. However other policies within the plan, TR1, TR3 and TR7 are also instrumental to achieving these objectives. The Transport and Movement Policies within the Plan, including TR5 are all aligned with NPPF and the LTP, and this strategy along with the LIP and WY+TF will provide the basis for providing the transport infrastructure necessary to facilitate the development proposed within the Plan.

Part c)

- 5.5 Policy TR5 is not specifically designed to consider existing traffic congestion and pressure points. The policy aims to support communities across the district to access key services and provide sustainable transport opportunities. Paragraph 5.2.44 of the Plan identifies how investment will be made to enhance connectivity in those areas and communities poorly served by transport.
- 5.6 The issues of traffic congestion and pressure points have been addressed through the work undertaken within the District Wide Transport Study (EB023) where specific corridors for further study and intervention have been identified. Section 7 of the District Wide Transport Study focuses on the Preferred Option for spatial development in the district, investigates the likely transport impacts of the future developments and identifies 10 key transport corridors in the district that will be expected to carry increased transport demand due to the future preferred option developments. Policies to address these issues along with infrastructure requirements are considered within the Sub-area policies and addressed within the infrastructure plan, along with other plans including the WY+TF and the Local Transport Plan.