

East Riding Local Plan
Sustainable Transport
Supplementary Planning
Document

Consultation Statement
April 2016



EAST RIDING

OF YORKSHIRE COUNCIL

Contents

1. Background.....	3
2. Consultation.....	3
3. Consultation Responses and Main Issues	4
4. Main changes to the SPD	4
Appendix 1: Summary of representations.....	6

1. Background

- 1.1 In preparing Supplementary Planning Documents (SPDs), the council is required to follow the procedures laid down in the Town and Country Planning (Local Planning) (England) Regulations 2012¹, and its adopted Statement of Community Involvement (SCI) (January 2013)².
- 1.2 Regulation 12 stipulates that before adoption of a SPD, the local planning authority must prepare a statement setting out:
- The persons that local planning authority consulted when preparing the SPD;
 - A summary of the main issues raised by those persons, and;
 - How those issues have been addressed in the SPD.
- 1.3 This Consultation Statement accompanies the Sustainable Transport SPD. The SPD provides guidance on how certain parts of Policies EC4 (enhancing sustainable transport) and S8 (connecting people and places) of the Local Plan Strategy Document are to be implemented.

2. Consultation

- 2.1 Preparation of the draft SPD involved consultation and engagement with a working group of planning agents and a variety of departments from across the Council. A scoping meeting was held in June 2013 to help identify potentially useful content for the draft SPD. The working group was then consulted on an early draft in February 2014 and on a further draft in April 2014. Where appropriate comments from previous Local Plan consultation events were incorporated into the draft SPD before the document was made available for public consultation.
- 2.2 The draft SPD, Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment (HRA) Screening Opinion were made available for statutory public consultation between Monday 23 June and Monday 4 August 2014. A wide range of stakeholders were consulted, including the following bodies and persons:
- All Town and Parish Councils;
 - Consultees registered on the Local Plan database who had previously made representations on the sustainable transport policies (policy S8 and EC4) at any stage in the East Riding Local Plan process;
 - Duty to Cooperate Bodies³;
 - Elected Members;
 - Planning agents registered on the Local Plan database; and
 - Specific Consultation Bodies⁴.

¹ Available to view from: <http://www.legislation.gov.uk/ukxi/2012/767/contents/made>

² Available to view from: <http://www2.eastriding.gov.uk/environment/planning-and-building-control/east-riding-local-plan/statement-of-community-involvement/>

³ Listed in Appendix D of the Council's Statement of Community Involvement (SCI)

⁴ Listed in Appendix D of the Council's Statement of Community Involvement (SCI)

- 2.3 A press release was issued, which subsequently led to articles in the East Riding Voluntary Action Service (ERVAS) newsletter and a Town and Parish Council newsletter ('Parish News') in July 2014. The consultation was also reported at Planning Committee.
- 2.4 The SPD and associated documentation was made available for inspection on the council's website⁵ and in all customer service centres and main libraries. Comments were invited in writing, no later than Monday 4 August 2014, either by post or email.

3. Consultation Responses and Main Issues

- 3.1 A total of 13 representations (76 individual comments) were received to the public consultation. A summary of these representations, together with the council's response is available to view in Appendix 1.

Highways England

- 3.2 Highways England have shown their support for the information provided in the SPD. They have also identified important stages in the travel planning process that they will have an active role.

Targets and timeframes

- 3.3 In addition to setting targets for the percentage of trips by different modes to a development, Highways England have requested that Transport Assessments and Travel Plans would expect targets to relate to the peak hour vehicle trip generation for developments that are likely to impact on the Strategic Road Network.

Securing a Travel Plan

- 3.4 Consultees have raised concerns that the guidance would result in an increase in the need for S106 legal agreements. S106 agreements can delay the implementation of development and in some cases make a development unviable.

Parking Guidance

- 3.5 One of the main issues raised by consultees was the thought that the Council would apply the guidance rigidly rather than using the figures as guidance. This makes the guidance look restrictive when compared to the Council's previously published maximum parking standards.

4. Main changes to the SPD

- 3.6 All responses to the draft SPD public consultation have been considered in preparing the final (adoption) version of the SPD. It was not always possible or appropriate to make changes to reflect every consultation response. This is because there are often conflicting opinions and evidence on the preferred way forward. The main changes are summarised as follows:

⁵ www.eastriding.gov.uk/spd

- Amendments to bring the document up to date with National Planning Practice Guidance following the withdrawal, in October 2014, of The Department for Transport Document (March 2007) 'Guidance on Transport Assessment'. This involved clarifying that the thresholds for requiring Transport Statements/ Assessments and Travels are still appropriate.
- Amendments to the Travel Plan flowchart to clarify individual roles in the Travel Plan process and to include a reference to the use of Cesus trip data.
- Further clarification that the use of planning conditions and section 106 legal agreements will be considered on a case by case basis.
- Amendments to make clear when Highways England should be involved in Transport Statements, Assessments and Travel Plans
- Clarification that the Travel Plan tool kit measures will not be applied rigidly.
- Clarification of the role and requirements of a Travel Plan Co-ordinator.
- Clarification that it is the trip projections identified by the Transport Assessment, which predict the impact of a scheme, will form the basis/ structure for the Travel Plan submitted alongside the Planning application.
- Amendments to update an error in Appendix A – threshold for a TA/TP at 'Assembly and Leisure' (D2) was 1,000m² and changed to 1,500m².

Appendix 1: Summary of representations

Comment No	Respondent	Section of Draft SPD	Summary of Comment	East Riding of Yorkshire Council Response
TSPD/1	Humber Archaeology Partnership	Sustainable Transport SPD 2014 (general comment)	No general comments to make on the current consultation for this draft SPD. However, if future consultations on this topic include any more specific details for individual developments, then we would welcome the opportunity to comment.	Humber Archaeology Partnership will be consulted on further consultations on planning policy or guidance relating to this topic area, as well as individual planning applications were appropriate.
TSPD/2	Mr M Martin	Sustainable Transport SPD 2014 (general comment)	Agree better public transport links and healthier ways of travel is needed. How much public input has there been and used in the content? Traffic calming measures ie humps cause me pain in the back at slow speed so am against them, safer pavements yes but we need cycles off them and back on the roads, the document seems to cover all the aspects we need but the last one.	The SPD does not encourage the use of cycles on pavements nor does it specifically promote speed humps. This is considered to be in conformity with national policy and a guidance which states, National Planning Policy Guidance Paragraph: 008 Reference ID: 42-008-20140306 states; <i>' While Travel Plans are intended to promote the most sustainable forms of transport, such as active travel, they should not be used to justify penalising motorists – for instance through higher parking charges, tougher enforcement or reduced parking provision (which can simply lead to more on street parking). Nor should they be used to justify aggressive traffic calming measures, such as speed humps.'</i>
TSPD/3	Skidby Parish Council	Sustainable Transport SPD 2014 (general comment)	Please note that Skidby Parish Council have studied the document and have no comments to make.	Noted.
TSPD/4	Marine Management Organisation	Sustainable Transport SPD 2014 (general comment)	The Marine Management Organisation (MMO) has no comments to submit in relation to this consultation.	Noted.
TSPD/5	Environment Agency	Sustainable Transport SPD 2014 (general comment)	No comments to make on the draft document.	Noted.
TSPD/6	Hook Parish Council	Sustainable	Support the notion of any new businesses moving into the area should,	Noted. The SPD does not set a requirement for Transport

Comment No	Respondent	Section of Draft SPD	Summary of Comment	East Riding of Yorkshire Council Response
		Transport SPD 2014 (general comment)	in the planning stage, provide/supply an area large enough for customers to park when using their facilities. Not in favour of every applicant having to write a transport/travel plan in respect of applications for one-off housing/garages etc.	Statements/ Assessments or Travel Plans for one-off housing / garages. The guidance thresholds for requiring a Travel Plan are provided in Appendix A of the SPD.
TSPD/7	Mr Alastair Welch Natural Engalnd	Sustainable Transport SPD 2014 (general comment)	<p>Natural England support the creation of a Draft Sustainable Transport SPD. Travel Plans should encourage sustainable forms of transport for all developments and Parking Guidance should ensure that sustainable forms of transport are provided for. This can contribute towards the reduction of air pollution levels and help mitigate against the effects of climate change. Section 106 agreements can be used to help implement these.</p> <p>Multi-functional green infrastructure can perform a range of functions including improved flood risk management, provision of accessible green space, climate change adaptation and biodiversity enhancement. Critically green infrastructure provides opportunities to create safe and attractive car free transport corridors.</p> <p>Para 109 of the National Planning Policy Framework (NPPF) states that the planning system should contribute to and enhance the natural and local environment by recognising the benefits of green infrastructure and ecological networks (which could be used as cycle paths and walkways where appropriate), minimising impacts on biodiversity, and providing net gains in biodiversity where possible. Achieving these objectives through the Local Plan is critical to the delivery of sustainable development and compliance with national policy. Natural England would encourage the incorporation of multifunctional GI within new developments where possible. Evidence and advice on green infrastructure, including the economic benefits of GI can be found on the Natural England GI web pages. Darlington's GI Strategy should also prove useful in this respect.</p>	<p>Strategy Policy ENV5 (Strengthening green infrastructure) identifies the need for new developments to incorporate existing and new Green Infrastructure within their designs. The Council proposes to produce a separate SPD on this topic.</p> <p>Welcome support for the SPD</p>
TSPD/43	Local Transport Projects	Para 1.3	Policy Context - Recent national guidance on Transport Assessments, Transport Statements and Travel Plans has been issued within 'Planning Practice Guidance - Travel Plans, Transport Assessments and Transport Statements in Decision-taking'. Should reference to this document and its principles be outlined within this section.	The SPD has been updated in line with the changes to National Planning Practice Guidance.
TSPD/45	Local Transport Projects	Para 1.8	Welcome the proposed use of the DfT thresholds and would recommend that they are applied in a consistent manner.	The Department for Transport thresholds for Transport Statements/ Assessments and Travel Plans has now been revoked. However the Council believe the thresholds still

Comment No	Respondent	Section of Draft SPD	Summary of Comment	East Riding of Yorkshire Council Response
				provide an appropriate starting point for assessing the need for Transport Statements/ Assessments and Travel Plans. Therefore the SPD will continue to use the thresholds.
TSPD/46	Local Transport Projects	Para 1.9	Welcome the comment that "early pre-application discussions between the developer and the Council's Highway Development Management are strongly recommended to determine the level of assessment that may be required" as establishing an appropriate scope at an early stage can has a positive outcome for all parties involved in the TS/TA/TP process.	Noted.
TSPD/47	Local Transport Projects	Para 1.11	We would agree that the aim of a Travel Plan is to improve accessibility for all modes of travel. However, we would not agree that the aim of a Travel Plan is to improve safety. Although safety is clearly an important consideration we would suggest that it is the role of the Transport Statement/Assessment to address such matters.	The Transport Statement and Transport Assessment does need to take account of highway safety issues as outlined in paragraph 32 of NPPF. This information should then be used in the preparation of the Travel Plan. NPPF Paragraph 36 notes that Travel Plans are a key tool for facilitating the creation of safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians.
TSPD/48	Local Transport Projects	1.12	It is not clear how mitigation measures within the TA (i.e. junction improvements) can form the basis of the TP. It is agreed that the TA and TP should be prepared in conjunction with one another but would suggest that the wording is changed to reflect that it is the trip projections within the TA that inform the TP, not the proposed mitigation measures.	The wording has been amended to clarify that it is the trip projections identified by the Transport Assessment, which predict the impact of a scheme, will form the basis/ structure for the Travel Plan submitted alongside the Planning application.
TSPD/49	Local Transport Projects	Figure 7 Travel Plan Flow Chart	TRICS data alone can be used to provide person trip generation projections but it can also be used in combination with local census travel to work data (and other datasets) to establish person trip generation. It is recommended that this is noted within the Figure. Can the model S106 Agreement be provided as an appendix to this SPD so that developers/applicants know how funding towards the Travel Plan will be structured? Is there scope to increase the amount of detail provided in Figure 1 for the 'post-planning' stages	Fig 1 has been updated to include reference to the use of relevant trip data including local Census travel to work data. A standard template for S106 agreements is being prepared which will be linked to the SPD in due course. The method of monitoring and reviewing a Travel Plan will be considered on a case by case basis and set out when the Travel Plan measures are drawn up. More information is provided in the Evaluation of Travel Plans section of the document.
TSPD/44	Local Transport Projects	1.7	Appendix A – The quoted threshold for a TA/TP at 'Assembly and Leisure' (D2) sites is 1,000m ² which is lower than the DfT's suggested threshold of 1,500m ² . Is this an error, if not, what is the reason for the difference?	1000 m ² was shown in error and the table has been amended to show 1,500m ² .
TSPD/41	Local Transport Projects	Title	Would it be more accurate if the document were titled 'Travel Plans & Parking Provision SPD' (or something similar) to better reflect the content (Travel Plans and Parking) of the document? As, with the	The title of the document is considered to suitably reflect its content.

Comment No	Respondent	Section of Draft SPD	Summary of Comment	East Riding of Yorkshire Council Response
			current title 'Sustainable Transport SPD' it is questionable as to whether one would expect to find parking standards within a document with this title	
TSPD/50	Local Transport Projects	1.14	The sentence states that " the first step in the production of a Travel Plan is to carry out a Transport Assessment (or Statement)". However, with reference to Appendix A it is understood that if a Transport Statement was required then a Travel Plan would not be required. It is recommended that the approach is consistent throughout the document. Similar to Figure 1 comment above, is it worthwhile highlighting other person trip generation methods such as the use of local travel to work census data?	Removed reference to Transport Statements to provide consistency in the SPD. Amended paragraph 1.14 to state that other person trip data such as the use of local travel to work census data can be used to estimate a developments overall likely impact on travel.
TSPD/51	Local Transport Projects	1.17	This comment also applies to a number of other places within the document. Elsewhere (1.53) it is outlined that Travel Plan measures and requirements can be secured by means of a planning condition (we would consider this to represent a valid approach). However, at 1.17 (and other places) reference is made to only the Heads of Terms of a Section 106 Agreement with no reference to the role of planning conditions and how this method can be used to successfully secure Travel Plan measures and requirements.	Amendments throughout the document have been made to clarify that planning conditions may be used and when they are appropriate. The use of planning conditions has also been added in table 1 to further clarify the position.
TSPD/52	Local Transport Projects	1.19	Welcome all of the points that demonstrate the assistance and partnership approach that the Council can provide in terms of developing Travel Plans.	Noted.
TSPD/53	Local Transport Projects	1.20	Disagree with the third bullet point as it is not realistic or practical for Transport Assessments and Draft Travel Plans to be available prior to pre-application discussions as it is these pre-application discussions that determine/shape what needs to be included within Transport Assessments and Travel Plans.	Amended paragraph 1.20 to provide a more practical approach.
TSPD/55	Local Transport Projects	Table 2 Stages in the basic (Workplace) Travel Plan Process	Row 6 - As per previous comments, would add that Travel Plans can be secured by appropriate planning conditions. Row 7 - Outlines the role of publicity and promotional Travel Plan measures. Within the Table, the responsibility for delivering this lies with the Occupier. We would suggest that to maximise potential Travel Plan benefits there is likely to be a role for ERYC in terms of producing/supplying/distributing publicity and promotional materials such as walking and cycling maps that have already been produced for a number of East Riding settlements.	Row 6 - The majority of Travel Plans will be secured by means of a S106 agreement. Paragraph 1.49 identifies when planning conditions may be appropriate. However a reference to the use of planning conditions has been added to row 6 for clarity. Row 7 - it is the responsibility of the applicant or developer to organise the implementation of monitoring and review of their Travel Plan. Paragraph 1.18-1.19 identifies what the Council can do to help with this.
TSPD/54	Local Transport Projects	1.23	In a number of ways the use of the Travel Plan checklist can be useful to those people preparing Travel Plans. However, we would also outline	It is not the Council's intension for the tool kit to be applied prescriptively. The tool kit is a starting point to aid the

Comment No	Respondent	Section of Draft SPD	Summary of Comment	East Riding of Yorkshire Council Response
			that we would not wish for the checklist to be too prescriptively applied as each site and its transport characteristics and circumstances are different and this uniqueness/difference needs to be reflected in individual Travel Plans.	preparation of a Travel Plan. Paragraph 1.35 states how measures will vary depending on the circumstances of the development.
TSPD/57	Local Transport Projects	Table 3 Production of a Residential Travel Plan	Row 3 - As per previous comments, would add that Travel Plans can be secured by appropriate planning conditions. Row 4 - Should ERYC Travel Plan Officer be listed as a potential member of the liaison/steering group? Row 5 - As per comment on Row 7 of Table 2 and the role of ERYC in publicity and promotional measures to maximise Travel Plan benefits. Row 7 - No mention of ERYC Travel Plan Officer role in the responsibility column. This is not consistent with Row 8 of Table 2.	Amended text in paragraph 1.49 to clarify that the mechanism for securing a Travel Plan will be agreed on a case-by-case basis Updated Table 3 rows 3,4 & 7 to include a responsibility of the ERYC Travel Plan Officer.
TSPD/58	Local Transport Projects	1.29	Welcome the production of interim Travel Plans for outline and speculative planning applications.	Noted.
TSPD/59	Local Transport Projects	1.35	As per previous comments, would add that Travel Plans can be secured by appropriate planning conditions.	Amended text in paragraph 1.49 to clarify that the mechanism for securing a Travel Plan will be agreed on a case-by-case basis
TSPD/60	Local Transport Projects	1.41	Within the tool kit of measures no consideration has been given to measures to promote car sharing which can form an important part of Travel Plans (particularly at more rural sites where car sharing is often the only viable sustainable transport mode). Similarly, no reference is provided to the potential for use of electric vehicles or the potential role of personalised travel planning as part of the tool kit. Within the 'walking' and 'cycling' sections it is felt that the 'provision of site specific walking/cycling information (e.g. maps/leaflets/online references) would be a useful addition to the listed measures.	Car sharing and personalised travel planning has been added to the toolkit of measures Additional text has been added to show that information could be presented in the form of maps, leaflets and online references. The list of tool kit measures is not definitive list and other measures such as the use of electric vehicles may be appropriate in some circumstances.
TSPD/61	Local Transport Projects	1.43	As per previous comments, would add that Travel Plans can be secured by appropriate planning conditions.	Amended text in paragraph 1.49 to clarify that the mechanism for securing a Travel Plan will be agreed on a case-by-case basis
TSPD/62	Local Transport Projects	Table 5 Travel Plan Evaluation Criteria	Row C - Would it be useful to include guidance on the typical suggested length of a Travel Plan Co-ordinator appointment and provide details as to their anticipated role in general? Row E - As per previous comments, would add that Travel Plans can be secured by appropriate planning conditions.	Text has been added to the paragraphs 1.42 and 1.43 to clarify the role of the Travel Plan co-ordinator and the expected term of appointment. Who has responsibility for monitoring compliance should be clear. Monitoring requirements should only cease when there is sufficient evidence for all parties to be sure that the travel patterns of the development are in line with the objectives of the Travel Plan. This includes meeting the agreed targets over a consistent period of time. At this point the Travel Plan would

Comment No	Respondent	Section of Draft SPD	Summary of Comment	East Riding of Yorkshire Council Response
				become a voluntary initiative.
TSPD/63	Local Transport Projects	1.48	Is it expected that the Travel Plan Co-ordinator would undertake this monitoring?	Yes or, as stated in paragraph 1.49, if agreed prior to permission being granted, the Council can undertake monitoring although this does involve a fee.
TSPD/64	Local Transport Projects	1.50	Could financial payments be levied against all developments or only the sufficiently large developments? It is assumed that penalties (financial payments) would be commensurate with the level of exceedance?	Planning obligations have to be; <ul style="list-style-type: none"> • necessary to make the development acceptable in planning terms • directly related to the development; and • fairly and reasonably related in scale and kind to the development.
TSPD/65	Local Transport Projects	1.51	Paragraph 1.48 refers to undertaking monitoring "normally annually". However, 1.51 refers to Council reviews taking place on a 3 to 5 year basis. Clarification is sought as to whether Travel Plan targets should be set on an annual basis (seemingly in line with para 1.48) or on a 3 to 5 year basis (seemingly in line with para 1.51)?	Paragraph 1.48 refers to submitting annual monitoring results to the Council. Paragraph 1.51 refers to reviewing the Travel Plan after 3 or 5 years
TSPD/66	Local Transport Projects	1.52	As per previous comments, would add that Travel Plans can be secured by appropriate planning conditions.	Amended text in paragraph 1.49 to clarify that the mechanism for securing a Travel Plan will be agreed on a case-by-case basis
TSPD/67	Local Transport Projects	1.53	Within the final line between 'Travel Plan' and 'can' is it worth adding the three words "and its implementation"?	The text has been amended to include 'and its implementation'
TSPD/68	Local Transport Projects	1.54	From our experience, the majority of Travel Plans involve the delivery of outcomes and the application of targets, not just at "more complex schemes" as suggested by para 1.54. Therefore, can more information be provided as to when S106 Agreements will be required in order to provide transparency on when the Council will look to utilise the S106 route (rather than planning conditions)?	S106 agreements will be used when a planning condition can not be lawfully used to secure the Travel Plan measures that involve the following; <ul style="list-style-type: none"> • restrict the development or use of the land in any specified way • require specified operations or activities to be carried out in, on, under or over the land • require the land to be used in any specified way; or • require a sum or sums to be paid to the authority on a specified date or dates or periodically.
TSPD/69	Local Transport Projects	1.57	We would suggest that developers have very little, if any, input in terms of the operation of privately operated public transport services.	The paragraph refers to a development's impact on highway capacity or public transport services.
TSPD/70	Local Transport Projects	Table 7 Bicycle Parking Guidelines	Accessible Row - Can "larger developments" be defined?	The text has been amended on this row to clarify when cycle changing facilities may be appropriate.
TSPD/71	Local Transport Projects	2.22	As a general point (and as per a previous comment in relation to Travel Plans) there is no reference to guidelines in terms of providing car share bays (+2 bays) at proposed developments. The provision of preferential parking for people that car share (and the appropriate management of	The need to consider the provision of car share bays has been added to paragraph 2.24.

Comment No	Respondent	Section of Draft SPD	Summary of Comment	East Riding of Yorkshire Council Response
			such provision) can be a useful tool in terms of reducing single occupancy vehicle use.	
TSPD/72	Local Transport Projects	2.26	Is echelon parking considered to be a suitable parking option by the Council and if so what angle(s) would the bays be required to be provided at?	The Council has not set design standards for specific types of parking. The SPD refers to best practice for design specifications, such as Manual for Streets and Parking What Works Where.
TSPD/73	Local Transport Projects	2.27	Generally welcome the flexible approach that is proposed	Noted.
TSPD/74	Local Transport Projects	Table 8 Car Parking Guidelines	<p>Food retail - Is it proposed that food retail stores of all sizes (i.e. established supermarkets, discount supermarkets, convenience stores etc) have the same parking guidelines?</p> <p>A2 Offices – Within the use classes order ‘A2’ is classed as ‘financial and professional services’ not ‘offices’. Offices (other than a financial or professional services office) fall into the ‘B1 Business’ use class. Do the Council consider that there should be a difference in parking guidelines for A2 and B1 uses as is currently identified within the Table? An alternative (although the merit of this suggestion has not been investigated) could be to combine the A2 and B1 guidelines into a single appropriate category.</p> <p>The B8 use class is ‘Storage and Distribution’ not ‘warehouse’ as indicated in the Table. It is also unclear as to why a typical threshold has not been specified for this land use?</p> <p>C3 Housing – It is unclear as to whether the visitor parking requirement (1 space per 4 houses) applies to all dwelling sizes or just those with in excess of six bedrooms (as it is suggested within the Table). It is felt that this point should be clarified as well as the rationale for the proposed level of provision.</p> <p>C3 Housing – To assist developers/applicants in providing high quality and appropriate developments in the East Riding it is felt that some consideration of what residential parking types are suitable at residential developments should be provided within this document. For example, should garages be provided and if so what dimensions are required? Does the Council support the use of driveways and if so what lengths/widths are required taking into account space needed to open garage doors etc? Are parking courts considered to represent an appropriate residential parking option? Would the Council support the use of on-street parking and if so in what situations? What other parking options would the Council recommend/consider? Although Appendix C provides some information in terms of ‘parking – what</p>	<p>The guidance provides a starting point for food retail developments. The provision should then increase or decrease from this point with justification from the development's needs.</p> <p>A2 uses have different guidelines that suit the nature of the development. It should be noted that these figures are a starting point and will not be applied rigidly.</p> <p>The number of staff operating in use class B8 developments can have considerable range with no correlation to the size of the development. Therefore it is considered appropriate to relate the level of parking provision to the proposed level of staff on the site rather than floor area.</p> <p>C3 - the level of visitor parking has been amended to; 1 visitor space per 4 houses.</p> <p>The Council has chosen not to set specific design criteria or standards for development as it generally stifles innovation. The document encourages pre application discussions with the Council to help identify appropriate designs for individual sites. The document also provides reference material of best practice such as, Manual for Streets and Car Parking What Works Where.</p>

Comment No	Respondent	Section of Draft SPD	Summary of Comment	East Riding of Yorkshire Council Response
			<p>works where' this is relatively brief and from our experience of the Highway Development Control / planning application process it is felt that detailed guidance on the different parking types and their suitability is needed and would benefit developers/applicants as well as the Council. Updated information on the requirements for turning heads/areas within the development would also be considered beneficial. It is recognised that some information on turning areas, parking types and overall street design in general is provided within the 'East Riding Highway Design Guide', however, this document was produced in the year 2000 and since its publication other documents that cover street design in detail, such as 'Manual for Streets' (DfT, 2007) and 'Manual for Streets 2' (CIHT, 2010), have been published and have generally being well received nationally in terms of providing guidance advice for achieving high quality and innovative street design.</p> <p>D1 – Would a threshold that relates to staff/student numbers (i.e. columns 2 and 3 of the Table) be more appropriate than a GFA threshold which does not relate to the previous columns? This would ensure consistency with the other land uses in the Table.</p> <p>It is noted that some land uses have not been assigned parking guidelines despite their listing within Appendix A. These land uses include A3 restaurants and cafes, A4 drinking establishments, A5 hot food take aways and C1 hotels. It is unclear as to why these uses do not have parking guidelines.</p> <p>As previously outlined, would it be worthwhile to provide some guidelines in terms of car sharing provision?</p>	<p>The typical thresholds are based on the size of developments that are being used as an example. This approach is considered to be a consistent approach with other uses in the table.</p> <p>The Council has not chosen to provide a guidance figure for those uses you have listed. The parking requirements for those uses can change dramatically depending on the nature of the site and its surroundings. Parking provision for these uses should be considered on a case by case basis with early discussion with the Council's Highway Management Officers.</p>
TSPD/75	Local Transport Projects	Appendix B - Travel Plan Checklist	<p>Table C, Row E – Is it essential to set targets for individual travel modes (i.e. car, public transport, cycle and walking) or can a target be set for car travel and the other sustainable modes grouped together? For example, if you set individual mode targets (i.e. cycle modal split of 10% and pedestrian modal split of 10%) and surveys reveal the modal split to be 8% cycling and 15% pedestrian you have a greater proportion of sustainable travel (23% - which is desirable) but would technically would have missed the 10% cycling target.</p>	<p>It is not essential to set targets for individual travel modes. It is important to set targets that are appropriate for the specific development site. Targets will be discussed on a case by case basis.</p>
TSPD/76	Local Transport Projects	Car Parking What works Where?	<p>Related to a previous comment, it is unclear why the definitions 'central', 'urban' and 'rural' have been used as they are not consistent with other definitions in the document (e.g. towns, villages, rural service centre etc). Also within the East Riding context what is the difference</p>	<p>The diagram refers to the guidance published in Car Parking: What works where. The table has been amended to clarify that the Central column should refer to urban centre locations, such as town centres. The table is shown in the document as</p>

Comment No	Respondent	Section of Draft SPD	Summary of Comment	East Riding of Yorkshire Council Response
			<p>between 'central' and 'urban'? Some of the assignments within the 'urban' on-plot column appear a little odd with 'detached garages' and 'detached garages' to the front assigned a 'no'. It is understood that a number of recent developments in urban areas of the East Riding have been provided with such garages. Diagrams/explanations of the different parking types would also be useful.</p>	<p>guidance and not a rigidly applied design standard.</p>
TSPD/25	Highways England	When is a travel plan required	<p><u>When is a Travel Plan Required</u> The SPD references that the guidance set out in the Department for Transport [DfT's]/ Department for Communities and Local Government [DCLG] 'Guidance on Transport Assessment' [GTA] for determining when a Travel Plan is required. However, the Agency supports the comment at Paragraph 1.8 stating that these thresholds are for guidance purposes and should not be read as absolute. When a development is likely to generate traffic at the SRN, the Agency will consider each individual development on its merit and may require the production of a Travel Plan outside of the thresholds presented within the GTA. Paragraph 1.9 of the SPD identifies that <i>'early pre-application discussions between the developer and Council's Highway Development Management section are strongly recommended to determine the level of assessment that may be required.'</i> When such discussions are in relation to a development which is likely to generate traffic at the Strategic Road Network [SRN], the Agency would wish to be involved in the discussions at the earliest opportunity in order to ensure that the level of assessment for the SRN is identified. The Agency generally agrees with the circumstances set out at Paragraph 1.10 for when a Transport Statement/Assessment and Travel Plan may be required and would wish to be consulted on any developments falling in to these categories should it be likely that their development traffic will impact on the SRN.</p>	<p>Additional text has been added to paragraph 1.8 to ensure developers and agents contact Highways England when their development is likely to generate traffic at the Strategic Road Network.</p>
TSPD/27	Highways England	Contents of a travel plan	<p><u>Contents of a Travel Plan</u> The Agency generally supports the requirements set out in Table 1 of the SPD. However, in relation to 'Targets and Time Frames', it is worth highlighting that in addition to the percentage of trips by different modes, the Agency would usually expect targets to relate to the peak hour vehicle trip generation that is agreed in a Transport Assessment/Statement for developments that are likely to impact on the SRN. Although the principles set out in Table 2 and 3 of the SPD are also</p>	<p>Table 1 Row 6 (Targets and Time Frames) - Additional text has been added to highlight the need for targets to relate to the peak hour vehicle trip generation. Table 2 (stage 2) & table 3 (stage 1a) - Additional text has been</p>

Comment No	Respondent	Section of Draft SPD	Summary of Comment	East Riding of Yorkshire Council Response
			<p>generally acceptable, it is worth highlighting that for sites which are likely to impact on the SRN, the Agency will expect the number of vehicle trips at the SRN to be determined from the Transport Assessment and not only person trips as suggested in Stage 2 of Table 2 and 1a of Table 3.</p> <p>In relation to speculative developments and outline applications, the Agency generally supports the content of Table 4 of the SPD. Where necessary, the Agency would wish to be involved in all stages of the Travel Plan from the Interim to Full Travel Plan stage.</p>	<p>added to highlight the need for Sites that create a likely impact on Highways England road network will need to estimate the vehicle trips on the strategic road network.</p> <p>Additional text has been added to paragraph 1.21 to clarify Highways England's involvement in the Travel Planning process.</p>
TSPD/26	Highways England	Producing a travel plan	<p><u>Producing a Travel Plan</u> Paragraph 1.12 of the SPD states that ‘the assessment of the impact of development on transport is integral to the subsequent production of a Travel Plan.’ However, the Agency would generally wish to see Travel Plans developed alongside Transport Assessments rather than after the assessment of the development’s impact, given that information from Travel Plans will inform Transport Assessments.</p> <p>Paragraph 1.14 identifies that the first step in the production of a Travel Plan is to carry out a Transport Assessment (or Statement) of the proposed development, including an estimation of its likely overall impact on travel (i.e. the anticipated number of person trips to and from the site that will be generated by the development). The Agency agrees that the number of person trips is an important indicator but would also wish to see the number of vehicle trips arising at the SRN in both Transport Assessments and Travel Plans.</p> <p>The Agency welcomes the reference at Paragraph 1.18 to the Highways Agency being involved in the partnership approach to the production of Travel Plans. The Agency also agrees with Paragraph 1.21 in that targets should relate to the circumstances of each individual scheme/premises and when a development is likely to generate traffic on the SRN, the Agency is keen to work with the Council and developers to ensure that targets set are suitable and realistic.</p>	<p>Amended text to delete the word 'subsequent', the section now states;</p> <p>Additional text has been added to paragraph 1.14 to incorporate the comments made by Highways England;</p> <p>Noted.</p>
TSPD/30	Highways England	Parking Guidance	<p><u>Chapter 2 Parking Guidance</u> This chapter sets out the principles of provision of parking for bicycles, motorcycles and cars. The principles set out are reasonable with car parking provision being provided within a range of values with full justification within the Transport Statement of Transport Assessment.</p>	Noted.

Comment No	Respondent	Section of Draft SPD	Summary of Comment	East Riding of Yorkshire Council Response
TSPD/29	Highways England	Approval, Securing, Monitoring and Review of Travel Plans	<p><u>Approval, Securing, Monitoring and Review of Travel Plans</u></p> <p>The Agency generally supports the principles set out in Table 5 and that under the headings ‘Monitoring of the Travel Plan’ and ‘Review of the Travel Plan’ in the SPD.</p>	Noted.
TSPD/31	Highways England	Sustainable Transport SPD 2014	<p>COMMENTS ON THE SCREENING DOCUMENT FOR SUSTAINABILITY APPRAISAL AND STRATEGIC ENVIRONMENT ASSESSMENT JUNE 2014</p> <p><u>Section 1 – Purpose of Sustainability Appraisal</u></p> <p>The Agency supports the general purpose of the SPD in that it aims to provide:</p> <p>Additional guidance on travel planning and parking provision and design, to supplement policies in the emerging East Riding Local Plan;</p> <p>Guidance on producing a travel plan and when a travel plan is needed in support of a planning application; and</p> <p>Help to ensure proposed developments provide appropriate level of parking for bike, motorcycles and vehicles.</p> <p>The Agency fully supports the use of travel plans as a mechanism to encourage the use of sustainable modes of travel to developments and manage down the traffic demand arising from developments. Where a development’s traffic has the potential to the impact on the SRN, the Agency would welcome any consultation in relation to a development’s travel plan at the earliest possible opportunity.</p> <p><u>Section 2 – Overview of the Proposed Transport SPD to be consulted on June-July 2014</u></p> <p>The Agency supports the purpose of the SPD and welcomes guidance on the range of approaches, guidelines and mechanisms required to deliver suitable Travel Planning, parking provision and parking design. When such matters relate to developments that are likely to generate traffic at the SRN, the Agency would wish to be consulted in relation to the preparation of travel plans and parking provision at the earliest opportunity.</p> <p><u>Section 3 – Sustainable Objectives and Assessment of Relevance/Impact</u></p> <p>Section 3 highlights how the SPD will potentially impact against each of East Ridings Sustainability Appraisal Objectives [SAO]. The impacts noted against the following objectives are of particular interest to the Agency:</p> <p>To improve accessibility and public transport links to key services and</p>	Noted.

Comment No	Respondent	Section of Draft SPD	Summary of Comment	East Riding of Yorkshire Council Response
			<p>employment areas – Beneficial effects; To improve air quality – Mixed effects; and To reduce the growth of road traffic – Mixed effects. The Agency fully supports the above noted objectives and is keen to work with the Council in achieving the objectives.</p> <p><u>Section 4 – Summary of Sustainability Appraisal of Strategy Policies to which the SPD relates</u> Table 2 of the document highlights that the SPD will not introduce adverse effects against the objectives of the Sustainability Appraisal. The Agency generally agrees that the SPD will not adversely affect the SAO listed.</p> <p><u>Section 5 – Habitat Regulation Assessment</u> The Agency has no specific comments in relation to Section 5.</p> <p><u>Section 6 – Conclusion and Screening Outcome</u> This section concludes that the SPD will not trigger the need for a Sustainability Appraisal / Sustainability Environment Appraisal. The Agency considers this conclusion to be appropriate.</p>	
TSPD/24	Highways England	Travel Plans	<p><u>Chapter 1 Travel Plans</u> The Agency fully supports the principle in Paragraph 1.1 that: <i>'The development of Travel Plans and Transport Assessment or Transport Statements should be an iterative process as each may influence each other.'</i> The Agency would wish to see Travel Plans developed alongside Transport Assessment/ Transport Statements in order for the information contained in all documents to correlate. For example, the traffic generation figures presented within Transport Assessments should be referenced within a corresponding Travel Plan. The Agency also supports the principle in paragraph 1.2 that Travel Plans can play an effective role in taking forward mitigation measures.</p>	Comments are welcomed
TSPD/32	Highways England	Sustainable Transport SPD 2014	<p><u>SUMMARY AND CONCLUSIONS</u> The Agency is fully supportive of the principles set out in the two documents. However, the commitments made are very dependent on how they are delivered which will determine whether a reduction in car drivers can be achieved.</p> <p>The measures are specifically aimed at new development and are unlikely to deliver a mode split change across the county. In order to deliver a change in mode split across the county East Riding of Yorkshire Council will need to commit to funding sustainable transport</p>	Noted. The Council's Local Transport Plan provides a framework that commits funding to sustainable transport schemes across the Authority's administrative area.

Comment No	Respondent	Section of Draft SPD	Summary of Comment	East Riding of Yorkshire Council Response
			schemes across the county.	
TSPD/28	Highways England	Toolkit of Travel Plan Measures	<u>Toolkit of Travel Plan Measures</u> The Agency supports the toolkit of measures listed in Paragraph 1.41 although would not wish to see developers limited by this list. The Agency would expect Travel Plans to provide a firm commitment to delivering a comprehensive package of measures which will reduce vehicle generation at the specific site.	The list of tool kit measures is not a definitive list and is to be used as a starting point. Test has been added to paragraph 1.35 to state that, ' Measures include but are not limited to;'
TSPD/13	Historic England	Sustainable Transport SPD	In terms of our area of interest, given the nature of the SPD, we would concur with your assessment that the document is unlikely to result in any significant environmental effects over and above those which were identified in the parent Core Strategy DPD. As a result, we would endorse the Authority's conclusions that it is not necessary to undertake a Strategic Environmental Assessment of the document.	Comment Welcomed
TSPD/12	Historic England	Sustainable Transport SPD	Thank you for consulting English Heritage about the above document. At this stage, we have no comments to make about its content.	Noted.
TSPD/14	Hull City Council	1.3	Last sentence: add brackets around 'Para 36' etc.	The wording in this section has been reviewed and minor changes have been made where it has been considered appropriate to do so.
TSPD/16	Hull City Council	1.5	Delete 'to'	Sentence has been reviewed - deleted 'the'.
TSPD/17	Hull City Council	1.9	1 st sentence : add 'the' before 'local highway'	Amendment made.
TSPD/18	Hull City Council	Table 6 Parking Guidance Zones	Other settlements etc: last sentence: replace 'all' with 'most' journeys (in general, development should not be permitted if it is accessible by motorised modes only)	Amendment made.
TSPD/19	Hull City Council	Table 7 Bicycle Parking Guidelines	Minimum numbers should be prescribed to ensure that cycle parking facilities are provided. It has been done for car parking so it should be fairly straightforward to do so for cycles.	The SPD provides guidance on cycle parking provision rather than prescriptive standards. This is to encourage designs that meet the specific needs of individual sites.
TSPD/15	Hull City Council	1.1	Last sentence: add 'Government guidance states that' before 'they should not' etc.	The wording in this section has been reviewed and minor changes have been made where it has been considered appropriate to do so.
TSPD/21	Hull City Council	Table 8 Car Parking Guidelines	Car parking standards should refer to ranges or to maximum provision (not minimum)	The levels of parking provision listed in table 8 are neither a minimum nor maximum. The parking provision figures are guidance and provide a starting point from which the developer can increase or decrease depending on the specific needs of their site.
TSPD/22	Hull City Council	2.28	In accordance with comment above, add 'no more than' before '1 space per 35m2'	The figures in table 8 are guidance and should not be applied as a standard.
TSPD/23	Hull City Council	Appendix C - Car Parking What works	Amend heading to 'Car parking: what works where'	Amended

Comment No	Respondent	Section of Draft SPD	Summary of Comment	East Riding of Yorkshire Council Response
		where?		
TSPD/20	Hull City Council	2.27	2 nd sentence: Amend to: 'Car Parking: What Works Where'	Amended
TSPD/8	Mr R Borrie	1.9	Since development in the East Riding is being led by East Riding Council through its Local Plan (which sets out housing allocations in considerable detail) would it not be more sensible for the Council itself to produce travel plans for each of the areas where it is proposing housing development? This approach would potentially speed-up the overall development process.	Paragraph 1.18 & 1.19 establishes what the Council can do to help implement the Travel Planning process for individual development sites. The Council does not have the resources available to produce Travel Plans for each housing allocation identified by the Local Plan.
TSPD/9	Mr R Borrie	2.14	I think this paragraph needs to be reviewed. It states 18% of the population of the East Riding does not have a car, but (a) this does not reflect local variations and (b) likely to be out of date and misleading for future planning purposes given that in many areas, such as Pocklington, the Council intends to increase the local population by a third, and motor traffic volumes by 50%. Furthermore, whilst it is probably correct to argue that good cycle parking provision can encourage uptake of cycling, the motor traffic growth envisaged by the Council is likely to have a far greater (and negative) impact – as a result of more cars and poorer road surfaces. It does rather seem here as if the Council is re-arranging deck chairs on the Titanic, rather than focussing its transport planning on the real challenge of maintaining a sustainable transport initiative against a backdrop of a substantial increase in car usage.	The reference to the 2011 Census provides the context for car ownership within the East Riding. This section on cycle parking design and provision is aimed at encouraging the use of cycles. Travel Plans will be produced using information on local context of each development rather than the average East Riding picture. The principles promoted by the SPD are already established by the ERLP policy context for which responses have already been received and considered prior to the ERLP Strategy Document's adoption.
TSPD/10	Mr R Borrie	2.14	Can the Council expand on the “opportunity to seek to modify travel demands and habits” which the Local Plan may bring? Whilst this is admirable in itself, other parts of the Local Plan propose significant population increases in the area, which will have a considerable (and as yet unquantified) impact on local transport infrastructure. I think the Council should explain in more detail how it will modify travel demand (i.e. reducing the need to travel and/or changing to more sustainable modes) whilst at the same time managing a dramatic increase in demand for travel in the region.	The Sustainable Transport SPD identifies opportunities to seek to modify travel demands and habits. A toolkit of measures is included within the SPD. The actual measures used in each development will vary depending on individual circumstances. The Transport Assessment quantifies travel demand by mode and influences development of the Travel Plan and associated measures to encourage modal shift to sustainable travel modes.
TSPD/38	Wykeland Group Ltd	Parking Guidance	Parking Guidance In almost all cases, ERYC has sought to tighten up its car parking standards, when compared to previous proposals (as set out in the ERYC Issues & Options – Transport Development Plan document) – both in terms of the actual level of provision and also in terms of the thresholds above which the standards apply. This sits against a backdrop of national guidance – quoted in the ERYC document – which notes that parking provision should be reasonable and should	The parking provision stated in the SPD is guidance and should be used as a starting point to help establish a site's individual parking need. The provision should not be read as a definitive standard. Previous versions of the Local Plan have proposed maximum parking standards. The SPD is different from previous consultations on the Local Plan Strategy Document. The SPD does not include maximum standards. The guidance in the SPD is considered to be in accordance with NPPF and NPPG.

Comment No	Respondent	Section of Draft SPD	Summary of Comment	East Riding of Yorkshire Council Response
			<p>meet the needs of the development (ERYC document paragraphs 2.2, 2.5, 2.6, 2.23 etc).</p> <p>The document includes some opportunity for flexibility but history shows that when these policies are implemented through the Planning process they are applied rigidly. The risk of Judicial Review results in the standards being applied rigidly and uniformly for every development in every area. There should be sufficient flexibility within the document for individual circumstances / requirements to be taken into account. The document quotes Policy EC4 of the Proposed Submission Strategy Document 2014 which notes that parking for new developments should reflect the site's accessibility, expected car usage on the site and the most efficient use of space. The Strategy Document also notes that different parking provision may be appropriate in different locations – eg town centres / rural settlements.</p> <p>Notwithstanding this, the ERYC Sustainable Transport document separates the Borough into two categories for the purpose of determining the parking provision – effectively towns and countryside areas. In doing so, it has not followed the guidance set out in its own Strategy document which also requires accessibility and expected car usage to be taken into account. The accessibility across the borough varies significantly and there should be flexibility within the standards for higher parking levels to be applied where necessary. The reference at paragraph 2.27 that the parking standards are to be used as 'starting point guidelines' is welcomed but as stated above, this rarely happens in practice.</p> <p>The Draft does not justify its thresholds and standards or set them within the context of the East Riding's rural character. The majority of ERY employment areas are outside major conurbations and the Draft provides no analysis of worker locations, settlement patterns, public transport options or working patterns (e.g. shift working and 24 / 7 operations).</p> <p>ERYC transport subsidies are becoming increasingly limited and public transport operators can only provide services which are viable. This means that even for established employment areas such as Melton, public bus services are limited therefore leaving workers with no option other than to use their cars. Flexible working, changing shift patterns and family responsibilities also limits the potential for car sharing.</p>	<p>SPD paragraph 2.6 states how parking provision should generally meet the anticipated level of demand. The SPD is considered to provide a flexible approach to allow individual developments to identify and provide for their own parking needs. Also paragraph 2.9 - Town Centres generally have greater public transport frequencies.</p> <p>The SPD does not justify the parking provision as it is considered to be a starting point for the developer to compare with their needs. The guidance requires developers and agents to consider their developments needs and provide parking based on that. The guidance suggests a higher parking provision for rural areas as a result of the lack of access to other modes of transport.</p> <p>SPD paragraph 2.7 states how sites with greater accessibility to town centre locations and public transport may result in the need to apply greater flexibility over how parking provision should apply.</p> <p>Additional text has been added to paragraph 2.9 to give further consideration to employment working patterns / transport options and how this may affect the parking provision.</p>

Comment No	Respondent	Section of Draft SPD	Summary of Comment	East Riding of Yorkshire Council Response
			<p>The typical thresholds above which car parking standards should apply seem unnecessarily low and therefore restrictive. No justification has been given as to why the threshold has been reduced by 50 – 80% of the previous threshold. The previous thresholds (set out in the Strategy Document) were broadly based upon the same thresholds as those requiring Transport Assessments / Travel Plans and thus had some bearing on a scale of development above which a ‘significant level of traffic’ was assumed to be generated. The current thresholds appear to have been set on an entirely arbitrary basis and are in our view, unreasonably low.</p> <p>The standards set in the current document include a range of parking provision for many of the land uses. However, in the case of both A1 (food & non-food), B1 and B2, the range now proposed uses the previous standard as the maximum level of provision which could be applied. This is inconsistent with NPPG and the ERYC Strategy document which accept that the car parking provision should meet anticipated demands. Looking at other neighbouring authorities, the ERYC standards for B1 and for A1 appear to be too onerous and could represent a deterrent to future occupiers moving to the area</p> <p>B1: ERYC Sustainable Transport SPD – 1 / 30sqm rural; 1 / 30-60sqm towns ERYC Transport DPD – 1 / 30sqm Hull CC – 1 / 25sqm (from saved Local Plan) North Lincs – 1 / 20sqm business parks ; 1 / 30sqm office</p> <p>A1 (Food): ERYC Sustainable Transport SPD – 1 / 14-20sqm rural; 1 / 18-25sqm towns ERYC Transport DPD – 1 / 14sqm Hull CC – 1 / 10-25sqm (from saved Local Plan) North Lincs – 1 / 14sqm</p> <p>The latest ERYC standards quote B8 parking provision on the basis of the number of staff working at the busiest period. This would be very difficult to determine as part of an outline application and could also be difficult with a detailed application, even if the end –user is known. The parking standard should be based upon an appropriate gross floor area,</p>	<p>The site area thresholds have changed as parking provision needs to be considered for all sizes of development.</p> <p>The parking provisions stated in the SPD are to be used as a starting point and should be read as guidance. The thresholds have changed to provide guidance for a wider range of developments.</p> <p>The guidance is not arbitrary, it relates to development parking schemes provided across the authority.</p> <p>The SPD does not set parking standards. The parking provision stated in the SPD is not guidance and should be used as a starting point in establishing a sites parking needs. Other local authorities still use maximum parking standards. The guidance is based on experience of standards applied through RSS and adjusted to eliminate past problems of under provision. The guidance therefore provides a robust starting point for considering parking provision for new development adjusted to circumstances in the East Riding based on the findings of built developments in the Council's administrative area.</p>

Comment No	Respondent	Section of Draft SPD	Summary of Comment	East Riding of Yorkshire Council Response
			<p>with scope for this to be varied to reflect the demands of the proposed development.</p> <p>The details set out in Appendix C 'Car Parking – What Works Where' are too prescriptive. The type of parking provision should be determined on a site-by-site basis.</p> <p>Current guidance actually moves away from maximum parking standards and particularly in the case of residential parking standards, accepts the harm that previous low parking standards (in PPG3) has done in terms of on-street parking effects.</p>	<p>The parking guidance for B8 use is based on staff working at the facility to reflect the demands of the proposed development. Staff employed at B8 storage and distribution centres can range considerably depending on the nature of the development. Therefore this approach is considered appropriate.</p> <p>The SPD makes it clear that parking provision will be considered on a site by site basis. However, 'Car Parking – What Works Where' is considered to be an example of methods of best practice and should be used to inform a sites parking provision and design.</p> <p>This is why the SPD does not set maximum parking standards.</p>
TSPD/33	Wykeland Group Ltd	Sustainable Transport SPD	<p>The proposed thresholds are too low and some of the requirements are unreasonable and too prescriptive (see text below)</p> <p>The parking standards quoted are inconsistent with other guidance published by ERYC</p> <p>None of the proposed thresholds and standards have a sound technical basis</p> <p>The draft makes no recognition of the rural character of the East Riding which results in poor or no public transport services and no option to the private car for a large proportion of the workforce</p> <p>The proposed extensive use of Section 106 Agreements will place a costly, time consuming and onerous burden on businesses and investors</p> <p>Previous experience shows that thresholds and parking standards will</p>	<p>The Parking provisions stated in the document are guidance and should be used as a starting point in establishing the parking needs for individual development sites.</p> <p>The Sustainable Transport SPD provides guidance for policies within the Local Plan Strategy Document. This document will supersede previous guidance published by the Council.</p> <p>The parking guidance is evidenced by historic development patterns within the East Riding.</p> <p>Table 6 Parking Guidance Zones of the SPD shows how urban and rural zones are defined and how the parking provision guidance is considered within each zone.</p> <p>S106 agreements will be used to make the proposed developments acceptable in accordance with NPPF and the</p>

Comment No	Respondent	Section of Draft SPD	Summary of Comment	East Riding of Yorkshire Council Response
			<p>in practice, be applied rigidly and not used as guidance in a flexible way</p> <p>The potential impact of the proposed Supplementary Planning Document is that it will result in on-street parking at best or discourage future investment at worst.</p> <p>Wykeland has many examples of prospective investors rejecting its East Riding premises due to insufficient car parking provision</p> <p>Onerous requirements in Travel Plans will reduce the value of commercial properties, adversely affect the viability of schemes and discourage investment</p>	<p>development plan. S106 agreements will be; necessary to make the development acceptable in planning terms directly related to the development; and fairly and reasonably related in scale and kind to the development.</p> <p>Paragraph 2.26 states that the parking guidelines should be used as a starting point. There is flexibility in the provision for each development and parking provision should be discussed and justified within a proposal's Transport Statement /Assessment.</p> <p>The requirements of Travel Plans will be appropriate to make the development acceptable in accordance with NPPF and the development plan.</p>
TSPD/35	Wykeland Group Ltd	1.4	<p>Paragraph 1.4 of the document notes that TPs can be secured via planning condition or S106 agreement, which is true. However, the document goes on to say (para 1.53) that the majority of measures / targets set out in the TP will be secured by means of a S106. It also notes that for smaller-scale schemes, the TP can be secured by condition. The requirement for a Section 106 Agreement is time-consuming and expensive and would not be appropriate in most instances. We therefore consider that the current wording within the draft SPD should be amended to state that the mechanism for securing a Travel Plan should be agreed on a case-by-case basis. A S106 approach could have an impact on value and viability and constrain investment especially during periods of economic downturn.</p>	<p>Amended text in paragraph 1.49 to clarify that the mechanism for securing a Travel Plan will be agreed on a case-by-case basis</p>
TSPD36/37	Wykeland Group Ltd	1.35	<p>Paragraph 1.35 states that “ The Travel Plan obligation contained in the agreement may be enforced against any future occupants of the development.” This is unnecessarily onerous and places an unreasonable burden upon smaller occupiers and also potentially the Authority. The parties responsible for implementing the Travel Plan are set out within the Travel Plan document and those parties who are signatories to the S106 should be required to deliver the obligations contained therein. There can be no requirement for parties outwith the S106 Agreement and agreed Travel Plan upon which such obligations could be placed. The transfer of obligations takes no account of operational / process changes within the building and could discourage new companies from moving to these premises.</p>	<p>Planning obligations have to be;</p> <ul style="list-style-type: none"> • necessary to make the development acceptable in planning terms; • directly related to the development; and • fairly and reasonably related in scale and kind to the development. <p>The targets and measures agreed in the Interim Travel Plan will be regulated by appropriate clauses in the Section 106 Agreement. The S106 will only include responsibilities that are necessary to make the development acceptable in accordance with the NPPF and Strategy Document.</p>
TSPD/34	Wykeland Group Ltd	1.20	<p>Paragraph 1.20 of the document notes that Transport Assessments and Travel Plans should ideally be submitted prior to pre-application</p>	<p>NPPG Paragraph: 003 Reference ID: 42-003-20140306 states <i>"Travel Plans should where possible, be considered in parallel to development"</i></p>

Comment No	Respondent	Section of Draft SPD	Summary of Comment	East Riding of Yorkshire Council Response
			discussions. This is clearly an unreasonable requirement as the focus of much of the transport / highways-related pre-application discussions is to consider and agree the requirement for / scope of a TA / TP.	<p><i>proposals and readily integrated into the design and occupation of the new site rather than retrofitted after occupation'</i></p> <p>Suggesting that a Travel Plan should be submitted and considered by the Council at an early stage in the application process is considered to be in line with NPPG.</p>
TSPD/39	Wykeland Group Ltd	Sustainable Transport SPD	Wykeland strongly believes that the Sustainable Transport SPD Draft would significantly deter investment, economic growth and job creation.	The SPD is considered to be in conformity with NPPF and NPPG. The guidance in the SPD will not result in the implementation of measures that would result in any significant additional disincentives to development than is already the case. The guidance is flexible and can be varied to take account of requirements of particular operators/business needs.