1. **Question 12.4**

1.1 The relevant national policies are the National Policy Statement for National Networks 2014 (NPS) and the National Policy for Ports 2012. The proposals for rail freight in Policy 13 D)1, 2, and 5 fulfil the NPS which recognises the crucial role rail has to play in delivering significant reductions in pollution and congestion. Road freight imposes heavy costs on society including air pollution, road accidents, noise, and wear and tear of the road surface. It will also be difficult to decarbonise. Tonne for tonne, rail freight produces 70% less CO2 than road freight, up to fifteen times lower NOx emissions and nearly 90% lower PM10 emissions. It also has de-congestion benefits – depending on its load, each freight train can remove between 43 and 77 HGVs from the road. The Government therefore concluded that at a strategic level there is a compelling need for development of the national rail network to provide for the transport of freight across the country, and to and from ports, in order to help meet environmental goals and improve quality of life.

1.2 Policy 13 D) 1 and 3 is supported by Government policy presented in the National Policy for Ports paras 3.1-3.8. This promotes the use of rail and inland waterways for the movement of goods to and from the port which offer more efficient transport links with lower external costs.

1.3 Since the NPS and the National Policy for Ports were written Transport for the North, the subnational transport body, has published its statutory Strategic Transport Plan 2019 which supports modal shift of freight to rail and inland waterways. Policy 13D is consistent with its concept of a rail freight ‘superhighway’ connecting Liverpool and the Humber, which would increase connectivity to the Port of Immingham and to Scunthorpe.

1.4 However the proposals will only be effective if the costs of moving freight by rail/water are less than those by road – demand management of strategic road capacity for freight would require a national charging mechanism which is a national issue beyond the scope of the Local Plan.

1.5 With respect to freight by air the extant policy commits the Government to working with airport operators, transport operators, local authorities and LEPs to improve surface access to airports across the country, whilst taking into account the associated environmental impacts. At present, as we have said in response to questions around Matter 10 DSA, the future of aviation and therefore of air freight is uncertain.

2. **Question 12.5**

2.1 Policy 14 A)1, 2, 3 is not robust with reference to national policy as it does not meet the requirements of NPPF para 110. This requires development to

   a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality

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1 Net Zero Technical Report, Committee on Climate Change, May 2019
2 Aviation Policy Framework, DfT, 2013
public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;

b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;

c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards.

2.2 Policy 14 needs amending to reflect this priority, the needs of the less mobile and the creation of secure and attractive places. Policy 14A)1 should read ‘access to the development should be prioritised according to the transport hierarchy’.

2.3 12.5a The proposed parking standards are excessive and should be reduced. Two spaces per dwelling and 1.5 spaces per apartment could be reduced to 1 or less for dwellings and 0.5 for apartments, with the provision of mobility hubs which include electric vehicle and bike charging points, car/bike/cargo bike share facilities, and car club bay. The proposed parking for pedal cycles is too low. Every dwelling should have secure cycle parking; visitor parking for cycles should equal that for visitor car parking.

2.4 12.5b Appendix 7 does not meet with national policy in NPPF para 148 which requires ‘the planning system to shape places in ways that contribute to radical reductions in greenhouse gas emissions minimise vulnerability and improve resilience’ (our emphasis). The Local Plan has used the identical indicative thresholds for transport statements/assessments as the now withdrawn DfT’s Guidance for Transport Assessment 2007. Thirteen years later and faced with a climate emergency and transport carbon emissions at the same level as they were in the 1990s, out-dated thresholds have no place in a spatial strategy. Transport statements and assessments are considered to be an iterative process through which development induced traffic can be reduced and managed, and sustainable alternatives encouraged. In order to capture these opportunities and have a real impact on travel in the Borough the thresholds for transport assessments need to be lower.

2.5 NPPF 111 sets out that all developments which generate significant amounts of transport movement should be required to provide a Travel Plan but leaves it to local authorities to make a judgement as to whether a proposed development would generate significant amounts of movement on a case by case basis.

3 https://como.org.uk/shared-mobility/co-mobility-themes/mobilityhubs/
3. **Question 12.6**

3.1 In our original representation we proposed changes to Policy 17B that made cycle routes shorter than routes for cars, and allocated road space to cycling if segregated routes cannot be provided.

3.2 Our answers are framed within the context of the impact of the Covid pandemic which has dramatically and radically altered patterns of travel behaviour, and increased home/remote working and the potential of the virtual office. Travel by public transport, both rail and bus, almost ceased but cycling levels increased dramatically with pop up lanes to accommodate them. According to the Department for Transport, weekday cycling levels increased by 100% and at weekends by 200% compared to pre-Covid levels. There will be complex new travel and non-travel behaviours whether or not a Covid vaccine or therapies are available. In the shorter term with the requirement for social distancing there is an issue of public transport capacity. This provides an opportunity for healthier active travel and to enable travel for those 29.5% of households that have no access to a car. The Sheffield City Region Combined Authority Transport Strategy 2019 and Active Travel Implementation Plan 2020 aim to increase walking by 21% and cycling by 350%. Building on the changes in travel behaviour induced by the pandemic is critical to avoiding a return to old habits of using the car. The Government’s latest policy on walking and cycling, Gear Change, has a bold vision.

3.3 The aim of Policy 17 should be to create a coherent safe Borough-wide walking and cycling network connecting residents, communities and the wider public transport network to reduce trips by car. The two main disincentives to cycle are perceived and actual road danger, and the distance to travel. Whilst e-bikes with charging points can overcome the latter and replace car trips, road danger is more difficult. Low traffic neighbourhoods with 10-20mph speed limits throughout residential areas are essential (as in Policy 45) but on busier routes safe allocation of road space or segregated cycle lanes are required.

3.4 Policy 17C should prioritise cycling in the same way that Policy 18 prioritises and maximises walking. Para 7.48 requires a cycle audit if projects impact on cycling. If cycling is to be given the priority it must have, and NPPF 148 and the Gear Change vision are to be realised, then the question should be how does cycling impact on the project or development.

3.5 12.6 a) We believe the change to Policy 17 C3 is justified and meets with NPPF 104d. One of the disincentives to cycling to work, is the lack of changing and showering facilities. With the

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huge increase during the Covid pandemic in active travel such facilities are likely to be needed more widely.

3.6  12.6 b) Yes, the requirement is justified. Whilst there is no doubt about the status of a public right of way shown on the Definitive Map, the fact that a route is not shown does not mean that a public right of way does not exist. Any person who has evidence that public rights exist (e.g. through unchallenged use of a way for a minimum period of 20 years or documentary proof) can ask the surveying authority (i.e. local highway authority) to modify the Definitive Map at any time. The ability to do this will end on 1 January 2026 when the Definitive Maps will be closed against the addition of paths claimed on the basis of historic evidence. Thus inclusion of this clause is justified. Local people have strong attachments to paths that have been created informally and using an approach which respects their use is important when planning development that would affect the local community and how they use the land.