Section 5 Transport

Overview and issues not covered in existing policies

The spatial strategy is based on the idea that by concentrating development in the strategically significant cities and towns (SSCTs), particularly in the centre and the north of the region, the need to travel will be reduced. A greater proportion of travel using sustainable modes like walking, cycling and public transport, would be possible. Many of the SSCTs, however, are suffering congestion already so that, with the predicted growth, there will need to be a considerable change in the way people move around, otherwise the SSCTS will become unpleasant places to live.

Throughout the RSS and RTS there is an underlying assumption that one cannot have economic growth without a corresponding increase in movement and therefore traffic growth. CPRE questions this assumption believing that economic growth is not necessarily coupled with traffic growth. If it were, it would be difficult to have growth without seriously undermining the quality of life in the South West.

Transport is also the fastest growing source of CO_2 emissions accounting for 36% of emissions in the West of England *(Bristol Climate Change Protection and Sustainable Energy Strategy 2004/2006*). Large districts of Bristol and Bath have been declared Air Quality Management Areas, where 100,000 residents suffer from poor air quality affecting people's health. *(Access West published by Forum for the Future quoting, Findings from the West of England Sustainable Mobility Project)*.

Intuitively it seems right to 'manage the network' (Paragraph 2.5.6) so that one can reduce journey times and make them more reliable. The consequence, however, is that people spend the same amount of time travelling but travel further and this allows patterns of activity to be more dispersed. Government statistics show that in 1972/73 the average person travelled for a total of 353 hours annually, covering 4476 miles and in 1998/2000 this had become 360 hours and 6843 miles.

The overall objective of the RTS is not clear. Is it to reduce congestion, to reduce car travel, to reduce the need to travel, to reduce the level of growth in congestion, to reduce the distance people commute or to reduce CO_2 emissions?

Paragraph 5.1.2 '*Planning development carefully can have a noticeable effect on movement in the region particularly by car, and in turn can help reduce the rate of increase in greenhouse gas emissions, so reducing regional contributions to climate change'*. This paragraph then states that reducing the need to travel is a challenge given the geography of the region, its rural nature and the predicted growth in both population and economy. It appears there is no confidence that reducing the need to travel is an achievable aim. Yet that is precisely what is underpinning the spatial planning and where the houses and jobs will be located.

The plan area does have different needs but it is not helpful to avoid setting goals for modal shift even though in some more rural parts of the South West they would be challenging to achieve. Many of the demand management measures within the SSCTs will have a knock on effect outside the urban areas making commuting more difficult

and discourage long distance commuting. The rural/urban issues are avoided within the RTS as it stands.

The difficulties of drafting a coherent regional transport strategy are not underestimated, in the absence of a clear national steer, together with a distant prospect of road user charging and in an environment where it is easier to find funding for roads than rail. It is also a challenge when car travel is significantly cheaper than rail travel and often air travel is cheaper than rail. There are things that can be done within the existing framework but it seems that this regional transport strategy is 'going through the motions' rather than setting a clear agenda to provide leadership to local authorities. There are strategies that can be put in place now that will help people to become more receptive to initiatives for more sustainable transport and improving the alternatives to the car.

Changes requested

- A less tentative tone throughout the RTS giving local authorities clear guidance on priorities including a hierarchy of transport modes outlined, with walking and cycling as the most sustainable way of travelling and with the clear recognition that air travel is the most unsustainable form of transport.

- A clear statement on what the overall RTS is trying to achieve for example " The objective of the RTS is to reduce the need to travel with the pursuit of 'smarter growth' decoupling economic growth from ever increasing movement with total road traffic reduced over the strategy period and growth reversed by 2010'.

- The policies within the RTS should aim to bring about a major change in travel behaviour away from reliance on the car to more sustainable modes while managing the demand on the road network.

  To contribute to a reduction in the region's climate change emissions by reducing growth, and ultimately achieving an absolute reduction in traffic on the region's road system.

  To increase the proportion of the region's movement by walking, cycling and public transport..

  To reduce the amount of transport intensity related to economic activity.

CPRE believes that more clearly defining the overall objective will make it possible to ascertain how different investments will contribute to the overall objective. In addition CPRE would like more clarity around delivery mechanisms.

See also our comments under Section 6 Green Infrastructure for the need for policy be developed there to address improving both: the built public domain - including opportunities for walking and cycling within towns and cities; and the network of foot paths, bridleways, quiet lanes and open access land that allow walking, cycling and riding within the countryside. *****

Policy / paragraph reference

Policy TR1 and supporting section 5.2 Transport and the SSCTs

Summary

- A clear direction needs to be given with a hierarchy of transport modes articulated. Walking and cycling should be the first priority particularly in the urban areas.

- Road capacity should not be increased until other measures are actually in place and working, to ensure that road capacity increases do not induce more traffic and car dependence.

- Delete Park and Ride from para 5.2.5

- Delete the paragraph relating to airports in 5.2.6 an insert a paragraph referring to managing the demand for air travel in the South West.

Reason supported/opposed

CPRE broadly supports this policy and demand management and believes it can stand as it is as long as it is the second policy after an overarching policy to reduce traffic - not just the rate of increase as suggested in our previous comments made in the ***Overview and issues not covered in existing policies section*.**

CPRE sets out below our views on the supporting paragraphs.

Paragraph 5.2.1 refers to achieving climate change targets but fails to acknowledge the very serious problem of the significant quantities of emissions created per passenger mile by aircraft. Further development of the South West's airports alluded to in the RTS will hugely increase CO_2 emissions in the next five years and beyond. It is likely that any care and good housekeeping by the public sought under paragraph 5.2.1 in restricting emissions in domestic use and car travel, will be heavily outweighed by the growth in flying. We would like to see the RTS support the demand management of flying in the same way that it is supporting the management of car travel.

A clear direction needs to be given with a hierarchy of transport modes articulated. Walking and cycling should be the first priority particularly in the urban areas. For example 21% of journeys to work in the Joint Local Transport Plan Area of Bristol, Bath, S. Glos and North Somerset are under 2km (potential walking distance) of which 45% are made my car. This situation can be changed using a package of measures to encourage people to change their behaviour along with infrastructure investment, information and maps which make walking and cycling more possible and a pleasurable experience. Healthier employees can improve productivity but these kinds of measures are not used to inform the conventional economic models. Much of

the congestion is around those areas of the SSCTs where behaviour change towards walking, cycling and using public transport could make a significant difference.

CPRE supports Paragraph 5.2.5 though it is highly sceptical of the contribution that improved Park and Ride facilities will make to the improvement of network management. Park and Rides capture cars after they have travelled on the road network just before they enter an urban area. They reduce congestion within the urban area rather than the surrounding road network and motorways. In fact it is argued that they create car journeys on the periphery by making car access easier, abstracting people from existing public transport and encouraging people to make journeys they might not otherwise have made.

Studies have shown that the overall traffic benefit of Park and Ride is marginal and they are a relatively expensive intervention for the benefit of car drivers and are predominantly built on greenfield sites. Park and Rides can also been seen as a 'competitive parking strategy' which contradicts Paragraph 5.2.9.

Park and Rides were put forward as a solution to the problem of urban congestion in the early 1970s in a particular transport policy environment before the idea of demand management. They were introduced for a number of reasons including the Government's unwillingness at the time to subsidise bus travel directly. In addition people felt it was the only way to get people to think about travelling by bus. Though it is still true that it is difficult to get people in cars to consider using the bus there are some successful bus routes like the X39 service between Bath and Bristol that have shown that with a frequent service with bus priority at both ends people will get out of their cars and use the bus.

In other words a fully integrated door-to-door public transport system is a more effective way of addressing congestion. It is worth noting that in Bath the four existing Park and Rides do not bring in as many people to Bath as the one bus service, the X39.

CPRE would like to see clear evidence that Park and Ride presents value for money relative to other interventions. Bristol City Council is one of the few Councils to have evaluated a Park and Ride before, during and after it was built at Brislington. The bus lane for Brislington Park and Ride was put in before the car park was built and with just the bus lane, bus patronage on that route into Bristol went up by 22 % - a very significant increase. Once the car park was in operation, people using it were interviewed and it was found that nearly half had either gone the whole journey by public transport before or would not have made the journey. In other words they cancelled out those who had been 'captured'.

The findings are supported by research done by S B Taylor for a Transport Laboratory Report 189 in 1996 at three P&R sites Bristol (Brislington), Oxford (Thornhill) and York (Askham Bar). He investigated the means by which individuals interviewed had made the journey prior to the introduction of the P&R site. They found that almost one in five users, irrespective of mode of transport used to the P&R, did not make the journey at all before the P&R was introduced.

In a policy environment of demand management there are legitimate questions to be asked about whether overall levels of parking are being reduced or just shifted from the centre to the periphery. T he RTS needs to give a clear expectation as to parking standards (see comments on Paragraph 5.7). It is not clear how Park and Ride will function under a road-pricing regime.

The measures listed in 5.2.5, 5.2.6, 5.2.7 and 5.2.8 are not necessarily complementary to working towards a common aim, which is why it is so important to define the actual goal. Though the regional funding allocation process to a large extent prioritised investment, it should perhaps be restated in the RTS with some kind of time frame. As stated in the SSA para 11.25 'the road capacity should not be increased until other measures are actually in place and working, to ensure that road capacity increases do not induce more traffic and car dependence…'.

In paragraph 5.2.6, under the heading to help achieve modal shift, the following is listed:-

improved access to, and investment in, Bristol, Exeter and Bournemouth airports to meet more of the region's air travel needs from within the South West.

This cannot be described as demand management yet it appears in the preamble to TR1 Demand management and public transport in the SSCTs.

Many of the options under 5.2.8 like travel plans have been suggested for some time yet some of the local authorities themselves still do not have travel plans and it might be helpful to group the measures in a way that can be clearly related to a policy and prioritised. Travel plans, visitor plans, car clubs and so on could come under a policy related to behaviour change encouraging people to leave their cars at home if there is an alternative.

Paragraphs 5.2.7, 5.2.10 and 5.2.11 refer to the investment in public transport with the objective of achieving modal shift and a step change in public transport.

CPRE believes that a step change is only likely to be achieved by significantly improving the quality of public transport quality and reducing prices in real terms, which under the present national policy regime is difficult.

In France and Germany regional authorities exercise 'control' over fares, service patterns, quality and investment in local rail services. Only those European cities that have transformed public transport, or severely restricted car use, have achieved a step change in public transport use. A rolling programme of modernisation is necessary for a significant modal shift in the South West. The present railway is decayed and under-funded, aggravated by an industry structure that increases unit costs by a factor of 3 over those in France and Spain, for example.

Fare levels in the British Rail period were increased substantially in real terms in order to reduce demand and restrict investment. Since privatisation in 1993 fare levels, although still high by continental standards, have increased less quickly than previously and this allied with growing road congestion has resulted in relatively large increases in demand on many routes. But history is about to repeat itself as the

DfT forces large real price increases on operators in order to dampen demand. First Great Western will need to increase fares very substantially in real terms to meet the premiums demanded in the new franchise. This is likely to be repeated with the renewal of the South Western franchise.

Changes requested

See Summary.

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Policy/paragraph reference

Policies TR2, TR3, TR4 and supporting paragraphs

Reason supported/opposed

TR2

CPRE strongly supports TR2, the better management of our existing road network, with the cautionary note that too often the word 'improvement' in the context of roads, as mentioned in TR2, means an increase in capacity which is likely to induce more traffic and car dependence.

Development or urban extensions will have to be designed to avoid the use of motorways for local traffic. An example of this problem is the proposed tunnel, leading traffic from the Swindon Southern Development Area to Junction 16, which is likely to generate distance commuting along the M4 and local traffic having to traverse Junction 16. CPRE and others have been pressing for an alternative bridge across the railway to join the extension with Swindon and take traffic away from the motorway.

TR3

TR3 CPRE has always questioned the need for a second strategic route. Although it has now been agreed to improve the A303/A358 second strategic route the likely effect will be to encourage more people to travel by car, allowing people to commute longer distances. CPRE welcomes the fact that the A303 route across the Blackdown Hills was rejected.

Paragraph 5.3 .2 It is stated that reliable connections to London and the South East (and international markets beyond) have been identified as the most important transport factor affecting the performance of the regional economy. This statement is built on a raft of underlying assumptions, which we question. See SSA/SEA para 8.8, which refers to research for the South West that indicates that other factors may be more relevant and refers to the fact that '*the SWARMMS report found that no wider economic impacts could be identified from improvements to the second strategic route*.' (See also our comments under Section 2.1 Inter and Intra-regional issues, Section 3 Policy D and Infrastructure priorities and Section 4 policy for Yeovil.)

CPRE supports the SSA/SEA (para 11.25) concern that road capacity should not be increased until other measures are actually in place and working, to ensure that road capacity increases do not induce more traffic and car dependence. These arguments are further developed in the CPRE report '***Beyond Transport Infrastructure –lessons for the future from recent road projects***' (July 2006)

TR4

CPRE broadly supports this policy with the caveat that investment targeted to maintain the safety, efficiency and reliability of journey times does not mean an increase in capacity but a real management of demand. *****

Policy/ paragraph reference

Policy TR5 The Interregional Rail Network and supporting paragraphs

Summary

- A new separate paragraph is required on the need for a major increase in rolling stock in order to increase train size and capacity by 40-50% (most routes have less capacity than that available 20 years ago).

- Existing High Speed Trains should be replaced by higher capacity electrified version based on the French TGV.

- A direct rail link should be provided from the South Western main line via Woking and Staines to Heathrow and thence to Paddington, via existing link, to connect with Crossrail.

- See also our comments under Section 8 Tourism and TR6 on the importance and high priority of improved and fully accessible interchange facilities with coach and bus to contribute to sustainable tourism travel, rural accessibility and social inclusion objectives.

Reason supported/opposed

CPRE welcomes the emphasis on rail improvements in TR5 though caution that further development of parkway stations will encourage longer-distance commuting and encourage more commuting from rural areas to urban areas.

The priority should be to dramatically increasing the capacity of trains through extra rolling stock; capacity can be doubled on some routes without infrastructure investment. In the short-term selective door opening will obviate the need for platform lengthening; all major stations have far longer platforms than the trains using them. Line capacity needs to be capable of taking the modal shift that the RSS sub regional policies expect to achieve: for example improving signalling and rolling stock between Weston-super-Mare and Bristol which are likely to be delivered ahead of any electrification.

The GW main line requires upgrading. Electrification alone will significantly improve performance and capacity, allowing trains of double the capacity of existing High Speed Trains. Existing High Speed Trains are life-expired and should only be life-extended in the short-term.

Consideration should be given to linking the South Western main line to Heathrow from Woking, as proposed by Prideaux and others, for Crossrail. Present Crossrail plans are deeply flawed and do not address access to Heathrow, Waterloo-Woking capacity or service provision for Reading adequately.

It is not clear whether the list in TR5 is comprehensive and perhaps should be in the supporting text. There are other interventions that need to be implemented, one

example being rail improvements in the Swindon area or a new rail station to serve the proposed eastern expansion.

Changes requested

See Summary.

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Policy/ paragraph reference

Policy TR6 The Inter-regional Bus and Coach Network

Reason supported/opposed

CPRE supports this policy if coach travel is fully integrated with the bus and rail network and avoids nodal centres alongside motorways - rather than within urban centres - which are likely to generate more car travel in an out to access the coach network and may encourage long distance commuting.

The close integration of rail with coach and bus services, and improvement to rail, coach and bus stations within the region, with fully accessible interchange facilities, is also a critical issue for sustainable tourism travel, rural accessibility and social inclusion. See our further comments under Section 8 Tourism.

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Policy/ paragraph reference

Policies TR7 and TR8 and supporting paragraphs on ports in section 5.4

Reason supported/opposed

TR7

CPRE supports the principle of transportation of passengers and freight by sea, subject to environmental codes and conduct being observed. The CPRE also supports the principle that if at all possible, access for passengers and goods to and from the ports should be by rail.

TR8

It is not quite clear why only the port of Bristol has been mentioned but CPRE in North Somerset has an ongoing campaign for better management of HGV routes and curbing HGV's using inappropriate roads as short cuts. CPRE is therefore concerned that increased numbers of container lorries travelling from Avonmouth will impact upon the rural countryside. As part of 'sustainable distribution' and the management of road based transport therefore, route signage and driver conduct are issues that properly need addressing.

The role of Southampton and Portsmouth and its relevance to the South West is recognised and improvements in sustainable access from these ports to the SW is supported.

Changes requested

TR7 Substitute 'particularly' with 'only' and add and 'and where existing high capacity road access already exists'.

*****

Policy/ paragraph reference

Policy TR9 Airports and supporting paragraphs in section 5.4

Summary

- A complete reworking of this policy is required. The growth of airports within the region should be limited to achieve the RSS CO_2 emission targets by managing the demand for the most unsustainable form of transport.

Reason supported/opposed

CPRE opposes TR9

This suggests an overall increase in air capacity which is the least sustainable form of travel and CPRE would like to see the demand management of air travel or 'managed growth' in the same way that car traffic growth is to be managed.

There are issues around who benefits from an increase in air travel and certainly the cheap flights from Bristol make it easier for people to spend their money in Spain rather than holidaying in the South West. Airport development can create jobs but may just replace existing jobs that are less environmentally damaging. The ancillary surface development also has a huge impact along with the surface access to airports.

If improvements in rail access were made to Heathrow as is suggested in 5.3.4 this investment would be undermined by the airport growth. Again these policies without any priorities or time sequence could be counterproductive. An investment in this rail connection would improve the overall integration of the public transport network.

Changes requested

- A complete reworking of this policy.

- The growth of airports within the region should be limited to achieve the RSS CO2 emission targets by managing the demand for the most unsustainable form of transport.

- Airport Operators are required to submit to Local Authorities and to other agencies, Master Plans giving proposals for the improvements to aviation facilities. These plans will be accepted and adopted where they comply with Government constraints and guidance concerning matters such as local air quality; noise management; surface access and bio-diversity impacts. Planning applications for developments arising from the Master Plan process will be acceptable to the Planning Authorities where related essential changes to the infrastructure affected by such developments will be in place. Such changes will include surface access improvements and planning applications that do not allow for them may be deemed premature". (The amendments are based upon the Aviation White Paper, (WP) and upon the DfT Paper "Guidance on the Preparation of Master Plans, (MP), published in 2004)

The following paragraphs should be inserted to justify the changes proposed to TR9:

- "5.4.15 The Aviation White Paper, (WP) and the 2004 Paper by the DfT, "Guidance on the Preparation of Airport Master Plans", (MP), requires consideration of the impacts due to airport development. Such impacts are not only matters to be considered by Local Authorities before adoption or approval of these Plans, but will need monitoring during the next 24 years or so. The matters covered by these Government Papers include:
    - Local Air Quality. Paras 3.6, 3.28 & 3.31 of WP and para 48 of MP;
    - Noise Management. Paras 3.12, 3.14, 3.21 & 3.24 of WP and 37 & 38 of MP;
    - Surface Access. Paras 4.58 & 12.20 of WP and 37 & 38 of MP;
    - Bio-diversity. Paras 3.5 & 3.6 of WP and para 42 of MP."

- "5.4.16 Surface access to regional airports in rural locations is not adequate in some parts to cater for the projected growth of aviation facilities. An example is Bristol, where airport traffic on minor roads currently causes serious nuisance to village residents. Local Authorities and other agencies should attempt to ensure that planning applications for improvements to aviation facilities are not submitted for consideration until the necessary related improvements to the transport system are in hand. Failing this Planning Regulations should be invoked to manage excessive rates of airport growth rates by the argument of Prematurity."

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Policy/ paragraph reference

Policy TR10 Regional Connectivity and supporting paragraphs of 5.5 on regionally significant road routes

Summary

- Tighten T10 to rule out major infrastructure to increase capacity. Tighten definition of routes in line with a tightened Freight Map. Incorporate public transport improvements now in other policies.

- Remove the A350 and A36/A46 in the list of "primary arteries for long distance intra-regional freight" para 5.5. 2

- The separation of policies TR10 and TR11 potentially allows road and public transport to be looked at in isolation rather than looking at a particular corridor and the different modal options.

Reason supported/opposed

CPRE supports the acknowledgement in paragraph 5.5.1 that improved journey times can sometimes lead to the undesired consequence of longer distance commuting and induced traffic which has been referred to in our previous comments relating to travel to and from the region.

CPRE supports a corridor management approach making best use of the network. However we fear that "improve the reliability and resilience of journey times" is open to interpretation to mean substantial road improvements that will increase capacity and run counter to sustainability and our efforts to reduce traffic and carbon emissions. The multi-modal studies tried to look at regional connectivity in terms of the potential for different modes along a particular corridor to enable local authorities to look at the different options. The separation of policies TR10 and TR11 potentially allows road and public transport to be looked at in isolation.

The changes we would like to see

- Tighten T10 to rule out major infrastructure to increase capacity. Tighten definition of routes in line with a tightened Freight Map. Incorporate public transport improvements now in other policies.

- Remove the A350 and A36/A46 in the list of "primary arteries for long distance intra-regional freight" para 5.5. 2 and as "offering regional access to the south coast ports". The Bristol Bath to South Coast Study showed that traffic along these routes was local. We believe that the region should instead be carrying out the study recommendation that HGVs should be re-directed away from the A350 and A36/A46 to use the M4/A34/M27/trunk road network to travel between the M4 and south coast ports.

- Amend paragraph 5.5.3 to specify that a corridor management approach includes facilitating the opportunities along corridors to move freight and passengers by rail. There are corridors where substantial improvement to rail could be implemented before major road building projects for example along the A350-A36/A46 corridors.

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Policy/ paragraph reference

Policy TR11 Interregional Public Transport and supporting paragraphs

Reason supported/opposed

We support TR11 but it is almost a statement of fact rather than a policy to give direction to local authorities as to the priority. It would be better to incorporate this policy with TR10.

Changes requested

Salisbury – Exeter should be added to the list of single-line routes listed in para. 5.5.5; the route is predominantly single track with only short stretches of double-track.

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Policy / paragraph reference

Policy TR12 Regional Freight Map and supporting paragraphs of section 5.6

Summary

- Refinements to the Freight Map are necessary.
- Reference needs to be made in the actual policy that the RTS is actively encouraging local supply chains to minimize the need for long distance freight movement.
- Clear steer in the policy towards the improvement of the scope and viability of rail freight, with more emphasis on improving the use of rail and shipping to transport freight than road.

Reason supported/opposed

CPRE supports TR12 but with refinements through origin and destination data analysis.

As an example we put forward more detailed information on freight movements in an around North Somerset which highlight the need for refinement. In North Somerset, for example, over the last six years, residents, Ward Councillors, MP's, Parish Councils, the CPRE, the Mendip Society and several Action Groups including TMTV (Traffic Management Through the Villages) have spent a great amount of time and effort in working on the problem and trying to find sustainable solutions.

CPRE has taken a lead role in bringing to the attention of the Authorities the plight of the North Somerset South Area countryside and its villages in and around the Mendip Hills AONB. North Somerset Council in response to the various submissions has set up a Freight Strategy Committee to address the main issues. The Committee meets approximately four times a year and is working to progress the management of road freight generally in North Somerset, but in particular, the South Area with its AONB.

CPRE has had separate meetings with transport officers of SCC and B&NES and it is pleasing to see that many of the specific recommendations and comments made by CPRE, TMTV and the NS Freight Strategy Committee have been listened to and taken account of in the Regional Freight map but it is our belief that to make this Freight Map work a number of actions need to be taken by the SWRA and its various Unitary Authorities. There is no doubt that proper route signage will be required and that in the cases of particularly, County Freight Routes and non assigned routes upon which 'through' HGV's travel, a combination of signage, weight restrictions and other forms of management will be necessary to ensure that the hierarchy is not abused. Three roads that will require special attention are the A371 County Freight Route and the non-designated routes of the A368 and the B3134. The latter passes through the Burrington Combe beauty spot and is used by many HGV's short cutting across the Mendip Hills AONB.

CPRE believes that the SWRA needs to initiate, at an early date, a map printing dialogue with all major map producers and GPS data suppliers to commence a co-ordinated and explanatory publication of the Freight Routes.

Changes requested

- CPRE would like to see the freight map refined with help from better evidence through analysis of origin and destination data. Map 5.2 should be the same as Map 5.1 as regards National, Regional and County (local) designations unless evidence indicates otherwise.

- This refinement would need to look at anomalies like the A368 between Banwell and Churchill, which is listed as part of the National Primary Route Network, although this road is barely a single carriageway in width through the village of Banwell.

- CPRE would like to see some reference in the policy to encouraging local supply chains to minimize the need for long distance freight movement as currently in the supporting paragraph 5.6.4.

- CPRE would like to see policy TR12 and TR13 integrated for the same reasons mentioned above under TR10 in that the guidance of the RTS should be that in the future the options for road and rail will be looked at together, with a steer towards the improvement of the scope and viability of rail freight, with more emphasis on improving the use of rail and shipping to transport freight than road. In the future those developments that are likely to generate high volumes of freight should be given preference if they are close to an appropriate rail or water freight facility as in para 5.6.4.

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Policy / paragraph reference

Section 5.7 Setting Parking Standards through Accessibility Planning

Reason supported/opposed

Limiting parking is probably the most effective tool available to local authorities for reducing traffic and discouraging long distance commuting. Making destination parking difficult forces people to look at alternatives.

Changes requested

The principle of reducing parking availability should be articulated in the overall context of demand management. Is it enough for the Regional Assembly to urge County and Unitary Authorities in close partnership working with district councils to set out detailed parking policies and standards that meet the requirement of PPG 13? Perhaps the RTS should give a clear interpretation of PPG 13.

See also our comments (Section 6 Policy H2 and Section 3 Policy F) on the importance of car parking standards in relation to achieving higher density development in city and town centres and close to integrated public transport provision.

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End of Section 5