



Leeds City Council

LEEDS TRANSPORT SPD

Consultation Report





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1 INTRODUCTION

1.1 OVERVIEW

- 1.1.1. The aim of the Transport Supplementary Planning Document (SPD) is to update and combine four existing transport related SPDs (as listed below) into one single document:
- Street Design Guide (2009);
 - Travel Plans (2015);
 - Parking (2016); and
 - Public Transport and Developer Contributions (2006).
- 1.1.2. In addition, to the existing SPDs, there is a new requirement within the Core Strategy and Site Allocation Plan for a “cumulative impact policy”. The Transport SPD provides a methodology to implement this requirement to take contributions to schemes identified as being required due to growth from the whole plan period.
- 1.1.3. The Transport SPD will, therefore, assist more targeted use of the current adopted Core Strategy and Saved Policies, which include; **Policy T1: Transport Management, Policy T2: Accessibility Requirements and New Development, Policy EN8: Electric Vehicle Charging Infrastructure, Spatial Policy 11: Transport Infrastructure Investment Priorities, Policy ID1: Implementation and Delivery Mechanisms and Policy GP5: Requirement of Development Proposals.**
- 1.1.4. In March 2019, a climate emergency was declared by the council and this has been reflected in the Transport SPD relating to a requirement for:
- Highway trees in new development;
 - Reduced city centre parking standards for residential development;
 - Incorporating a guidance note on electric vehicle charging points (to supplement policy EN8); and
 - Improved cycle infrastructure guidance.
- 1.1.5. The council’s ‘*Standard Construction Details*’ do form an appendix to the Transport SPD but were not part of this consultation as they are currently being reviewed and updated by the Highways Authority. The latest version of these standard details will be made available on the council’s website.
- 1.1.6. Although, the majority of Transport SPD text remains the same, there are some changes throughout the document to pick up issues from the use of the SPDs previously adopted.

1.2 CONSULTATION PERIOD

- 1.2.1. The Transport SPD was subject to public consultation for eight weeks from Monday 6 January 2020 until 5pm on Monday 2 March 2020. The aim of the consultation was to provide external bodies with an opportunity to learn about the proposals, provide feedback on the document and to identify opportunities for its improvement and further refinement. It was conducted online using the council’s consultation software, or alternatively, respondents were able to email or send a response form.

1.3 REPORT STRUCTURE

1.3.1. The structure of this report is outlined below:

- **Chapter 2** – Provides details of the methodology underpinning the assessment.
- **Chapter 3** – Analyses the responses received and summarises the key themes / topics raised across all feedback. Provides an overview of the changes proposed to the Transport SPD as a result of the responses received.
- **Chapter 4** – Provides a summary of the report findings and the conclusions drawn from the consultation.

2 METHODOLOGY

2.1.1. The approach to managing and processing the submissions received along with how these will be used to influence the project process is described below.

2.1.2. In accordance, with statutory requirements, the following individuals and groups were consulted:

Statutory Consultees

- Canal & River Trust
- The Coal Authority
- National Grid
- Selby District Council
- Highways England
- Forestry Commission
- Environment Agency
- Historic England
- Network Rail
- Natural England
- North Yorkshire County Council
- Scarcroft Parish Council
- West Yorkshire Combined Authority

Other Consultees

- Individuals
- Resident Groups
- Community Groups
- Private Sector Organisations
(Housebuilders, Consultants etc.)
- Education Establishments

2.1.3. Respondents were able to provide free-text feedback online via the council's consultation software, using the designated page set up for the Transport SPD, or alternatively, respondents were able to email or send a response form. Each participant's feedback was recorded as a single response, but each comment was reported in more detail, with each comment individually summarised in the consultation spreadsheet, attached in **Appendix A**. For ease of reference, participants were encouraged to state the section of the Transport SPD to which the comments applied. Where the same individual responded to the same proposal twice, these duplicates were removed to avoid double counting. Although, a separate consultation was held for council stakeholders, these stakeholders were able to provide additional feedback in this consultation. This feedback was separated from that provided by external bodies. The forthcoming chapters of this consultation report focuses **solely** on the feedback provided by external bodies. WSP and LCC reviewed each participant's feedback to determine if an action on the Transport SPD was required (an explanation for each decision was also provided). This approach allowed comments to be categorised by section, and thus, the key themes and topics became evident.

3 ANALYSIS

3.1 SUMMARY OF RESPONSES RECEIVED

3.1.1. The make-up of the type of respondents and number of comments received from each is shown in **Table 3-1** below. Overall, there were 70 external respondents to this consultation.

Table 3-1: Types of Respondents

RESPONDENT TYPE	NUMBER OF RESPONDENTS	NUMBER OF COMMENTS	PERCENTAGE
Statutory Consultees	13	98	17%
Other Consultees	57	464	83%
TOTAL	70	562	100%

3.1.2. **Table 3-1** shows that of the 70 respondents to the consultation, 13 were statutory consultees and 57 were other consultees. A total number of 562 comments were received from the consultees during the formal consultation period and **Table 3-1** highlights that the clear majority of comments (83%) are provided by other consultees. As stated earlier, each comment received from the consultees was recorded in the consultation spreadsheet attached in **Appendix A**. Each comment was independently reviewed and coded with either a ‘yes’ or a ‘no’ to determine whether an action on the Transport SPD was required. An explanation to justify each decision was also provided in the next column. In summary, 68% (384) were marked for ‘no’ action and 32% (178) were marked ‘yes’ for a required action. Further details can be found in the consultation spreadsheet attached in **Appendix A**.

3.2 SUMMARY OF MAIN FINDINGS FROM THE CONSULTATION

3.2.1. **Table 3-2** shows the breakdown of the comments (which have been marked as ‘yes’ for a required action) across the Transport SPD.

Table 3-2: Comments by Part

TRANSPORT SPD	NUMBER OF COMMENTS	PERCENTAGE
PART 1	36	20%
PART 2	37	21%
PART 3	31	17%
PART 4	18	10%
PART 5	34	19%
APPENDIX A	4	2%
APPENDIX C	1	<1%
GENERAL	17	10%
TOTAL	178	100%

3.2.2. **Table 3-2** shows that Part 2 of the Transport SPD, entitled ‘Street Design Guidance’, received the most comments (21%). **Table 3-2**, also, illustrates that the distribution of comments across the Transport SPD is evenly focused on Parts 1, 2, 3 and 5 rather than one specific standout Part. A further analysis to establish the key themes / reoccurring topics has been undertaken in **Table 3-3**.

Table 3-3: Comments by Chapter

TRANSPORT SPD	CHAPTER	THEME	NUMBER OF COMMENTS	PERCENTAGE
PART 1 INTRODUCTION	1	INTRODUCTION	18	10%
	2	LEGISLATION AND POLICY	18	10%
PART 2 STREET DESIGN GUIDANCE	1	DESIGN GUIDANCE	7	4%
	2	STREET TYPES	13	7%
	5	JUNCTIONS AND VISIBILITY	7	4%
	6	SPEED RESTRAINTS	3	2%
	8	PEDESTRIAN MOVEMENTS	1	-0.5%
	9	CYCLE FACILITIES	4	2%
	10	LANDSCAPE AND GREEN INFRASTRUCTURE	2	1%
PART 3 PARKING	1	BACKGROUND	3	2%
	2	CAR PARKING	3	2%
	3	ELECTRIC VEHICLE CHARGING POINTS	14	8%
	4	MOTORCYCLE PARKING	1	-0.5%
	5	BICYCLE PARKING	7	4%
	6	COMPLEMENTARY FORMS OF TRANSPORT INTERVENTION	3	2%
PART 4 TRAVEL PLANS	2	WHEN IS A TRAVEL PLAN REQUIRED?	1	-0.5%
	3	TRAVEL PLAN TYPES	1	-0.5%
	4	PRODUCING A TRAVEL PLAN	2	1%
	5	CONTENTS OF A TRAVEL PLAN	1	-0.5%
	6	TOOLKIT OF TRAVEL PLAN MEASURES	6	3%
	7	APPROVAL, SECURING, MONITORING AND REVIEW OF TRAVEL PLANS	7	4%
PART 5 HIGHWAYS CUMULATIVE IMPACT	1 / 2 / 3*	HIGHWAYS CUMULATIVE IMPACT	34	19%
APPENDIX A STREET DESIGN SPECIFICATION	1	MATERIALS AND CONSTRUCTION	1	-0.5%
	2	ADOPTION PROCEDURES	1	-0.5%
	4	DRAINAGE	2	1%
APPENDIX C PUBLIC TRANSPORT	6	PUBLIC TRANSPORT	1	-0.5%
GENERAL			17	10%
TOTAL			178	100%

*Comments questioned both the Site Allocation Plan and Proposed Approach.

3.2.3. **Table 3-3** shows the number of comments received on each chapter of the Transport SPD (including 'General' comments). This information shows that the top five reoccurring themes were

- 1 Highways Cumulative Impact (19%);
- 2 Introduction – to the Transport SPD (10%);
- 3 Legislation and Policy (10%);
- 4 Electric Vehicle Charging Points (8%); and
- 5 Street Types (7%).

Note. 'General' comments have not been included in the above list.

3.2.4. The responses received raised a series of items in relation to the Transport SPD. The content of the consultation spreadsheet was discussed with LCC and the responses to each comment were agreed. In summary, the key themes / findings from the consultation (and the **responses** to each item) are described below:

- 1 Requests to include a greater emphasis on the Climate Emergency (including a review into associated reports and guidance) in the document.

Additional text will be provided in the SPD to provide greater emphasis on the Climate Emergency.

- 2 Requests to include a greater emphasis on the Clean Air Zone, Mass Transit and other new guidance (including the Local Transport Plan) in the document.

Additional text will be provided in the SPD to provide greater emphasis on the Clean Air Zone, Mass Transit and other new guidance (including the Local Transport Plan).

- 3 Requests to use hedgerows near to schools / playgrounds.

The Transport SPD does not prevent the use of hedgerows near to schools / playgrounds, and therefore, no further action is required.

- 4 Requests for a review / changes to the level of car parking provision for schools, town centres, hot food take aways and studio flats.

The level of car parking provision for schools, town centres, hot food take aways and studio flats was agreed with LCC in previous internal consultations using the latest available data at the time of publication. If new information / data is available this will form a new study outside the scope of the Transport SPD, and therefore, no amendments to the Transport SPD are proposed.

- 5 Requests for a review into the level of cycle parking provision following the introduction of the new Local Transport Note 1/20 and amendments for large flat developments (including student accommodation) and reference to hubs.

The level of cycle parking provision (including the reference to hubs) provided for all developments was agreed with LCC in previous internal consultation using the latest available data at the time of publication. No amendments to the Transport SPD are proposed as the new Local Transport Note 1/20 was published after the Transport SPD.

- 6 Requests for changes to the provision of Electric Vehicle Charging Points (for residential developments).

The Transport SPD reflects the new Policy 'EN8' for Electric Vehicle Charging Infrastructure in the Core Strategy. This comment will be checked to ensure consistency with EN8.

- 7 Requests to remove references to Mary Portas review and importance of parking for town centre vitality.

References to the Mary Portas review will be removed because it is not a model of good practice guidance on sustainable development.

- 8 Requests to alter the duration a Travel Plan needs to be monitored for.

- There will be no alterations to the duration a Travel Plan needs to be monitored for as this is a set standard.*
- 9 Requests to focus Travel Plan targets on sustainable travel and not car use.
The Transport SPD does not prevent this from happening. Each development Travel Plan would be considered on a case by case basis. Therefore, no further changes to the Transport SPD are proposed.
- 10 Requests to alter the number of residential units' threshold for one access.
The Transport SPD states that at least two points of access are 'preferred' for developments of between 50 and 300 dwellings. This is not a prescriptive requirement one access can be provided, as site specific circumstances will dictate this in practice. Therefore, no further changes to the Transport SPD are proposed.
- 11 Requests to amend the lateral visibility 'Y' distances tabled in the Transport SPD to the Stopping Sight Distance values given in Table 7.1 of Manual for Streets (MfS) and not the Stopping Sight Distance (SSD) values which have been adjusted for bonnet length.
The Transport SPD will be updated to reflect this comment. MFS does not say that the Y distance should be based on the values for "SSD adjusted for bonnet length" which are also given in MFS Table 7.1.
- 12 Requests to review the location and content of the public transport section.
The location of the public transport improvement section in the Transport SPD will be reviewed.
- 13 Requests to review the Street Lighting section.
The street lighting section accords to national guidance and legislation, and therefore, no further review is required.
- 14 Requests for more clearer advice regarding suitable materials for permeable paving.
The advice regarding suitable materials for permeable paving is provided in the Transport SPD so no further review is required. This information is not specific or prescriptive to account for any guidance changes that may occur in the future.
- 15 Requests to review the methodology / mechanism and sites included in Part 5 Highways Cumulative Impact.
The proposed Highways Cumulative Impact assessment in the Transport SPD will be reviewed and the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors will be refined.

4 CONSULTATION

4.1 CONCLUSION

- 4.1.1. This report presents a summary of responses by appropriate category together with a clear explanation of the reason why responses have either led to no change or a change. The Transport SPD will be updated where changes are required.
- 4.1.2. Feedback received from both statutory and non-statutory consultations indicated that there was a broad number of comments across the Transport SPD. Responses to each comment have been agreed with LCC. In general, respondents indicated a widespread support for the purpose of the Transport SPD.

4.2 NEXT STEPS

- 4.2.1. Further pre-adoption consultation will take place later in the year.

Appendix A

CONSULTATION SPREADSHEET



	Part / Section / Paragraph	Comment	Action (Y/N)	Explanation	Further Comment
	General	The Transport SPD will need to address "anti-social parking", particularly, cars parking on the roads and footways / grass verges within existing / new developments.	NO	The document consistently advocates against "anti-social parking" and developers must use design to reduce this problem (see Part 1 paragraphs 1.1.22 and 2.8.4). But changes to technical requirements notably the removal of 4.8m widths in new streets, will encourage drivers not to park on pavements.	
	General	The advice currently contained within the Transport SPD is interpreted prescriptively, for example: garages are still interpreted as for formal allocated parking provision. The current guidance which permits garages to constitute allocated car parking spaces does not work, as few people use their garage for vehicle storage.	NO	Paragraph 11.1.2 (Part 2) explains that even when the requirements for a garage (to be designed to be available for car parking) are met, they will not count as a sole parking provision (a double will count as one space). This Transport SPD takes into account that many people will never make use of a garage for car parking.	
	Part 3, Section 2.1	On-street, in existing areas - The Councillor notes that on street parking has consistently caused problems and complaints from members. Whilst, much of this is existing and there are no alternative measures in many areas, on street parking cannot be prevented. The Councillor would like to see more positive steps to protect junction sight lines and pedestrian desire lines (i.e. measures to stop parked cars blocking pavements and build outs to help with crossing roads).	NO	The document consistently advocates that developers must use design to reduce this problem. People will park on the footways on narrow roads (to ensure vehicles are still able to pass), but changes to technical requirements (notably the removal of 4.8m widths in new streets), will alleviate the concerns arising from the narrowness of the carriageway.	
	Part 3	In new developments - The street design should prevent this.	NO	No action required.	
	Part 3	School Sites - The Councillor notes that school sites have a large employee base and car journeys are the primary mode of travel due to the nature of the job. The current parking ratios applied has consistently caused problems and complaints from employees at schools. Further guidance on parking provision for parents/carers (drop-off / pick-up) and visitors is also required.	NO	The standards form a consistent basis for discussion between developers applying for planning permission and the appropriate planning authority. It is intended that they should be applied throughout the region. However, it is recognised that situations may arise where the local economic environment and the availability of alternative means of travel to the private car may lead to parking provision that is more appropriate to local circumstances.	
	Part 3, Paragraphs 2.23 to 2.2.27	Use Of Cleared Sites For Temporary Car Parks - Until Leeds has a comprehensive public transport network (covering the whole of the City), the Councillor is relaxed about these.	NO	No action required.	
	Part 3	Hot Food Takeaways - The Councillor notes that this Use Class has consistently caused problems and complaints from members particularly with regards to the ratios applied, i.e. delivery service need dedicated parking bay(s).	NO	The standards form a consistent basis for discussion between developers applying for planning permission and the appropriate planning authority. It is intended that they should be applied throughout the region. However, it is recognised that situations may arise where the local economic environment and the availability of alternative means of travel to the private car may lead to parking provision that is more appropriate to local circumstances.	
	Part 3	Studio Apartments - The Councillor questions the derivation that 'visitor parking is not normally appropriate', which has caused problems in the past and believes a ratio is required.	NO	The standards form a consistent basis for discussion between developers applying for planning permission and the appropriate planning authority. It is intended that they should be applied throughout the region. However, it is recognised that situations may arise where the local economic environment and the availability of alternative means of travel to the private car may lead to parking provision that is more appropriate to local circumstances.	
	Part 3, Section 3	Electric Vehicle Charging Points: Residential - There should be one per parking space. Commercial - All new sites should have wiring to each bay given the move towards all electric. The proposal to install charging units on 10% is fine at the moment but there should be planning conditions to increase that to 25% on existing and new by 2025 with a further sliding scale to get to 50% by 2030. Layout - the proposal seems acceptable, although concerns that contractors installing charging points in public car parks are not following this.	YES	This Section has been updated to reflect the new Policy for Electric Vehicle Charging Infrastructure EN8 in the Core Strategy. WSP recommend this comment is checked to ensure consistency with EN8.	
	Part 3, Section 4	Motor Cycle Parking - These spaces / areas may need to provide charging points and could also double up as electric buggy parking spots.	YES	This Section has been updated to reflect the new Policy for Electric Vehicle Charging Infrastructure EN8 in the Core Strategy. WSP recommend this comment is checked to ensure consistency with EN8.	
	Part 4	Travel Plans - This Part should provide evidence showing the effectiveness of Travel Plans in different developments.	NO	No change required. This Part provides the criteria for developing successful Travel Plans, rather than provide commentary on the effectiveness of Travel Plans at different developments.	
	Part 4	Public Transport Box - The Transport SPD should recognise the disparity in the level of bus services and provision across the Leeds region particularly where a high frequency service in urban areas (Leeds City Centre) and a low frequency service in rural areas exists.	NO	This comment is not related to the purpose of the Transport SPD.	
	Part 5	The Councillor has raised the issue of a levy on developers to reflect the subsidy the Council provide them within certain centres. In outer areas the Council expect developers to provide parking spaces - which are a cost. In centres, the Council do not, so the development cost is lower. A mechanism for introducing a specific levy to fund public transport should be introduced so services can be expanded.	NO	No change required. This comment would be covered by the Community Infrastructure Levy, a charge which can be levied by LCC on new development in their area. It is an important tool for LCC to use to help them deliver the infrastructure needed to support development in their area.	

	Part 2, Section 9.1, Paragraph 9.1.4	<p>The Canal and River Trust welcome the recognition of cycle facilities in the document. Sustrans Routes 66 and 67 utilise part of the towpath network, and provide traffic free cycle routes between Leeds centre and suburbs to the south east (including Woodlesford and north west (including Kirkstall, Rodley and north Bradford). The Canal and River Trust wish to highlight that paragraph 9.1.4 states that the minimum width of new cycle routes should be 3m as a minimum. This could be inappropriately wide for areas next to water, as it could encourage high cycling speeds, which could present hazards for other users in proximity to the water's edge. In addition, the increase in width could result in the removal of grass verges which presently enhance the character and appearance of the canal and help to enhance local biodiversity. Should any new or improved cycleways be proposed next to their waterspace, it is likely that the Trust would request the width to be limited in order to ensure the safety of users and to safeguard grass verges alongside our infrastructure. The Canal and River Trust would not wish for the document to prejudice the ability to request for narrower widths (in the interests of health and safety and biodiversity) in the event of the provision of resurfaced or the provision of new routes next to their waterspaces.</p> <p>Whilst the Canal and River Trust note that paragraph 9.1.4 states that reduced widths can be provided in exceptional circumstances, the Canal and River Trust do advise that this should be expanded in order to include reference to the above circumstances to make these circumstances more explicit. For example, the paragraph could be expanded to read: "Reduced widths can be provided in exceptional circumstances - please seek advice of the City Council. Examples could include the need to limit cyclist speeds next to hazardous spaces, or the need to safeguard green verges."</p>	NO	No change required. The Transport SPD covers the minimum widths provided for new cycle off carriageway routes. As stated in paragraph 9.1.4 (Part 2), reduced widths can be provided in exceptional circumstances and further advice should be sought from LCC.	
	Part 2, Section 10.3	<p>Landscape / Green Infrastructure Health and Wellbeing</p> <p>The Trust welcome the contents of paragraph 10.3.1, which emphasise that pleasant walking and cycling routes promote their use and help to fulfil the Local Authority's Health and Wellbeing agenda, notably with respect to priorities 4 and 6 of the strategy. As an example of the wellbeing benefits of walking and cycling routes, with respect to their towpath network, their 2017 nationwide Community Survey (carried out in conjunction with Karter TNS) identified that 30% visitors to our towpath network do so for health / fitness reasons; and 90% of users agree that the towpath network is a good place to relax / de-stress.</p> <p>Whilst section 10.3 focuses on health and wellbeing, the Trust do have concerns that it focusses primarily upon cycle and pedestrian routes next to road utilised by vehicular traffic, as opposed to segregated routes which could include separate paths and routes along their waterways. Development alongside segregated routes, including towpaths, can have a significant impact upon the attractiveness and wellbeing benefits of walking and cycling routes. For example, the Trust only own 4% of land adjacent to our network, and third party development can have a significant impact upon the attractiveness of walking and cycling routes in our control. The Trust, therefore, request that section 10.3 is expanded to include a new paragraph referencing the need for development to respect and enhance, where possible, the character and appearance of existing (and new) walking and cycling routes that may exist alongside. This would help to avoid instances where development could result in harm to existing routes, which could be of dis-benefit to the local community.</p>	YES	WSP propose that the Transport SPD should include a new paragraph referencing the need for development to respect and enhance, where possible, the character and appearance of existing (and new) walking and cycling routes that may exist alongside.	
	Part 4, No section, No paragraph.	<p>Travel Plans - The use of Travel Plans to promote sustainable travel is welcomed as they can help to identify alternative means of sustainable travel to and from sites, as well as, including measures to promote the use of sustainable travel. There is an opportunity for Travel Plans to promote the use of underutilised walking and cycling routes, which could include parts of the towpath network. It is suggested that Travel Plan targets should include targets for the use of key walking and cycling routes alongside sites, in order to allow a judgement to be made as to the effectiveness of the plan in promoting the use of such routes.</p>	NO	No change required. This would be considered on a case by case application.	
	Part 4, Section 5.3, No paragraph.	<p>Travel Plans - There is a risk that the existing focus provided in paragraph 5.3.1 is upon levels of car use, as opposed to pedestrian / cycle use, which could make the Travel Plan less effective in assessing the quality and reasons as to why alternative sustainable travel modes are not being fully utilised.</p>	NO	This Section indicates that the setting of targets should be 'site and development specific', which would include all modes of transport. A Travel Plan sets out a range of measures to encourage the use of sustainable travel patterns, thus reducing reliance on the private car.	
	Part 4, Section 6.5	<p>The identified measures, which include the provision of improvements to the local walking network, including particular strategic routes such as the canal towpath are welcomed. A requirement for the improvement of access points to key walking and cycling corridors should be included is advised. Often, the canal and river trust network can be hidden from public view due to its segregated nature. Improvements to access points, including landscaping or even simple signage could help to make the presence of key walking routes more apparent to the public, which could help to incentivise their use.</p>	NO	Considered on a case-by-case basis.	
	Part 4, Section 7.3	<p>In circumstances where the promotion of a key walking or cycling route is proposed, then targets may need to be set to measure the use of that route. It is advised that section 7.3 could be expanded to include pedestrian / cyclist counts of key walking and cycling routes to / from the site.</p>	NO	Considered on a case-by-case basis.	
	Appendix A, Section 4 Drainage	<p>Consent from the Trust as Landowner would be required for the piped discharge of water into one of our watercourses. It is, therefore, requested that the Trust is referred to within paragraph 4.1.4 (alongside the Environment Agency, Lead Local Flood Authority and Local Internal Drainage Board) so that this is made clear to future decision makers and prospective applicants. Water runoff from highways into watercourses could introduce hydrocarbon pollution to the wider environment. It is, therefore, advised that paragraph 4.1.5 should be expanded to advise that interceptors should be installed prior to water discharging into a watercourse as may be required by the Environment Agency and / or the Canal & River Trust.</p>	YES	Paragraph 4.1.4 should reference the Trust so that this is made clear to future decision makers and prospective applicants. Paragraph 4.1.5 should be expanded to advise that interceptors should be installed prior to water discharging into a watercourse as may be required by the Environment Agency and / or the Canal & River Trust.	

	General	The Coal Authority has reviewed the Transport SPD and has confirmed that there are no comments to be made in response to this consultation.	NO	No action required.	No action required.
	Part 5, Section 1, Paragraph 1.1.1	The members of the Little Woodhouse Community Association (LWCA) do not consider that their area is a 'balanced' community. A concept coined by Leeds City Council. The Little Woodhouse Area is made up of a student population of more than 75%, according to LWCA. The LWCA would like to see more mixed housing for families and a primary school for younger children, with appropriate supporting infrastructure (i.e. GP surgeries, Dentists, Leisure Facilities etc.). Park Lane College (City College) should be required to only sell to another educational establishment for development on that site in order that growing families have facilities on the doorstep. There are no electric vehicle charging points in the Little Woodhouse Area, it is considered that CIL / Section 106 monies should be directed towards funding these in the future.	NO	General comment. All applications are considered on a case-by-case basis.	
	Appendix A, Section 1.2, Paragraph 1.2.14	The members of the LWCA state that York Stone flags have systematically been stolen by the general public and, also, removed by Leeds City Council in Conservation Areas. In general, guidance on pavement design does not seem to be adhered to. Contrasting materials have also been used at Woodhouse Square (two sides have been paved using York Stone flags and the other two concrete machine cut tegula squares), which appears odd.	NO	General comment.	
	Appendix A, Section 1.5, Paragraph 1.5.1	Tegula blocks are not an appropriate replacement for York Stone flags in a Conservation Area.	YES	WSP propose to review this comment with LCC.	
	Appendix A, Section 2.4, Paragraphs 2.4.7 and 2.4.8	The LWCA explain that Little Woodhouse Street LS2 has a cast iron street sign, yet the community have been told (by LCC Asset Management) that this is a 'non-adopted' road – even though there is no sign to indicate such, which contradicts the information contained in paragraph 2.4.7. In the past, the local council tasked a Highways engineer to get a change of Traffic Regulation Order to arrange for double yellow lines to be applied to that road in order to stop fly parking. This never happened. It is likely that future developers in the area will have to sort this dilemma out.	NO	This comment relates to a specific item which has been raised by the Consultee to LCC in the past and therefore should not form part of the Transport SPD.	
	Part 4, Section 6.2, Bullet Points	As stated earlier, the LWCA would like to see more family homes and schools in the Little Woodhouse Area. This location can utilise (and take advantage) of walking / cycling into the City Centre (due to the close proximity), and thus, residents would not require cars.	NO	No action required.	No action required.
	Part 5, Section 2, Paragraph 2.1.7	Bus services into and out of the City are available in some parts of Little Woodhouse. It is important to consider a circular system that links non-city centre areas. The Corridor Improvement Programme (CIP) is not required. It is expected that a rapid transit system will be in place in the next decade in order for the City to function efficiently.	NO	This comment relates to Transport provision in Leeds.	
	Appendix A, Section 4, Paragraph 2.4.15	Further guidance on road markings in Conservation Areas is required, inconsistent with Leeds City Council Highways.	YES	WSP propose to review this comment with LCC.	
	General	The National Grid has reviewed the Transport SPD and has confirmed that there are no comments to be made in response to this consultation.	NO	No action required.	No action required.
	General	Officers from Selby District Council have reviewed the Transport SPD and have confirmed that there are no comments to be made in response to this consultation.	NO	No action required.	No action required.
	Part 2, Section 9.2, Paragraph 9.2.2	Figure XXX, is referenced in Part X paragraph 9.2.2, but is not presented in the Transport SPD.	YES	All images / graphics will be provided in the Final Transport SPD.	
	Part 2, Section 12.4	Good to see a section on 'Disabled Access' for cyclists included in the Transport SPD. Good examples of such schemes exist in The Netherlands.	NO	No action required.	No action required.
	Part 3, Section 2, Paragraph 2.5.8	Additional bus based park and ride facilities are welcomed, but for rail based park and ride facilities to be successful existing capacity issues with car parks need to be addressed, particularly at Horsforth Station and Kirkstall Forge.	NO	General comment. All applications are considered on a case-by-case basis.	
	Part 1, Section 2.5, Paragraph 2.5.30	The Clean Air Strategy has not been thought through, as it fails to address the following aspects; the cost of electricity for cars, mileage electric vehicles can achieve, compatibility between electric vehicles and different charging points, charging times when compared to petrol / diesel alternatives etc. Fireworks should also be banned except at public events.	NO	This comment is not related to the purpose of the Transport SPD.	
	Part 2, Section 2.6, Paragraph 2.6.9	Children will not play outside in a Home Zone type layout, where vehicle speeds are 10mph. In addition, some children will bring anti-social behaviours to an area which are not welcomed (ball games, unsupervised etc.)	NO	This comment is not related to the purpose of the Transport SPD.	
	Part 1, Section 2.5, Paragraph 2.5.33	A walkable City Centre sounds good in theory, but not on a practical level. Leeds City Centre covers a wide geographical area and the vast majority of people get other forms of transport to access the centre. Crime and disorder should be considered when making an area 'walkable' as different groups of people (vulnerable groups) would perceive the 'fear of crime' differently, as such, this could create barriers.	NO	Local Authorities are obliged under Crime and Disorder Act 1998 to consider the crime and disorder implications of all planning applications. Crime prevention through environmental design (CPTED) is a concept that focuses on designing out crime by developing an understanding of the factors that are likely to contribute to a higher incidence of crime within a community. The built environment can have both a positive and negative impact upon criminal activities, and is a crucial factor to how safe and secure people feel within their community. However, planning out crime can only work if it is part of a wider strategy incorporating other measures such as regeneration, community involvement and town centre management.	
	Part 2, Section 6.3	It is important to ensure that all pot holes have been filled in too.	NO	This comment is not related to the purpose of the Transport SPD.	No action required.
	Part 3, Section 3.1	Electric vehicle charging points - Refer to comments to 2.5.30 above.	NO	No action required.	No action required.
	General	Scarcroft Parish Council supports the principles of the Transport SPD, and will wait with anticipation to see how the planning process will implement these.	NO	General comment.	No action required.
	General	The Holbeck Viaduct Project is a community project to bring the disused Holbeck Viaduct in Leeds, England, back into public use. A pre-feasibility scoping study report has been prepared and outlines several uses for the viaduct which would enable Leeds City Council and the wider city to better meet its obligations related to the Transport SPD, Leeds Local Plan and the Climate Emergency. These uses include a green walkway (particularly to secure much better access from the city centre to/from Elland Road and Holbeck), cycle path, park, arts space, community garden, events hub, public allotments, café, music venue, viewing platform, local landmark or other community-focused project(s).	NO	General comment.	No action required.
	Part 1, Section 1, Paragraph 1.1.1	The Transport SPD states that "Leeds City Council has the ambition to be the best City in the UK". The 'ambition' or aspiration sentence is not required. Reason - It is not sufficiently positive. It is suggested that paragraphs 1.1.2, 1.1.3 & 1.1.4 are incorporated, as follows: "Leeds City Council has prepared a policy document entitled the "Best Council Plan" which will address matters such as Inclusive Growth, Promote Health & Wellbeing strategies, reduce inequalities". Council policy is to address climate change & become Carbon Neutral by 2030. The Council will embrace "Sustainable Transport & Travel" and energy saving policies for "New Development" throughout Leeds City Centre together with urban & rural villages' districts in the administrative area."	NO	No change required. This comment would not add to the content of the Transport SPD.	
	Part 1, Section 1, Paragraph 1.1.5	It is recommended that paragraphs 1.1.5, 1.1.6 and 1.1.7 should be integrated. Reason - Simplify and to concise the document (avoid duplication of draft shown in Section 2 'Legislation and Policy'). As follows: "This Transport plan supplements the Leeds City Council Core Strategy, Area Action Plans, Site Allocation & Adopted Supplementary Planning Documents including Neighbourhoods for Living, National Policy / Legislation evidenced in Section 2."	NO	No change required. This comment would not add to the content of the Transport SPD.	
	Part 1, Section 1, Paragraph 1.1.8	The phrasing "intended for use" should be removed. Reason - to ensure positive requirement to follow policy guidance. Suggested change: "The Transport SPD sets out guidance to be used by developers ..."	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.	
	Part 1, Section 1, Paragraph 1.1.9	In this paragraph, and the Transport SPD as a whole, there is an over use of words. It is suggested that, for clarity, omit phrases such as "in its broadest sense, namely" and insert "including".	NO	No change required. This comment would not add to the content of the Transport SPD.	
	Part 1, Section 1, Paragraph 1.1.10	Agreed	NO	No action required.	No action required.

Part 1, Section 1, Paragraph 1.1.11	In the final sentence, change the word "should" to "must". Reason - to be positive.	NO	No change required. This comment would not add to the content of the Transport SPD.	
Part 1, Section 1, Paragraph 1.1.12	Further explanation, of what constitutes to "exceptional cases" is required.	YES	WSP recommend that the Transport SPD should explain what constitutes to be "exceptional cases" and provide examples of which.	
Part 1, Section 1, Paragraph 1.1.13	Change the word "should" to "needs to be" and omit the words "where possible".	NO	No change required. This comment would not add to the content of the Transport SPD.	
Part 1, Section 1, Paragraph 1.1.14	Change the word "should" to "needs to be".	NO	No change required. This comment would not add to the content of the Transport SPD.	
Part 1, Section 1, Paragraph 1.1.15	Change the word "should" to "needs to be".	NO	No change required. This comment would not add to the content of the Transport SPD.	
Part 1, Section 1, Paragraph 1.1.16	Change the word "should" to "must".	NO	No change required. This comment would not add to the content of the Transport SPD.	
Part 1, Section 1, Paragraph 1.1.17	Agreed	NO	No action required.	No action required.
Part 1, Section 1, Paragraph 1.1.18	Change the word "should" to "needs to".	NO	No change required. This comment would not add to the content of the Transport SPD.	
Part 1, Section 1, Paragraph 1.1.19	Agreed	NO	No action required.	No action required.
Part 1, Section 1, Paragraph 1.1.20	Change word "encourages" to "requires".	NO	No change required. This comment would not add to the content of the Transport SPD.	
Part 1, Section 1, Paragraph 1.1.21	There is an inconsistency in the language used in this paragraph and Part 2. This paragraph refers to "Residential Street", whilst Part 2 refers to "Connector Street". The wording should change to read "any street design above or outside the parameters of Street Hierarchy identified in Part 2 will require early engagement with the Local Planning/Highway Authority."	NO	Paragraph 2.1.4 (Part 2) defines the classified residential streets into Types 1-5, and therefore, there would be no benefit to changing the Transport SPD.	
Part 1, Section 1, Paragraph 1.1.22	Anti-Social parking as described in this paragraph is unlawful, "should be designed out wherever possible" is, therefore, inappropriate - condones breaking the law & therefore must be omitted.	NO	In general, Rule 22 of the Highway Code says: "You must not park partially or wholly on the pavement in London, and should not do so elsewhere unless signs permit it..."; however, outside of the capital, you are permitted to partially park your vehicle on the pavement but it must not be causing an obstruction. Parking on the pavement can obstruct and seriously inconvenience pedestrians, people in wheelchairs or with visual impairments and people with prams or pushchairs. Therefore, layouts should ensure that anti-social parking should be designed out wherever possible.	
Part 1, Section 1, Paragraphs 1.1.23 to 1.1.32	All agreed.	NO	No action required.	No action required.
Part 1, Section 2.1 to 2.5	It is agreed that legislation and policies indicated in sections 2.1 to 2.5 provide a framework to inform the Transport SPD. However, the final policy SPD needs to recognise urban and rural communities have differing needs. Policies must not be a "one size fit all" (see draft document paragraph 7.7.4). Within policy, Officers, Elected members and appeal planning inspectors must be provided with guidance on "site specific" matters to enable determination of Planning Applications or change of use. The Transport SPD must complement with Section 9 of the National Planning Policy Framework namely to "Promote Sustainable Transport".	NO	WSP have reviewed all existing Transport related SPD's and updated guidance to meet current policy and practice in line with the Best Council Plan, the refreshed Neighbourhoods for Living SPD and local and national policy and amalgamate content into one streamlined Transport SPD.	
Part 1, Section 2.5, Paragraph 2.5.8	Omit "actively pursue the implementation" and insert "implement" . Reason: This policy emerges from those set out in the Local Plan more than a decade ago. The Council must illustrate positivity.	NO	No change required. This comment would not add to the content of the Transport SPD.	
Part 1, Section 2.5, Paragraph 2.5.10	This paragraph uses the word "consideration". If after a decade the Council are unable to determine if the identified are feasible or not the policy becomes vague and indecisive. The policy has to prioritise the sites shown on Map 9 against the need to satisfy Core Strategy policies T1 and T2, NPL principles 13 & 19 and, also, new climate change targets	NO	This comment relates to other aspects of policy (potential park and ride sites across Leeds) which is outside the control of this Transport SPD.	
Part 1, Section 2.8, Paragraph 2.8.3	This paragraph must include a reference to Paragraphs 39 to 46 of the National Planning Policy Framework and the Leeds City Council "Statement of Community Involvement".	YES	WSP recommend that the Transport SPD should be updated as per the comment provided. Paragraphs 39 to 46 of the NPPF refer to pre-application engagement and front loading, while Statement of Community Involvement is the council's statement on how the local community and others will be involved in the consideration of planning applications, both of which are appropriate to reference in paragraph 2.8.3.	
Part 1, Section 2.8, Paragraph 2.8.6	Agreed and welcome.	NO	No action required.	No action required.
Part 1, Section 2.8, Paragraph 2.8.7	Agreed and welcome albeit the final sentence is a contradiction of the overall policy principle of "No Trade-off".	YES	WSP recommend that the final sentence of this paragraph is reviewed to remove contradiction of the overall policy principle of "No Trade-off". The last sentence states, "Elements of design applications which are proposed primarily to overcome physical site constraints or legal restrictions will be considered on their merits" which could be misinterpreted.	
Part 2, Section 2.1, Paragraph 2.1.4	Street Type 1 & 2 should include a reference of maximum traffic movements each weekday.	NO	No change required. Traffic volumes vary throughout the day and are likely to change throughout the life time of this document.	
Part 2, Section 2.2, Paragraph 2.2.3	Type 1 Connector Streets – Vehicle access points ; please note a conflict between "An emergency access does not constitute a secondary point of access but may provide other benefits". Omit words shown in bold type/italics. Reason - to ensure consistency with Section 7 paragraph 7.2.2 (Emergency Services).	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.	
Part 2, Section 5, Paragraph 5.2.12	"Relaxation", as identified (d) where recommended standards are not achievable or not introducing traffic measures associated with restricting speed is wholly inappropriate. Reason - the interests of road safety for all road users and pedestrians.	NO	No change required. This comment is in relation to accesses onto the external highway network which do not meet the Y-distance values stated. This point would be subject to discussion with LCC and considered on a case by case application if a relaxation was required in certain circumstances.	
Part 2, Section 10	10.1.3 to 10.13 Strongly supported, reflecting paragraph 2.2.5 and Section 10.3.	NO	No action required.	
Part 2, Section 10, Paragraph 10.2.4	Owner / occupiers of dwellings on new housing estates can be informed by developers of the opportunities to maintain verges outside their properties. Whether it is necessary to obtain a "license to cultivate" to conform to Section 142 of the Highways Act would require the agreement of the Council.	NO	No action required.	
Part 2, Section 11 and 12	Section 11 & 12 All agreed and supported	NO	No action required.	No action required.
Part 3	The general principles outlined in the draft are supported, however, the omission of detailed parking provision at "distinct centres" such as Crossgates & Wetherby creates a reliance on on-street parking which needs to be addressed in this Transport SPD.	NO	The standards form a consistent basis for discussion between developers applying for planning permission and the appropriate planning authority. It is intended that they should be applied throughout the region. However, it is recognised that situations may arise where the local economic environment and the availability of alternative means of travel to the private car may lead to parking provision that is more appropriate to local circumstances.	
Part 3, Section 2.3	This Section is strongly supported for the reasons set out in paragraph 2.3.5. The concern is, notwithstanding the success of Eiland Road and Temple Green, there is the perceived lack of commitment by the City Council and the West Yorkshire Combined Authority to implement Park & Ride on those sites identified on Map 9 of the Local Plan.	NO	This comment is not related to the purpose of the Transport SPD.	
Part 4, Section 3.2, Paragraphs 3.2.1 to 3.2.4	Agreed in principle.	NO	No action required.	No action required.
Part 4, Section 3.3, Paragraph 3.3.1	Omit / Remove paragraph.	YES	WSP recommend that the Transport SPD is updated. Omit / Remove paragraph as it provides no benefits.	
Part 4, Section 3.3, Paragraph 3.3.2	The final sentence should be changed to read, "An interim travel plan must be finalised to meet the criteria of a "Full Plan" at the "Reserved matters stage", this must be a condition attached to any outline development approval."	NO	No change required. This comment would not add to the content of the Transport SPD.	
Part 4, Section 4, Paragraphs 4.1.1 to 4.1.2	Agreed.	NO	No action required.	No action required.
Part 4, Section 4, Paragraph 4.3.2	Key third parties must also include "Local Community Representatives" . Reason - to ensure there is compliance with the Leeds City Council "Statement of Community Involvement".	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.	

Part 4, Section 5.2, Paragraphs 5.2.1 to 5.2.3	Agreed and strongly supported.	NO	No action required.	No action required.
Part 4, Section 5.2, Paragraph 5.2.5	Review and reword to read: "Travel plans must focus on definite commitments and not include ambiguous or vague wording such as "should, explore, research, look into, if possible, investigate or consider" "	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.	
Part 4, Section 5.3, Paragraph 5.3.1	Targets and indicators must "Not be Aspirations". All targets and Indicators must be achievable and have a factual baseline.	NO	No changes required. Section 5.3 advocates that targets will be challenging but achievable.	
Part 4, Section 5.4, Paragraphs 5.4.1 to 5.4.8	Agreed and together with Table 5.1 and Section 6.1.0 paragraph 6.10.1 which provide excellent preparation guidance for the School and "Governors".	NO	No action required.	No action required.
Part 4, Section 5.4, Paragraph 5.4.9	Omit words "Where Possible". Community engagement with residents, particularly those living in close proximity to the school, who would be affected by "on-street parking" at opening / close of the school day is essential. Paragraph 6.1.3 of Section 6 is noted. Reason - in the interest of child safety and to ensure "Good Neighbours". Similarly public transport services and school crossing officers can and are affected by inconsiderate parking. Traffic Regulation Orders need to be enforced to support the school – police and community support officers using their powers.	NO	No change required. This comment would not add to the content of the Transport SPD.	
Part 4, Section 5.4, Paragraph 5.4.13	Agreed, attention in this paragraph requires to be drawn to Section 7 - Paragraph 7.3.8.	NO	No action required.	
Part 4, Section 6.4	Most of the measures which the council suggest to promote and support Public Transport improvements will be publically supported. However, deregulated bus service provisions rely on the will of the provider to register & operate frequent, reliable services. Potential passenger expectations are not always deliverable and operators fail to offer & meet the accessibility criteria indicated in the Core Strategy/Local Plan.	NO	This comment is not related to the purpose of the Transport SPD.	
Part 4, Section 7	Previous reference has been made above to paragraphs 7.3.8 and 7.7.4 7.8 Failure to reach agreement on a Travel Plan 7.8.1The importance of sanctions is appropriate. For clarity please include in the text after NPPF - insert - Section 9.	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.	
Part 5, Section 2, Paragraph 2.1.7	It appears that, in this paragraph, the various income streams identified in the draft document (CIP & LPTIP) will not adequately fund the "significant" Transport schemes being promoted in Leeds by the City Council. Is this correct? It is also noted that examples should be provided after the state, "It is therefore key that additional sources of funding are identified ..."	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.	
Part 5, Section 3	Table 3.1 - Will developer contributions Section 106, Section 38 or Section 278 of the Highways Act 1980 agreement obligations meet the total cost for the implementation of highway mitigation measures required to make the cumulative impacts on (a) 10,599 dwellings (81 sites) (identified in Table 3.1) or only (b) direct junction mitigation for 31 direct junction impact sites, 1,742 dwellings?	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.	
Part 5, Section 3	Table 3.2 - Where two or more combined sites, like the 12 shown affecting 38 individual sites require a cumulative contribution. For those sites to obtain planning permission / approval, at what stage would mitigation and appropriate works commence?	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.	
Part 5, Section 3	Table 3.3 - The same question arises as for Table 2, above. There are 5 cumulative impact sites affecting 17 individual sites.	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.	
Part 5	It is not clear from the information relating to any of the necessary mitigation work required for the sites in the tables are those arising from Part 5. Junction design and visibility for this Transport SPD or if, the anticipated ratio of flow to capacity (RFC) or degree of saturation (DoS). Can this be provided?	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.	
General	To conclude, the draft can be made shorter and more succinct, as recommended by paragraph 15 of the National Planning Policy Framework. The draft SPD contains negative or statements which are less than positive, in other instances open to interpretation must be removed and avoided.	YES	WSP propose to undertake the changes in line with the preceding Consultee comments outlined above.	
Part 1, Section 2, Paragraph 2.5.19.	CBOA notes that the use of water freight transport referred to in Part 1, paragraph 2.5.19, references the already adopted Leeds Natural Resources and Waste Plan (2013). The Leeds Transport Strategy was adopted in 2015. However, the situation with environmental and emissions considerations has moved apace since then. Leeds now has a Clean Air Zone and all measures to prevent growth and to lower vehicle emissions should be examined and pursued wherever possible. Use of water transport is excellent at going a considerable way towards achieving this, as barges can carry up to about 600 tonnes and a single barge can eliminate many lorries (up to about 30) from the roads. Cost should not be the sole decision maker in the choice of the transport means, but effectiveness in lowering emissions. As a summary, the benefits of barge transport are:- ○ Significant reduction of road congestion, where HGVs in built up areas are a major issue. ○ Lower risk of road accidents/fatalities. ○ Lower noise on highways. ○ Reduced highway wear and tear from HGVs, meaning lower long term highway maintenance costs. ○ Lower fuel consumption meaning reduction of the carbon footprint. ○ Lower exhaust emissions, meaning less air pollution in the district. ○ Each barge can carry 30 or more lorry loads.	NO	General comment.	

Part 3, Section 2.3		<p>Highways England are generally supportive of the principles around car parking set out in the Transport SPD, particularly the presumptions against new permanent car parking in the City Centre Public Transport Box and against an increase in existing commuter parking between and within the Public Transport Box, City Centre Core and Fringe. It is noted in the Transport SPD that "proposals relating to car parking for Leeds railway station will be considered on their own merits in the context of promoting rail Park & Ride and future High-Speed rail connections." In response to the consultations on the Leeds Integrated Station Masterplan and the Leeds City Region HS2 Growth Strategy, Highways England commented that the impact of the proposed HS2 station car park would need to be fully assessed and mitigated accordingly. Whilst we support the principle of promoting rail Park & Ride, the significant parking facility adjacent to the railway station will run counter to one of the key objectives in the South Bank SPD of implementing a sustainable parking strategy on the basis that the facility is not controlled to only serve customers of the rail facility. A large rail Park & Ride car park at this location will have significant traffic implications on the strategic road network (SRN), particularly at junctions 3 and 4 of the M621. Therefore, Highways England would comment that the impact of a railway station car park will need to be fully assessed (once the number of spaces has been finalised, or assuming a worst-case scenario) and mitigated accordingly. It is noted that one of the desirable characteristics of public Park & Ride sites is a location at the intersection of radial and orbital routes, which could include junctions on the SRN. Whilst Highway England would support the interception of car trips to reduce vehicle flows on the SRN during peak periods, we would note that facilities at these locations could have significant impacts on the operation of the SRN and its junctions by virtue of the vehicles using them arriving via the SRN.</p>	NO	This comment is not related to the purpose of the Transport SPD.	
Part 3, Section 2.10		<p>Car club and car share Highways England support the council for the uptake of car sharing and car clubs, as well as the recommended provision for car club and car share spaces, and are supportive of these measures and any further measures to encourage the use of these services to reduce the reliance on single occupancy private car trips.</p>	NO	General comment.	No action required.
Part 3		<p>Roadside facilities Highways England note that, while not specifically addressed in the SPD, the specific parking requirements and methodology for calculating parking provision for new motorway service areas, motorway rest areas, truckstops and trunk road service areas are outlined in Annex B of Circular 02/2013 The strategic road network and the delivery of sustainable development.</p> <p>Where a site is subject to a pre-existing sealed agreement which specifies the levels of parking provision, this shall continue to apply until such time as the scale and/or scope of on-site activities is extended. If the scale and/or scope of on-site activities is extended, the requirements and calculation methodology set out in Annex B should be used. These requirements are in place to ensure adequate provision for roadside facilities and to ensure that the safety of the SRN is not compromised.</p>	NO	General comment.	
Part 4		<p>Travel Plans Highways England support the continued use of Travel Plans as a way of promoting sustainable travel and would expect the promoters of all developments to put forward initiatives that reduce the traffic impact of their proposals by supporting the promotion of sustainable transport and the development of accessible sites. This is particularly necessary where the potential impact is on sections of the SRN that could experience capacity problems in the foreseeable future. Highways England also note that a robust Travel Plan (inclusive of monitoring and updating) can manage the impact of development on the SRN and can be effective in reducing the need for major transport infrastructure. Measures such as this can also retain network capacity to support further development. The partnership approach outlined in Section 4.3 remains key; early engagement with Highways England enables them to identify appropriate measures to facilitate the delivery of sustainable development. Lack of such a collaborative approach on behalf of developers leads to delays in the planning process. We will actively engage in any pre-application discussions with the council and promoters. As above this will ensure a reduction in the consultation and review period once a planning application has been submitted.</p> <p>In terms of Travel Plan targets and indicators, Highways England support the assertion that trip generation targets should refer to vehicle trips and would comment that initial targets should match the levels assumed in any capacity assessments undertaken in the Transport Assessment. All targets should be SMART (Specific, Measurable, Achievable, Realistic and Time-Related). In monitoring and reviewing the performance of the Travel Plan, Highways England will require a survey is undertaken within six months of occupation of the development, and then annually at the same time each year (during a neutral month), for as long as the site is occupied. The results of the survey should be provided to the Council and Highways England within one month of the survey being undertaken and should include vehicular trips and modal splits. If targets are not being met, additional measures should be implemented in consultation with Highways England and the Council.</p>	NO	General comment.	
Part 5		<p>Highways cumulative impact Highways England are supportive of any proposals that seek to identify and mitigate the cumulative impact of developments on the SRN as part of the Council's plan led system. Of the junctions identified in the Transport Background Paper (where congestion is worsening and likely to require mitigation in the future), the following are on the SRN:</p> <ul style="list-style-type: none"> *M1 junction 41 *M1 junction 42/M62 junction 29 (Lofthouse interchange) *M1 junctions 45-47 *M62 junction 26 *M62 junction 28 *M62 junction 30 *M621 junctions 1 and 2 *A1(M) junction 46 <p>At these locations, it is likely that private developer contributions will be required. Furthermore, Highways England support the view that the traditional Transport Assessment methodology is often inadequate for identifying cumulative development impacts. If the cumulative impact of developments is not identified and adequately mitigated against, this could have safety implications on the operation of the SRN. Therefore, Highways England are broadly supportive of the proposed alternative methodology in the Transport SPD to facilitate funding from developments to support mitigation schemes due to cumulative impacts. Where a contribution towards the cost of a mitigation scheme on the SRN is identified, Highways England would request that they are consulted at the earliest opportunity, regarding the specific mitigation scheme required to agree details such as design, cost and scope. All proposed mitigation schemes on the SRN would need to undergo Stages 1-4 of the Road Safety Audit process in liaison with Highways England.</p>	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors. There is also no text on the mechanism LCC would use to obtain monies for Highways England (and the SRN junctions).	

Part 1.	Better Wetherby are generally supportive of the aspiration and ambition contained in the document. When the document refers to being the "Best City", it is hoped it means the whole of the metropolitan area. At paragraph 1.1.4, it states: The geographic scope of this Transport SPD is the entire Leeds Metropolitan District which includes the City Centre as well as the main urban area of Leeds and many designated town centres. However, there appears to be little evidence of focus on or attention to outlying areas either in this text or in current practice. This document should have a consistency of approach across the area. Such significant settlements and transport hubs as Wetherby and Otley are not referred to under the several headings and categories in this document, whereas the City Centre and the Fringes are constantly referenced. The aspiration, ambition and goals in the document have little detail or substance alongside i.e. data showing commuters using public transport currently stands at 19%, those using cars 66%, those cycling 2%, those walking 12%. There does not appear to be a timescale in this document other than a carbon neutral target date of 2030. Target dates are needed for planning, consultation and delivery. The statistics, documents, agencies promoting sustainable travel, sustainable transport, improved health and education, that are referred to, have been long in existence and it begs the question why little has been acted on in Wetherby to date. It is noted that this document now supersedes documents with those failed aspirations. It may be argued that this is a strategic document and that the tactical and operational documents are elsewhere. Evidence of delivery is overdue in the Wetherby and Leeds Outer North East area. This must change if Leeds City Council wishes credibility.	NO	The Transport SPD should not be location specific and the guidelines should be applicable to all areas of the region.	
Part 2, Section 9	Cycling is a well-supported sport and past-time in Wetherby. However, as a daily alternative form of transport it fails to gain traction. This despite some local encouragement and several Travel Plans associated with new developments. Safe and confidence-inspiring cycle routes have not and currently cannot be identified. The Town Centre roads are narrow, old in design and uneven and therefore dangerous for cyclists, particularly the young, the inexperienced and the less competent. Other alternatives such as the use by cyclists of bridle paths have been identified but have failed to impress. These are often unsuitable for everyday use or are generally used for more appropriate leisure activities for which they were preserved. Cycling initiatives such as "Leeds Cycling Starts Here Strategy 2017" again concentrates on the city area and does not engage with Towns and the outer Unitary area. The residents of Wetherby look forward to engaging with feasible and funded initiatives in the near future that create safe cycling conditions. It would involve a new traffic system for the Town centre, for cycle ways to be specially built and created and for cycle parking facilities to be provided as a norm in the town. This will take serious planning, organisation and finance to support the sustainable aims within this SPD.	NO	This comment is not related to the purpose of the Transport SPD.	
Part 2, Section 10.3	Current thinking identifies mental and physical wellbeing all the residents to be of paramount importance. Sections of the population are identified as especially vulnerable such as the elderly and disabled. Public transport is required on a daily basis to enable these sections of the population to socialise with friends and family, attend hospital appointments and also attend entertainment, sporting events, exercise classes and the like. Many elderly residents either cannot drive for health reasons or cannot afford to run a car. The last Census for Wetherby showed there was a higher proportion of elderly residents than the norm. Isolation and loneliness are identified as a problem to be more seriously addressed. Lack of public transport exacerbates or even causes these problems which in turn leads to the downward spiral in physical and mental wellbeing. Public transport is equally very necessary to other sections of the community particularly to young people to access Higher Education, Training and work opportunities and the workplace. This at timely intervals and at affordable prices. Hospitals and clinics are situated in Leeds, York, Harrogate and Otley. The current levels of public transport in LONE area do not facilitate convenient travel the majority of these sites. Increasing referrals to York are particularly problematic by public transport. Recognising the importance of socialising and entertainment to wellbeing, it should be noted that it is not possible to visit any entertainment venue in York by public transport in the evenings or on Sundays. Even visiting such as Leeds Grand Theatre, the Playhouse etc means clock watching in order not to miss the last X99 bus home at 22.43. Leeds City Council has stated its intention to eventually charge private cars for entering the city and in the future ban them altogether. Residents of LONE area can only choose travel by bus or car, there is no train station. The last Leeds Health and Wellbeing Strategy document was published to address the period 2016 – 2021. The intention, aspirations, aims have been in play for three plus years. We would ask how the 12 priorities in that document have been address and how they will now correlate with the Transport SPD. The residents of Wetherby area currently ask what consideration has been given to them under those priorities and what is the results and benefits.	NO	This comment is not related to the purpose of the Transport SPD.	
Part 3	Wetherby and the surrounding villages fall within the Leeds City unitary area and need at all times to be given consideration as a large settlement on the strategic routes that is highlighted on mapping. The requirement for parking in Wetherby Town currently has to meet three needs. It needs to accommodate the workers travelling to the town as a recognised centre of employment and who have an inadequate or no bus service. Further the Town needs parking for clients and customers to use the commercial establishments and retailers of necessity and thus supporting its economy. Parking is also required for visitors to this hitherto attractive and historic town as a successful tourist venue. Some visitors and would-be visitors already avoid the Town centre due to lack of parking spaces and this before new developments in the area. Further to this there has been an overwhelming need for a park and ride for commuters from Wetherby to Leeds, York, Harrogate and other destinations. The siting of a park and ride at Wetherby would be close to two major junctions on the A1 (M) motorway. Visitors from nearby communities and visitors from further afield need this facility if cars are to be removed from the Town centre and from the roads leading to Leeds, York, Harrogate and elsewhere. The users would be those car using commuters that would be using their cars from the trunk roads and the cities.	NO	This comment is not related to the purpose of the Transport SPD.	
Part 5	The cumulative effects in Wetherby of vehicle sourced pollution, of congested roads, of the increased danger to pedestrians and to cyclists, of the increased lack of parking facilities, of threats to health, to the utility and enjoyment of a historic town have been growing now, over some years. Housing developments being completed and those passed and planned threaten to increase the number of private cars used in the area by 1800 and more. This dubious achievement is the result of Leeds City Council Officers and Councillors initially addressing the accumulation "problem" against individual applications and not as a cumulative whole of several developments within a short period of time. Mitigation has been alluded to for each application but rarely specified and has not yet materialised in the required major form. Traffic experts, some within city council TDS, have suggested that the required major mitigation cannot physically be delivered. If the aspirations in the Transport SPD are to be credible, they need now to be urgently addressed against this previous poor performance.	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.	
Appendix C References to in Pt 4 Pages 128 -171 References to in Pt 5 Pages 173 -176	Although Wetherby is referred to by Leeds City Council as being on key public transport routes and arbitrarily referred to as a "Transport Hub" despite it having no bus station. (It has two bus stands.) It still does not have the regularity of bus services to main employment areas that would discourage several thousand daily commuters from using cars; to enable residents to visit major hospitals and clinics without using private transport; to enable the population to use sports and health facilities that have never been provided for in the Town or to reach education establishments, without the use of their cars. These public transport shortcoming for the town folk and residents of the villages have been highlighted for years and very recently in such forums as Leeds Outer North East meetings and with the City Planners. They appear to be ignored or financial costs and availability are cited as a reason for no action. But we have in the Transport SPD the central aspiration to provide alternatives to car use. To reduce pollution caused by the internal combustion engine. To encourage residents to use alternatives. To ensure new developments support these ambitions. Leeds have been talking about such measures and initiatives for some time now but have not deigned to involve other main settlements. We see little or no evidence of this in Wetherby as yet. In fact, recent road and housing planning decisions show the reverse. Leeds City Council Planners constantly permit the contravention of their own accessibility guidelines and standards. For example, Leeds Planners have a standard requirement that all Planning Applications do/will have a 15 minute frequency of Public Transport passing or accessible to an application site. This has consistently not been applied to applications in Wetherby. Indeed, existing services do not meet this standard. Contravention of these guidelines elsewhere have resulted in planning refusals. These are dual standards which do not sit well with the Transport SPD document.	NO	This comment is not related to the purpose of the Transport SPD.	
General	Better Wetherby recognises and supports the declared Climate Emergency by Leeds City Council. However initial discussions led by such as Leeds Climate Commission and initiatives such as the Big Leeds Climate Conversation have for many months either not sought representation of Wetherby residents or have paid lip service to their needs. Attempts to engage with lead Councillors e.g. Councillor Mulherin, involved in these schemes have been ignored. Why? References in this report and other reports tend to be Leeds City centric and do not readily address the effects of Climate Change and pollution across the Leeds Unitary Area and certainly not in relation to Wetherby Town and its surrounding area.	NO	This comment is not related to the purpose of the Transport SPD.	

	General	<p>Natural Environment and Rural Communities Act 2006 (published October 2006). Section 40 – "Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity".</p> <p>National Planning Policy Framework (published July 2018). Paragraph 175 – "development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists".</p> <p>National Planning Practice Guidance – Natural Environment Guidance. (published March 2014)</p> <p>This Guidance supports the implementation and interpretation of the National Planning Policy Framework. This section outlines the Forestry Commission's role as a non-statutory consultee on "development proposals that contain or are likely to affect Ancient Semi-Natural Woodlands or Plantations on Ancient Woodlands Sites (PAWS) (as defined and recorded in Natural England's Ancient Woodland Inventory), including proposals where any part of the development site is within 500 metres of an ancient semi-natural woodland or ancient replanted woodland, and where the development would involve erecting new buildings, or extending the footprint of existing buildings"</p> <p>It also notes that ancient woodland is an irreplaceable habitat, and that, in planning decisions, Plantations on Ancient Woodland Sites (PAWS) should be treated equally in terms of the protection afforded to ancient woodland in the National Planning Policy Framework. It highlights the Ancient Woodland Inventory as a way to find out if a woodland is ancient.</p> <p>The UK Forestry Standard (4th edition published August 2017).</p> <p>Page 23: "Areas of woodland are material considerations in the planning process and may be protected in local authority Area Plans. These plans pay particular attention to woods listed on the Ancient Woodland Inventory and areas identified as Sites of Local Nature Conservation Importance (SLNCIs)".</p> <p>Keepers of Time – A Statement of Policy for England's Ancient and Native Woodland (published June 2005). Page 10 "The existing area of ancient woodland should be maintained and there should be a net increase in the area of native woodland".</p> <p>Natural Environment White Paper "The Natural Choice" (published June 2011)</p> <p>Paragraph 2.53 - This has a "renewed commitment to conserving and restoring ancient woodlands".</p> <p>Paragraph 2.56 – "The Government is committed to providing appropriate protection to ancient woodlands and to more restoration of plantations on ancient woodland sites".</p> <p>Standing Advice for Ancient Woodland and Veteran Trees (first published October 2014, revised November 2017)</p>	NO	This comment is not related to the purpose of the Transport SPD.	
	Appendix C, Section 1.1, Paragraph 1.1.10	<p>In view of the March 2019 declaration of a Climate Emergency by Leeds City Council it should be a requirement of developers proceeding to develop a major housing site under these provisions: On the assumption these sites are otherwise acceptable in overall planning term these measures would normally involve new or diverted infrastructure/services, (including where appropriate pump priming of the services) the provision of which will be met by the development. Any shuttle bus funded by the developer should be electric. There is no logic in their being a requirement that every dwelling on these developments have electric charging points and yet a bus frequently travelling (perhaps every 15 minutes) round these same developments be other than electric. If the Council is serious that it wishes to create excellent new places for people to live and make new developments sustainable in the broadest possible meaning then this would be a real signal of intent.</p>	NO	General comment.	
	General	<p>No new roads should ever be built in Leeds, unless they have a segregated cycleway. These segregated cycleway does not need to be continuous with other cycle routes. This approach will slowly build up a comprehensive network and avoid expensive and compromised retro fitting. Segregated cycleways and bus routes should run in a straight line away from other traffic through the heart of any new development. They should be the first lines drawn on a Masterplan.</p>	NO	This comment is not related to the purpose of the Transport SPD.	
	General	<p>The document should include more ways of encouraging walking, cycling and the use of public transport and discouraging private car usage. At present, there must be more private traffic going into and out of Leeds than taxis, buses and HGVs. However, if people could be given the confidence that with more buses (and bus priority measures) their journey home could be quicker than a private car, it would be more appealing for them to leave their private vehicles at home, and thus, fewer cars on the roads. Could an occasional ban on private cars (with an organised alternative mode of transport) be undertaken to demonstrate this point?</p>	NO	This comment is not related to the purpose of the Transport SPD.	
	General	<p>This is not a good process to undertake a consultation on the scale of this document and would not standup to legal challenges. It is not a good way to analyse different viewpoints and each comment will be analysed individually, which runs a high risk of unconscious bias and / or missing things. The document could of been broken up into key themed topics and asked external consultees specific questions on whether or not people preferred the approach adapted by Leeds City Council and, also, viable alternative options. A mixed approach is preferred and tends to reflect ideas from the audience better. Public consultations required, as not everyone would have access to the material online.</p>	NO	This comment is not related to the purpose of the Transport SPD.	
	General	<p>This consultee make the following comments:</p> <ul style="list-style-type: none"> - Build more bike and bus lanes. - Congestion charge for cars. - Park and ride at Iainwood. - Don't bother competing with Uber. 	NO	This comment is not related to the purpose of the Transport SPD.	

General	This Part of the document focuses too much on parking. The document is suppose to be about all modes of transport, and sustainable transport in particular, in reference to the climate emergency. The introduction, also, seems to get into specifics in too much detail.	NO	General Comment.
Part 1, Section 1.1, Paragraph 1.1.3	Would it be possible to refer to Leeds City Council as the 'Transport Authority' rather than the 'Highway Authority'? Highway Authority makes everyone think of motorised travel first.	NO	Highway Authority is the correct terminology.
Part 1, Section 2.3	It would be good to refer to Better Planning Better Transport Better Places document recently published by CIHT and the new Transport for New Homes document, as they are progressive in their approach for creating places people want to be in and which prioritise non-car modes. Links https://www.ciht.org.uk/media/10218/ciht-better-planning-04_updated_linked_.pdf and http://www.transportfornewhomes.org.uk/wp-content/uploads/2018/07/transport-for-new-homes-summary-web.pdf Also 'Designing for Inclusive Cycling' should be referred to https://wheelsforwellbeing.org.uk/wp-content/uploads/2019/12/FINAL-v3.pdf There should be reference to BS8300 Design of an accessible and inclusive built environment Part 1 external environment throughout.	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.
Part 1, Paragraph 1.1.24	Welcome that car parking provision should be based on car ownership. Does this relate mostly to residential development? It is welcome in terms of PRS/BIR schemes in the city centre.	NO	This relates to all types of development. This methodology should be provided to suit the nature and location of the development.
Part 1, Paragraph 1.1.25	"Set car parking behind the front of the dwellings [80]" needs further clarification.	YES	WSP recommend this point is clarified further in this paragraph.
Part 1, Paragraph 1.1.26	"Construction depths must be the same as the adjacent carriageway in adopted areas" needs further clarification.	YES	WSP recommend this sentence is removed from this paragraph.
Part 2	In the image (2.7.2) of disabled parking spaces could the 1.2m safety strip also be shown on the right hand side? e.g. Figure 4 in BS8300-1:2018 is useful.	YES	All images / graphics will be provided in the Final Transport SPD.
Part 2, Section 2.10	It should be included that Car Club vehicles in car parks should be parked in a disabled parking bay so that all people have access to driving or being a passenger in a Car Club vehicle.	YES	Car club bays should be located in accessible areas, to ensure the provision of disabled bays remains unaffected.
Part 4	Travel Plans - It would be beneficial to provide advice relating to student accommodation in the Travel Planning Part, as many developments being applied for in Leeds City Centre are student accommodation.	NO	No change required. This Part provides the criteria for developing successful Travel Plans, rather than provide commentary on the effectiveness of Travel Plans at different developments.
Part 4, Section 6.8	When the RTPF is first introduced in this Section, it needs to be expanded to "Residential Travel Plan Fund".	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.
Part 4, Paragraph 7.5.2	Basing the Travel Plan review fee on employee numbers. It should be clear how this will be calculated for speculative developments where employee numbers are unknown.	YES	WSP recommend this point is clarified further in this paragraph.
Part 4	It should be made clear that the RTPF can be used to fund the measures in the toolkit if this is the case. Or, if not, which measures in the toolkit can and cannot be funded by the RTPF.	YES	WSP recommend this point is clarified further in this paragraph.
Part 4, Paragraph 7.3.4	From experience, surveying 3-months after first occupation is not a good time as sites are occupied slowly, for example only 20/100 homes are ready to survey, with only 30% of whom are likely to reply. Does not give useful data.	YES	WSP believe this is a valid point, which is something LCC should consider further.
Part 4, Paragraph 6.8.3	Is the RTPF the same regardless of location? (city centre, somewhere less well connected?)	YES	WSP recommend this point is clarified further in this paragraph.
Part 4	It should be made clear that the RTPF can be used to fund the measures in the toolkit if this is the case. Or, if not, which measures in the toolkit can and cannot be funded by the RTPF.	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.
Part 4, Paragraph 7.3.8	From experience, a 50% target response rate for travel surveys is impossible, even with continued promotion and incentives. It is suggested that a figure of 30% is more practical, and is still a challenge.	YES	WSP believe this is a valid point, which is something LCC should consider further.
Part 3, Table 5.1	Cycle parking provision for student accommodation is too high (1 space per 5), which has been carried through from the existing Parking SPD, but there is much evidence to suggest that it is an overprovision, especially in the City Centre, but also elsewhere.	NO	From experience WSP believe this is a valid point, but no evidence has been provided.
Part 3, Paragraph 5.2.1	It should be made clear if this also means for outline applications.	NO	This paragraph refers to applications, and therefore, covers outline applications.
Part 3, Paragraph 5.2.9	As well as butterfly stands, it should be made clear that vertical and semi-vertical stands are also not accepted.	NO	Paragraph 5.3.5 (Part 3) states that "vertical storage options are not supported unless in extreme circumstances and only way to provide secure locking."
Part 3, Paragraph 5.3.7	It should be made clear what 'electronic control of cycle parking' is and provide a photo or link.	YES	WSP recommend this point is clarified further in this paragraph.
Part 3, Paragraph 5.3.8	Cycle repair facilities - The word 'public' may be better as 'communal' as some of the areas will be private.	NO	The correct terminology is 'public bike pump'.

	General	No responses.	NO	No action required.	No action required.
	General	This is an overall comment about transport planning in Wetherby as whole rather than individual points about the plan. With all the new housing developments in and around Wetherby, the surrounding roads, e.g. A661 and junctions, are near capacity and resident experience delays, and a lot of new housing developments are still being built or planned. The Council's need to tackle climate change and promote the use of public transport is supported. However, the reality is any new housing will generate new traffic, public transport or private cars, especially when the public transport available at the moment is insufficient and unreliable (infrequent services). New roads need to be planned together with the new developments to ease the traffic into or bypass the Wetherby Town Centre.	NO	This comment is not related to the purpose of the Transport SPD.	
	General	Pedestrian Crossings - The A661 (Glebe Field Drive in Wetherby) is getting busier with the new housing developments coming forward along it. This makes it more dangerous for local people (especially children) to cross the A661 without a pedestrian crossing. Although, there are two pedestrian crossings further along the A661, one on each side of the junction, they are rarely used as they are away from densely populated areas. They are also outside of acceptable walking distances of younger children. Understanding of the crossing criteria used by the Council to decide where to put pedestrian crossings should be explained. The Council should review the criteria, the process of planning pedestrian crossings and ongoing monitoring / reviewing of their usage.	NO	This comment is not related to the purpose of the Transport SPD.	
	General	General Comment 1 - Providing feedback on a 267 page document is quite intimidating and time-consuming, perhaps more effort could have been made to highlight the potential areas of change from the previous document in order to focus the reader's attention on these specific areas?	NO	General comment.	
	General	General Comment 2 - In terms of Transport and the Climate Emergency, the most significant impact will potentially be made by reducing private car usage by extending public transport provision. This is a Leeds City Council document and, as such, the broader Transport initiatives are the prerogative of the West Yorkshire Combined Authority - presumably in liaison with Leeds City Council (and the other Councils in West Yorkshire), but progress in this area will be stymied by the fact that there is no public control over public transport or the public transport infrastructure (still in private ownership with limited regulatory oversight).	YES	LCC to provide additional text on the climate emergency.	
	General	General Comment 3 - This document should contain a reference to the proposed low emission zone in Leeds City Centre and to the north which is planned to be introduced (following a delay) in 2020?	NO	The Transport SPD should not reference policies or guidance that is not already in practice.	
	Part 2, Section 10	Agree with the importance of 'greenery' especially trees and shrubs bordering the highway, but perhaps an additional paragraph on the importance of 'green corridors' and how trees, shrubs and verges can improve and open up green corridors.	NO	LCC uses the West Yorkshire Combined Authority's "Green Streets" agenda which is referenced at paragraph 10.1.4 of this section.	
	Part 3	Agree with everything on this page but what about other forms of ultra-low emission vehicles, especially hydrogen vehicles. Hydrogen power vehicles (waste product water) might end up as a more viable way forward than electric cars. Should a case be made for Hydrogen refuelling points as well as purely electric ones?	NO	At present, due to the anticipated future demand in electric vehicles LCC only wish to outline guidance for this type of charging point. Hydrogen cars would be refilled at petrol filling stations (where appropriate pumps are provided).	
	Part 3	All the guidelines are for new developments (which is understandable given this is a Planning document), but could this also include guidelines on retrofitting existing parking provision, including supporting such retrofitting with presumed consent. In addition, this could also include policy on retrofitting existing Council owned parking provision, e.g. Woodhouse Lane multi-storey car park.	NO	This comment is not related to the purpose of the Transport SPD.	
	Part 4, Section 6	Agree with everything on this page, but please refer back to previous comments, in addition could the document have a section on the promotion of a 'Light Rapid Transit system' of some sort in Leeds (e.g. a light rail system or tram network?), as Leeds is the only large city in Western Europe not to have such a system.	NO	This comment is not related to the purpose of the Transport SPD.	
	Part 1	It is very disappointing to note that the Climate Emergency, as declared by Leeds City Council in March 2019, barely gets a mention. Yet, surely the Climate Emergency should be at the forefront of all decisions relating to Transport Infrastructure. Firstly, there is an issue with the use of "Leeds", does this mean the Metropolitan area or Leeds City? When reading through the document Leeds is mentioned frequently and market towns like Otley also get a mention. However, Wetherby is not mentioned. The "Connecting Leeds" 2017 map, which was published with the document of the same name, does not even show Wetherby and surrounding villages on the map (although Harrogate and York are shown) and there are certainly no transport initiatives shown on any of the subsequent documents relating to Transport Infrastructure for Wetherby. It is perceived that "Planners" are barely aware of Wetherby, except when they wish to build large numbers of houses in the area (in unsustainable locations with inadequate roads and Public Transport). The fact that Wetherby is next door to A1 does not solve the problem of poor bus services and non-existent services to such places York hospital, where residents are frequently treated. The Transport SPD is full of aspirations, but there are no targets. It would be helpful for Planners to know that currently 68% of commuters into Leeds use their car and only 19% use PT, 12% walk and 2% cycle. The quickest way to reduce emissions from Transport and reduce the very severe congestion on the roads is to provide frequent and inexpensive buses and trains. In addition, Wetherby does not have a train station. Leeds is aiming to be carbon neutral by 2030 - further clarification and definition of what constitutes this (LCC, its offices, vehicles etc or is it referring to the wider community of residents, students and workers, their vehicles and poorly insulated homes).	YES	LCC to provide additional text on the climate emergency only.	
	Part 1, Section 2.4, Paragraph 2.4.3	It states that car usage will be reduced by 3.5% by 2027, is this correct or a typo? Timescales and targets should be revised / higher.	YES	WSP recommend that this figure (including timescales and targets) are reviewed.	
	Part 1, Section 2.5, Paragraph 2.5.4	The Transport SPD aims for 'a well connected district to support communities, sustainable travel' etc., but the residents of Wetherby have an infrequent half hour bus service to Leeds and Harrogate, and only 5 buses journeys per day to York. Therefore, the only other option for resident is to use their cars. There are no safe cycle routes to work, schools etc, only leisure routes on the old railtracks. Wetherby, is mentioned as a 'major transport hub' in planning documents. This is hardly borne out by the frequency of bus services.	NO	This comment is not related to the purpose of the Transport SPD.	
	Part 1, Section 2.5, Paragraph 2.5.6	Delivering strategic park and ride. There are no plans for a park and ride for Wetherby on any of the connecting Leeds initiatives. Yet as A1 is next door it would make sense to have a park and ride with services into Wetherby for workers, tourists etc. This would relieve the serious congestion on the narrow roads of the Town Centre. Faster, more frequent bus services into Leeds or to Garforth or Thorpe Park rail stations would encourage commuters, students etc. to leave their cars at home.	NO	This comment is not related to the purpose of the Transport SPD.	
	Part 1, Section 2.5, Paragraph 2.5.28	'Building a great city for cycling', focuses on more city centre planning.	YES	WSP will explore the use of language in the Transport SPD to ensure that the focus is not predominately on Leeds City Centre, and guidance is provided to cover the whole of the metropolitan area.	
	Part 2, Section 10.1, Paragraph 10.1.3	There should be emphasis on the huge importance of trees in our Environment, with respect to Climate change. Trees help to improve air quality, they leaves trap the dangerous particulates from traffic. Trees provide Biodiversity, shade for walkers and cyclists and importantly can cool the temperatures around buildings (on hot days) by upto 6C, thus reducing the need for air conditioning in offices and homes. Trees also remove CO2 from the atmosphere. Grass verges should be seeded with wildflowers, to improve biodiversity and as a food source for insects, where possible.	NO	General comment. Section 10 of the Transport SPD covers the benefits of landscape and green infrastructure.	
	Part 3	The issue of 66% of commuter journeys by car should be mentioned here. Also, Car Clubs and Car Sharing should be given more emphasis. If fewer people needed to use cars to access work, education, entertainment etc. then there would be fewer issues with parking. Car free developments should not just be an option for city centre housing developments.	NO	Using statistics in the Transport SPD can become outdated quickly, therefore, WSP recommend this is avoided.	
	Part 3, Section 2.2, Paragraph 2.2.15	Parking for rail stations. Even when the Headrow works are completed there is no dedicated public transport between the bus station and the rail station. This is a problem for those going on holiday having to walk with their suitcases. Cattle rail station is the nearest to Wetherby but there is no public transport to get there and those using cars have nowhere to park.	NO	This comment is not related to the purpose of the Transport SPD.	
	Part 4	It is very important that Travel Plans are fully discussed before building work begins and check should be made to ensure that Travel Plans are implemented when a schedule is completed. Retrospective Travel Plans should be an option with larger employers, as people are creatures of habit and will use the same route to work unless they receive good information about the alternatives.	NO	General Comment.	
	Part 2, Section 10.3	It is well recognised that good access to public transport is vital to ensure both the physical and mental wellbeing of residents. Isolation leads to a downward spiral in health. Wetherby has a higher proportion of elderly people and increasing numbers of people are being referred to York Hospital. There are only 5 buses per day to York, none in the evenings or on Sunday. Tough for impatient and their visitors. Many older people either cannot afford to run a car or for health reasons are not allowed to drive. There is a lack of safe cycling routes in Wetherby area and none in Connecting Leeds plans. The congested and polluted streets of Wetherby are a cause for concern for all residents. Electric cars do not reduce congestion and still produce particulates from their brake pads and tyres. The particulates are damaging to lung and heart health.	NO	This comment is not related to the purpose of the Transport SPD.	

General	The Transport SPD is full of aspirations and few targets, with little reference to the Climate Emergency and sustainability issues. Recent planning decisions for housing in Wetherby have ridden rough shod over the sustainability issues and the issues that lead to Global Warming and Climate Change. Residents of Wetherby are left wondering what they pay Council Tax for as 'Connecting Leeds' has forgotten about Wetherby and area and therefore any Climate Emergency issues related to Planning of Transport Infrastructure in the area would appear to have no relevance. Any journeys outside the town boundary can only be undertaken by bus or car and the bus options are certainly not in line with a major 'transport hub'. Improving the bus services and connections by bus to rail stations are the only way that car usage will be reduced and therefore pollution and congestion.	YES	LCC to provide additional text on the climate emergency.
Part 1, Section 1.1, Paragraph 1.1.2	The Environment Agency support the overall aspirations for this SPD.	NO	General comment.
Part 1, Section 1.1, Paragraph 1.1.9	Lighting should consider the impacts to wildlife and be appropriate to the local setting - i.e. be designed so as not to disturb the normal behaviours and sleep/wake patterns of wildlife. The default position should be to light as small an area as necessary to achieve the required purpose. There has been recent research that light pollution is a cause of insect decline (https://www.theguardian.com/environment/2019/nov/22/light-pollution-insect-apocalypse https://www.sciencedirect.com/science/article/pii/S0006320718313636 https://www.sciencedirect.com/science/article/pii/S0006320719307797). Insects are important base fauna of healthy ecosystems.	NO	This comment is not related to the purpose of the Transport SPD.
Part 1, Section 1.1, Paragraph 1.1.10	The Environment Agency note reference to the 2004 document 'Sustainable Drainage in Leeds'. This document needs updating to be in line with both current national and local policy. The appendix of the document, includes reference to culverting which needs to link to Leeds Core Strategy policy ENS which refers to the removal of culverting wherever practicable and appropriate to install oil receptors / silt traps where detergents mix with oils (e.g. car washes). Instead these areas should drain to mains foul sewer for treatment with the consent of Yorkshire Water.	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.
Part 1, Section 1.1, Paragraph 1.1.20	The Environment Agency support this statement regarding green/blue infrastructure. Currently, it states the 'encouragement of provision. We consider the Council should expect this provision and we would hope the Council will only support schemes that include it or support its provision via appropriate means wherever it is robustly demonstrated that it cannot be delivered 'on site'. We also highlight the potential contribution that green/blue infrastructure has to economic growth (https://www.shu.ac.uk/research/eres/sites/shu.ac.uk/files/green-infrastructure-contribution-growth.pdf).	NO	No change required. This point is driven by guidelines i.e. developments needing to manage the sites at green field run off rates.
Part 1, Section 1.1, Paragraph 1.1.31	Evidence has shown that hedges along roadways have particular value for attenuating the pollution caused by vehicles and therefore hedges should be given particular consideration as part of environmental schemes that are permissible uses for parking services (https://www.bbc.co.uk/news/science-environment-39943197 https://www.surrey.ac.uk/news/planet-hedges-combat-near-road-pollution-exposure). Particularly those of high volume / high throughput. Especially where they are close to sensitive receptors, including places frequented by children such as schools and playgrounds.	NO	This comment is not related to the purpose of the Transport SPD.
Part 1, Section 2.2, Paragraph 2.2.2	The Environment Agency note that Transport is the largest source of emissions at 36% within Leeds (https://cordis.europa.eu/article/id/413280-hedging-against-traffic-emissions-cut-roadside-pollution-with-vegetation-barriers https://democracy.leeds.gov.uk/documents/s198403/Climate%20Emergency%20Cover%20Report%20191219.pdf). The following should be included: "In the revised NPPF (Feb 2019) Chapter 9 promotes sustainable travel (https://www.gov.uk/government/publications/national-planning-policy-framework-2). Paragraph 102 states: "Transport issues should be considered from the earliest stages of plan-making and development proposals, so that... the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account - including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and ..." This provides a strong basis for the need to consider the environmental impact of transport schemes, along with considering the appropriate mitigations and the environmental net gains that could be achieved.	NO	No change required. This comment is already happening.
Part 1, Section 2.2, Paragraph 2.2.8	The Environment Agency note that under 'attractive routes', this would include green routes and spaces.	NO	General comment.
Part 1, Section 2.2, Paragraph 2.2.9	The Council should ensure that the provision of green infrastructure is delivered in parallel with local cycling and walking networks (and included within, unless robustly demonstrated to be unfeasible).	NO	This comment is not related to the purpose of the Transport SPD.
Part 1, Section 2.2, Paragraph 2.2.15	To encourage sustainable (and healthier) travel to school, e.g. walking or cycling, the routes to school should include the planting of hedges which have particular qualities in capturing pollution from vehicles to which children are particularly vulnerable (see references above (1), and https://evergreenhedging.com/blog/hedges-air-pollution-and-heart-disease/).	NO	No change required. This comment is related to landscape featuring.
Part 1, Section 2.5	Policy G9 from the Leeds Core Strategy should be included within this section. "Policy G9: Biodiversity Improvements: "Development will be required to demonstrate: (i) That there will be an overall net gain for biodiversity commensurate with the scale of the development, including a positive contribution to the habitat network through habitat protection, creation and enhancement, and (ii) The design of new development, including landscape, enhances existing wildlife habitats and provides new areas and opportunities for wildlife, and (iii) That there is no significant adverse impact on the integrity and connectivity of the Leeds Habitat Network." This is a key biodiversity policy in the Core Strategy and must be considered for transport schemes and development to ensure they incorporate/contribute to biodiversity enhancement/net gain. Conforming to this policy will also facilitate the wider objectives on climate change and improving health and wellbeing. The RTP I have produced a document that provides an overview of the main obligations and opportunities for planners to promote biodiversity through the UK planning system (https://www.rtpi.org.uk/media/3560735/biodiversityinplanningpracticesadvice2019.pdf).	NO	No change required. This comment is specifically related to biodiversity policy.
Part 1, Section 2.5, Paragraph 2.5.19	The environment agency support all measures that increase the amount of tree cover, given their multi-benefit value in terms of flood reduction, carbon capture, biodiversity enhancement, public health and wellbeing benefits, pollution capture and shading (https://www.forestresearch.gov.uk/research/health-benefits-of-street-trees/).	NO	General comment.
Part 1, Section 2.6, Paragraph 2.6.1	Objective 4 should be improved to include biodiversity net gain. This would be in line with NPL principles 55-60.	NO	No change required. This comment is specifically related to biodiversity policy.
Part 1, Section 2.8, Paragraph 2.8.4	Appropriate design elements should include use of hedges due to their ability to capture pollution, helping to improve air quality and therefore encouraging adults and children to spend more time outdoors https://evergreenhedging.com/blog/hedges-air-pollution-and-heart-disease/ https://www.theguardian.com/environment/2019/nov/22/light-pollution-insect-apocalypse https://www.sciencedirect.com/science/article/pii/S0006320718313636 https://www.sciencedirect.com/science/article/pii/S0006320719307797	NO	General comment.
Part 2, Section 1.1, Paragraph 1.1.4	This paragraph should be expanded to include new street hedges, as well as new street trees: https://www.bbc.co.uk/news/science-environment-39943197 https://www.surrey.ac.uk/news/planet-hedges-combat-near-road-pollution-exposure	NO	No change required. This comment is related to landscape featuring.
Part 2, Section 1.1, Paragraph 1.1.14	Reference should be included to the sequential test to avoidance of areas at flood risk https://www.gov.uk/guidance/flood-risk-assessment-the-sequential-test-for-applicants . Where there is a need raise land, consideration should be given to the carbon footprint involved in importing and landscape the required volume of material.	NO	This comment is not related to the purpose of the Transport SPD.
Part 2, Section 2.2, Paragraph 2.2.5	Due to their previously mentioned benefits, the text should include direct reference to hedges as being shown in the diagram. The environment agency are pleased to see reference to "an element of shrub and hedging shall also be included. Reflect best practice on emerging research on the contribution of vegetation to air quality." The environment agency strongly encourage the planting of trees, hedges and shrubs. Value should be given to tightly packed vegetation for its ability to capture harmful pollutants.	NO	No change required. This comment is related to landscape featuring.
Part 2, Section 2.3	Consideration should be given to providing pollution capturing greenery on both sides of the road. For each development how best to design the layout to incorporate greenery will need to be considered from the outset.	NO	General comment.
Part 2, Section 2.8, Paragraph 2.8.10	The environment agency note that there will be technical requirements for turning heads for industrial roads. However, given the concentrated pollution likely to result from turning manoeuvres the environment agency encourage provision of hedges to capture pollutants wherever possible.	NO	General comment.
Part 2, Section 5.3, Paragraph 5.3.2	The environment agency note that verges should be designed to have the multipurpose benefit of SuDS.	NO	General comment.
Part 2, Section 7.3, Paragraph 7.3.4	The environment agency note that there will be technical requirements for turning heads. Given the concentrated pollution likely to result turning manoeuvres the environment agency would encourage designs that maximise provision of greenery (e.g. hedges and trees) to capture pollutants and provide multipurpose benefits, including health/wellbeing and biodiversity net gain.	NO	General comment and is related to landscape featuring.

Part 2, Section 8.2, Paragraph 8.2.5	The provision of hedging along pavements next to roads would be beneficial to capture pollutants https://www.theguardian.com/environment/2019/nov/22/light-pollution-insect-apocalypse https://www.sciencedirect.com/science/article/pii/S0006320718313636 https://www.sciencedirect.com/science/article/pii/S0006320719307797 https://evergreenhedging.com/blog/hedges-air-pollution-and-heart-disease/	NO	General comment and is related to landscape featuring.	
Part 2, Section 10.1, Paragraphs 10.1.3 & 10.1.4	The environment agency strongly support these paragraphs and their referencing of the value of tree and vegetation more widely, and that highways are not just for vehicular traffic, but also need to be attractive to pedestrians and cyclists. The SPD should more overtly recognise that pedestrians and cyclists come before motorised vehicles in the travel hierarchy. The environment agency note evidence that along with trees, other green infrastructure / vegetation such as hedges offer pollution capture, health/wellbeing benefits, biodiversity net gain and climate change mitigation/adaptation properties https://www.forestresearch.gov.uk/research/health-benefits-of-street-trees/ https://www.epa.gov/green-infrastructure/benefits-green-infrastructure	NO	General comment.	
Part 2, Section 10.1, Paragraph 10.1.8	The environment agency note and support the comment around the value of mature trees and any design should look retain mature trees wherever possible - recognising that new tree planting will not deliver the full benefits until mature. The environment agency understand that Leeds require a ratio of 3:1 for any trees lost, however due the aforementioned reasons, the removal of trees needs to be a last resort. Given the length of time it takes for trees to mature and provide the same benefit, consideration should be given to additional hedge/shrub planting.	NO	General comment.	
Part 2, Section 10.1, Paragraph 10.1.9	The environment agency support this paragraph, however think it is important that it includes the specific role of hedges in capturing pollution at exhaust pipe level.	NO	General comment.	
Part 2, Section 10.1, Paragraph 10.1.13	The environment agency strongly support this paragraph and green infrastructure (including hedges) should be a significant factor when considering scheme design and development.	NO	General comment.	
Part 2, Section 10.2, Paragraph 10.2.1	Limiting shrubs/hedges to only those areas of 2 metre width or more may drastically reduce the opportunities to plant hedges at road sides. Means of maintaining hedges of less than 2 metres wide should be actively investigated. As stated by this document, hedges have the ability to capture pollutants at exhaust pipe level and this particularly beneficial for children.	NO	General comment and is related to landscape featuring.	
Part 2, Section 10.2, Paragraph 10.2.2	Where hard measures are not required for safety purposes, and it is more a matter of discouragement, consideration should be given to the use of hedges and other green infrastructure.	NO	General comment and is related to landscape featuring.	
Part 2, Section 10.3, Paragraph 10.3.1	Alongside aesthetics, the health considerations of a given route should be considered in relation to exposure to pollutants.	NO	General comment.	
Part 3, Section 2.3	Biodiversity net gain should be incorporated into any park and ride scheme.	NO	General comment.	
Part 3, Section 3.1	The environment agency support measures to reduce carbon emissions from vehicles, including for the air quality benefits. Photovoltaics should be incorporated into designs wherever possible to contribute to the power requirement for charging points. See the examples of solar panel car parks https://www.britishtparking.co.uk/News/new-solar-car-park-guide	NO	General comment.	
Appendix A, Section 2.3, Paragraph 2.3.2	Drainage grates for surface water drains should be marked to clearly indicate that the water drain to river to encourage responsible behaviours https://www.thames21.org.uk/2015/05/only-rain-down-the-drain/ - example of drain marking in the Thames area	NO	General comment.	
Appendix A, Section 2.6, Paragraph 2.6.1	The environment agency strongly support this paragraph, space for tree and landscape features should be prominent in pre-application advice. Strategic planning policy should require developers to ensure through early design consideration that there is not conflict between landscaping and service provision such that the need for services is not preventative of landscaping.	NO	General comment.	
Appendix A, Section 4.1, Paragraph 4.1.2	Highway drainage should not drain direct to surface water sewers without prior treatment, including SUDS, to prevent oils and other pollutants draining to river.	NO	General comment.	
General	Further Resources detailed below: 25 Year Environment Plan The environment plan sets out our goals for improving the environment, within a generation, and leaving it in a better state than we found it. It details how the government will work with communities and businesses to do this. It sets out what it will be doing over the next 25 years. https://www.gov.uk/government/publications/25-year-environment-plan Environment Bill 2020 The Bill will bring into UK law environmental protections and recovery. Further information is available here: https://www.gov.uk/government/publications/environment-bill-2020 Natural England GI Guidance http://publications.naturalengland.org.uk/publication/35033 Biodiversity Net Gain The government intends to incorporate mandatory biodiversity net gain in the Environment Bill. Further information is available here: https://www.gov.uk/government/consultations/biodiversity-net-gain-updating-planning-requirements . Please note that the NPPF already has net gain included. Biodiversity RTPI Guidance RTPI has published practice advice on Biodiversity in planning: Obligations and opportunities to promote biodiversity through the UK planning systems. This is in partnership with the Partnership for Biodiversity in Planning. https://www.rtpi.org.uk/media/3560735/biodiversityinplanningpracticeadvice2019.pdf	NO	General comment.	
General	Historic England has reviewed the Transport SPD and, at this stage, has confirmed that there are no comments to be made in response to this consultation.	NO	No action required.	No action required.
General	Demand for rail use has already doubled over the last 20 years and the demand for rail travel is forecast to increase by 40% by 2040, therefore, it is crucial that new development contributes to meeting this demand, providing passengers with viable travel options, enabling growth, improvements to efficiency and reliability and above all, a safer railway. It is noted that the SPD does include specific references to Public Transport, however, this section is included as an appendix at the latter stage of the draft document, inferring it is of lesser priority.	NO	General comment.	
Part 5	Network Rail considers this cumulative effect is not limited solely to highway infrastructure but is also relevant to developments in proximity to railway stations located within the Leeds district, and often beyond, and should be acknowledged.	NO	No change required. This comment would be covered by the Community Infrastructure Levy, a charge which can be levied by LCC on new development in their area. It is an important tool for LCC to use to help them deliver the infrastructure needed to support development in their area and ensure i.e. rail stations are not adversely affected.	
General	It is noted that Paragraph 6.30 of the Leeds Core Strategy outlines how developer contributions are expected to take a role in the funding and delivery of any required new infrastructure as a result of cumulative impacts and we would wish to see cognisance of railway infrastructure/ mitigation measures included within this expectation, as well as for stand-alone developments. In order to accommodate increases in use generated by development(s), developer contributions/ Community Infrastructure Levy funding towards improvements to station facilities should be considered. Access improvements, enhancements/expansion to car parks, additional cycle facilities and improvements to passenger waiting facilities, customer information and security would all benefit from additional funding which should be sought in connection with new development. Access to a number of rail stations within the Leeds district are not fully compliant with the Equality Act 2010 (such as Garforth, Cross Gates, Morley) and therefore approaches to remedy this within the SPD should be included.	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.	
General	It should also be noted that Network Rail regards rail safety as a priority and therefore will seek opportunities for level crossing closure/ improvements wherever possible, particularly in instances where new development is likely to increase the number and frequency of level crossing use.	NO	General comment.	
Part 3	Network Rail recognise the benefits of rail based Park and Ride facilities and the active support for them within the SPD (supported by saved Policy T16 of the Revised UDP), along with the proven success of bus based P&R at the Eiland Road and Temple Green sites. Future engagement with Network Rail and other key stakeholders will be crucial in the delivery of any rail based P&R schemes.	NO	General comment.	
General	Three new rail stations are proposed for the Leeds district, these are White Rose, Leeds Bradford Airport and Thorpe Park. Whilst no dedicated car parking is proposed at the White Rose (as it is considered a destination station as opposed to a commuter station), the role of car parking at the other two stations needs to be carefully considered. In particular the overall design and function, to ensure for example that the car park at Leeds Bradford Station isn't simply used as an overflow airport car park.	NO	This comment is not related to the purpose of the Transport SPD.	
General	Natural England support the creation of a 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 pollution levels and help mitigate against the effects of climate change. Section 106 agreements can be used to help implement these.	NO	General comment.	

	General	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. Evidence and advice on green infrastructure, including the economic benefits of GI can be found on the Natural England GI web pages.	NO	General comment.	
	General	Transport proposals are likely to generate additional nitrogen emissions as a result of increased traffic generation which can be damaging to the natural environment. The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a greater distance away from the development) can be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required. Natural England consider that the designated sites at risk from local impacts are those within 200m of a road with increased traffic. (The ecological effects of diffuse air pollution (2004) English Nature Research Report 580 Design Manual for Roads and Bridges Volume 11, Section 3 Part 1 (2007) Highways Agency), which feature habitats that are vulnerable to nitrogen deposition/acidification.	NO	This comment is not related to the purpose of the Transport SPD.	
	General	Regarding effects on general air quality (regional or national), Natural England advise that in addition to assessing local air quality effects, consideration should also be given to national air quality impacts resulting from diffuse pollution over a greater area. The UK Government has international commitments to reduce national emissions of pollutants and consideration should be given to impacts that occur on a regional, national and international scale and which also contribute to background concentrations.	NO	This comment is not related to the purpose of the Transport SPD.	
	General	As an overall impression, SCP feels that the Transport SPD overly focuses on transport issues rather than consider these alongside the wider environmental, housing and affordability challenges we also face. The accumulative impact of the changes will, in the round, create layouts that will be slightly more highway dominated, which are more costly to build and in turn attract higher S38 maintenance charges, but at the same time reduce space for housing/jobs etc. Therefore it is recommended that the Council review this SPD in the round as this will impact on site viability and scheme deliverability.	NO	General comment.	
	Part 2, Sections 2.2 / 10.1 / 10.2	The use of soft landscaping, especially trees, to reduce pollution, create a sense of place is welcome, however SCP feel that this may be better done as part of a site-wide landscape scheme. The solution proposed will widen roads by up to 4.0m removing valuable land space from developable areas, adversely impacting on street lighting and potentially safety. Providing trees in highway space also increases construction costs and the Council's standards are more onerous than that for private areas and have the compounding cost impact of incurring S38 maintenance fees (para 1.2.15 page 170). SCP recommend that the SPD is changed to retain tree planning in highways as an option, but instead encourage such landscaping in private areas first, considering the overall aesthetic of the site.	YES	WSP propose to review this comment with LCC.	
	Part 2, Sections 2.4 / 2.7 / 2.8, Paragraphs 2.4.3 / 2.7.2 / 2.8.5	The wider width of streets will increase the visual dominance of the highway spaces in residential developments in particular, this is at odds with national advice. It will also reduce the available land for housing density. In the main the extra width will increase the dominance of vehicular areas, contrary to the wider aims of the SPD. The need for a connector loop on sites where there is only a single means of access, is only required for emergency purposes or during temporary highway works. In SCP's opinion this only needs to be the minimum width to accommodate a fire engine (3.1m plus clearance from fences/walls) or 4.5m plus clearance margins for 2-way vehicles. This suggests that the maximum width needed is 5.5m not the 7.3m proposed. A 7.3m wide highway will create a vehicle dominated layout. On industrial estates, shared footway/cycleway width has increased. National standards (Local Transport Note 1/12 shared use routes for pedestrians and cycles) says only 3.0m is required for shared areas. Local standards should adhere to national guidance. There overall effect of the extra highway widths will necessitate the use of more raw materials in the construction of the highway space, and in turn potentially increase the number of deliveries. This will have both an environmental and financial cost implication. It will also result in an increase in S38 maintenance contributions for new development. SCP recommend that the existing highway standards are retained and minimise widths where practicable and safe.	NO	The new widths for carriageways have been requested by LCC. Specific circumstances will also determine practicalities of application.	
	Part 3, Section 2.1, Paragraph 2.13	This is welcomed, and it is further recommended by SCP that cycle pools are considered for flats, in place of a basic cycle parking standard of 1 space per unit, this is because cycle parking within flats is not practical or results in cycles being left on balconies. Alternatively large numbers of cycles take up a lot of space and seldom is 1 cycle parking space per flat required above (say) 75 units, therefore providing excessive volume of cycle parking is wasteful. SCP recommend that cycle pools are considered for flat developments above 75 units in lieu of 1 cycle space per unit. See Doncaster Monks Bridge site off Whitehall Road as an example.	NO	From experience WSP believe this is a valid point, but the standards form a consistent basis for discussion between developers applying for planning permission and the appropriate planning authority.	
	Part 3, Section 3.2, Paragraph 3.2.1	SCP note that this standard seems excessive given the current and projected take up of electric cars. Indeed the attractiveness of EV cars may change again with hydrogen cars under test. To require larger houses to offer multiple charge points (1 charge point per parking space) is environmentally wasteful. SCP is also concerned about the feasibility of providing charging for visitors on residential sites as parking for visitors is typically provided on-street. 1 space per dwelling feels much more realistic and is much less wasteful in providing excess electric points which are most unlikely to be used. SCP support EV charge points for dwellings and offices being low speed charging, given the opportunity for long stay charging. This will result in a reduced need to provide additional substations etc. SCP recommend that EV charging is set at 1 space per dwelling, with no requirement for EV charging for on-street visitor parking.	YES	This Section has been updated to reflect the new Policy for Electric Vehicle Charging Infrastructure EN8 in the Core Strategy. WSP recommend this comment is checked to ensure consistency with EN8.	
	Part 3, Section 5.5, Paragraph 5.5.1	The new section on cycle parking guidance is welcomed. But see the related point about cycle parking at larger residential developments. The guidance on electric bikes is noted, suggesting that twin 13amp sockets should be provided for every 20 long stay cycle spaces. However, SCP's view is that where people have access to electric sockets within offices or the home, then charging within the office/home should be acceptable in lieu of charging by cycle parking spaces, this is because bicycles almost exclusively have removable battery packs. However, the standard suggested is appropriate in locations where ready access to 13 amp sockets are not available. SCP recommend that 13 amp cycle charging points are not required where access to charging is readily available, for example houses / flats or office.	NO	This Section has been updated to reflect the new Policy for Electric Vehicle Charging Infrastructure EN8 in the Core Strategy. WSP recommend this comment is checked to ensure consistency with EN8.	
	Part 4, Sections 6.8 / 7.5	SCP are opposed to the Travel Plan monitoring fees is illegal. The High Court has supported the Planning Inspectorate and ruled that Council claims for Travel Plan monitoring fees is illegal. The decision was based on the grounds that there was nothing in the wording of the Town and Country Planning Act 1990, the Planning Act 2008, the Community Infrastructure Levy (CIL) regulation 122, or the National Planning Policy Framework to say that councils could claim administration and monitoring fees as part of planning obligations. Furthermore the increase in cost, as a time when the resource provided by the team at Leeds City Council has been cut, does not feel justifiable. The flexibility in use of funding generated through the Residential Travel Plan Fund is welcomed. However the proposed plan to obligate Office developments close to existing or proposed Car Club bays to provide a contribution to promote the Car Club through a free trial. The guidance must make clear this is for new build and the money should not be simply a tax and if the contribution is not used with say 3-5 years this should be returned. SCP recommend that if the Council wish to review travel plans this should be covered by the Business rates or Council tax charges generated by the development, rather than through an additional tax proposed. SCP also recommend that the Office car club charge must make clear this is for new build only and the unused money refunded after 3-5 years.	YES	LCC to review the proposed Travel Plan monitoring charge and funding mechanism for Travel Plans in the Transport SPD.	
	General	While welcoming the production of this convenient single source for relevant transport information in development, the Ramblers Leeds Group believes that the connections between the highways and the existing (and future) Public Rights of Way could be brought out more explicitly, and a number of suggestions are made.	NO	General comment.	
	Part 2, Section 1.2	Considering how many times the term is used in the document, it is odd that no definition of the terms 'adopted'/adoption' etc is given.	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.	
	Part 2, Section 1.2, Paragraph 1.2.12	The definition offered for Public Right of Way (PRoW) at 1.2.12 is much too restrictive. It fails to make clear (in contrast to 'footpath') that the routes have a special legal status, and suggests quite wrongly that PRoWs are restricted to rural areas away from buildings. PRoWs occur throughout Leeds, as a glance at the online version of the Definitive map shows very quickly, and are an essential part of the transport network offering safer off-carriageway routes for pedestrians.	YES	WSP propose to review this comment with LCC.	
	Part 2, Section 1.2, Paragraph 1.2.10	The phrase 'rights of way' occurs also in 1.2.10 Cycle Tracks, but it is not clear in what sense it is being used. It might be intended as in 1.2.12, but, if so, it is misused, as there is no path of any kind (other than a cycle lane on a carriageway) which confers rights on cyclists but not on pedestrians. Cycle tracks, depending on their mode of creation, may be PRoWs, but need not be. The alternative sense is that of 'precedence in use of the way' or the principle of whether cyclists give way to pedestrians or vice versa. This lack of clarity should be tidied up.	YES	WSP propose to review this comment with LCC.	

Part 1, Section 2.8, Paragraph 2.8.6	The list of requirements for development applications is valuable, but incomplete and inexplicit. Requirement to show PROWs on plans and to complete Section 8 of the Application Form: An omission from this list is that any PROWs running on the site or on its boundaries should be shown clearly on the plans which appear in the Design and Access Statement and in the Proposed Site Layout/Landscape plans. Related to this is the need to complete Section 8 of the Application Form relating to PROWs. Diminution of pedestrian convenience: If an application should "...not diminish the convenience and suitability of facilities for pedestrians..." then this alone (quite apart from specific prohibitions in national documents) ought to render unacceptable all those cases where a PROW running across a site is 'diverted' to the footway of a new carriageway on the development. This implication should be brought out explicitly, as a very common defect of planning applications is that PROWs on the site are often ignored, or pushed onto footways.	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.
Part 1, Section 2.8, Paragraph 2.8.10	There is a general weakness in this section that highways are deemed to cover only carriageways and footways. While the principal emphasis in new developments will inevitably have to specify these highways in detail, PROWs must not be forgotten when they are relevant to the site. Note the earlier remarks about the need to show PROWs in the Design and Access Statement, where the best applications at present not only show the routes of paths but outline how they will be integrated into the project as a whole. Only thus will "...the needs of pedestrians of all ages and abilities..." be properly considered.	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.
Part 2, Section 1.1, Paragraph 1.1.6	The Ramblers Association note with interest that in Part 2, paragraph 1.1.6 Home Zones are supported. These are streets where vehicular traffic does not have priority. In Home Zone Design Guideline paragraph 2.25 there is a valuable suggestion that PROWs on unadopted streets can also be incorporated in Home Zone projects. There is the germ of an idea here which could be developed as a more fruitful way of dealing with PROWs on sites than "diverting" to footways on standard carriageways – a practice universally frowned on in national planning documents, but sadly still frequently advanced in planning applications.. The Transport SPD could bring out these possibilities more clearly.	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.
Part 2, Section 2.2	It is recommended that pedestrian and cycling provision be segregated on Type 1 streets, but the Ramblers Association note that the document (Table p33) allows for the possibility of shared use footways with a minimum width of 3.5ms. As Connector Streets are likely to carry a high volume of fast commuter cyclist traffic we are opposed to shared use ways of this type. In any case the illustration shows that constraining features beside the shared use way such as hedges could occur. In such cases the minimum width of 3.5 ms would be insufficient.	NO	The new widths for footways shared by pedestrians and cyclists have been requested by LCC. Specific circumstances will also determine practicalities of application.
Part 2, Section 9.1, Paragraph 9.1.4	Shared unsegregated routes alongside carriageways. If the width of a shared way is set at 3.5ms on p 34, then why is this shrunk to 3m and perhaps less in 9.1.4? This is quite insufficient for a route which could be used by commuter cyclists. Table 9.1 should spell out explicitly, or provide clear examples for, those cases where there are edge constraint.	YES	WSP propose to review this comment and ensure no inconsistencies exist.
Part 2, Section 9.2, Paragraph 9.2.2	There is a reference to a shared (unsegregated?) track at Kirkstall Forge, for which an illustration would be helpful. The previous sentence refers to a figure which appears to be missing.	YES	All images / graphics will be provided in the Final Transport SPD.
Appendix A, Section 2.3, Paragraph 2.3.1	The Ramblers Association are pleased to see that developers seeking adoption of streets would be obliged to show how these streets "links with the surrounding areas, public rights of way, bridleways, cycle routes etc." (p196). The Ramblers Association would prefer it if at this point explicit mention was made of the not infrequent need to divert PROWs as part of the development, and an obligation made on developers to show at an early stage how they propose to deal with PROWs on the site.	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.
General	Creation of new paths: In the past it has probably been the case that developers have used spaces unoccupied by buildings, gardens etc to leave convenient lines of access for pedestrians, often in order to avoid long detours on footways to reach neighbouring streets and facilities. This has given rise to a very large number of ginnels in Leeds, many of which are treated as 'private' (ie unadopted) by the Street Register. It would prevent a great deal of later confusion about such ways if developers would now make explicit provision for such routes, either by dedicating them as PROWs with a continuing obligation for upkeep or as adopted highways.	YES	WSP propose to review this comment with LCC.
Part 5	Taylor Wimpey UK Limited submitted an outline planning application (LPA ref: 17/02594/OT) for residential-led mixed use development on land falling within Site Allocations Plan (SAP) site HG2-226 in April 2017. Site HG2-226 is identified in the SAP as having capacity for 1,100 residential units, whereas the planning application submitted by Taylor Wimpey is for 800 units, an on-site primary school and a local convenience store. Table 3.1 of the draft Highways Cumulative Impact policy identifies Site HG2-226 as having a 'direct' impact at one junction and a cumulative (in-combination) impact at two other junctions. Table 3.3 identifies the A1(M) Junction 46 as being the junction which is impacted directly. The various Tables do not identify the two other junctions where cumulative impacts are predicted by LCC. Taylor Wimpey UK Limited strongly objects to Site HG2-226 being referenced within the draft Highways Cumulative Impact policy for the following reasons:- The Transport Assessment (TA), prepared by i-Transport (ref: ITM8252-005 A R) assessed the traffic impacts arising from the development of the entire allocation (i.e. 1,100 units plus the proposed primary school and local convenience store). The TA concludes that traffic impacts arising from development of the entire allocation are less than severe at A1(M) Junction 46 and that mitigation is not needed. The traffic assessment presented in the TA, and subsequent sensitivity testing conducted by the Applicant, has been reviewed and vetted in detail by both LCC Transport Development Services and Aecom on behalf of Highways England (HE). HE's consultation response (dated 23 June 2017) offers 'no objection' to the planning application; neither physical mitigation nor a developer contribution towards mitigation at A1(M) J46 is sought by HE. HE's position has not changed in the intervening period. Similarly, LCC TDS' consultation response on the planning application dated 19 November 2018 makes no reference to the need for a developer contribution towards improvements at A1(M) J46. Mitigation is not needed at A1(M)J46 and hence the references to it in respect of Site HG2-226 should be deleted from the draft Highways Cumulative Impact Policy. Through the planning application process, Taylor Wimpey has already committed to making a developer contribution towards improvements at two off-site junctions in Wetherby, these being: 1) A661 Spofforth Hill / West Gate / Linton Road mini-roundabout; 2) A661 West Gate / Crossley Street priority junction. LCC TDS' consultation response dated 19 November 2018 confirms that Taylor Wimpey's contribution offer is acceptable. This contribution will be secured via a S106 Agreement which is in draft and which the Council has seen. There is thus no basis or need for the draft Highways Cumulative Impact Policy to include any reference whatsoever to Site HG2-226. All references to it should be deleted.	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.
Parts 1 to 4	Parts 1 to 4 (inclusive) do not assist in meeting the issues, causes and impact of Climate Change and this Consultation is potentially a missed opportunity. As a region Leeds could and should be pioneering the development of emerging transport technology such as active travel, transport as a service, connected and automated vehicles and fast charging electrical infrastructure. Including guidance on these matters in the Transport SPD would provide a policy impetus to implementing some of the recognised solutions that are required to address the climate emergency. AECOM's client has provided examples including car sharing schemes (such as that widely accessible across Switzerland (https://www.mobility.ch/en/sustainability/)) and encouraging modal shift to more environmentally sustainable transport modes (such as that being investigated and promoted in Bath (https://bathtrams.uk/proposal/)) and the West Midlands (https://ulpartners.com)) and elsewhere, all based upon a 10 year operating record of a propane/lythel hybrid light railcar at Stourbridge, carrying over 5m passengers with a 99.8% reliability track record that produces ultra-low emissions and has low installation and operating costs. AECOM would be happy to present other examples.	NO	General comment, with examples provided of good design nationally.
Part 5	AECOM understand that a roof tax style approach has not been adopted (as this does not in the opinion of LCC meet the S106 test) but the approach that has been proposed in Part 5 is financially open ended and does not provide developers with financial certainty until very late in the development design process. This approach is unlikely to be attractive to developers and could inadvertently delay delivery of SAP sites.	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.
Part 5	Where a congested junction has been identified to receive cumulative impacts from two or more SAP sites, how is the delivery of the initial site(s) possible when other sites are still to progress through planning and thus contribute to the mitigation scheme? How will the funding gap be bridged? The inability to plug the funding gap could jeopardise and delay the delivery of the initial site(s), particularly where contributions are required from multiple sources.	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.
Part 5	For the purposes of the cumulative impacts policy, what is the actual definition of mitigation? For example, is it a scheme that mitigates existing and future congestion or is it a 'no worse off' situation?	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.
Part 5	If windfall or subsequent SAP review sites come forward in the future, will there be a claw-back mechanism for sites that have over-contributed to a junction improvement scheme?	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.

	Part 5	There is potentially a cross-boundary element to impact on certain junctions. Some commentary on how this is to be addressed is required in the policy.	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.
	Part 5	It is conceivable that some junction improvements will require multi-million pound contributions, which is likely to render small and medium sized sites unviable. In such circumstances what is LCCs procedure for overcoming the financial constraint to deliverability?	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.
	Part 5	The SPD describes the SAP but it does not describe the relationship of the SPD to the SAP or the assessment and allocation of sites within the SAP review. Given the financial implications of the cumulative impacts policy to the deliverability of sites, it is assumed that a review will be required of existing allocated SAP sites, together with any new allocations, as part of the SAP review.	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.
	Part 5	Capitol Park Leeds PLC controls land at Capitol Park, Leeds which is allocated in the Site Allocations Plan (SAP) for employment uses and which is identified as Site EG2-19. Capitol Park Leeds PLC objects to the current drafting of the proposed Highways Cumulative Impact Policy for the following reasons- The thresholds for identifying impacts set out in the Transport Background Paper and noted at Paragraphs 2.1.3 (on Page 174) and 3.1.5 (Page 176) of the consultation draft Highways Cumulative Impact are arbitrary, not justified and onerous; they should be reconsidered. For example, the Council has recently accepted Environmental Impact Assessments which consider additional driver delay at junctions of between 30 and 60 seconds as being of only 'minor' consequence. Similarly, the suggestion that adding only 10 no. peak hour vehicle trips to a congested junction would necessitate a developer contribution to as yet (in some cases) undefined, unspecified and uncosted highways works is unduly onerous and has the potential to constrain development coming forward in Leeds. The Council has not adequately demonstrated or justified in the consultation draft policy that the Leeds Transport Model (LTM) is the appropriate tool to determine the number of trips generated by development proposals at individual junctions. The LTM is a strategic level model, is informed by generic trip rates and does not necessarily accurately reflect proposed development quanta or land use mix, which can change and evolve between a site being allocated and a planning application being lodged. The appropriate method for accurately determining the number of peak hour vehicular trips through a junction is the Transport Assessment process conducted at planning application stage. The Council acknowledges (at point vi on Page 177) that it has, 'some high-level estimates of mitigation costs for some of the congested junctions but more detailed work will be required at the time of any pre-application submission by the Applicant to agree required mitigation and cost.' Clearly this position is inadequate and a much more substantive evidence base than currently exists is needed to justify the collection of developer contributions where impacts are demonstrably in combination with others (i.e. cumulative) before the policy can reasonably be adopted. The consultation draft Highways Cumulative Impact policy identifies (in Tables 3.1 and 3.2) Site EG2-19 as having a 'direct' impact on two junctions – the M62 J28 and A643 / A6110- and as having a 'cumulative' impact on the A650 / A6039 Rein Road junction. i-Transport LLP has been engaged with LCC Transport Development Services on behalf of Capitol Park Leeds PLC on detailed assessment parameters since September 2016 and has submitted a wealth of detailed technical assessment material to the Council in the intervening period. The Council has not been able to supply any 'high level' mitigation costings for works at the junctions it links development of Site EG2-19 to. With regard to M62 J28, Capitol Park Leeds PLC acknowledges that development of Site EG2-19 will have a cumulative impact, in combination with other committed and allocated sites both within Leeds and across the administrative boundary in Kirkstede. The Council has not however adduced any evidence to demonstrate that development of Site EG2-19 alone will result in direct impacts at M62 J28 that could be considered.	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.
	Part 1, Section 2.8, Paragraph 2.8.4	The aim of designing out potential for 'anti-social parking' is welcomed – where cars are parked on the footway or on landscaping, often on both sides of the road. This is a significant problem on residential streets and should be a priority for the Council to tackle. The document would benefit from more detail here and throughout on the kinds of design choices necessary to prevent and discourage anti-social parking.	NO	No change required. The Transport SPD provides the guidance on technical requirements to design out the potential for anti-social parking, each application will interpret this guidance and LCC will determine each application on a case by case basis.
	Part 2, Section 1.1, Paragraph 1.1.4	This paragraph states that all new housing layouts should incorporate 'Green Street' principles by encouraging integration of new street trees "wherever possible and especially on Type 1 streets". This section could be strengthened, so that it becomes a mandatory requirement of new developments of any size and on any street type to have new trees integrated into them to some degree. The Council should be more ambitious when it comes to tree planting and ensure that developers know they are expected to include tree planting as part of applications. This is particularly important in the context of the climate emergency.	YES	LCC to promote the WYCA's "Green Streets" guidance. LCC to provide additional text on the climate emergency.
	Part 2, Section 1.1, Paragraph 1.1.13	The move to have all residential streets designed to keep speeds below 20mph is broadly welcomed, however there are concerns about the "self-enforcement" aspect of this. Experience has shown that streets with 20mph limits are not self-enforcing, leading to residents complaining about limits being breached. More detail is needed on the full spectrum of enforcement measures required to maintain speed limits.	NO	Good designs (incorporating speed restraint features) would ensure that the speeds of vehicles are self enforced.
	Part 2, Section 10	The discussion in this section on the benefits of trees and green infrastructure on the highway is broadly welcomed. As noted above, however, this should be emphasised further with some specific commitments setting out the level of tree provision, so that developers are clear about what is expected, rather than what is merely desirable. The Councillor advocates a "20 for 1" policy, wherein 20 trees should be planted for every 1 tree that is lost as part of new developments, and this should be built into the design guidance. It is also thought that tree planting can assist with deterring anti-social parking, and this should be emphasised further in the document.	NO	No change required. This comment is practical in application.
	Part 3, Section 2.2, Paragraphs 2.2.3 to 2.2.5	These paragraphs discuss the Council's charging policy in relation to parking, and specifically reference town and district parking. The document says that "the current management of these car parks is usually without charge", but that "[w]here the efficiency of a car park is affected by a lack of available spaces, charging or other demand management measures may be considered in town centres as an effective management tool." In order to support our town and district centres, car parking in these centres should remain free. Therefore, this section could be reworded to underline the Council's commitment to keep parking free of charge in town and district centres. Other demand management measures should be considered to address any efficiency / lack of space issues that may arise.	NO	No change required. This text has previously been agreed with LCC, however, WSP consider whether this is appropriate for this Transport SPD.
	Part 3, Section 2.3, Paragraph 2.3.3	Would like to see more discussion of potential actions to address the issue of commuter parking in the outer areas of the city and the town and district centres. In terms of Park and Ride options, this should include exploring the potential for the Council to co-operate with neighbouring authorities to coordinate the location of potential future park and ride sites, for commuters travelling to Leeds from outside the Leeds boundary. Stiling Park and Ride sites outside the Leeds boundary, where appropriate, could be beneficial within the context of the climate emergency, and relieve pressure on the outer areas.	NO	This comment is not related to the purpose of the Transport SPD.
	Part 3, Section 2.10	The expansion of car club car share and high occupancy lanes are welcomed, provided they are planned for properly and located in the appropriate locations.	NO	General comment.
	Part 3, Section 3.2, Paragraphs 3.2.1 to 3.2.2	The table provides information on the required number of EVCP for different use classes. For residential, the requirement is 1 EVCP per parking space and 1 EVCP per 10 visitor spaces (both at 32amp). It is considered that this provision should be increased given these ratios if required, and also to the merits of installing rapid charge points in appropriate locations. There is also little reference to the potential for on-street charging points, and this should be considered in greater detail. There should also be greater consideration of how charging points can serve back to back properties and other developments where there are challenges around access. There should however be a comprehensive assessment of electrical infrastructure capacity and need, to ensure the grid is capable of meeting demand. The Council should also be looking at alternative fuel options and the possible infrastructure requirements needed to support them.	YES	This Section has been updated to reflect the new Policy for Electric Vehicle Charging Infrastructure EN8 in the Core Strategy. WSP recommend this comment is checked to ensure consistency with EN8.
	Part 5, Section 2.1, Paragraphs 2.1.5 to 2.1.7	This paragraph notes that across the Leeds main road network, "the effect of the SAP in the absence of mitigation has been modelled as an average increasing peak hour radial journey times by 25% in the morning peak and 28% in the evening peak," but that this forecast level of journey time increase is "likely to be an underestimate for many radial routes." It is observed that the impact on journey times would have been far less, had the Council opted for a lower housing target, as the Councillor long argued. The admission at 2.1.7 that there is a limit to the amount of funding presently available for mitigation measures, and that further sources will need to be sought (hence the need for this CIP). The strain on infrastructure as a result of the targets in the SAP was another of our prime concerns, about which it was warned repeatedly. Given the situation now, it is agreed that it is essential that additional sources of funding are identified to enable a greater number of mitigation schemes to be progressed to address growth due to development. It is also considered that greater use of the CL strategic fund to target more investment in highways mitigation measures.	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.
	Part 5	These tables set out the list of affected sites that may necessitate mitigation measures. It is requested that there is consultation with ward members to ensure no sites have been missed and to ensure any measures are designed to take account of local need.	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.
	Part 2, Section 7.3, Paragraph 7.3.2	The maximum refuse vehicle dimensions used by Leeds City Council have increased from 11.0m (as stated in the adopted Street Design Guide) to 11.5m. Whilst not a significant increase, it will have noticeable effects and any additional manoeuvring space required will further serve to create spaces engineered around the requirements for vehicles rather than non-motorised road users.	NO	11.5m is the length of the largest refuse vehicle currently used by the City Council.

Part 4, Section 2.6	The residential parking standards for developments in the 'core' appear to have changed. The currently adopted Parking Standards SPD states that large residential developments should apply the DCLG Residential Parking Research methodology. The DCLG method is flexible and provides standards based on how many spaces are allocated / unallocated, relating this to dwelling tenure and size. Whilst this would require updating to Census 2011 data, it overall presents a more flexible methodology than the standards presented in the draft Transport SPD.	NO	This methodology has been removed. The data which informed the calculation previously no longer exists in the latest Census data and, as such, has been removed as per LCC discussions.
Part 4, Section 2.3, Paragraph 2.3.1	A new section on scheme viability has been included which suggests that in some circumstances, if the cost for mitigation or introduction of measures is deemed to be high, a lesser package of measures can be agreed. Concerned if this was seen as a means by which significantly unsustainable development were allowed to be granted permission on viability grounds and this served to undermine developments which prioritise sustainable transport solutions.	NO	All applications will be considered on their merits. No development would receive special treatment with this regard.
Part 5, Section 3.1, Paragraph 3.1.5	The draft SPD appears to include a new methodology for identifying sites which need to contribute to mitigation schemes by determining their 'cumulative impact'. The sites identified as having a cumulative impact are those which result in 10 or more peak hour trips through a congested junction (as pre-determined in the Site Allocations Plan). Each site will need to contribute to a proportion of the cost of delivering a mitigation scheme at that junction. This frames discussions in a highways / congestion / capacity setting and suggests a high car mode share can be mitigated by capacity improvements, and that these are the only contributions specifically required by the SPD. It should not be about accommodating car trips, but encouraging measures aimed at reducing car use. This also assumes a high level of vehicle growth regardless of development, a 'business as usual' approach. It does not take account of a different 'future' that could be planned for in light of the climate emergency declaration.	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.
Appendix C, Sections 6.1 & 6.2, Paragraphs 6.1.1 & 6.2.1	It is notable that the only section relating to Public Transport is three pages long in a 250-page document. It appears as an appendix to the 'Highways Cumulative Impact' section and is disjointed in layout. This is unexpected as the adopted Public Transport Improvements and Developer Contributions SPD contained a ten-page section on public transport improvements which appears to have been removed from the draft SPD. There is also little attention given to walking and cycling, given the importance of active travel modes in tackling the climate emergency, and the Council's own priorities for investing in these modes. The Public Transport section no longer contains any prescriptive standards or thresholds for collecting contributions for public transport improvements (in isolation or cumulatively). This inadequately serves to influence mode choice and contribute to a reduction in car dependency in light of the climate emergency declaration. As with the adopted Highways Cumulative Impact SPD, much of the technical guidance still refers to HT, 1999. It is disappointing that the opportunity has not been taken to update this with more recent, Leeds specific design guidance on the barriers and opportunities for public transport use. Related to this, the guidance refers to physical distance to stops (with no evidence presented on the distances stated), rather than focus on service frequency, cost and reliability, which are more important influences on travel behaviour and uptake in public transport.	YES	WSP propose to review the location of the public transport improvement section in the Transport SPD. There are specific chapters addressed to pedestrian and cyclist movements, and therefore, no further action is required. A significant amount of the Public Transport and Developer Contributions SPD has been removed and not incorporated within the new Transport SPD with the introduction of LCC CIL policy. It is understood that the CIL policy has made much of the policy contained within the Public Transport and Developer Contributions SPD redundant in the current political climate, with the exception of the infrastructure requirements. LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.
General	The draft Transport SPD is a combination of four existing highways and transport SPDs adopted by Leeds City Council. This aspiration is welcomed and should serve to consolidate and simplify disparate and disaggregated sources of information into one document. Unfortunately, the draft document for review is unnecessarily lengthy, difficult to negotiate and often disjointed and conflicting. There are some areas, particularly relating to parking standards and highways / public transport contributions which appear to have changed from the adopted documents. These areas are not easily highlighted, and hence could be missed, as the context for this consultation draft suggests that it is simply an amalgamation of the adopted SPDs rather than an introduction of any new standards or material. Overall, it is considered that in some respects the draft SPD is not sufficiently engaging with the latest policy arena needed to reflect the declaration of the climate emergency by Leeds City Council. Much of the document still presents a focus on highway capacity-focussed mitigation to new development, which risks undermining the progressive approaches to low-car developments which should be being pursued in the city. It is notable that the public transport section is only 3 pages long and sits at the very end of the 250-page document – public transport, alongside active travel, should have much greater prominence if Leeds is to fulfil its ambition to be a progressive and low-car leading city. The document should be leading on public transport and active modes – with cars as alternative. It is suggested that it is produced as 'interim guidance' which helpfully brings together several sources of information, but only up to the point where a new, concise and legible Transport SPD that engages with the climate emergency is produced. This should be progressed as a priority.	YES	General comment and repetition from above. But LCC will provide additional text on the climate emergency.
Part 1, Section 1.1, Paragraph 1.1.6 Part 2, Sections 2.3 & 2.8, Paragraphs 2.3.5 / 2.3.6 / 2.8.5 Appendix D	Manual for Streets is referred to within the Transport SPD. However, in dealing with accesses onto the existing highway network later in the SPD, reliance is made on the outdated guidance in the DMRB (which is for Trunk Roads). LCC still insist on requiring DMRB to be used on certain Secondary Distributor Routes based on an outdated definition. Manual for Streets should be considered as a starting point in all urban areas and on lower speed rural roads.	NO	The Transport SPD states the new requirements MIS can be applied to a street. The document uses MIS visibility splay requirements on Distributor Roads or Strategic Routes which are within a designated town centre. No further action required.
Part 2, Sections 2.2 / 2.3 / 2.4 / 2.5 / 2.6, Paragraphs 2.2.3 / 2.3.3 / 2.4.3 / 2.5.2 / 2.6.10	The document is suppose to be a guide for developers, but for example in these paragraphs, it effectively prescribes what road layout would be accepted for adoption. The wording is likely to lead to overly prescriptive road designs with no design variation to suit topographic or environmental circumstances. For example, for Type 2 streets the table in para 2.3.3 suggests a 2m footway on each side – this may be unnecessary in certain circumstances and so should be recognised here. Past experience of LCC officers now quoting 'the proposed layout does not satisfy a particular street type or minimum adoptable requirements as outlined in the Street Design Guide and is not acceptable as shown', shows a lack of understanding and appreciation that the SPD is suppose to be guidance!	NO	The new widths for carriageways have been requested by LCC. Specific circumstances will also determine practicalities of application.
Part 2, Section 2.2, Paragraph 2.2.3	The table for Type 1 Streets indicates a higher forward visibility requirement for HGV and buses – this is reasonable only if the predicted combined proportion of HGV and buses is greater than 5% (para 10.1.8 of MIS2 refers) otherwise excessive.	NO	There is a negligible difference between the forward visibility requirements for HGV / Buses and Light Vehicles.
Part 2, Section 2.4, Paragraph 2.4.3	The table for Type 3 Streets indicates a 'minimum overall adopted corridor width of 8.1m' – this is an increase from 7.4m in the current guide – why? This will further encroach into the developable area of the site.	NO	The new widths for carriageways have been requested by LCC. Specific circumstances will also determine practicalities of application.
Part 2, Section 2.5, Paragraph 2.5.2	The table for Type 4 Streets increases the minimum carriageway width from 3.1m to 3.3m – why?	NO	The new widths for carriageways have been requested by LCC. Specific circumstances will also determine practicalities of application.
Part 2, Section 2.6, Paragraph 2.6.10	The table for Type 5 Streets has had the caveat on forward visibilities removed (Visibilities significantly above this level should be avoided to deter excess speeds) – why? This could lead to unsafe layouts in a Home Zone.	NO	No change required. This will not lead to unsafe layouts in Home Zones.
Part 2, Sections 2.7 / 3.1 / 5.3, Paragraphs 2.7.4 / 3.1.5 / 5.3.4	The current guide requires 4.8m width for first 10m, so why has this measurement been increased to 5.5m – this is excessive for low key / small scale developments. Also, to ask for pedestrian / cycle linkages may not be practicable.	NO	The new widths for carriageways have been requested by LCC. Specific circumstances will also determine practicalities of application.
Part 2, Section 2.8, Paragraphs 2.8.10 & 2.8.11	These paragraphs and the diagrams between have just been stuck in after the turning requirements for industrial nursery court and the latter script then continues at 2.8.12 so is broken up – consider reorganising paragraphs..	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.
Part 2, Section 3	The useful guidance on widths of 4.8m and 4.1m appears to have been removed – why?	NO	The new widths for carriageways have been requested by LCC. Specific circumstances will also determine practicalities of application.
Part 2, Section 4.1, Paragraph 4.1.10	The addition of this paragraph is welcomed.	NO	General comment.
Part 2, Section 5.1, Paragraph 5.1.4	Despite quoting Manual for Streets 1 and 2 earlier, where mention is made of 'rural' situations, the word 'rural' does not appear here or elsewhere in the guide and LCC still insist on requiring DMRB to be used on certain Secondary Distributor Routes based on outdated definition (their maintenance hierarchy). Manual for Streets should be considered as a starting point in all urban areas and on lower speed rural roads.	NO	The Transport SPD states the new requirements MIS can be applied to a residential street. However, the document states that the DMRB requirements may be required on Distributor Roads or Strategic Routes (i.e. due to traffic volumes). No further action required.
Part 2, Section 5.1, Paragraph 5.1.6	MIS states that the guidance in DMRB is just that, guidance and on non Trunk Roads should not be used uncritically – this is not covered here.	NO	The Transport SPD refers to this guidance, and therefore, it is considered that no repetition of this statement is required.
Part 2, Section 5.3, Paragraph 5.3.1	The visibility distances for industrial roads are same as current guide but inconsistent with 2.8.5 so latter should be reduced from 36m to 33m.	YES	WSP recommend the Transport SPD is updated as per comment.
Part 2, Section 6.2	Where is the logic of having a speed control bend and then require the full forward visibility for the 'appropriate' design speed to be provided – this could end up with a wide area of land on the inside of a tight bend being given over to forward visibility which HDC officers will merely just quote the full design speed for the road and take no account that the actual speed around the bend will be significantly less – this needs to be acknowledged / considered.	NO	No change required. Speed control features allows there to be reduced visibility.
Part 2, Section 6.3	Useful to mention that if vertical measures are required on a new estate road, how can the residents on a 'yet to be approved' development be consulted – one assumes any consultation on this can only be done by LCC at Planning Application stage?	NO	This comment is not related to the purpose of the Transport SPD.
Part 2, Section 8	There is no mention of vertical clearance requirements over footways.	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.
Part 2, Section 9.2, Paragraph 9.2.2	The example picture missing.	YES	All images / graphics will be provided in the Final Transport SPD.

Part 3, Section 1.3, Paragraph 1.3.2	The maps showing the Core and Fringe Areas have remained unchanged for over 10 years. The level of development now approved / proposed / mooted means that these maps are out of date and the boundary lines need to be redrawn particularly between North St and Burnmantoffs St, east of Marsh Ln from the A64 to East St, east of Black Bull St to the A61, Leathley Rd, and then around to south of Jack Lane and over towards Ingram Distributor.	NO	The map has been developed based of the type of road and that in turn sets the maintenance category not the other way around.
Part 3, Section 2.4, Paragraph 2.4.2	The change in expectation such that in the Core and Fringe a minimum level of spaces is no longer required with the given caveat of no detrimental impact is welcomed.	NO	General comment.
Part 3, Section 2.4, Paragraph 2.4.7	The HMO expected parking is not annotated as such in the table at 2.6.	YES	WSP recommend that the Transport SPD is updated as per the comment.
Part 3, Section 2.5	One use is still missing, namely 'assisted care / sheltered type residential' accommodation. This was lost in the 2009 SDG and for such applications reference had then to be made to the 'revised appendix A9A of the UDP provides separate guidance for Student and Retirement and Sheltered Housing' - that document stated "for retirement and sheltered housing then one parking space per two dwellings should be provided". Table 2.1 in 2.6 should be revised accordingly.	YES	WSP propose to discuss this comment in more depth with LCC parking services team.
Part 3, Section 2.10	This section is largely unchanged and generally positive towards current proposals in the Core and Fringe areas.	NO	General comment.
Part 3, Section 2.13	This section is largely unchanged and generally positive towards current proposals in the Core and Fringe areas.	NO	General comment.
Part 3, Section 3	The current guidance for EVCP provision for residential development is 1 charging point per unit (with allocated / dedicated parking) or 1 charging point per 10 unallocated spaces. The table at 3.2.1 states 1 per parking space and 1 per 10 visitor spaces. This is neither practicable nor reasonable. On a housing estate, you might get more than one parking space per dwelling so how can an EVCP be provided for each space? Also, how can one EVCP be provided for every 10 visitor spaces on such an estate and who would pay for the energy? If it is intended that this is applied to parking areas for apartments, then each allocated space would have to be 2.6m wide which then increases the land required for parking which means either larger car parks or smaller developments / reduced parking provision. This part needs to be reworded / revised. Also, unsure why two categories for motorway services?	YES	This Section has been updated to reflect the new Policy for Electric Vehicle Charging Infrastructure EN8 in the Core Strategy. WSP recommend this comment is checked to ensure consistency with EN8.
Part 3, Section 7	As stated previously, the detailed maps showing the Core and Fringe Areas have remained unchanged for over 10 years. The level of development now approved / proposed / mooted means that these maps are out of date and the boundary lines need to be redrawn particularly between North St and Burnmantoffs St, east of Marsh Ln from the A64 to East St, east of Black Bull St to the A61, Leathley Rd, and then around to south of Jack Lane and over towards Ingram Distributor.	NO	Repeated Comment.
Part 4	A flat rate for the RTPF of £200 per unit is suggested. Whilst this offers some clarity, it has to be said that the present mechanism for implementation is deeply flawed and impracticable and needs to be reviewed in a pragmatic manner (not just for the convenience of LCC).	YES	WSP propose to review this comment with LCC.
Part 5	The Part seems like a draft document with work yet to be done to finalise what is required – laudable in its idea but not sure how it can be reasonably delivered. It makes reference to junctions identified in the 'SAP Infrastructure background paper and Table 3.1', which implies there are differences between the two, but these need to be given altogether in one place which is the idea of this new SPD (and a criticism of the old one). Also, it refers to the cost of appropriate mitigation without identifying what mitigation / schemes have been developed at these identified junctions. This makes it difficult to determine at an early stage as to what level of additional costs might be incurred which when a developer is looking at the viability of a site / purchase of the same is an important consideration. The whole process could result in S106 overload in the LCC Legal Department.	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.
General	It is hoped that this consultation process is not the end of the matter and further dialogue with interested parties will be forthcoming. This was asked for with regard to the Kirksteds SDG and not taken up resulting in significant errors being maintained in the final document. One hopes LCC does not fall in the same trap.	NO	General comment.
General	Parts of North Yorkshire are within the Leeds City Region. Where appropriate the SPD should take account of strategic issues and have regard to NYCC Transport and Highway guidance and standards, and SUDS to ensure there is an integrated approach to addressing cross boundary transport issues arising from development.	NO	No change required. Both authorities should be applying the similar national guidance required.
General	Developer contributions may in certain instances be necessary to mitigate effects of growth within Leeds, including cumulative impacts of growth on the transport network outside the city boundaries.	NO	General comment.
General	New Local Transport Note (LTN) will provide national cycling design guidance – This guidance is not yet published but is likely to provide new guidance for cycling design. WYCA suggest that the SPD should acknowledge that this new guidance may change the guidance in this SPD.	NO	No change required. The Transport SPD should only refer to published guidelines.
General	The West Yorkshire Design Principles for Walking and Cycling is expected to be developed with Transport Committee agreement in May 2020.	NO	General comment.
General	Local Cycling and Walking Infrastructure Plans are mentioned in National Policy but no reference to Leeds own plan and status of it with respect to this SPD. The SPD refers to other documents that are interim or still in development. Transport for New Homes checklist - wouldn't WYCA/LCC support the use of the checklist?	NO	No change required. The Transport SPD should only refer to published plans.
General	There is a mixture of introductory/context info here and some specific directions for specific modes (e.g. 1.1.17) – WYCA suggest that the introduction needs to remove some of the specifics or signpost to actual sections within the document where the full guidance can be found. The SPD should lead developers towards what is regarded as current best practice rather than simply signposting other guidance documents without any direction of which aspects of the guidance is the 'best practice'.	NO	No change required. This comment would not add to the content of the Transport SPD.
Part 1, Section 1.1, Paragraph 1.1.2	WYCA welcome that the Climate Emergency is referenced in the SPD. The text should be amended to recognise that measures to move to more sustainable travel behaviour is an important part of moving to net zero.	NO	General comment.
Part 1, Section 1.1, Paragraph 1.1.6	Reference to Manual for Streets/Manual for Streets 2 – document states that guidance is based on this – does this mean the detailed design guidance/parameters Leeds align with MS or are there departures?	NO	No further action required. Any departures from standards will need to be discussed with LCC.
Part 1, Section 1.1, Paragraph 1.1.19	Reference is made to Cycling England. Cycling England was shut down in April 2011 and therefore may not be the best reference to use.	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.
Part 1, Section 1.1, Paragraphs 1.1.22 to 1.1.28	The SPD refers to Mary Portas review and importance of parking for town centre vitality – there is significant challenge to this idea nationally/internationally. WYCA suggest that a balanced statement about pedestrian pound/value of active travel to economic vitality. https://www.livingstreets.org.uk/media/3890/pedestrian-pound-2018.pdf Convenient parking for residents (eg as advocated/required in 1.1.26) will discourage use of alternative modes. The tone of this paragraphs and this section needs to be more balanced about ensuring that design does not lead to uncontrolled parking vs not locking in/perpetuating car dependency. Anti social parking critically reduces pedestrian space and amenity – this is a key issue alongside neighbourhood tension and safety. The statement on car parking in housing locations should be qualified – 'appropriate' or 'suitable levels of' car parking needs to be accommodated.	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.
Part 1, Section 2.2, Paragraph 2.2.9	The SPD describes LCWIPs as national initiative – There is an LCWIP under development for Leeds as part of a West Yorkshire initiative. There should be some reference to this.	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.
Part 1, Section 2.4	West Yorkshire Transport Strategy 2040 – full title. The section should include reference to walking, bus and rail targets.	YES	The title should be updated, however specific targets should be avoided in the Transport SPD as they become outdated quickly.
Part 1, Section 2.7	Could widen this to make clear that keeping simple also means reducing street clutter – and unobstructed footways.	NO	No change required. This should already be happening.
Part 1, Section 2.8, Paragraph 2.8.4	Reference should be made to the council's Play Streets initiative. https://www.leeds.gov.uk/parking-roads-and-travel/licences-and-permits/play-streets	NO	No change required. The Transport SPD refers to home zones.
Part 2, Section 1.1, Paragraph 1.1.3	Manual for Streets 1 cautions that "The DMRB is not an appropriate design standard for most streets, particularly those in lightly-trafficked residential and mixed-use areas"; this is reiterated in Manual for Streets 2 which states the strict application of DMRB to non-trunk routes is rarely appropriate for highway design in built up areas, regardless of traffic volume". Both documents provide further guidance on when DMRB or values identified in DMRB should be considered. This seems like a more widely applicable interpretation of use of Manual for Streets than simply 'residential streets'.	NO	General comment.
Part 2, Section 1.1, Paragraph 1.1.4	Green infrastructure should not be limited just to street trees – other planting types can be useful. Reference should be made to the Combined Authority Green Streets Principles. https://www.kirksteds.gov.uk/beta/white-rose-forest/pdf/principles.pdf This section could promote use of tools to determine the health impact of streets e.g. TIL Healthy Streets framework; or West Yorkshire Streets for People Toolkit	NO	LCC promote the WYCA guidance 'Green Streets'.
Part 2, Section 1.2, Paragraph 1.2.3	Suggested wording of "provide access to dwellings from connector streets" – emphasise there is no need or desire for through traffic function.	NO	No change required. This comment would not add to the content of the Transport SPD.
Part 2, Section 2.1	This section with details of different types of streets – would it be helpful for there to be suggestions of what sort of traffic volumes would be expected (the number of units hints at this but without explicit direction to restrict through traffic, the volumes will be dominated by through traffic).	NO	No change required. This comment would not add to the content of the Transport SPD.

Part 2, Section 2.1, Paragraph 2.1.3	This should be explicit to state that layouts need to avoid lengthy routes by pedestrian/cycle/mobility scooters – through permeable design even if for motor traffic these are circuitous routes? Suggest use of word “permeable” rather than linked – industry standard.	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.
Part 2, Section 2.1, Paragraph 2.1.6	Mentions Place and Movement – the SPD could it expand on this idea with the diagrams or signpost to other guidance.	YES	All images / graphics will be provided in the Final Transport SPD.
Part 2, Section 2.2, Paragraph 2.2.2	Pedestrian dominated – could more positive language be used e.g. “pedestrian focussed”.	NO	No change required. This comment would not add to the content of the Transport SPD.
Part 2, Section 2.2, Tables	All of these have guidance for carriageway width and footway width – they should all have guidance on how cycling should be provided based on the vehicle flow/width in LTN 1/20 (https://www.london.gov.uk/transport-and-roads/public-transport/ltn-1-20)	YES	LTN 1/20 is a recent publication so WSP recommend that the document is referred to in the Transport SPD
Part 2, Section 2.2, Paragraph 2.2.3	Depending on expected traffic flows – LTN 1/20 is likely to suggest it be better to either have segregated cycle facilities (separate from pedestrian routes) or mixing with suitable volume/speed traffic. Shared ped/cycle routes are not recommended in urban areas or unless pedestrian volumes are very low.	YES	LTN 1/20 is a recent publication so WSP recommend that the document is reviewed in relation to this comment.
Part 2, Section 2.2, Paragraph 2.2.5	The example of a connector street should include a street with segregated cycle facility. Wording is ambiguous as to whether the recommendation in the text is for a shared ped/cycle route – see previous.	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.
Part 2, Section 2.5, Paragraph 2.5.1	“cul de sac” – a fuller definition is needed. This is a street with restriction on through movement by motor traffic at one end – access only (emphasise not restricted for pedestrian / cycle etc)	NO	No change required. This comment would not add to the content of the Transport SPD.
Part 2, Section 2.5, Paragraph 2.6.2	Suggest no use of “normal” – avoid normalising motor traffic dominated street types.	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.
Part 2, Section 2.7	This is an opportunity to ensure that private road accesses do not take priority over pedestrian movement on footways – this document could advocate pedestrian priority over accesses in design terms (visual priority across side roads/accesses; no change in level for pedestrians)	NO	No change required. The Transport SPD already includes guidance on this item.
Part 2, Section 2.9, Paragraph 2.9.2	Manual for Streets 1 cautions that “The DMRB is not an appropriate design standard for most streets, particularly those in lightly-trafficked residential and mixed-use areas”; this is reiterated in Manual for Streets 2 which states the strict application of DMRB to non-trunk routes is rarely appropriate for highway design in built up areas, regardless of traffic volume”. Both documents provide further guidance on when DMRB or values identified in DMRB should be considered. This seems like a more widely applicable interpretation of use of Manual for Streets than simply “residential streets”.	NO	General comment.
Part 2, Section 3.1, Paragraph 3.1.1	This section on carriageway widths should take into account guidance in new LTN 1/20 which advocates considering narrower carriageways. Suggest being clear about distinction between carriageway widths and lane widths.	NO	The new widths for carriageways have been requested by LCC. Specific circumstances will also determine practicalities of application. However, LCC may want to review these requirements in light LTN 1/20.
Part 2, Section 5	Does this guidance reflect detail from MIS and MIS2? (e.g. 5.3 table – how does this relate to the values in 8.3 of MIS2?) Common issues that overly wide visibility splays are included in new development through to adherence to wrong standards (DMRB) where not appropriate. The Principles text should highlight that visibility splays improve safety for motor traffic but reduce safety and convenience for pedestrians that have to cross wider streets. It should be seen as advantageous to reduce splays wherever possible for this reason and a principle for junction design should include reducing diversion, inconvenience and safety concerns for pedestrians travelling across the new junction (and any cyclists using cycle tracks).	NO	The Transport SPD considers all road users and not just pedestrians. This is particularly important when considering vehicles entering onto high speed roads.
Part 2, Section 5.1, Paragraph 5.1.6	As per previous - does this suggest that any signalised junctions should meet DMRB – MIS2 states that DMRB should not be used “uncritically” where used in non-trunk road situations.	NO	The design of traffic signal infrastructure is only contained within the DMRB. However, visibility requirements are contained within both MIS and the DMRB depending on the type of road.
Part 2, Section 5.2, Paragraph 5.2.13	Stopping cyclists by means of a barrier should not be encouraged – this significantly reduces convenience/utility for cycling and cyclists may end up not using the facility and remaining on carriageway. Barriers can exclude use of some types of cycles and do not enable inclusive cycling.	NO	No change required. There are circumstances where barriers are required.
Part 2, Section 6	Suggest use of different terminology – references to restraints and features may draw focus on specific traditional interventions such as cushions, tables etc. - may be preferable to refer to design principles to restrain speeds/keep speeds low (language from MIS2).	NO	No change required. This comment would not add to the content of the Transport SPD.
Part 2, Section 6, Paragraph 6.1.4	The guidance refers to the IHT 1999 Planning for Public Transport in Developments. The Chartered Institution of Highways & Transportation (CIHT) has recently published new guidance ‘Buses in Urban Developments’ and ‘Better planning, better transport, better places’ that provides updated guidance on integrating public transport and planning. https://www.ciht.org.uk/media/4459/buses_us_tp_full_version_v5.pdf https://www.ciht.org.uk/media/10218/ciht-better-planning-ad_updated_linked_pdf	YES	WSP propose to explore this research further and consider whether this paragraph could be expanded to reflect best practice on emerging research.
Part 2, Section 6, Paragraph 6.1.5	Where new bus infrastructure is required, developers need to engage with West Yorkshire Combined Authority to ensure that the suitable location can be agreed and necessary consultation undertaken. This could be added to 6.1.10.	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.
Part 2, Section 6.3	The positioning of vertical displacement measures needs to consider the location of bus stops as passengers are more likely to be stood on the vehicle while boarding and alighting.	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.
Part 1, Section 1.1, Paragraph 1.1.31	The paragraph states that for every Council car parking space lost as a result of a development the lost spaces should be replaced or funds/contributions provided towards parking, transport or revenue improvements. The contribution is calculated as 5 years income per space lost. In principle, this is acceptable however each site/proposal should be assessed on its own merits. For example, a development may eliminate a certain number of parking spaces, but increase significantly the Council’s likely income from business rates or council tax. The contribution described in this paragraph would have the effect of penalising development on its bottom line, although the development is a net contributor to the Council’s finances. In addition, the Council should recognise that the loss of its parking spaces should also form part of an overall reduction in parking capacity, which is necessary to facilitate the move towards more sustainable modes of travel. It is inconsistent for private landowners to be expected to reduce parking capacity and therefore lose revenue whilst the Council maintains its revenue from its parking provision. Instead, any loss of Council parking provision should be seen in the context of the wider benefits of a development proposal i.e. where on-street parking is lost to provide a pedestrianised environment or new areas of public open space.	NO	There are no proposals from LCC to change this mechanism going forward.
Part 3, Section 3.3, Paragraph 3.3.1	This paragraph sets out the requirements for electric vehicle provision and what the layout should be. Within the bullets it includes the proposal that dwell times should be restricted - ‘Rapid EVCPs should be limited to 1 hour stay and include an overnight tariff via the Back-Office system’. The reasoning behind this restriction is understandable, however it needs to be less restrictive for retail and leisure destinations. Rapid charging is achieved through 7kW to 22kW and these can take between 1 and 4 hours for a full charge. A 1 hour restriction is overly restrictive.	YES	This Section has been updated to reflect the new Policy for Electric Vehicle Charging Infrastructure EN8 in the Core Strategy. WSP recommend this comment is checked to ensure consistency with EN8.
Part 3, Section 6.2, Paragraph 6.2.1	Off-street parking will remain an important part of the mixed use and commercial / retail businesses in the city centre. This is acknowledged in paragraph 2.2.15 (page 92) and again seem to be allowed in paragraph 6.2.1 (page 124), where the variety of offers is set out, including car club and car share. Mention is also made to car share within Table 2.3 (page 104). We do not see detail of how car share is defined or regulated and this will need to be made clearer for future developments.	YES	WSP propose to discuss this comment in more depth with LCC .
General	As a substantial investor and landowner, Hammonden welcomes the opportunity to review and comment on the Transport SPD. This shows a strong emphasis on car parking standards and notes the inevitable reduction of available spaces in future development, whilst assuming an increase in public transport availability. Avison Young would be happy to work with the LPA through any further consultations on this SPD to ensure it is robust and acceptable.	NO	General comment.
Part 2, Section 5.2, Paragraph 5.2.11	The simple point is that the lateral visibility Y distances Tabled at para 5.2.11 should be amended to the SSD values given in Table 7.1 of Manual for Streets and not the SSD values which have been adjusted for bonnet length. The more detailed basis for that request is as follows. The figures tabled are said to be derived from MFS and that is to be welcomed, but they have not been. There are two points here, firstly that the Y distances given for speeds of 10 and 15mph have been increased from those in MFS without justification. The second point is that the distances in the draft SPD arise from a common mis-reading of the guidance in MFS relating to adding 2.4m to Stopping Sight Distance, SSD to allow for bonnet length and then relating that to the different parameter of Y distance. Table 7.1 of MFS presents values for SSD, for motorists driving along a road. SSD is measured quite differently to lateral visibility Y distance (MFS Fig 7.19). MFS directs the reader to use the SSD values in Table 7.1 to also represent the lateral visibility Y distance. MFS 7.7.10 states “The Y distance should be based on the values for SSD in Table 7.1” The mis-reading commonly creeps in because MFS Para 7.6.4 also points out that since the front bumper of a vehicle driving along a road is generally 2.4m ahead of the driver position, 2.4m should be added to the calculated SSD (for shorter SSDs). That is to reflect that if the stopping distance applies from the position where the driver makes the decision to stop, then the front bumper will be 2.4m beyond the SSD when the vehicle comes to a halt, hence the advice to add 2.4m to the SSD. That parameter is called SSD Adjusted for bonnet length. That is understandable for SSD, however SSD is not Y distance and the situation is quite different for the lateral visibility distance afforded to a motorist waiting to emerge from a side road or access. In this case, the driver does not need to see as far as the driver of an approaching vehicle to know that the approaching vehicle is present, they just need to see the front of the vehicle. So consequently, 2.4m should not be added to the Y distance component of lateral visibility splays. MFS actually confirms this to be the case in paragraph MFS 7.7.10 which states “The Y distance should be based on the values for SSD in Table 7.1. These are 2 to 3m shorter (due to rounding) than those tabled in SPD Para 5.2.11. MFS does not say that the Y distance should be based on the values for “SSD adjusted for bonnet length” which are also given in MFS Table 7.1.	YES	WSP recommend the Transport SPD is updated as per comment.

Part 2, Sections 5.2 & 5.3	<p>The text of paragraph 5.1.4 "For speed limits of 30mph or less visibilities set out in 5.2.11 will apply in the following circumstances:..... and then lists various circumstances. The key words here are "speed limits". Paragraph 5.1.6 states "In all other circumstances the visibility guidelines set out in paragraph 5.2.13 should be utilised for priority junctions unless otherwise agreed by the City Council....." Firstly, I think it means to refer to paragraph 5.2.12 and not 5.2.13. The distances in Tables A and B under Paragraph 5.12 are based on the Design Manual for Roads and Bridges, which applies to Trunk Roads. The inconsistencies which arise are perhaps best illustrated by an example. Say one stretch of a 30mph speed limit road has a measured 85th %ile wet weather speed of 37mph while a stretch of a 40mph speed limit road has a measured 85th %ile wet weather speed of 31mph. For the 30mph road, the SPD 5.1.4 states that the table under paragraph 5.2.11 applies and a Y distance of 59m is required. For the 40mph road where actual speeds are 31mph, i.e. 6mph lower, SPD 5.1.4 does not apply. SPD 5.1.6 applies and that should refer to Table A under 5.2.12 which requires a visibility splay of 90m. So in this example, SPD guidance states that a Y distance of 59m is adequate when an approaching vehicle is travelling at 37mph, but that an extra 31m of Y distance to 90m is required when a vehicle is approaching 6mph slower, at 31mph. Vehicles do not know the standard or classification of the road they are driving on and if drivers can join a road safely with a Y distance of 59m when approaching traffic is travelling at 37mph, then they can do so with a shorter Y distance when traffic is approaching at 31 mph. Indeed, MFS states that 43m would be adequate in that case, not 90m. The inconsistency arises from seeking to hold on to the older and far more onerous trunk road guidance, when more modern (actually now 10 and 13 year old) guidance exists for roads with speeds of up to 40mph. It is our view that this inconsistency should be resolved and that the SPD should state as follows....</p> <p>"In circumstances where 85th %ile wet weather speeds are up to 40mph, the formulae in Manual for Streets and Manual for Streets 2 shall be used to derive Stopping Sight and Lateral Visibility Y distances. In fact, those MFS formulae are still overly robust and additionally take account of factors such as gradient and % HGV content.</p>	YES	WSP recommend that the Transport SPD is updated as per the comment.	
Part 2, Section 5.2, Paragraphs 5.2.11 & 5.2.12	<p>Table B under paragraph 5.2.12 carries the footnote "c) Where it can be shown that vehicle speeds will be contained to either 30mph or 20mph, the respective major road 'Y' distance can be amended to 60m and 33m respectively" N.B. containing speeds to 30mph means that no speeds will exceed 30mph and for that situation, the draft SPD requires a Y distance of 60m. In contrast, the table under 5.2.11 states that where the 85th %ile wet weather speed is 30mph a Y distance of 43m is required (although that should actually be 40m as demonstrated in a separate representation). An 85th %ile wet weather speed of 30mph means that 15% of vehicles will be exceeding that speed and moreover it is recognised that in dry conditions vehicles will travel approximately 2.5mph faster again. The SPD therefore is inconsistent here where the SPD requires 60m Y distance, when all speeds are 30mph or lower, but only requires 43m when 85% of speeds are up to 32.5mph and 15% of speeds are higher still. To resolve this inconsistency it is WYG's view that the SPD should delete 5.2.12 point c) and state that: "In circumstances where 85th %ile wet weather speeds are up to 40mph, the formulae in Manual for Streets and Manual for Streets 2 shall be used to derive Stopping Sight and Lateral Visibility Y distances.</p>	YES	Further consideration required. WSP / LCC	
Part 1, Section 1.1, Paragraph 1.1.6	<p>Paragraph 1.1.6 states that it draws upon national guidance where relevant, including Manual for Streets and MFS2. It is clear however from the detail in Section 5, particularly in relation to Lateral visibility Y distances, that the draft SPD still seeks to hold on to the old guidance in the DMRB for certain classes of road, even if the measured 85th %ile wet weather speeds are below 40mph. The DMRB guidance is for Trunk Roads and where alternative guidance exists, i.e. Manual for Streets and Manual for Streets 2, for roads with 85th %ile wet weather speeds up to 40mph, then that more recent guidance should be used. In SPD, page 55, 56 etc for example, the visibility requirements are identical to those in the Street Design Guide SPD of 2009. Whilst the 2009 document did refer to Manual for Streets 2007, it did not and could not have referred to Manual for Streets 2 which was published in 2010. MFS2 sought to extend the applicability of MFS which primarily referred to residential streets and lightly trafficked rural roads, to any roads with speed limits up to 37 or 40 mph. MIS2 also stated that it should be used as a starting point for the design of all roads, except trunk roads, even roads with speed limits above 40mph. Together MFS and MFS2 are very important documents presenting the latest evidence and dynamics based guidance on geometric design, yet the detail in Section 5 of the SPD steers away from that for speed limit roads above 30mph. The current SPD under consultation does not adequately take on board those MFS2 principles. Separate representations have been made to seek to rectify that. In addition, this representation requests that the first sentence of Paragraph 1.1.6 be amended to read: "<i>It draws upon national design guidance where relevant and adopts the geometric design guidance in Manual for Streets (MFS) and Manual for Streets 2 (MFS2).</i>" WYG see no reason or justification for it not doing so.</p>	NO	The Transport SPD states the new requirements MIS can be applied to a residential street. However, the document states that the DMRB requirements may be required on Distributor Roads or Strategic Routes (i.e. due to traffic volumes). No further action required.	
General	<p>Disappointed with how little cycling featured in the SPD, there was absolutely no ambition or evidence that the Council is taking Climate Change seriously. In Manchester, there are big plans being outlined to criss-cross the city with proper safe and secure cycling lanes, whilst here in Leeds we get paint and absolutely no coherence, nothing is joined up. Why are we not sending a delegation to Manchester to find out what they are doing? In the Council's aspirational map, Meanwood and Otley Road are marked as Core Network as though they are shining examples of a finished linked up network. This is disgraceful, they are just painted and not even all the way along the road and these are the most used roads for cycling in Leeds. I saw in the YEP news that a new development Kirkstall Forge was being built but there was very little reporting about environmental considerations for the development apart from electrical charging points for cars, surely the planning department needs to demand more now for new builds, to actively encourage cycling or walking this need to be the forefront of any new development. The Council has supposedly declared an Climate emergency but it looks like the ambulance attending the accident is stuck in congested city centre unable to move.</p>	NO	This comment is not related to the purpose of the Transport SPD.	
General	<p>The SPD is not radical in its ambitions. There should be a huge focus on reducing demand for private vehicles and car ownership, linked to traffic restraint measures and traffic free residential developments.</p>	NO	General comment.	
General	<p>All new developments should prioritise walking and cycling over the needs of motor-vehicles.</p>	NO	General comment.	
General	<p>The SPD should articulate a clear vision for a sustainable city which takes account of LCC's declared "climate emergency".</p>	YES	LCC to provide additional text on the climate emergency.	
General	<p>This ambition [climate emergency] should be mainstreamed in all decision-making with clarity as to what it means in practical terms. Focus on reducing the need for journeys by car and for space which is not dominated by the needs of motor vehicles.</p>	NO	General comment.	
General	<p>The focus should be on people walking and cycling.</p>	NO	General comment.	
General	<p>A 20 mph speed limit should be the norm in residential areas.</p>	NO	No change required. All Local Residential Streets (Type 2) should be designed to be self-enforcing to keep speeds below 20mph.	
General	<p>Proper provision for cyclists and cycle parking in line with best practice in other cities.</p>	NO	General comment.	
General	<p>More "must do" rather than "should" or "could". More of the same will not do e.g. in relation to the provision of commuter parking, it states that more may be allowed instead of giving encouragement to more sustainable means of getting around.</p>	NO	No change required. This comment would not add to the content of the Transport SPD.	
General	<p>The same applies to more parking for visitors. Much more consideration needs to be given to public transport which should be a cornerstone of all new developments.</p>	NO	General comment.	
Part 1, Section 2.2, Paragraph 2.2.7	<p>What evidence is used to determine whether a road section is operating at over capacity and what constitutes adequate mitigation? Garforth has been affected by many developments some without any adequate mitigation other than altering the entrance to the development e.g. Ninelands Lane, where traffic queues at peak periods exacerbating pollution from vehicle emissions, whilst waiting to exit Ninelands Lane in both directions. The development of the PAS site in Kippax was given permission with mitigation measures of traffic lights at Charlie Sweeps Corner. Although, lengthy works have been carried out these are completely inadequate as traffic builds up to turn right onto the Kippax Road and queues back up to the roundabout of the A63 and the A642.</p>	NO	This comment is not related to the purpose of the Transport SPD.	
Part 1, Section 2.2, Paragraph 2.2.8	<p>Garforth Neighbourhood Planning Forum endorse the CWIS but ask where the evidence is that this will be adequately funded?</p>	NO	This comment is not related to the purpose of the Transport SPD.	
Part 1, Section 2.3, Paragraph 2.3.3	<p>To encourage the fullest use of public transport in areas where there is public transport service need to be made more reliable with increased frequency and reducing the time spent travelling. Some routes from Garforth could have limited stops or progress directly into Leeds without detouring around Colton, Halton and Cross Gates Journey times have increased significantly compared to 40/50 years ago. Time is valuable to most commuters.</p>	NO	This comment is not related to the purpose of the Transport SPD.	
Part 1, Section 2.5, Paragraph 2.5.19	<p>Garforth Neighbourhood Planning Forum would fully support the protection and increase the amount of tree cover. Hedgerows play an important part in absorbing excess surface water and vehicle emissions</p>	NO	General comment.	

Part 1, Section 2.5, Paragraph 2.5.30	Garforth Neighbourhood Planning Forum are disappointed to see that Garforth has not been included within the Leeds Clean Air Strategy. Garforth continues to see an increase in traffic associated with new housing. Main Street is heavily congested with delivery vehicles and other HGVs who appear to pass through from the Selby Road end without stopping to deliver. Garforth Neighbourhood Planning Forum would wish to see Garforth included within the Leeds Clean Air boundary (as is Morley).	NO	This comment is not related to the purpose of the Transport SPD.
Part 1, Section 2.5, Paragraph 2.5.31	Especially important when one considers that Garforth is one of the wards with the highest incidence of childhood asthma.	NO	General comment.
Part 1, Section 2.8, Paragraph 2.8.4	Garforth Neighbourhood Planning Forum endorse the aspirations of these design proposals but will they have any teeth? New housing in Garforth (and no doubt elsewhere) restricts parking to the front of the dwelling creating a landscape of parked cars which is at variance with the statement made in the first bullet point.	NO	This comment is not related to the purpose of the Transport SPD.
Part 2, Section 2.6	Home Zones are a positive idea, however this would necessitate larger areas than currently provided and density would be decreased. This may need a change in the Core Strategy density criteria.	NO	This comment is not related to the purpose of the Transport SPD.
Part 2, Section 2.9	This is relevant to Garforth. Main Street is hazardous and exacerbated by delivery vehicles parking on pavements. There was a pedestrian fatality last year! Garforth Neighbourhood Planning Forum would like to know how this situation would be remedied.	NO	This comment is not related to the purpose of the Transport SPD.
Part 3, Section 2	Parking is a serious issue for Garforth residents especially when trying to support retail shops in Main Street. There are now additional hazards along the Aberford Road where commuters park to access the station or local business. It appears that Leeds does not have a consistent policy of car parking charges, in Garforth over 50% of spaces are taken for the whole day and a further 25% for half a day (Garforth Neighbourhood Planning Forum Survey). There are no charges and nearby Cross Gates parking fees are quite steep.	NO	This comment is not related to the purpose of the Transport SPD.
Part 3, Section 2.3, Paragraph 2.3.5	Whilst the Park and Ride schemes for Leeds are beneficial, they are full for most weekdays. Are there any more planned for the proposed new development in this planning period?	NO	This comment is not related to the purpose of the Transport SPD.
Part 3, Section 3.2, Paragraph 3.2.1	This table will need some revision if Leeds plans to achieve its proposed targets. Only one rapid charging point per 50 parking spaces at motorway service stations is surely inadequate.	YES	This Section has been updated to reflect the new Policy for Electric Vehicle Charging Infrastructure EN8 in the Core Strategy. WSP recommend this comment is checked to ensure consistency with EN8.
Part 4, Sections 6.5 & 6.6	Garforth Neighbourhood Planning Forum endorse all travel plans to promote walking and cycling. The 2 key issues are 'improvements to local cycling network' and 'provision of segregated cycle paths'. Without sufficient funding the aspirations will come up against the harsh reality of people refusing to use bicycles because the roads are deemed too dangerous. Even existing advisory routes eg Garforth to Leeds are often poorly maintained and unpleasant/ dangerous in wet weather.	NO	General comment.
Part 4, Section 7.1, Paragraphs 7.1.1 & 7.1.2	The key will be for these to be monitored rigorously to ensure plans have been implemented as outlined.	NO	General comment.
Part 4, Section 7.3	Could the monitoring surveys be well publicised, perhaps on the Main Street notice board and on our notice board in the library.	NO	General comment.
Part 4, Section 9.1, Paragraphs 9.1.35 & 9.1.36	Have mitigation or remedial measures ever been carried out against an organisation whose travel plans failed to meet significant parts of its objectives.	NO	General comment.
Part 5, Section 3	HG2-235, (impact at 4 junctions) and Hg3-18 and Hg3-19 not mentioned anywhere but all require significant mitigation.	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.
Appendix A, Section 4	Whilst the drainage section seeks to allocate responsibility for 'drainage assets' between the council and water authority, it seems to treat them as isolated assets without recognising that each asset is a small component of a wider drainage network spreading all the way from the rain falling on the ground to the ultimate discharge into the sea. Any drains constructed for the purpose of draining highways will inevitably connect into other downstream outlets which would not necessarily be adopted by Yorkshire Water and instead run under or over council land, commercial land, private residences etc. with a complex mix of responsibilities and flooding vulnerabilities. It should therefore be incumbent on the highway constructors to ensure that any run off from their drains does not increase flood risk further downstream, particularly during extreme weather events, and if necessary, to incorporate water retention facilities in their construction. The NPPF for flooding and drainage in respect of property developers requires the developer to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and where possible will reduce flood risk overall. There should be a similar requirement for highways.	NO	No change required. The scheme design would ensure that any surface run off from their drains does not increase flood risk further downstream due to current design criteria.
Appendix A, Section 5, Paragraph 5.2.5	Garforth Neighbourhood Planning Forum would agree that planting of broadleaf evergreen trees (avoids most leaf drop and absorbs most carbon) would be of the most benefit in addressing climate change and help to reduce surface water flooding and should be encouraged.	NO	General comment.
Part 5	Taylor Wimpey UK Limited submitted a full planning application (LPA ref: 19/05296/OT) for residential development at Site Allocations Plan (SAP) site HG1-125 in August 2019. Table 3.1 of the draft Highways Cumulative Impact policy identifies Site HG1-125 as having a cumulative impact on a single junction. The junction is Junction 47 of the M1 motorway - Mosodi limited on behalf of Taylor Wimpey UK Limited objects to Site HG2-125 being referenced within the draft policy for the following reasons:- Highways England offer no objection to the development in their consultation response dated 20th November 2019. Enclosed with this submission is the Highways England Planning Response (HEPR 16-01) signed 20th November 2019. They reference impact at Junction 47, this indicates it has been considered by HE but they have offered no objection without a contribution to J47 being required. Junction 47 is a Highways England asset. Discussions subsequent to the submission of the planning application and the HEPR 16-01, LCC TDS have confirmed that they (LCC) will not be pursuing a contribution through this application. An improvement scheme has not been identified. Based on the above there is no justification for HG1-125 to contribute to an improvement scheme at Junction 47 of the M1 and therefore reference to this HG1-125 should be wholly removed from Part 5 of the SPD.	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.
General	As recognised within the SPD, Leeds declared a climate emergency in 2019 and have introduced aims to reduce the carbon emissions across the city. The minimisation of vehicular usage should be strongly encouraged throughout all developments and a change in approach to how many parking spaces etc are required. Development should focus on connecting to public transport links and cycle paths making the city more accessible without the need for a car. This should be complemented further by the encouragement of vehicles charged with renewable electricity; however the costs (resources) of the production of batteries and their realistic longevity must also not be underestimated. Innovative approaches to reduce emissions should be encouraged and promoted wherever possible. As new technologies emerge, there should be flexibility within local policy to encourage trials to reduce emissions.	NO	General comment.
General	Whilst we appreciate that there is mention of tree planting and grass verges within 10.1.9 and at other points within the document, and we are encouraged by the inclusion of consideration for the WY Green Strategy; we feel this does not go far enough. The provision of green infrastructure, tree planting and wildflower verges are essential to meet our net zero carbon aims and other climate change implications. Street trees have been shown to reduce the urban heat effect, improve air quality and have numerous health and wellbeing benefits. Their benefit should not be underestimated and encouragement should be clear to include tree and hedgerow planting on as many roads as possible. This will contribute towards the targets which will be placed on the local planning authority to create a 'Local Nature Recovery Strategy' (or habitat network) by the emerging Environment Bill. Utilising transport links will be the most pragmatic way in implementing this requirement, will improve the aesthetic of the roads and include a number of benefits as detailed above. Leeds should be seen as the leading authority in implementing this strategy and ensuring a true zero carbon economy.	NO	No change required. LCC promote the WYCA guidance 'Green Streets'.
General	Yorkshire Wildlife Trust would also be encouraged by further consideration of wildflower verges and would support the inclusion of principles outlined in Plantlife Road Verge Campaign. Careful design and implementation would ensure lower management and maintenance costs in the long term, hence there does not appear to be any detriments to the creation of wildflower road verges.	NO	No change required. This comment relates to landscape featuring.
General	Yorkshire Wildlife Trust believe it is essential for an ecologist to be a stakeholder in the discussion and design process. Thoughtful, innovative and unique design will ensure a number of benefits are felt with problems detected early and costs of retrofitting mitigation and enhancements minimised.	NO	General comment.

General	Yorkshire Wildlife Trust have also noted that not much text is dedicated to the impacts of lighting. Whilst it is appreciated the statements within the SPD that any cycle and footpaths must feel 'safe and secure'; Yorkshire Wildlife Trust believe this can be achieved in other ways than lighting. Light pollution is a huge concern for large cities, not only as it diminishes star light in the night sky but it interferes with astronomical research, disrupts ecosystems, has adverse health effects and wastes energy. This can however be avoided, for instance, the city of Eindhoven in the Netherlands uses a system which dims LEDs to 20% power when no one is in the area. When a sensor detects movement, the lights switch to full power and alerts other lights in the person's path to brighten as well. Trials in large cities across the world have found that implementing LED street lights with smart controls such as this could result in savings of up to 85%. Research has shown little evidence of harmful effects of switch off, part-night lighting, dimming, or changes to white light LEDs on road collisions or crime in England and Wales, therefore there does not appear to be a well-supported reason for implementation of street lights as is currently utilised. Other innovations, such as solar charged luminescence particles in foot and cycle paths should also be considered. All lighting must have regard for the Institution of Lighting Professionals (ILP) guidance for bats and lighting (2018) which has been written in partnership with Bat Conservation Trust (BCT) and will be updated regularly.	NO	This comment is not related to the purpose of the Transport SPD.	
General	Overall, whilst there are some encouraging considerations within the SPD, Yorkshire Wildlife Trust feel it does not go far enough, in particular in light of the declared climate and biodiversity emergencies. Transport will be fundamental to achieve net zero carbon and is essential to promote healthy and abundant habitat networks across the city. Further consideration and good innovative design should be implemented into all developments and transport strategies to ensure these factors are not overlooked and old practices implemented out of 'ease' and habit. Early consideration and liaison with professionals including ecologists will be essential.	NO	General comment.	
General	Alex raises concerns in regard to this process. How is any normal person supposed to meaningfully ingest a heavyweight 267 page document and provide a PhD-grade referenced response within such a tight window of time? As a senior manager for a large public-sector organisation based in the centre of Leeds and a car/motorcycle commuter he would very much like to respond in detail, but working long hours quite simply will not permit Alex to provide a constructive response to such an oppressively large publication in such a short period of time. Sadly, mobility constraints preclude him from walking/cycling to my place of work and the public transport provision in my area is poor, so Alex feels like an ideal stakeholder yet also excluded by the onerous time constraints necessary to comment in a valuable context.	NO	General comment.	
General	One element Alex would however like to highlight from my 2-hour skim of the document is the intention to provide utopian cul-de-sac connectivity for cyclists. This is an incredibly naive proposal and will simply create off-road rat runs for crime, anti-social behaviour and illegal motorcycles to roam with ever-greater impunity, the latter being a never-ending source of anger without his own community and a longstanding subject of discussion with my MP, Rachel Reeves.	NO	This comment is not related to the purpose of the Transport SPD.	
General	Without taking a period of leave to comprehensively review the strategy, it is quite simply implausible that professionals such as myself with a stake in urban transportation can respond in a coherent manner to this consultation. Very disappointing indeed.	NO	This comment is not related to the purpose of the Transport SPD.	
General	One positive note from a visit to your website appeared to be the provision of free parking to owners of electric vehicles, one of which I am currently awaiting delivery of, yet it appears because I have ordered my EV via a scheme supported by my employer and the V5 document will be held by the leasing company I am viewed in a somewhat inferior capacity and somehow disqualified from such an incentive as your parking department will not even respond to my queries. It seems my small, imminent contribution to reducing emissions within the city is decreed null and void due to the forward-thinking of my employer in providing access to a salary-sacrifice vehicle scheme. So on second glance, not so positive after all.	NO	This comment is not related to the purpose of the Transport SPD.	
General	It seems that Leeds City Council have an enormous opportunity to engage in a meaningful/insightful capacity with the local community at this juncture, yet are failing to do so due to the overbearing nature of the process required of participants and policies designed to make headlines whilst insouciantly minimising the needs of parking revenue.	NO	This comment is not related to the purpose of the Transport SPD.	
Part 2, Section 1.2	Section 1.2 (of Part 2) provides definitions and standards of roads and states that Connector Streets "form the primary network for the town/city as a whole and all long-distance traffic is channelled on to such roads." In Section 2, a Street Type 1 is described as a 'Connector Street' serving up to 700 dwellings. It is recommended that a 'Connector Street' in Section 1.2 would be better described as an 'External Distributor Road' leaving the term 'Connector Street' to be used for Street Type 1. (this fits in with para. 2.1.2 where it states that the street hierarchy should provide an understandable transition from the external distributor roads...).	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.	
Part 2, Section 2.1	Section 2.1 deals with Street Hierarchy and it notes that five street types are covered with guidance on the number of dwellings or maximum peak hour traffic flows that each can accommodate. Street Type 3 is a Shared Space Street and it states that Type 3 streets should have traffic flows of no more than 100 two-way vehicular movements in the weekday evening peak hour. It is unclear why the evening peak hour is specified (At para. 7.2.14 Manual for Streets (MfS) makes no distinction as to the peak hour). It is recommended that the table in paragraph 2.1.4 is amended in relation to Street Type 3 to state "Type 3 streets should have traffic flows of no more than 100 two-way vehicular movements per hour (peak)".	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.	
Part 2	There are two main issues identified with the guidance contained at Part 2 of the Transport SPD which is concerned with Street Design Guidance. The first issue relates to it being more prescriptive than the Street Design Guide SPD in terms of the number of vehicular access points that are preferred / required, and the second issue is that road space requirements are increased across all street types.	NO	General comment.	
Part 2	For Street Type 1: Connector Streets, the Transport SPD states that at least two points of access are preferred for developments of between 50 and 300 dwellings. In the Street Design Guide SPD, the requirement to consider more than one point of access only applies for developments over 200 dwellings. A similar more onerous requirement is also put on Type 2: Local Residential Streets and Type 3: Shared Surface Streets, both of which can serve up to 200 dwellings (the requirement for Type 3 is based on traffic generation which broadly equates to 200 dwellings) where the Street Design Guide SPD makes no mention of two points of access and the Transport SPD states that for over 50 dwellings, at least two access points are required.	NO	The Transport SPD states that at least two points of access are 'preferred' for developments of between 50 and 300 dwellings. This is not a prescriptive requirement one access can be provided, as site specific circumstances will dictate this in practice.	
Part 2	Particularly for smaller sites, the requirement to provide two points of access could significantly impact on the viability and feasibility of developing those sites. It is recommended that the guidance on the required / preferred number of vehicular access points is based on that contained in the Street Design Guide SPD.	NO	The Transport SPD states that at least two points of access are 'preferred' for developments of between 50 and 300 dwellings. This is not a prescriptive requirement one access can be provided, as site specific circumstances will dictate this in practice.	
Part 2	It is noted that the guidance in the Transport SPD on the carriageway width for a Type 1: Connector Street mirrors that in the Street Design Guide SPD where both state that the carriageway width for this type of road if serving more than 300 dwellings should be 6.0m increasing to 6.75m if a bus route. There is no evidence to back up the need for this enhanced requirement which is in excess of what is recommended in MfS which states at para. 6.5.7 that "Streets on bus routes should not generally be less than 6.0m wide (although this could be reduced on short sections with good inter-visibility between opposing flows)". Excessive carriageway widths lead to highway-dominated environments and make it difficult to control vehicle speeds. It is recommended that the guidance on the carriageway width for Type 1: Connector Streets is amended to require a general carriageway width of 5.5m increasing to 6.0m if a bus route with swept path analysis being used as required to determine the width of streets to accommodate large vehicles including buses.	NO	The new widths for carriageways have been requested by LCC. Specific circumstances will also determine practicalities of application.	
Part 2	The Street Design Guide SPD contains guidance on carriageway widths for Type 2 and Type 3a streets (now Type 2 and Type 3 in the Transport SPD) and states that for streets serving up to 50 dwellings, a minimum carriageway width of 4.8m is to be provided. The Transport SPD no longer recognises a carriageway width of 4.8m and requires 5.5m however many dwellings are being served. MfS states that carriageway widths should be appropriate for the particular context and uses of the street and clearly increased carriageway width may be required to accommodate greater traffic volumes especially when the percentages of larger vehicles also increase. Given the likely traffic usage of a street serving 50 dwellings or less, it is considered that a carriageway width of 4.8m is appropriate and necessary in order to keep traffic speeds low. It is recommended that the guidance on the width of carriageway needed to serve 50 dwellings or less from a Type 2 or Type 3 is based on that contained in the Street Design Guide SPD i.e. 4.8m.	NO	The new widths for carriageways have been requested by LCC. Specific circumstances will also determine practicalities of application.	
Part 2	The Transport SPD requires a footway that is shared with cyclists to be a minimum of 3.5m in width. This is not in line with Department for Transport guidance which states that 3.0m is the preferred minimum width of an unsegregated shared facility. It is recommended that the Transport SPD allows for a preferred width of 3.5m and a minimum width of 3.0m for a footway that is shared with cyclists. This will allow for flexibility in individual layouts.	NO	The new widths for carriageways have been requested by LCC. Specific circumstances will also determine practicalities of application.	
Part 2	The Transport SPD and the Street Design Guide SPD contain guidance on the highway width for Shared Surface and Level Surface Streets and note that this will be variable but then specify a minimum overall adopted corridor width for each which is increased in the Transport SPD from the widths given in the Street Design Guide SPD. Specifying a minimum width does not allow for flexibility in smaller sized developments and to deal with site-specific constraints. It is recommended that the overall adopted corridor widths given in the Street Design Guide SPD (7.4m for Type 3 streets and 6.7m for Type 4 streets) are used in the Transport SPD and these are given as the minimum to allow for flexibility.	NO	The new widths for carriageways have been requested by LCC. Specific circumstances will also determine practicalities of application.	
Part 2	The Transport SPD and the Street Design Guide SPD contain guidance on the maximum length of a cul-de-sac stating that this should be 200m. The reason for limiting the length of a cul-de-sac is generally seen to be based on the requirements for emergency vehicles which are, in the main, dictated by the fire and rescue service requirements.	NO	No change required. This comment will be dictated by the number of dwellings proposed.	

Part 2	The Building Regulations 2010 Approved Document B covers Fire Safety and Requirement B5 is concerned with 'Access and facilities for the fire service'. Section 13 of this document covers the requirements for the provision and design of access routes and hardstandings and there is no specific requirement for a maximum length of cul-de-sac, only that a fire and rescue service vehicle should not have to reverse more than 20m from the end of an access road. In the preparation of MIS, the Association of Chief Fire Officers expanded on the Building Regulations requirements and in terms of the length of cul-de-sac, para. 6.7.3, bullet 3, states "the length of cul-de-sacs [sic] or the number of dwellings have been used by local authorities for limiting the size of a development served by a single access route. Authorities have often argued that the larger the site, the more likely it is that a single access could be blocked for whatever reason. The fire service adopt a less numbers-driven approach and consider each application on a risk assessment for the site, and response time requirements." It is recommended that there is no maximum length for a cul-de-sac stated within the Transport SPD.	NO	No change required. This comment will be dictated by the number of dwellings proposed.
Part 2	There appears to be a greater emphasis on use of soft landscaping within the highway including trees and rather than simply providing a 'green street' environment, the Transport SPD considers that this will contribute to air quality. Whilst the Transport SPD is not prescriptive on the use of verges containing trees it should be made clear that this will be considered on a site-by-site basis. LCC recognises that tree planting is essential to improving air quality and tackling its 'Climate Emergency'. Therefore, these benefits should be recognised when considering committed sum payments and trees and other landscaping should not be considered as an additional maintenance burden. It is recommended that the Transport SPD makes it clear that the use of verges containing trees will be considered on a site-by-site basis.	NO	No change required. LCC promote the West Yorkshire Combined Authority's "Green Street" guidance.
Part 2	Section 5 of Part 2 deals with junctions and visibility and in para. 5.1.4 the circumstances are given where the visibilities set out in 5.2.11 (based on MIS) are applicable. This is within residential developments and at an access junction on to the external highway network where the major route meets four criteria. Bullet point (a) in the list of criteria refers to the circumstance where a route is not a Distributor Road or Strategic Route in accordance with a map at Appendix D to the Transport SPD. The routes shown on the map at Appendix D reflect LCC's maintenance priorities for its road network which is not a relevant consideration for the application of visibility standards. It is recommended that the criterion that a route is not a Distributor Road or Strategic Route be removed from the list of when MIS visibility requirements apply. The map at Appendix D is also not required.	YES	WSP recommend that the values contained at paragraph 5.2.11 are updated. Although, the map at Appendix D is still required.
Part 2	Section 11 of Part 2 deals with 'Garages and Driveways' and a minimum clear opening of 2.6m at a garage door is now required for the garage to be considered as a parking space which is an increase from 2.4m specified in the Street Design Guide SPD. It is not clear why this has changed, and this increase will impact considerably on standard house types which are designed to current Government standards (NDSS). It is recommended that the guidance for a garage door opening with a minimum width of 2.4m is retained in the Transport SPD.	NO	The minimum clear opening of 2.6m has been requested by LCC.
Part 3	This section of the SPD is linked to and expands on the requirement in LCC's Core Strategy Policy EN8: Electric Vehicle Charging Infrastructure. LCC's Core Strategy was originally adopted in November 2014 and an update of the Core Strategy in 2019 following a selective review resulted in the addition of Policy EN8. The amended version of the Core Strategy was adopted on 11th September 2019. Policy EN8 requires all applications for new development which include the provision of parking spaces to meet the minimum standard of provision of electric vehicle charging points (EVCPs). For residential development the Policy requires 1 charging point per parking space and 1 charging point per 10 visitor spaces. Concerns were put forward by the development industry during the Core Strategy Selective Review in relation to the introduction of Policy EN8 regarding the requirement of a charging point per parking space, rather than a charging point per dwelling. The concerns focussed on the viability impacts; the type of charger and the potential impacts on the network capacity to accommodate the requirement. These concerns remain and were raised before it was fully known what Amp requirements would be for EVCPs as is now covered in the Transport SPD. A viability assessment (GVA Economic Viability Study Update January 2018 (EVS)) was prepared to consider the impact on viability of the proposed changes to the Core Strategy in the Core Strategy Selective Review. The EVS (Section 12) provides detail on the assumptions used when considering the impact on viability of providing EVCPs as required by Policy EN8. The EVS modelled the viability of Policy EN8 by including an extra over cost (EOC) of £100 for every charging point (para. 12.4). With regard to residential development, it is not clear from the EVS whether the £100 EOC is per dwelling or per parking space and, if the latter, how many parking spaces per dwelling has been assumed based on the number of bedrooms. It is also not clear as to what type of EVCP was assumed. Whilst Policy EN8 deals only with the number, not the specification of EVCPs, the Council was asked at the Core Strategy Selective Review examination what EVCP specification had been applied in the derivation of the £100 EOC. The Council's response was that the EVS assumptions were based on the provision of slow EVCPs which charge overnight and are more economical for customers. This therefore relates to a Standard 13 Amp (up to 3kW) EVCP, not the 32 Amp point proposed in the Transport SPD. The Council's proposed 32 Amp EVCP requirement therefore requires the Economic Viability to be re-visited.	YES	This Section has been updated to reflect the new Policy for Electric Vehicle Charging Infrastructure EN8 in the Core Strategy. WSP recommend this comment is checked to ensure consistency with EN8.
Part 3	There is a cost implication of providing a 32 Amp EVCP, which charges vehicles in 3 – 4 hours, rather than providing a 13 Amp EVCP which charges vehicles overnight (6 – 8 hours). The cost of a 32 Amp EV outlet is more than double that of a 13 Amp EV outlet (costing information can be provided upon request). In addition to the cost requirement for installing 32 Amp EVCP at every parking space, there is a much higher cost associated with the need to potentially provide an extra sub-station to accommodate a 32 Amp EVCP at every parking space. This additional 'infrastructure' cost has not been considered in the Council's viability work. A known example in the District is a residential scheme for circa 200 dwellings, where the difference between the provision of standard 13 Amp EVCPs and 32 Amp fast EVCPs will result in an uplift from 1 electricity sub-station to 3 sub-stations. This poses a considerable additional cost of circa £100,000 per sub-station (cost of the sub-station, enhanced services and loss of the developable area). For a 100 dwelling site, the combined cost of providing a 32 Amp EVCP per space; upgrading consumer units for each plot; and the provision of an additional sub-station could increase the cost per plot by an estimated £600. This is on top of the cost of supplying a standard 13-16 Amp unit per space which is currently about £400 per plot. This does not factor in the loss of developable area. Based on these approximate costs, it is clear that the Council needs to re-visit the economic viability work and it is recommended that an updated economic viability assessment is undertaken, based on the new index linked CIL rates, and on the latest Core Strategy policies, which will therefore factor in matters such as Electric Vehicle charging. In addition to the viability concerns, there is no justification in the Transport SPD of why fast charging 32 Amp units are required for residential development, rather than a standard 13 – 16 Amp charging unit.	YES	This Section has been updated to reflect the new Policy for Electric Vehicle Charging Infrastructure EN8 in the Core Strategy. WSP recommend this comment is checked to ensure consistency with EN8.
Part 3	Lewes District Council has recently produced a Technical Guidance Note on Electric Vehicle Charging Points (February 2019), which is appended in full to this statement at Appendix 2. Of particular relevance to the issue of standard vs fast charging, paragraph 30 states that: <i>"The Government wants to see the majority of charging occur at home, overnight, to avoid occurring during peak electricity demand. Whilst home recharging can be supported by workplace recharging, electric vehicles are expected to predominantly be charged residentially."</i> The provision of standard 13 Amp EVCPs in residential development would facilitate the overnight charging of electric vehicles. The Lewes District Council Technical Guidance Note also includes examples of what other Local Authorities are doing. The detail is included in the guidance note, but to summarise, the Greater London Authority requires Standard 13 – 16 Amp charging points for residents parking. Scarborough Borough Council states that 13 Amp is adequate for home charging in a dedicated EV unit. Lewes District Council requires one standard EV charging unit per dwelling at a minimum requirement of 16 Amps. It is clear from these examples that a 13 Amp charging unit is acceptable in other authorities, and there is no reason why it should not be acceptable in Leeds District.	YES	This Section has been updated to reflect the new Policy for Electric Vehicle Charging Infrastructure EN8 in the Core Strategy. WSP recommend this comment is checked to ensure consistency with EN8.
Part 3	The Transport SPD does not provide any detail of involvement of the electricity providers in the drafting of the proposed requirements. Is there capacity to deliver the proposed 32 Amp requirement charging points on residential development? The issue of capacity of the network is not new. Concerns were reported in The Planner in November 2018, 'Electric Vehicle charging infrastructure: the impact on new development' which stated that: <i>"Planning authorities need to understand the unintended consequences of their requirements and work more closely with stakeholders (particularly electricity network operators) to develop a more pragmatic policy."</i> (underlining and bold our emphasis)	YES	This Section has been updated to reflect the new Policy for Electric Vehicle Charging Infrastructure EN8 in the Core Strategy. WSP recommend this comment is checked to ensure consistency with EN8.
Part 3	In summary, the development industry accepts the need to provide EVCPs in residential schemes; however, remains concerned at the requirement of charging points per space rather than per dwelling and requests that this is reviewed. The residential development industry has significant concerns with the SPD charging point 32 Amp requirement for every parking space. The Transport SPD does not provide any justification for the 32 Amp requirement, when a Standard 13-16 Amp unit would be adequate to allow overnight charging in accordance with the Government's desire of charging vehicles overnight to avoid peak electricity demand, as well as householders desiring to charge overnight at the cheaper rate.	YES	This Section has been updated to reflect the new Policy for Electric Vehicle Charging Infrastructure EN8 in the Core Strategy. WSP recommend this comment is checked to ensure consistency with EN8.

Part 3	The Transport SPD does not provide any background information regarding whether any discussions have taken place with the electricity network operators regarding the capacity of delivering the 32 Amp requirements per space. While an Economic Viability Update was prepared for the Core Strategy Selective Review there is significant doubt that the EVS charging assumption of £100 per house for electric vehicle charging is sufficient and there is no additional viability testing on the proposed 32 Amp Charging point requirement or additional sub-station requirements in the Transport SPD.	YES	This Section has been updated to reflect the new Policy for Electric Vehicle Charging Infrastructure EN8 in the Core Strategy. WSP recommend this comment is checked to ensure consistency with EN8.
Part 3	The requirement to provide an EVCP at a ratio of 1 per 10 visitor spaces is also questioned. In the main, visitor spaces within residential development are provided on-street, within adopted highway, either informally where carriage-way width allows or in dedicated bays. It is unclear who would be responsible for these EVCPs following adoption of the residential estate roads and how their use can be monitored to avoid mis-use by residents or visitors. Other local authorities do not appear to have a similar requirement.	YES	This Section has been updated to reflect the new Policy for Electric Vehicle Charging Infrastructure EN8 in the Core Strategy. WSP recommend this comment is checked to ensure consistency with EN8.
Part 3	The development industry considers that it and other key stakeholders such as the power companies should have been separately consulted prior to adopting EN8 of the Core Strategy and drafting the Transport SPD and suggests that a workshop is arranged prior to any adoption of the Transport SPD. Recommendation: <ul style="list-style-type: none"> • Consult with the development industry and other key stakeholders to understand the feasibility of EVCPs in terms of numbers and specification. • Review the Core Strategy requirement to provide 1 EVCP per space, with the industry preference for 1 charging point per dwelling. Review the Core Strategy requirement to provide any EVCPs for visitor parking. • Prepare an updated Economic Viability Assessment based on the new index linked CIL Rates and latest Core Strategy policies. • Amend the Table at para. 3.2.1 of the Transport SPD as follows to allow for the provision of 13-16 Amp EVCPs at residential development (1 per parking space and 1 per 10 visitor spaces) "the provision requirements would be changed if the Core Strategy is amended. 	NO	This comment is not related to the purpose of the Transport SPD.
Part 4	Part 4 of the Transport SPD deals with Travel Plans. At para. 7.3.5, the Transport SPD introduces a requirement that all travel plans will require monitoring to continue for at least 5 years post full occupation of the development. This is very onerous for residential development as given the build-out times involved, travel planning may have been ongoing for more than 5 years prior to full occupation, and what can be achieved by it, particularly for residential development, when there will no longer be any presence from the Developer. It is recommended that Residential Travel Plans are monitored only until full occupation or for one year post occupation for smaller developments (less than 200 dwellings).	NO	There is a charge to be paid to the council to monitor this.
Part 4	Sub-section 7.5 deals with the Travel Plan Review Fee and it is noted that this has been increased.	NO	General comment.
Part 5	This part of the Transport SPD reiterates information contained within the Site Allocations Plan (SAP) and the Updated Infrastructure Background Paper (Including IDP), July 2018. The proposed approach to considering highways cumulative impact is set out in some detail and appears to be an attempt to be consistent when assessing the impact of development proposals. It is noted that the Transport SPD contains an alternative methodology to a 'roof tax' style levy as it is considered that the latter may not meet Section 106 tests; namely being directly related to the development; and fairly and reasonably related in scale and kind to the development. The alternative methodology considers various criteria of a development proposal including where a development yields 10 or more peak hour trips through a congested junction as identified in the SAP Infrastructure Background Paper. A development proposal yielding less than 10 trips in a peak hour is well below the threshold where any Transport Statement or Transport Assessment is required (a Transport Statement is required only for residential development of 50 or more dwellings which typically will generate 30 two-way trips in the peak hour). It is therefore considered inappropriate for any development where a Transport Assessment (above 80 dwellings for residential development) would not normally be required to be considered as part of the alternative methodology. It is recommended that the requirement for a development proposal to be considered under the alternative methodology is when it is of an appropriate quantum to require a Transport Assessment (bullet point (i) in para. 3.1.5)	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.
Part 5	Cumulative impact should continue to be considered on a site by site basis, based on the impact at the time of application. The alternative methodology appears to be a tax in addition to CIL, which has not been viability tested in the Core Strategy. Table 3.1 within this part of the Transport SPD lists the allocated sites from the SAP and the expected yield in dwellings / HA / sq. m depending on type of development. There are errors within the table which need to be corrected such as Site HG2-167 which has a suggested yield of 619. This is the February 2017 Pre-Submission dwelling capacity rather than that within the Adopted SAP which is now 207.	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.
Part 5	A separate submission has been made by Taylor Wimpey in relation to Site HG2-226 which is already the subject of Planning Application 17/02594/OT and for which ongoing negotiations have taken place between the Applicant and Leeds City Council as highway authority and also Highways England. As a result of the negotiations, the information contained within Table 3.2 (Site Requirements Register by Junction) and Table 3.3 (Other site requirements) is now out-of-date. Tables 3.2 and Tables 3.3 are taken directly from the Updated Infrastructure Background Paper (Including IDP), July 2018. Clearly as the situation on any particular site evolves from allocation through to negotiations at the planning application stage and implementation, the information in these tables will become outdated and may change. Additionally, interventions at some of the locations in Tables 3.2 and 3.3 are known to have been implemented or are partially complete further demonstrating that these tables are time-dependent and therefore should not be included within the Transport SPD. It is recommended that Tables 3.2 and 3.3 are omitted from the Transport SPD. If Table 3.1 is to remain, it should be reviewed for accuracy against the adopted SAP and any sites that are currently under consideration as part of a live planning application removed. It should also be noted that Table 3.1 indicates the possible cumulative and direct impact of a site in terms of the number of junctions, but this will be discussed at planning application stage.	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.
General	The Transport SPD places greater focus on creating more hardstanding, at a time when good environmental design seeks less. The recent UCL report (January 2020) criticises new housing developments being dominated by roads, which follows a government survey suggesting an increase in public concern over the impact of cars on people's health and the environment.	NO	General comment.
General	There appears to be a greater emphasis on the use of soft landscaping within the highway, including trees, rather than simply providing a 'green street' environment.	NO	Both hard / soft landscaping considered.
General	The Draft Transport SPD proposes highway design changes which move away from the Street Design Guide, without clear justification and the changes appear to be moving towards a pre-Manual for Streets time when it was recognised that roads dominated housing areas, without regard to the overall quality of the locality.	NO	General comment.
General	The 32 Amp Electric Vehicle EVCP requirement is not justified, is contrary to the Government's overnight charging aims, and which has not been viability tested. The Core Strategy requirement to provide residential development with 1 EVCP per parking space and 1 charging point per 10 visitor spaces should be reviewed as it is not in line with the requirements of other local authorities and its impact on viability has not been fully assessed.	YES	This Section has been updated to reflect the new Policy for Electric Vehicle Charging Infrastructure EN8 in the Core Strategy. WSP recommend this comment is checked to ensure consistency with EN8.
General	There are concerns with the Travel Plan monitoring requirement post full occupation, which are considered onerous.	NO	There is a charge to be paid to the council to monitor this.
General	There are concerns with the Highways Cumulative Impact charging policy, which lacks detail in relation to the proportion of costs required. Specific site examples are identified where cumulative impacts in the Draft SPD are contrary to site specific highway discussions. Cumulative impact needs to be addressed on a site by site basis, based on the impact at the time of application. This alternative methodology appears to be a tax in addition to CIL, which has not been viability tested in the Core Strategy.	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.
General	Recommendation: A thorough review of the formatting of the document is carried out to ensure there are no paragraph numbers repeated.	YES	WSP recommend the Transport SPD is updated as per comment.
General	It is unclear how the proposed draft policy would work alongside the existing Community Infrastructure Levy (CIL), how will decisions be made regarding the availability of funding available to contribute towards certain junction improvement works be made, compared to monies generated through CIL and/or S106 agreements, and how transparent such decision making will be.	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.
General	At the moment it is not possible to take on a view on the acceptability by developers, etc. of the draft policy without costings of the junction improvement works to be identified through pre-application discussions, particularly where developments in isolation would not trigger the need for substantive junction improvements.	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.
General	It is unclear what would happen in the event that a series of windfall sites come forward in the vicinity of one of the cumulative impact junctions prior to the SAP site against which the need for the costings for junction improvements have been calculated.	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.

General	The Chamber is concerned that there could be significant risk to investment decisions through the adoption of the policy. It could be that developers may withhold/delay development in the hope that other parties move first and then trigger contributions towards junction improvements, thereby reducing their costs by avoiding financial liabilities on their scheme. The city needs more housing to accommodate growth but any potential delay in bringing schemes forward could have a detrimental impact on the Leeds economy and the attractiveness of the area for inward investment.	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.
General	The Introduction to Leeds City Council's Transport Supplementary Planning Document (TSPD) Consultation Draft, states the council's ambition to be the "Best City" in the UK. This is a lofty ambition which sets high standards for any document which will be a cornerstone in the realisation of that ambition. Leeds Cycling Campaign would expect this ambition to be embodied in a clear vision of what being the "Best" would look like and very clear guidance to those expected to deliver this. Leeds Cycling Campaign would also expect such an ambitious city to be on the leading edge of innovation and developing best practice as a leader prepared to innovate, take risks and learn from mistakes. Sadly, the TSPD consultation draft does not paint such a picture. Throughout the document there are references to other guidance documents and many of these are very good in their fields. However, the Leeds TSPD is seldom clear on which parts of these other guidance documents it thinks best, leaving it to the reader (i.e. developers) to choose for themselves. Where clear examples are given these are often not best practice. If Leeds is to be the "Best" and most sustainable City in the UK then it must be prepared to be a leader in exploring practice that is new to or emerging in the UK. Nowhere in the document could this be said to be the case. In short the ambition to be the "Best City" is betrayed by a document that is totally lacking in ambition or any real conviction. It is rather a recipe for more of the same. In the light of the declared climate emergency the TSPD should be a call to radical action with clear guidance that its vision is to enable development that provides: <ul style="list-style-type: none"> • Significantly reduced demand for private motor vehicle use and car ownership • Traffic restraint measures • Motor traffic free residential development, both large and small • Walking and cycling routes that fit into a fully comprehensive cycle and pedestrian network plan linking to key local and urban destinations • New developments all prioritising walking and cycling over motor vehicles • Public transport hubs throughout the city that are integrated with the cycle and pedestrian network • Local delivery hubs across the city to facilitate zero carbon last mile delivery by cargo bikes and electric vehicles None of the above are seriously considered in the SPD draft and for this reason Leeds Cycling Campaign would recommend nothing short of a complete re-write of the document.	NO	General comment.
Part 1, Section 1	At the start of the introduction there should be a very clear statement of what a sustainable city looks like. This should state the commitment to reduce the need for journeys, particularly those by motor vehicles, while promoting healthy modes. Car free development should be clearly supported. There should be a clear understanding that the "Best City" is one where citizens have human space that is not dominated by vehicles. There is no such clear vision statement.	YES	WSP will include high-quality development proposals (successful Leeds based examples).
Part 1, Section 1.1, Paragraph 1.1.2	The SPD references and links to many other strategies and policy documents. The declaration of the Climate Emergency should mean that all these documents are reviewed in light of it. A few of these documents have been released since the Climate Emergency declaration e.g. the Sustainability Appraisal of the Core Strategy and Leeds Cycling Campaign note these do not acknowledge the Climate Emergency declaration. This is perhaps understandable in more historic documents, but if the declaration is to have any chance of delivering a carbon neutral Leeds by 2030 then a radical review of all existing strategies must take place and the fact that this is underway should be acknowledged clearly and unambiguously within the SPD. As it stands the SPD is rather an invitation to carry on business as usual. More specifically within this section, measures to reduce reliance on fossil fuels should include a mention of the promotion of cycling and walking, not just electric vehicles which, while better than other motor vehicles, are not necessarily carbon neutral. They do not eliminate other problems such as air pollution from tyre and road wear, and of course use space just as inefficiently as fossil fuel powered vehicles. An understanding of sustainability in its broadest sense would appreciate that simply replacing these trips with electric ones may be less damaging but is not fully sustainable. The document should, from the outset, put forward the understanding that cycling and walking have the highest priority and that this is understood.	NO	General comment.
Part 1, Section 1.1, Paragraph 1.1.11	The accepted terminology is "people walking and cycling" not "pedestrians and cyclists". This may seem a pedantic point but it rather betrays the writers' lack of understanding of current guidance and key terminology.	NO	No change required. This comment would not add to the content of the Transport SPD.
Part 1, Section 1.1, Paragraph 1.1.12	A "maximum" design speed of 20mph supported by 20mph speed limit signing should be demanded for all new residential roads, without exception.	NO	
Part 1, Section 1.1, Paragraphs 1.1.13 - 1.1.15	This is an opportunity to put down a marker. The best Dutch designs (e.g. Houten https://bicycledutch.wordpress.com/2018/01/16/houten-cycling-city-of-the-netherlands-2019/) make pedestrian and cycling routes direct and motor vehicle routes indirect. Such an ambition for Leeds developments would be a real innovation. In 1.1.14 the use of bollards is suggested as a measure to prevent vehicles accessing paths. Good design should prevent this happening and bollards should only be a last resort. Their mention here threatens to elevate their use to a first choice. Bollards can be a hazard and obstruction and their use should be avoided where possible.	NO	Bollards or similar should be used to prevent the abuse of paths by motorists, but designed in such a way people walking or cycling or those in wheelchairs and mobility scooters can still maintain access.
Part 1, Section 1.1, Paragraphs 1.1.16 - 1.1.17	This is good but could be better with the suggestions in the previous comment.	NO	General comment.
Part 1, Section 1.1, Paragraphs 1.1.18 - 1.1.19	New cycling infrastructure in developments should be designed to link to or fit into the proposed Leeds Cycle Network, not simply link to existing routes. The web link leads to a rather uninspiring network that few developments could sensibly link to. The problem is that Leeds does not have a serious proposed network plan. There is a Cycle Ambition Network but this is vague in its detail and the fact that it is not referenced in the SPD is a clear statement of its current status. This issue needs to be remedied urgently and will be further discussed in the comments on sections 2.2.8 to 2.2.12.	NO	This comment is not related to the purpose of the Transport SPD.
Part 1, Section 1.1, Paragraph 1.1.22	Provision of cycle parking in developments should be highlighted here too.	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.
Part 1, Section 1.1, Paragraph 1.1.23	This is where reference to the walking and cycling network plan should be. This paragraph is just not strong enough on intention or understanding.	YES	All images / graphics will be provided in the Final Transport SPD.
Part 1, Section 1.1, Paragraph 1.1.24	Car parking based on "expected car ownership" is simply predict and provide. This is no encouragement to developers to create developments that will reduce motor vehicle demand. It is very poor.	NO	No change required. Adequate parking provision must be provided to cater for the needs of the development, without encouraging excessive motor vehicle use.
Part 1, Section 1.1, Paragraph 1.1.28	The "Mary Portas report" is hardly a model of good practice guidance on sustainable development. Rather Leeds Cycling Campaign would hold up the example of the highly successful Liveable Neighbourhood approach in Waltham Forest's Mini-Holland as an example of how traffic restraint and parking removal can revitalise a local urban village centre. https://www.transportxtra.com/publications/local-transport-today/news/61522/mini-holland-is-making-streets-people-friendly-says-clyde-loakes/ In addition Leeds Cycling Campaign would point to https://ftl.gov.uk/corporate/publications-and-reports/economic-benefits-of-walking-and-cycling . This link provides access to a suite of reports setting out the economic and broader case for providing for walking and cycling in a whole range of urban environments and also how traffic restraint plays a major part of this.	YES	WSP propose to undertake further research into the example provided in the comment. Many comments have reported that the Mary Portas report is hardly a model of good practice guidance on sustainable development.
Part 1, Section 2.2, Paragraph 2.2.3	Paragraph 105 of the NPPF is quoted, conveniently ignoring paragraph 104 which states that planning policies should "provide for high quality walking and cycling networks and supporting facilities such as cycle parking" (drawing on Local Cycling and Walking Infrastructure Plans). This entrenches the LCWIP as a key component for demanding walking and cycling infrastructure within developments. It is therefore essential that the Leeds LCWIP is rapidly expanded to cover the whole of the city if its potential benefits are to be realised city wide.	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.
Part 1, Section 2.2, Paragraph 2.2.9 - 2.2.12	LCWIP. As previously stated the Leeds LCWIP by its lack of scope will be a severe handicap to potential planning gain for cycling and walking until it is expanded to cover the whole of the council area.	NO	This comment is not related to the purpose of the Transport SPD.
Part 1, Section 2.2, Paragraph 2.2.13	Should read "Public Sector Equality Duty" (PSED) not "public-sector Equality Duty". Again a minor but revealing error.	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.
Part 1, Section 2.3, Paragraph 2.3.6	This paragraph should explicitly include the DMRB section stating that DMRB should only be used for design of high speed inter-urban main roads. However, CD195 "Designing for cycle traffic" does include detailed cycle design guidance which is appropriate for all cycle tracks.	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.
Part 1, Section 2.5, Paragraph 2.5.3	The Leeds Core Strategy sets out the Council's vision for development until 2028. It was adopted in September 2019. The main strategy was first adopted in 2014 and this was then subject to a sustainability appraisal which was effectively completed in February 2019 before final adoption at the later date. Leeds declared a Climate Emergency in March 2019 and this should have been noted within the core strategy at the beginning of the document. It is not, nor is it obvious elsewhere in either the Strategy or the Sustainability Appraisal. This then has a cascade effect on all the policies that come from the Core Strategy.	NO	This comment is not related to the purpose of the Transport SPD.

Part 1, Section 2.5, Paragraph 2.5.28	The "Leeds Cycling Starts Here Strategy" is more a list of worthy objectives than a real plan of how to deliver them. A real strategy would set a road map stating how each of the objectives would be funded and delivered. An LCWIP for all Leeds would be a big step in remedying this.	NO	This comment is not related to the purpose of the Transport SPD.
Part 1, Section 2.5, Paragraph 2.5.29	The Leeds Transport Strategy may include a nice statement on the desire to improve things for walking and cycling but there is no road map or vision expressed for how this will be achieved. A key part of this must surely be a proposed network plan covering the whole council area. Nowhere is this mentioned as even a remote aspiration.	NO	No change required. This comment relates to a separate policy document outside of the Transport SPD.
Part 1, Section 2.6, Paragraph 2.6.1	The list of key objectives should start with "Demonstrating how the development addresses the Climate Emergency declared by the Council in March 2019."	NO	No change required. This would be the output of all successful proposals.
Part 1, Section 2.8, Paragraph 2.8.6	"Including increased production of climate change gases." Should be added to the end of the third bullet point. The word "efficiency" should be removed from the fourth bullet point as this criteria is used to promote new road building.	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.
Part 1, Section 2.8, Paragraph 2.8.10	Transport Assessments/Statements should pay proper attention to how walking and cycling will be facilitated in the new development and not simply repeat existing routes or other proposals. Safety Audits do not pass or fail proposed measures. Instead they raise issues which designers must address. It is acceptable, for example in the case of innovative design, to apply a risk assessment to the design which addresses issues raised in the safety audit as long as this is properly documented.	NO	This comment is not related to the purpose of the Transport SPD.
Part 2	It is really revealing that there is no mention of filtered permeability as a technique to achieve traffic reduction in residential areas and create an environment that encourages walking and cycling. Filtered permeability is achieved by introducing a series of permanent or time limited road closures for motor vehicles that remove through traffic from residential areas. Physical barriers e.g. gates or barriers and/or signed restrictions are typically used to effect the closures. Hackney is perhaps the best known user of this technique. The Liveable Neighbourhood in Waltham Forest also uses road closures with very notable positive results.	NO	No changes required. It is WSP's view that this would require extensive management of this sort of facility.
Part 2, Section 1.1, Paragraph 1.1.3	As stated in comments on section 2.3.6 DMRB should only be used for design of high speed inter-urban main roads.	NO	This comment is already incorporated into the Transport SPD.
Part 2, Section 1.1, Paragraphs 1.1.4 - 1.1.11	The guidance in this whole series of paragraphs should be much more intentional. As stated in overall comments there is still no clear vision of what is really wanted. The statement that the City Council "supports the principle of Home Zones" is simply not strong enough. A real vision would be to state that the Council expects to see Home Zone principles as the norm in the development of new residential areas.	NO	No change required. The Transport SPD provides guidance on the type of developments considered in the region.
Part 2, Section 1.1, Paragraph 1.1.12	This guidance is not remotely strong enough. People work in industrial areas as well as customers seeking access. There is a tacit acceptance here that these people will use motor vehicles. However, every effort should be made to facilitate journeys to these areas being made on foot, by bike, by public transport or by a combination of these modes. Again this section shows no clear vision of what is needed to tackle a Climate Emergency and bring carbon zero transport by 2030.	NO	No change required. The purpose of the Transport SPD is to promote sustainable modes of travel.
Part 2, Section 1.1, Paragraph 1.1.13	Shared space streets should have design speeds of 10mph and all other streets mentioned in this section should have a maximum design speed of 20 mph without exception.	NO	No change required. The design speeds of each street type is the requirement LCC would like to take forward.
Part 2, Section 1.2, Paragraph 1.2.10	Cycle lanes can be designed with light segregation by the use of wands, armadillos, planters. This treatment is emerging best practice for moderately busy to busy roads https://www.itf-oecd.org/sites/default/files/docs/light-protection-cycle-lanes_2.pdf .	YES	WSP propose to explore this research further and consider whether this paragraph could be expanded to reflect best practice on emerging research.
Part 2, Section 2.2, Paragraph 2.2.3	Leeds Cycling Campaign reiterate that the maximum design speed for connector streets should be 20 mph. These streets are also ideal at the lower range of where light segregation is appropriate. Therefore the table stating widths etc. should include this option and also reflect this in carriageway widths. See link in previous comment.	YES	WSP propose to review this comment with LCC.
Part 2, Section 2.2, Paragraph 2.2.5	The cross section of the connector street shows shared pavements. This is not best practice which with Leeds Cycling Campaign recommendation of a maximum 20 mph design speed and/or light segregation means that cycling should be accommodated on the highway.	NO	No change required. Although, this may not be considered best practice it is still acceptable.
Part 2, Section 2.3, Paragraph 2.3.3	Local residential streets should have a design speed of 20 mph or lower and pavements should not be shared with cyclists. The design speed should create a carriageway environment that encourages cycling. The cross section in this section is labelled "Secondary road" which is a new category but the diagrams are clearly meant to represent a residential street. This should be clarified.	YES	All images / graphics will be provided in the Final Transport SPD.
Part 2, Section 5.2, Paragraph 5.2.12	Table B should be deleted from the document as speeds should be measured on site where the major road exists or the design of a new road should be such that speeds can be controlled.	NO	No change required. There are circumstances where not all applications are submitted with measured road speeds.
Part 2, Section 5.2, Paragraph 5.2.13	Delete the section "or if the cyclist is physically slowed to a stop immediately before a crossing by means of a barrier". It is impossible to stop a cyclist using a EA compliant barrier and even with a chicane the cyclist could still be moving as they arrive on the footway.	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.
Part 2, Section 5.3, Paragraph 5.3.2	Where a kerb is dropped for an access and the footway level lowered at least a 1m wide section of footway should remain level. Consideration should be given to using and "Entrance Kerb" also known as a "Dutch Entrance Kerb" to keep the whole footway width level. https://theranycyclingman.blogspot.com/2017/01/kerb-your-enthusiasm-stepped-cycles.html	NO	General comment.
Part 2, Section 6.2	Where carriageways are narrowed on 30mph roads the default should be that they have cycle bypasses or there should be a clear reason given why a bypass is not to be included. In a 20mph zone, or where speeds are kept low by other measures a cycle bypass need not be provided particularly where the narrowing is to make it easier for pedestrians to cross.	NO	No change required. Each scheme will take cycle requirements into consideration.
Part 2, Section 6.3	The default for the ramps on all full width vertical deflection measures should be that they are sinusoidal. This should be the default for all new ramps and the replacement of existing ramps. Sinusoidal ramps are more comfortable for cyclists and equally effective in speed reduction for motor vehicles. It should be noted that there can be less than satisfactory sinusoidal ramps. In reality it is the ramp gradient that is critical. Dutch easy to ride over humps have a gradient of 1 in 40 (2.5%) on 50km/h roads and 1 in 20 (5%) on 30km/h roads, in other words, much gentler ramps than we use although the height permitted is higher at 120mm.	NO	No change required. For cost and practical installation reasons
Part 2, Section 8.2, Paragraph 8.2.2	Use of guard railing should be avoided particularly short isolated lengths. The only exception will be where an irrefutable justification can be given.	NO	As stated in paragraph 8.2.2, guard rails should be avoided.
Part 2, Section 8.2, Paragraph 8.2.5	Practice emerging in Greater Manchester, mirroring that in mainland Europe is to put informal zebra markings across the head of minor road junctions. These can be with raised plateau or not. A raised plateau should not be seen as giving pedestrians a false sense of security but rather reinforcing that pedestrians should be given the right of way when crossing at the head of uncontrolled junctions. Where dropped pedestrian crossings are being designed for a major/minor junction consider that pedestrians emerging from the side road may want to cross the major road.	NO	No change required. The Transport SPD does not prevent these designs from being implemented.
Part 2, Section 9.1, Paragraph 9.1.2	Again light segregation should be included as a preferred option here. As previously stated this can be achieved cheaply using wands, armadillos or other devices. It is revealing that this technique, which has been used in the UK for nearly a decade has not been recognised in the Leeds SPD.	NO	No changes required. The Transport SPD does not prevent these designs from being implemented.
Part 2, Section 9.1, Paragraph 9.1.4	Where there is a shared unsegregated path alongside a carriageway there should be a verge or contrasting strip of at least 0.5m between it and the kerb edge.	NO	No change required. Some schemes will be available to provide this width, whilst other developments will not. Where possible should be provided
Part 2, Section 9.2, Paragraph 9.2.1	Although mentioned in 12.4.2 barriers must still be accessible to people using tricycles, cargo bikes, and trailers.	NO	No action required.
Part 3, Section 1.1, Paragraph 1.1.2	This places resident car parking second on the hierarchy, above cycle parking! The hierarchy should read: • Disabled cycle parking e.g. with wider spacing that could also be used by cargo bikes. • Disabled car parking. • Cycle parking. • Motorcycle & car club parking. • Park and Ride. • Local business servicing. • Local resident car parking. • Local business essential car parking. • Short stay shopper/visitor car parking. • Commuter car parking.	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.
Part 3, Section 1.2	Definitions should include cycle parking.	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.
Part 3, Section 1.3, Paragraph 1.3.4	The aim to "control" on-street commuter parking should be replaced by one to "reduce" it year on year, with space reallocated to healthier, more sustainable uses (e.g. parklets such as the trial approved by the Council at The Calls)	NO	No change required. Developer have to pay to remove on-street parking, so this would put them off.
Part 3, Section 1.4, Paragraph 1.4.3	The guidelines for cycle parking should vary by geographic location. As in the London Plan, higher levels should apply to the Core and Fringe zones, plus other local District centres, as follows: Core zone: 2x provision in Table 5.1 Fringe zone & district centres: 1.5x provision in Table 5.1	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.

Part 3, Section 2.3, Paragraph 2.3.5	Park & ride sites should include cycle parking to a similar standard as at rail stations (interchanges).	NO	No change required. Rail stations are usually located centrally, whereas park and ride site are located near strategic road routes, and therefore, the travel mode share using bicycles would be different, and thus, different standards apply.
Part 3, Section 2.10, Paragraph 2.10.6	The provision of cycle parking at Car Club bays is welcomed but should be made clearer by being placed in a separate paragraph.	NO	No change required. This comment would not add to the content of the Transport SPD.
Part 3, Section 3.3, Paragraph 3.3.1	EV charge point layout – these should not be on footways in almost all locations (i.e. not as shown in plan 3.32). Add bullet point • EVCP to be on carriageway unless a minimum of 2.5m clear footway space is maintained	NO	No change required. If Electric Vehicle Charging Points are provided in the carriageway they would more than likely be struck and damaged.
Part 3, Section 5	Title should be "Cycle Parking"	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.
Part 3, Section 5.2, Paragraph 5.2.2	There should be a reference to a proportion of spaces being allocated to non-standard cycles (to include those types already listed, plus cargo cycles). Hackney SPD requires: "At least 1 accessible/cargo bike space should be provided in all developments. In schemes with more than 25 cycle parking spaces, an additional accessible/cargo bike space should be provided for every 25 cycle parking spaces or part thereof (use classes B2-B8, C3-C4 and D1 (nurses and primary schools only)) and every 50 cycle parking spaces or part thereof (all other uses)"	NO	The standards form a consistent basis for discussion between developers applying for planning permission and the appropriate planning authority. It is intended that they should be applied throughout the region. However, it is recognised that situations may arise where the local economic environment and the availability of alternative means of travel to the private car may lead to parking provision that is more appropriate to local circumstances.
Part 3, Section 5.2, Paragraph 5.2.9	Should be reworded as follows: "The following types of cycle parking are unacceptable in all circumstances: • Butterfly-type stands • Stands that support the cycle by the front wheel only • Single posts • Artistic designs that differ significantly from the basic "Sheffield" type of stand."	NO	No change required. This comment would not add to the content of the Transport SPD.
Part 3, Section 5.2, Paragraph 5.2.10	1st bullet point add "and no more than 50m distance". Where it says "Sheffield Stands" this could be amended to include the "M" version. Add reference to default for new short term parking to be on carriageway as in Brighton, Hackney, Oxford (i.e. not on built outs as recommended).	YES	WSP propose to review this comment with LCC.
Part 3, Section 5.3, Paragraph 5.3.1	Sheffield stands. 1st bullet point replace with: "Be constructed from minimum 50mm diameter steel tubing either black polyurethane (plastic) coated or stainless steel (only in locations where this is in contrast to prevailing landscape to avoid hazard to people with impaired vision). Both versions must have bands in contrasting colours i.e. reflective white/yellow on black or black on stainless steel" Dimensions would be much better on a plan as used by TfL on Cambridge Cycle parking guide https://www.cambridge.gov.uk/media/8771/cycle-parking-guide-for-new-residential-developments.pdf	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.
Part 3, Section 5.3, Paragraph 5.3.2	Two tier parking: Add additional requirement: all parking must include provision for the attachment of a U-lock to both the cycle and the rack/ Designs that allow locking of the front wheel only are unacceptable.	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.
Part 3, Section 5.3, Paragraph 5.3.7	Remove reference to "no need for user's lock to be used" as this is not recommended good practice. Add new recommended type: Bike hangar All new residential developments including streets to include "Bike hangar" type provision to serve dwellings without dedicated parking spaces.	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.
Part 3, Section 5.6, Paragraph 5.6.1	All spaces to be rounded up to nearest 2.	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.
Part 3, Section 5.6	Level of provision to be increased as follows: A1: short stay 1:150 (cap 40), long stay 1:250 A2: s/s 1:100, l/s 1:250 A4-A5: As A3 B1 offices: s/s 1:500, l/s 1:100 B1 other: s/s 1:500, l/s 1:200 C2 education: s/s 1 space/10 bed spaces, l/s 1 space/5 bed spaces plus 1 space for each 10 members of staff C3 residential: flats: s/s 1 space/20 bedrooms, l/s 1 space/10 bedrooms Houses: s/s 1 space/40 bedrooms, l/s 1 space/10 bedrooms R&L as shown Reference to Travel Plans omits any mention of cycling!	NO	The standards form a consistent basis for discussion between developers applying for planning permission and the appropriate planning authority. It is intended that they should be applied throughout the region. However, it is recognised that situations may arise where the local economic environment and the availability of alternative means of travel to the private car may lead to parking provision that is more appropriate to local circumstances.
Part 3, Section 6.2, Paragraph 6.2.1	Monitoring cycle parking should be done on a regular basis, not ad hoc. Ideally this would be quarterly but a minimum of annual monitoring should be required.	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.
Part 3, Section 6.4, Paragraph 6.4.6	The report on the enforcement activities of the City Council should be an attractive and easy to read document setting out progress on the council's overall transport aims, not just parking. Brighton & Hove City Council's report (see www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/6777%20Annual%20Report%202018%2019%20512%20WEB.pdf) has been acknowledged by the industry as an example of best practice and this style should be followed by Leeds.	NO	Undertaken by Travel Plan Co-ordinator
Part 3, Section 6.4, Paragraph 6.4.7	There appears to be no focus on centres outside the main city centre. Leeds covers a very large area with many towns and other centres, e.g. Otley, Wetherby et al, which have their own transport and parking issues.	YES	WSP propose to explore this comment further and consider whether this paragraph could be expanded to reflect best practice on emerging research.
Part 3, Section 7		NO	The standards form a consistent basis for discussion between developers applying for planning permission and the appropriate planning authority. It is intended that they should be applied throughout the region. However, it is recognised that situations may arise where the local economic environment and the availability of alternative means of travel to the private car may lead to parking provision that is more appropriate to local circumstances.
Part 4, Section 1.3, Paragraph 1.3.3	Simply "encouraging" developers to consider the impact of their scheme is very weak. This should be reworded so that developers "must take into account" the wider impacts of their scheme.	NO	No change required. This comment would not add to the content of the Transport SPD.
Part 4, Section 2.1, Paragraph 2.1.1	Relating the need for a Travel Plan to gross floor area may cause issues from small but heavily used developments. It would be good to include a threshold for trips generated as well (as is the case for D class developments).	YES	WSP propose to review this comment with LCC.
Part 4, Section 5.3	Travel plans should include targets and indicators for cycling, based on the DIT Propensity to Cycle Tool (PCT) with an aspiration for a significant level of cycling based on the council's overall target.	NO	No change required. This comment is more focused to specific Travel Plans for developments.
Part 1, Sections 1.1 / 2.2 / 2.3, Paragraphs 1.1.6 / 2.2.6 / 2.3.5 / 2.3.6 Part 2, Sections 1.1 / 2.8 / 2.9 / 3.1, Paragraphs 1.1.3 / 2.8.3 / 2.9.2 / 3.1.1	To bring the standards used by the local highways authority together and amended to be in line with National guidance is welcomed. At several locations within the consultation SPD reference is made to the Design Manual for Roads and Bridges (DMRB) and the Manual for Streets (MIS). At Part 1 para 1.1.6 it is stated that the document is in line with the Manual for Streets publications. At 2.2.6 reference is made to the Strategic Trunk Road network and how this is the responsibility of Highways England. At 2.3.5 it is stated that the Manual for Streets should be used for residential street design. At 2.3.6 it is stated that the Manual for Streets 2 provides a link between the Manual for Streets residential standards and the design standards for Trunk Roads set out in the DMRB, clearly acknowledging that the DMRB is for Trunk Road use. Other than this reference to being the standard for Trunk Roads, the DMRB gets no other mention in the National Guidance section of the SPD (Section 2.3). At several places in Part 2 of the consultation SPD (1.1.3; 2.8.3; 2.9.2; 3.1.1 etc.) it is stated that the DMRB standards should be used for roads which the SPD applies to, which as the SPD does not apply to the Strategic Trunk Road Network (which is not the responsibility of the local authority) means that the DMRB standards are being applied to roads which are not part of the Trunk Road (despite the statement at Part 1 2.3.6). Upon publication of the Manual for Streets the Government made it clear that the DMRB should be used only for highways making up the Strategic Trunk Road network, and that for schemes on all highways other than the Strategic Trunk Road network the Manual for Streets should be used as the Highways England website demonstrates. The advice does not say that "other than the strategic trunk road network or any other road which may be considered to provide a strategic function, the Manual for Streets should be used", but that the Manual for Streets should be used on all highways other than those making up the Trunk Road network. To issue a SPD which does not comply with National guidance clearly defeats the purpose of having consistent standards. The SPD should reflect national guidance and state that for schemes involving the Strategic Trunk Road Network the DMRB should be used and consultation should take place with Highways England. For all other schemes the Manual for Streets (original and Issue 2) should be used and liaison take place with the City Council Highways Authority.	NO	The Transport SPD states the new requirements MIS can be applied to a residential street. However, the document states that the DMRB requirements may be required on Distributor Roads or Strategic Routes (i.e. due to traffic volumes). No further action required.

Part 2, Section 5.2, Paragraph 5.2.2	At Part 5.2.2 it is stated that Visibility Splay Y distances are to be measured along the nearside kerbline of the main road despite the wheeltrack of a vehicle being a distance from the kerbline. The Manual for Streets 2 (which has already been demonstrated as being the standard that should be used on all highways other than the Strategic Trunk Road network) makes it clear that this is a simplistic approach and a more accurate method of measurement is to use the nearside edge of a passing vehicle track. Turner Lowe Associates would expect the authority to use the most accurate method of measurement and references to nearside kerblines should be replaced by nearside edge of a typical vehicle path.	NO	General comment.	
General	Thank you for the opportunity to comment on this draft document. This response is on behalf of the Leeds Clean Air Alliance, which brings together 25 organisations with the common aims of reducing traffic-related air pollution and greenhouse gas emissions, and promoting active travel across the whole of Leeds. Our response is focused on whether the TSPD supports the achievement of these aims, which are key to the stated ambition of making Leeds the "Best City in the UK". The way we travel is an important factor in three of the major challenges we face in Leeds. Air pollution, climate emergency, and obesity and other public health problems linked to lack of exercise are all related to our car-dependent life styles. The TSPD offers a real opportunity to demonstrate that Leeds City Council understands these challenges and has the vision and ambition to tackle them. Unfortunately the draft TSPD does none of these things.	NO	General comment.	
General	Poor air quality is the largest environmental public health risk in the UK (PHE 2018) and road traffic emissions are the principal source of the main pollutants of concern. There is no safe level of exposure, so as well as promoting the switch to less polluting electric vehicles, Leeds should aim to ensure future developments focus on reducing the need for car ownership with priority given to walking, cycling and public transport. The TSPD does not demonstrate any real commitment to ensuring this.	NO	General comment.	
General	The Climate Emergency Update to the LCC Executive Board (Jan 2020) notes that transport emissions are the most important source of greenhouse gas emissions, and that levels of emissions are not reducing as any fuel efficiencies are offset by increased journeys. The report states that it is the council's aim to be city where you don't need to use a car, and includes objectives to help achieve this aim including:- o A 10% increase in walking o A 300% increase in cycling o A 15% decrease in car usage In addition, the Leeds Climate Commission Citizens' Jury recommended that "extensive positive action is taken to make the use of private cars a last resort for transportation" in Leeds. This draft SPD absolutely does not reflect these recommendations. There is no evidence of any real desire to limit car usage.	NO	No change required. The Transport SPD consistently advocates the prioritisation of sustainable modes of transport.	
General	Physical inactivity costs the NHS in England more than £8.2 billion a year. More than one in five Leeds residents are inactive, doing less than 30 minutes physical activity a week. A fifth of year 9 children are obese, and 34% overweight or obese. The Leeds 2018 Health and Wellbeing Strategy update notes: "We want Leeds to be the most active big city in England. This requires wide-ranging action..... It also means making active travel the easiest and best option wherever possible, with lots more walking and cycling due to good infrastructure, creative planning and behaviour. This ambition is not reflected in the detail of the TSPD, which continues to favour private motor vehicle use. It is essential that all new developments are designed so that walking and cycling are the easiest and most convenient transport mode, with good links to accessible and affordable public transport.	NO	General comment.	
General	To tackle the three major threats described above we need to create and develop healthy and sustainable places and communities where walking and cycling are the first choice for travel. We need bold and visionary leadership from our Local Authority to develop Leeds as the Best City in the UK. We would welcome explicit recognition of the damage that car dependency does to our health and our environment, together with a clear statement on the urgent need to limit car usage and reduce car dependency. The TSPD should then build on these principles to provide clear advice for developers.	NO	General comment.	
Part 2, Section 2.2, Paragraphs 2.2.1 - 2.2.5	Paragraph 2.2.2 states that Type 1 Connector Streets can serve developments of between approximately 200 and 700 dwellings. This is consistent with the current adopted Leeds Street Design Guide. However, the criteria set out in the Table on Page 33 (beneath Paragraph 2.2.2) identifies that for developments of between 50 and 300 dwellings, at least two points of vehicular access are preferred, whereas the current adopted Leeds Street Design Guide states that above 200 units two accesses are preferred (i.e. below 200 units a single point of access could suffice). The justification for the proposed change is not clear. The rationale set out at Paragraph 2.2.4, which refers to maximising accessibility and connectivity, and achieving efficient operation in emergencies and for maintenance is exactly the same rationale as is applied in the current adopted Leeds Street Design Guide (at Paragraph 3.21). As such, no technical justification or evidence base has been put forward by the Council to justify its proposal to lower the threshold at which two points of access are preferred. We object to the proposed change on the basis that it is unduly onerous to the point it could unnecessarily constrain otherwise acceptable development sites and has not been justified. The correct test is whether safe and suitable access can be achieved for all users (as per NPPF Paragraph 108) given due consideration of site specific issues, junction capacity, highway safety matters and professional judgement.	NO	The Transport SPD states that at least two points of access are 'preferred' for developments of between 50 and 300 dwellings. This is not a prescriptive requirement one access can be provided, as site specific circumstances will dictate this in practice.	
Part 2, Section 2.2	The proposed new criteria for Type 1 Streets includes widening verges from 1.0m to 3.0m to accommodate tree planting. The potential carbon trapping benefits of tree planting are acknowledged. However, the suggested solution could have unintended consequences in terms of impacts on street lighting, surveillance and safety. The suggested change is also likely to increase maintenance costs. It is suggested that providing suitable tree planting within developments is better specified as part of an overall landscape proposal for the entire site rather than being too prescriptive in terms of street cross-sections.	NO	LCC to promote the WYCA's "Green Streets" guidance.	
Part 2, Section 2.3, Paragraphs 2.3.1 - 2.3.3	Transport SPD is adopted as currently drafted) for such a street to be acceptable for adoption by the Local Highway Authority. It is noted that whereas the current adopted Leeds Street Design Guide permits a carriageway width of 4.8m to serve up to 50 dwellings the updated guidance that is the subject of this consultation is that 5.5m should be the minimum carriageway width. The Council has not presented any technical justification for the proposed change, which appears to be arbitrary. Not only is 4.8m a nationally recognised carriageway width, it is referenced in MfS as being capable of accommodating two-way traffic. Wider carriageways can have the effect of resulting in greater vehicle dominance in developments. We therefore object to the proposed increase in minimum carriageway width.	NO	The new widths for carriageways have been requested by LCC. Specific circumstances will also determine practicalities of application.	
Part 2, Section 2.4, Paragraphs 2.4.1 - 2.4.3	The Table on Page 36 relating to the adoption criteria for Type 3 Shared Space Streets states that the notional carriageway width should be a minimum of 5.5m, whereas the current adopted guidance is a minimum of 4.8m up to 50 dwellings. The Council has not presented any technical justification for the proposed change, which appears to be arbitrary. In the context of creating shared spaces, where place function is prioritised over movement function, and the needs of non-motorised users should be prioritised over private cars, it does not follow logically that the Council would require increased notional carriageway widths. We therefore object to the proposed change.	NO	The new widths for carriageways have been requested by LCC. Specific circumstances will also determine practicalities of application.	
Part 2, Sections 5.1 - 5.2, Paragraphs 5.1.4 - 5.1.5 & 5.2.11 - 5.2.14	Paragraph 5.1.4 notes that for roads subject to speed limits of 30mph or less, the visibility splay 'y' distances set out in Paragraph 5.2.11 (which are derived from the methodology set out in Manual for Streets 1 (MfS1)) will apply to all developments and at the access junction onto the external network where the major route meets four stated criteria. The first stated criteria is that the major route is not a Distributor Road or Strategic Route, with these being identified on the map provided at Appendix D. Paragraph 5.1.5 clarifies that the definitions of Distributor Roads and Strategic Routes are based on the Council's maintenance hierarchy. It is illogical to apply more onerous, 'y' distance requirements simply on the basis of whether the Council considers a route to perform a strategic function and without consideration of prevailing speeds, gradients etc. Rather, visibility splays constructed using the Sight Stopping Distance methodology detailed in Section 5.5 of MfS1 should be applied where it can be demonstrated that observed speeds are routinely below 37mph – in line with guidance set out in MfS1 – irrespective of whether a route is considered by the Council to be strategic.	YES	MfS does not say that the Y distance should be based on the values for "SSD adjusted for bonnet length" which are also given in MfS Table 7.1, and therefore the Transport SPD should be updated. The Transport SPD states the new requirements MfS can be applied to a residential street. However, the document states that the DMRB requirements may be required on Distributor Roads or Strategic Routes (i.e. due to traffic volumes). No further action required.	
Part 2, Section 7, Paragraph 7.3.2	Paragraph 7.3.2 identifies the dimensions of the largest refuse collection vehicle currently used by the City Council. It is noted that the length of the vehicle is specified as being 11.5m, whereas the length of the vehicle identified in the current adopted Street Design Guide is 11.0m. The other key dimensions are the same. The current adopted Street Design Guide identifies (at Paragraph 3.225) the vehicle within the AutoTRACK database that most accurately represents the Council's largest vehicle. The new Transport SPD should provide the same clarification and/or a full technical specification of the test vehicle such that its swept path can be accurately reproduced using AutoTRACK software.	NO	The dimensions provided are for the largest refuse vehicle currently used by the City Council.	
Part 2, Section 2.7, Paragraph 2.7.4	As above, the proposed increased width for private drives is onerous. We consider it appropriate to retain the currently adopted 4.8m width over the first 10m.	NO	The new widths for carriageways have been requested by LCC. Specific circumstances will also determine practicalities of application.	
Part 2, Section 2.8	The Table on Page 44 requires footways alongside Industrial Roads to be a minimum of 3.5m wide if shared with cyclists. National guidance (e.g. LTN1/12) identifies that the minimum width of shared footways/cycleways should be 3.0m. It is considered that the SPD should reflect national guidance in the absence of any compelling technical case the contrary.	NO	The new widths for footways shared by pedestrians and cyclists have been requested by LCC. Specific circumstances will also determine practicalities of application.	

Part 2, Section 2.11, Paragraph 11.1.2	Paragraph 11.1.2 notes that even where the Council's stated requirements for garages are met, a garage will not count as sole parking provision (meaning that additional driveway space is required) and that a double garage will only count as one parking space. The Council asserts that this is because garages are often used for storage and not for parking. Whilst this may be true in practice, there is no technical evidence base presented to justify the assertion. The currently adopted Street Design Guide (Paragraph 3.198) does count garages which meet sizing requirements as parking spaces. Application of the proposed changed approach could result in developments with more car parking than is necessary, contrary to the Council's own wider objectives of promoting alternatives to the private car and responding to the climate change emergency which it has declared.	NO	The aim is to remove excessive on street parking.	
Part 3, Section 3.4	Sub-section 3.4 specifies the type of Electric Vehicle Charging connection required by the Council. It would be prudent to be less prescriptive and to allow a degree of flexibility as this technology is evolving and new solutions will inevitably come to the market as the UK works towards banning new petrol, diesel and hybrid car sales by 2035. The text should, at the least, be reworded to acknowledge the potential for the specification to change over time.	YES	This Section has been updated to reflect the new Policy for Electric Vehicle Charging Infrastructure EN8 in the Core Strategy. WSP recommend this comment is checked to ensure consistency with EN8.	
Part 4, Section 6.2	Sub-section 6.2 of the Travel Plans chapter identifies seven (7 no.) measures to reduce the need to travel. It is notable that home delivery of products has been omitted from this list given that it is identified in the same sub-section of the currently adopted Travel Plan SPD. There is no explanation or justification for its removal. We are of the view that home deliveries can assist in reducing the need to travel given the sophisticated logistics programmes used by major distributors which enable deliveries to be coordinated and linked. The reference to home delivery should be reinstated.	YES	WSP propose to review this comment with LCC.	
Part 4, Section 6.8, Paragraphs 6.8.1 - 6.8.3	Paragraphs 6.8.1 to 6.8.3 define a Residential Travel Plan Fund (RTPF). i-Transport is supportive in principle of the use of such funds given they provide flexibility and choice to the end user. However, Paragraph 6.8.3 states that the cost of a RTPF is £200 per unit. The derivation of the cost is not substantiated or explained and therefore appears arbitrary. Paragraph 6.8.3 should be expanded to provide a detailed and reasoned derivation of the proposed £200 per unit sum. We also consider it necessary to be able to reduce the RTPF contribution sum to reflect other sustainable transport developer contributions on a case-by-case basis.	YES	WSP propose to review this comment with LCC.	
Part 4, Section 6.8, Paragraph 6.8.8	Paragraph 6.8.8 provides wording that the Council expects all Residential Travel Plans to incorporate in respect of RTPF. The final bullet point suggests that the RTPF could cover 'a grant towards the purchase of an EV vehicle'. Such incentives would normally be made at Central Government level. It does not appear practical to include this measure within the RTPF; if a resident chose this option then realistically it would not leave any monies available for other sustainable travel measures, nor would it result in car usage or deter single occupancy trips.	YES	WSP propose to review this comment with LCC.	
Part 4, Section 7.3, Paragraph 7.3.5	Paragraph 7.3.5 states that all travel plans will require monitoring to continue for at least five years post full occupation of the development. This is considered onerous and no technical justification has been put forward by the Council. The need to continue monitoring beyond full occupation of a development should be agreed on a case-by-case basis informed by site specific survey data.	NO	No change required, normal practice.	
Part 5	i-Transport has made specific representations in respect of the proposed new Highways Cumulative Impact policy on behalf of developer clients under separate cover. We would however make the following comments: The thresholds for identifying impacts set out in the Transport Background Paper and noted at Paragraphs 2.1.3 (on Page 174) and 3.1.5 (Page 176) of the consultation draft Highways Cumulative Impact are arbitrary, not justified and onerous; they should be reconsidered. For example, the Council has recently accepted Environmental Impact Assessments which consider additional driver delay at junctions of between 30 and 60 seconds as being of only 'minor' consequence. Similarly, the suggestion that adding only 10 no. peak hour vehicle trips to a congested junction would necessitate a developer contribution to as yet (in some cases) undefined, unspecified and uncosted highways works is unduly onerous and has the potential to constrain development coming forward in Leeds. The Council has not adequately demonstrated or justified in the consultation draft policy that the Leeds Transport Model (LTM) is the appropriate tool to determine the number of trips generated by development proposals at individual junctions. The LTM is a strategic level model, is informed by generic trip rates and does not necessarily accurately reflect proposed development quanta or land use mix, which can change and evolve between a site being allocated and a planning application being lodged. The appropriate method for accurately determining the number of peak hour vehicular trips through a junction is the Transport Assessment process conducted at planning application stage. The Council acknowledges (at point vi on Page 177) that it has, 'some high-level estimates of mitigation costs for some of the congested junctions but more detailed work will be required at the time of any pre-application submission by the Applicant to agree required mitigation and cost.' Clearly this position is inadequate and a much more substantive evidence base than currently exists is needed to justify the collection of developer contributions where impacts are demonstrably in combination with others (i.e. cumulative) before the policy can reasonably be adopted. We therefore strongly object to adoption of the Cumulative Highway Impact policy as currently drafted. In its current form it is ill conceived and requires considerable re-working to be acceptable to developers acting across the city.	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.	
Appendix C, Section 6.1, Paragraphs 6.1.1 - 6.1.11	Paragraphs 6.1.1 and 6.1.2 cross refer to adopted Core Strategy Policy T2. Paragraph 6.1.2 identifies criteria which specify the ideal maximum walking distance from any dwelling to a bus stop and/or a rail station (if applicable). Whilst we acknowledge that the walk distances quoted are identified in recent guidance published by the Chartered Institution for Highways and Transportation (CIHT), other peer reviewed and evidence based research has identified that people are willing to walk further to access public transport services. As an example, research conducted by Walkenshaw and Burn of WYG titled, 'How Far Do People Walk' identifies mean and 85th percentile walk distances to bus stops of 580m and 810m respectively. Whilst we note the important use of the word 'ideally' prior to the three bulleted criteria, walking distance thresholds cannot be more than a useful guide and should not be applied slavishly. Greater flexibility is needed and the wording of Paragraph 6.1.2 should be amended accordingly. Paragraph 6.1.9 states that, 'the minimum level of accessibility' for determining the adequacy of access to public transport services will be based on the Council's adopted Accessibility Criteria (at Appendix 3 of the Core Strategy). We strongly object to this statement. This section of the Transport SPD should acknowledge that the adopted Accessibility Criteria are not a 'pass or fail' test and that various recent planning consents and appeal decisions have confirmed that - it will not always be possible for development sites to meet every accessibility standard; - a degree of flexibility is therefore needed in the application of the Core Strategy Accessibility Standards; and - Policy T2 is not worded negatively and does not prohibit development which does not meet all of the accessibility criteria. The following planning consents and Appeal Decisions are salient to this matter but are not considered to be an exhaustive list: - 17/07970/QT - Land off Walton Road, Walton, Wetherby (City Plans Panel report of 6 November 2018, Paragraphs 2.2 and 2.11) - APP/N4720/W/17/3196216 - Land at Ridge Meadows, Linton, West Yorkshire, LS22 4HS (Paragraph 36). - APP/N4720/W/18/3200471 - Land East of Scholes, Leeds (Paragraph 48).	NO	No change required. WSP believe this is a valid point.	
Part 5	This includes Site HG2-2 as having a cumulative impact (greater than 10 trips). No specific details on the routing of traffic or the trip generators for each site have been provided within the SPD. Work undertaken to assess the impact of this Site (HG2-2) by Mosodi (Appended) shows that the impact is less than 10 trips in the peak hours using a worst case scenario of all trips being commuter trips. It is considered that HG2-2 should be removed from this table as the number of trips is less than 10.	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.	
Part 5	This includes Site HG2-2 as having a cumulative impact (greater than 10 trips) at the A65/A6120 Horsforth Roundabout. No specific details on the routing of traffic or the trip generators for each site have been provided within the SPD. Work undertaken to assess the impact of this Site (HG2-2) by Mosodi (Appended) shows that the impact is less than 10 trips in the peak hours using a worst case scenario of all trips being commuter trips. It is considered that HG2-2 should be removed from this table as the number of trips is less than 10.	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.	

	Part 5	<p>In no particular order, the areas of concern and source of objection triggered following review of the draft policy are summarised below:</p> <ul style="list-style-type: none"> • It is unclear how the draft policy will work alongside CL, how transparent the process would be regarding funding made available through CL or S106 for mitigation of transport related impacts, and, therefore, how the legal tests applicable to S106 agreements (necessary, directly related to development, and fair) will be met. • For example, how will decisions be made regarding the availability of funding available to support improvement works at certain junctions, compared to monies generated through CL and/or S106 agreements, and how transparent will such decision-making be. • It is not possible to take a view on the acceptability of the draft policy and its impact on development viability without costings of the various junction improvements being set. • It is not feasible to expect these potential costings to be established through pre-application discussions, particularly in instances where developments in isolation will not trigger the need for substantive junction improvements. For example, why would a developer look to design and cost major improvements works to a junction where their development may only trigger some minor white lining or signal timing changes. • It is not clear what would happen in the event that a series of windfall sites came forward in the vicinity of one of the cumulative impact junctions prior to the SAP site against which the need for improvements has been calculated. • On the basis that these windfall sites could fund the improvements themselves this is an area where it could be difficult to demonstrate compliance with the legal tests for S106 agreements moving forward, and raises more significant concerns regarding the impact on delivery of development across the city (see below). 	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.	
	Part 5	<p>Concerns regarding Leeds Valley Park</p> <p>Although these comments relate to a specific development proposal and corresponding cumulative impact junction (A61/Wood Lane) we anticipate that similar concerns are likely to apply elsewhere across the city where Caddick have development interests:</p> <ul style="list-style-type: none"> • The cumulative impact policy is a blunt instrument as drafted, not least for some of the reasons outline above. There is very limited flexibility or transparency built into the wording. • A significant concern, and area of objection in this case, relates to the application of criterion (vii) of the draft policy – “any windfall or saved sites which do not have planning permission would also be required to pay the contribution where a development meets the conditions above”. • Leeds Valley Park is subject to allocation for office development within the Aire Valley Leeds Area Action Plan, and is subject to a corresponding extant planning permission for a significant quantum of new office (B1a) floorspace across much of the undeveloped area of the site. • However, Caddick Developments are working up a planning submission for an alternative form of employment floorspace (B2 and B8 focussed) which would generate some vehicle movements through the A61/Wood Lane junction and inevitably be subject to a request for a financial contribution under the terms of the draft policy (albeit, the extent of such a contribution is unknown at this stage in the absence of any improvement works costings). • This is despite the fact that the new development will result in a significantly reduced number of trips through this (and all other) junction when compared to the extant planning position. The proposals will have a net beneficial impact on the local highway network when compared to the modelled assumptions. • The policy needs to be reviewed and revised to take account of such reductions in modelled transport movements through the junction. In such cases no financial contribution should be required. 	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.	
	General	<p>Linked to the concerns highlighted above, there is significant risk that investment decisions will be affected by adoption of the policy. It is reasonable to expect that developers may withhold investment decisions in the hope that other parties move first and trigger contributions towards junction improvements, thus reducing or avoiding the financial liabilities on their scheme. A domino effect of stalled development sites which could have a significant detrimental impact on the Leeds economy and its level of attraction for inward investment.</p>	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.	
	Part 5	<p>This includes Site EG2-27 as having a direct impact. No specific details on the land use of the development Site, the routing of traffic or the trip generation for each site have been provided within the SPD. The development impact of the redevelopment of the site would need to be assessed within a future TA. It is considered that EG2-27 should be removed from this table as the number of trips which will impact J46 of the M1 is unknown.</p>	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.	
	Part 5	<p>This includes Site EG2-27 as having a direct impact. No specific details on the land use of the development Site, the routing of traffic or the trip generation for each site have been provided within the SPD. The development impact of the redevelopment of the site would need to be assessed within a future TA. It is considered that EG2-27 should be removed from this table as the number of trips which will impact J46 of the M1 is unknown.</p>	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.	
	Part 5	<p>Site EG2-27 – Former Ice Cream Factory, Manston Lane, Leeds</p> <p>The previous use is understood to have ceased operation at the end of 2013 and the site is currently vacant. It is unclear if the site has been in operation since this date for alternate use but a search of planning history via Leeds City Council planning portal shows that there have been no planning applications registered for this site in the last five years. No account of the previous land use appears to have been considered within the impact study, with the Site seemingly treated the same as Green Belt release and previously undeveloped land sites. The previous use and associated trip generation of the use should be acknowledged when considering the contributions to undefined highway infrastructure projects. The Local Authority should be seeking to promote the redevelopment of brown field sites such as this. It appears from the content of the draft SPD that Sites such as EG2-27 are considered against the same assessment criteria as, for example, previously undeveloped Green Belt land. Regarding this site, should it be redeveloped for commercial use for B2 then it is unlikely that the number of trips reaching the M1 junction could be considered material if all trips were assessed as “new”. Furthermore, if the previously developed nature of the site was considered then any changes in traffic flow would be negligible. Should the Site be developed for residential purposes it would likely have a capacity of circa 100 dwellings. This would generate approximately 50 two-way car trips from the Site in each peak hour period, for robustness all could be assumed to be commuter trips. Given the location of the site and the employment draw of Leeds City Centre and the nearby Thorpe Park it would be expected that a very low proportion of the trips would route through Junction 46. If the Site is brought forward as residential then it is considered that the impact at Junction 46 would be negligible. If an allowance was made for the previously developed commercial element of the development then there would likely be a net benefit when residential use is compared against this. A final point to note is that Junction 46 has recently been amended to allow for the development of Thorpe Park (The Springs), the business park and accommodate the residential development being brought forward by Redrow. These infrastructure improvements should have allowed for traffic growth, allocations (allocations within the SAP should feed into growth calculations) and planning permissions yet to come forward that would impact on the junction. In summary, no allowance has been made for the previously developed nature of the Site. The highway network has historically been developed/implemented with the trips generated from the previous operation using the highway network. Therefore, the network currently benefits from the vacant nature of this site due to the trips not currently using the network. Given the previously developed nature of the Site and the allocated status, the recently implemented highway improvements, and the major infrastructure improvements that are forthcoming should have been designed to allow for traffic that could be generated by this site. This is likely to have been allowed for through the implementation of background traffic growth. Based on the above all references to SAP Site Ref. EG2-27 should be removed from We do not consider that this SPD is lawful and we believe that this should be a development plan document (“DPD”) and subject to the statutory examination procedure. If a document contains statements or policies falling within any of regulations 5(i), (ii), or (iv) of the Regulations, it must be made as a DPD. This is the case even where the document contains statements that might otherwise be included in an SPD or other local development document.</p>	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.	
	General	<p>Pursuant to Regulation 5, a document which contains statements regarding:</p> <p>(i) The development and use of land which the local planning authority wants to encourage during any specified period; or</p> <p>(iv) development management policies that are intended to guide the determination of application for planning permission: are therefore required to be made as a DPD, and subject to examination by the Secretary of State under section 20 of the Planning and Compulsory Purchase Act 2004. Such documents should also be subject to strategic environmental assessment.</p>	NO	General comment.	

General	<p>If the Council are serious about addressing climate change the parking guidelines should be drafted in such a way to make it clear that they are extremely flexible throughout the city and not just within the Core and Fringe. There should be no minimum level of spaces required on any development and the Council should be looking to reduce the propensity of residents to own vehicles in highly sustainable locations even where these sites are outside the Core and Fringe areas. The guidelines should be drafted to make it clear that they are fully flexible and will be responsive to each site's situation. In sustainable locations sustainable forms of transport should be encouraged above private car ownership.</p> <p>The SPD refers to parking causing detrimental problems on the local highway network and detrimental impact on surrounding streets. This should not be a reason to encourage more car parking which goes against the Leeds Carbon Neutral strategy. Where there is a problem with on-street parking the Council should use its powers to implement 'permitted parking zones' for residents, the on-street parking issues are often caused by none residents parking on street as free commuter car parking. The Council must use the SPD to promote the Leeds Carbon Neutral 2030 strategy and ensure that any parking guidelines are not a minimum so that sustainable transport is encouraged and individual car ownership is not promoted in sustainable locations.</p>	NO	No change required. The Council promote maximum levels of spaces for car parking, therefore, anything below these levels should be deemed acceptable. With regards to the second paragraph, this should be reviewed on a case by case basis.	
Part 3, Section 2.4, Paragraph 2.4.1	Therefore, we consider that Part 3, paragraph 2.4.1 should be removed and paragraph 2.4.2 should be amended to refer to the whole of Leeds not just the Core and Fringe Areas.	NO	No change required. This comment would not add to the content of the Transport SPD.	
Part 3, Section 2.6, Table 2.1	In relation to table 2.1 at Part 3, paragraph 2.6 the car parking guidelines need to be expressed as maximums across Leeds not just within the Core and Fringe areas. The table should be amended to add "maximum spaces" under "Elsewhere" as is the case with the Core and Fringe columns.	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.	
Part 1, Section 1.1, Paragraph 1.1.12	We endorse the requirement of all new residential development to be subject to 20mph speed limits for vehicles on their roads and streets. Where additional residential development is to be added along an existing road or street, however few the number of additional dwellings, the whole existing road or street should be subject to a 20mph speed limit.	NO	General comment.	
Part 1, Section 1.1, Paragraph 1.1.13	In sentence one add 'free from steps'. At the end of the second paragraph remove 'where possible', the reason being that if it is not possible the development should be deemed to be unsustainable.	NO	No change required. This comment would not add to the content of the Transport SPD.	
Part 1, Section 1.1, Paragraph 1.1.14	Add abuse by motorcyclists and cyclists. The general principle that needs to be included is that separate provision is made for cyclists to pedestrians (cyclists frighten and knock down pedestrians on shared routes. Add baby buggies to wheelchairs and mobility scooters.	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.	
Part 1, Section 1.1, Paragraph 1.1.15	Cycle routes also need to be step free.	NO	No change required. This comment would not add to the content of the Transport SPD.	
Part 1, Section 1.1, Paragraph 1.1.17	Wording here needs revision to say "with the heads of cul-de-sacs being provided with well-lit and overlooked links for cyclists and pedestrians between one head and another."	NO	No change required. This comment would not add to the content of the Transport SPD.	
Part 1, Section 1.1, Paragraph 1.1.19	Consideration of how cyclists and pedestrians are provided for should a consideration at the Outline Planning application stage, not at the later Design Statement stage as otherwise developments will get approved and later find to be unsuitable for cycling and pedestrian provision.	NO	Cycle and pedestrian design are considered at all stages of a scheme.	
Part 1, Section 1.1, Paragraph 1.1.20	Specific reference is needed to welcoming home zones and woonerf living street type developments.	NO	No change required. This comment would not add to the content of the Transport SPD.	
Part 1, Section 1.1, Paragraph 1.1.21	Cut 'typically serving up to 700 dwellings' in the first sentence. Replace the second sentence with 'Where above 700 dwellings are being proposed early engagement with the City Council is encouraged to establish appropriate complimentary provision and design standards for distributor and secondary roads, and for other public transport provision.'	NO	No change required. This comment would not add to the content of the Transport SPD.	
Part 1, Section 1.1, Paragraph 1.1.22	Reduced parking facilities in new housing developments should be perfectly acceptable especially inside the Ring Road and motorway corridor to south and east Leeds, and where public and active transport provision are adequate. Where parking is provided it needs to be an integral part of the design of the development and make provision for visitors such that on public road parking is banned to allow public and active transport unimpeded access. Targets set need to reflect signature of the Paris Agreement and the adopted climate emergency declaration.	NO	General comment.	
Part 1, Section 1.1, Paragraph 1.1.23	Cut 'however, car parking still needs to be accommodated whilst not dominating the street scene or dictating the overall layout'. Where parking is provided it needs to be an integral part of the design of the development and make provision for visitors such that on public road parking is banned to allow public and active transport unimpeded access. Targets set need to reflect signature of the Paris Agreement and the adopted climate emergency declaration.	NO	General comment.	
Part 1, Section 1.1, Paragraph 1.1.24	This paragraph lack currency as trends are rapidly making it inappropriate. Not only car ownership but also Uber style car use and bicycle ownership should be considered especially in relation to anticipated demography. It is not just the availability of public transport but also the opportunity for walking and cycling offered. Pedestrian routes should not just be considered for safety reasons but more importantly for promoting active lifestyles and direct shorter accessibility.	NO	General comment.	
Part 1, Section 1.1, Paragraph 1.1.25	Not clear if the SPD is endorsing these principles, but they also need extending to cycle parking. This whole Overview is very car and van oriented and runs counter to the Paris Agreement and adopted climate emergency policy.	YES	WSP recommend that this paragraph is expanded to address the items raised in the comment.	
Part 1, Section 1.1, Paragraph 1.1.26	The second sentence needs amending to 'All pavement parking and public road parking should be banned except in designated bays wider than the normal carriageway.'	YES	In general, Rule 22 of the Highway Code says: "You must not park partially or wholly on the pavement in London, and should not do so elsewhere unless signs permit it...", however, outside of the capital, you are permitted to partially park your vehicle on the pavement but it must not be causing an obstruction. Parking on the pavement can obstruct and seriously inconvenience pedestrians, people in wheelchairs or with visual impairments and people with prams or pushchairs. So, WSP recommend further discussions with LCC and LCC legal team to explore this comment further.	
Part 1, Section 1.1, Paragraph 1.1.27	The first sentence is fallacious: kindly read and understand the Independent Transport Commission's report on the relationships between retail and parking published c.2006 or 'The relevance of parking in the success of urban centres: A review for London Councils' by Sophie Tyler, Giles Semper, Peter Guest & Ben Fieldhouse, October 2012. Planning policy and this SPD need to foster less reliance on car parking and more on sustainable active and public transport mobility. It is just aping past trends and policies that are known to be unsustainable. As an example of how to reduce car dependency through the planning system please see the February 2019 Friends of the Earth Briefing entitled 'Planning for less car use' written by Lisa Hopkinson and Lynn Sloman, and also the many references that it cites.	NO	No change required. This comment would not add to the content of the Transport SPD.	
Part 1, Section 1.1, Paragraph 1.1.28	The Mary Portas report lacked environmental credibility and should not be relied upon. Its recommendations should not be cited with balanced consideration of contrary views. We advocate that parking should not be free in town centres, but priced as a deterrent to car and van use. Cycle parking should be provided at all retail and service clusters, and even at bus stops. Environmental concerns should be the overriding factor rather than commercial considerations, otherwise residents will not be able to keep the economy ticking over.	YES	WSP propose to undertake further research into the example provided in the comment. Many comments have reported that the Mary Portas report is hardly a model of good practice guidance on sustainable development.	
Part 1, Section 1.1, Paragraph 1.1.29	The policy to adopt is unclear here. Parking charges should be required to be levied by all out-of-town retail parks and supermarkets to level the playing field with retail in more central locations.	NO	No change required. This comment would not add to the content of the Transport SPD.	
Part 1, Section 1.1, Paragraph 1.1.30	Again, these are descriptive statements and not guidance on policy. The whole coverage of parking policy in the SPD needs to accommodate the possibilities of introducing a workplace parking levy, and needs to recognise the effects of having a Charging Clean Air Zone.	YES	WSP propose to discuss this comment in more depth with LCC parking services team, so a clear charging strategy is provided.	
Part 1, Section 1.1, Paragraph 1.1.31	The provisions in this paragraph need to say they will be phased out as substitute revenue streams become available from the Charging Clean Air Zone and any future Workplace Parking Levy. It is bad and environmentally perverse planning policy to penalise developers financially for removing parking places.	YES	WSP propose to review this comment with LCC.	
General	<ol style="list-style-type: none"> 1. There is a lack of accordance to the Paris Agreement, to the Climate Change Act 2008 and its amendments, to the Committee on Climate Change reports, and to the Emergency Climate Change resolution adopted by LCC: all this needs considerable attention in revising this draft SPD. 2. Lack of recognition of the need to reduce carbon and small particulate emissions, as well as NOx, through the planning system via this SPD. 3. Walking as a mode is badly considered in comparison even to Cycling: overall there is far too much emphasis on cars. 4. There appears to be no recognition of the need to protect former rail alignments for reinstatement. If fact rail considerations appear fugitive in this whole Transport SPD. 5. There appears to be no recognition that a form of mass transit is likely to be part of the transport mix in the Leeds City Region and will require land use and road space allocation. 6. There is no recognition that a Workplace Parking Levy that has done so much to stimulate economic activity in Nottingham, nor that forms of road pricing beyond the current proposed CAZ, will form part of the transport demand management mix in the future. 	YES	WSP propose to review this comment with LCC. LCC to provide additional text on the climate emergency.	
Part 1, Section 2.1, Paragraph 2.1.3	Reference should be made to and a requirement to accord to the Transport for the North Strategic Transport Plan (February 2019)	NO	No change required. This comment would not add to the content of the Transport SPD.	
Part 1, Section 2.2, Paragraph 2.2.7	LCC needs to say in relation to this DfT Circular that both the individual site and the cumulative impacts of all identified sites in the Local Plan will be taken into consideration.	NO	No change required. This is for LCC to do not the developer, unless the developer is looking at committed developments.	

Part 1, Section 2.2, Paragraph 2.2.11	Where in this SPD does it say development proposals will need to accord to and support emerging and extant LCWIPs? The SPD needs to.	NO	No change required. This comment would not add to the content of the Transport SPD.
Part 1, Section 2.2, Paragraph 2.2.12	This paragraph is irrelevant to this SPD and should be omitted.	YES	WSP recommend that the Transport SPD should be updated as per the comment provided.
Part 1, Section 2.2, Paragraph 2.2.16	Planning Obligations refer to much more than CIL and S106 requirements. Should this part be titled 'CIL and S106 Obligations'?	YES	WSP propose to review this comment with LCC.
Part 1, Section 2.3, Paragraph 2.3.1	Should not the NPPG being referred to be that published on 19 February 2019?	NO	National Planning Policy Framework was published in 2019, but associated National Planning Practice Guidance is still 2014.
Part 1, Section 2.5, Paragraph 2.5.6	Parking should be tightly limited in out of city and town centres to encourage more active travel and public transport use. Pricing of parking needs to be part of the deterrence of car and van use.	NO	This comment is not related to the purpose of the Transport SPD.
Part 1, Section 2.5, Paragraphs 2.5.7 & 2.5.8	On street parking in the City Centre should be severely restricted and in retail and service centres outside the City Centre it should be restricted in the interests of managing transport demand (vide para 2.5.4) and deterring the use of cars and vans in preference to active & public transport. No medium stay car parking in the centre should be supported and short-stay parking should be severely limited mostly provided only for use by those of impaired mobility. Conversely, bicycle parking in all centres needs to become a requirement of all development & re-development. Motorcycle parking provision also needs restraining. PNR parking needs very tight control within the area covered by the Charging Clean Air Zone (CAZ). This section is car biased and almost non-compliant with the Climate Change Act, the Paris Agreement, and the declared Emergency Climate Change resolution. There is no recognition that a mass transit system is likely to be introduced into the transport mix during the duration of this SPD.	NO	General comments.
Part 1, Section 2.5, Paragraph 2.5.9	This section needs rethinking. It is not just commuting that leads to road congestion, it actually just contributes to peak hour road space demand. Other types of car- and van-based transport demand need managing through restricting the quantum of supply of parking and the pricing of that parking made available. There appears to be a lack of understanding amongst the authors of this SPD concerning the relationships between parking and business activity, retail, leisure pursuits, and education centres, and also between short-stay, medium-stay & long-stay parking, between NPR and public and private parking provision, between on-street and off-street parking, between the quantum of supply and the pricing regime, between resident only parking permits and the hiring of drives for parking (which is occurring in Leeds), and between all these different types of parking. Introduction of a Workplace Parking Levy would tackle partly the NPR issue (by far the biggest part of total supply bar parking at dwellings). Maximum parking provision guidelines need extending beyond the City Centre to the whole of the LCC area. We support the continuation of the policy of no new parking of any type within the Transport Box but consider that policy should be extended to beyond the City Centre and apply to other retail and service Centres. Neither commuter nor non-commuter parking operation on development sites should be allowed to encourage the rapid re-development of such sites and stop the erosion of other parking and traffic management policies.	NO	No action required. This comment is outside the purpose of the Transport SPD.
Part 1, Section 2.5, Paragraph 2.5.10	The promotion and use of Park & Ride facilities needs very careful consideration on a case by case basis as P&R can generate still more road transport demand, induce modal switching from buses to car, and lessen the business case for rail and bus improvements. It also needs to be recognised that taking 1000 vehicles off a main road carrying 25,000 vehicles per hours (and maybe 60,000 vehicles per peak 3 hours) makes a tiny dent in those flows and may well induce more traffic to use those main roads. P&R facilities need integrating into mass transit provision.	NO	This comment is not related to the purpose of the Transport SPD.
Part 1, Section 2.5, Paragraph 2.5.15	The T1 policy here needs extending to residential developments, train and bus stations, retail centres, and leisure centres.	NO	Policy T1 is independent of the Transport SPD.
Part 1, Section 2.5, Paragraphs 2.5.25 / 2.5.29 & 2.5.30	Parking provision should NOT be used to promote economic growth: it has widespread adverse externalities that go unconsidered and unpriced to the developers and generators of economic growth. Demand management of road and parking space is needed to assist addressing the climate emergency, also with the improvement of public health which has received scant attention in this SPD except at para 2.5.31. Reducing congestion by restricting parking can lead to economic growth by making environments more attractive to work and live in. This statements in this paragraph currently contradict those at paras 2.5.30 on the Clean Air Zone and 2.5.29 on the Leeds Transport Strategy.	YES	WSP propose to review the paragraphs referred to in the commentary and ensure no contradiction exists, but items specifically relating to policy contained within the Leeds Inclusive Growth Strategy are not related to this Transport SPD.
Part 1, Section 2.5, Paragraph 2.5.27	Where is the complementary Walking Strategy? It needs to be present and referred to in this SPD.	YES	WSP propose to check whether a Walking Strategy has been produced.
Part 1, Section 2.5, Paragraphs 2.5.30 & 2.5.31	These two policies need linking together. The Clean Air Strategy incorporated into this SPD needs to aim to do more than meet the current legal NOx emissions which are below WHO Guidelines, but also aim to reduce NOx emissions to the minimum (any NOx emission is harmful to health), to reduce carbon emissions to meet Climate Change objectives, and to reduce small particulate emissions (PM10 & PM2.5).	NO	This comment is not related to the purpose of the Transport SPD.
Part 1, Section 2.6, Paragraph 2.6.1	This needs to specify that in residential areas the maximum speed limit should be set at 20mph and design features incorporated to self-enforce this. That is for safety and environmental reasons. Item 15 should be put first in the list as item 1.	YES	The first part of this comment is already in the Transport SPD. WSP propose to put item 15 in the list as item 1 following discussions with LCC.
Part 1, Section 2.8, Paragraphs 2.8.8 & 2.8.9	A balance needs to be kept between crime prevention and providing access for walking, cycling and public transport. Links that provide shorter access for pedestrian and cyclists, and the incorporation of bus gates should not be overridden by crime considerations. Keeping such access open and visible may be desirable but not the non-provision of such links in the interests of crime safety. Types of crime are changing: for example, cybercrime occurs with disregard to the design layouts of developments.	NO	Local Authorities are obliged under Crime and Disorder Act 1998 to consider the crime and disorder implications of all planning applications. Crime prevention through environmental design (CPTED) is a concept that focuses on designing out crime by developing an understanding of the factors that are likely to contribute to a higher incidence of crime within a community. The built environment can have both a positive and negative impact upon criminal activities, and is a crucial factor to how safe and secure people feel within their community. However, planning out crime can only work if it is part of a wider strategy incorporating other measures such as regeneration, community involvement and town centre management.
Part 2, Section 1.1, Paragraph 1.1.2	The threshold two-way peak hour movements is too low: 700 houses will generate about 600 such movements.	NO	General comment.
Part 2, Section 5.2	On the measurement of splayed T junctions, mention is made of the need for visibility for the Driver, but nothing on the range of difficulties pedestrians have in crossing unnecessarily wide openings.	NO	The Transport SPD endorses MS values, this being one such aspect.
Part 2, Section 11.1	We are concerned that the provision of garages may lead to encouraging car use. Designs should make adequate provision for utility and store rooms, and for bicycle storage.	NO	No change required. A garage will not count as a sole parking provision (unless it is a double). The Transport SPD takes into account that many people will never make use of a garage for car parking (rather a storage facility).
Part 2, Section 12.3, Paragraph 12.3.1	Tactile paving slabs have been observed at the side of busy roads where few pedestrians dare to cross. An example is west of the White Rose Centre on the Outer Ring Road.	NO	This comment is not related to the purpose of the Transport SPD.
Part 3, Section 2.1.10, Paragraph 2.1.10	Car parking charges should be used as a demand management tool.	NO	This comment is not related to the purpose of the Transport SPD.
Part 3, Section 2.2, Paragraph 2.2.15	We fail to see how the vitality of an area can be enhanced by more cars and more pollution.	NO	General comment.
Part 3, Section 2.3, Paragraph 2.3.6	Park & Ride fares should not be cheaper than those on nearby bus routes as this encourages car use as far as the Park and Ride Site.	NO	This comment is not related to the purpose of the Transport SPD.
Part 3, Section 2.5, Paragraph 2.5.6	School runs should be discouraged in favour of active travel. They lead to congestion around schools and on the road network. 400m zones around schools where car and van stopping and parking during school start and finish times should be instituted.	NO	General comment.
Part 4	A serious omission from its whole section is the need for Area Travel Plans that apply to developments below the specified thresholds and encompass all developments (even including single dwelling developments) in the area. This enables a large proportion of the smaller developments to be subject to the same travel influencing and transport demand management measures that apply to larger developments. Area Travel Plans should be developed as part of this SPD.	NO	No changes required. This is a developer guideline document developers should not be expected to pick up area wide Travel Plans.
Part 4, Section 1.2, Paragraph 1.2.1	The objective should be specified in positive terms of promoting walking, cycling and local satisfaction in the supply of goods and services. It also needs to encourage the reduction in the need to travel and to substitute other means of communication for physical travel.	NO	No changes required. The Transport SPD promotes sustainable modes of travel.
Part 4, Section 1.2, Paragraph 1.2.4	Travel plans to persist long after the duration of the development as stated here. They need to be made conditional through planning obligations for ten years after the completion of the development. A means of financial support for this level of delivery also needs to be provided for via the planning conditions such that monies are put in a ring-fenced fund derived from CIL, S106, CAZ, Workplace Parking Levy or similar sources.	NO	No changes required. This comment is not appropriate for developers.
Part 4, Section 1.3, Paragraph 1.3.1	The health benefits need more explicit recognition.	NO	No changes required. The Transport SPD already refers to health and well-being benefits.
Part 4, Table 4.1	This should stipulate that the car use target is a maximum.	YES	WSP propose to review this comment with LCC.
Part 1 - Part 4	We want to see a reduction in road space and the creation of travel alternatives such as a mass transit system. This has been found to reduce traffic volumes elsewhere, such as in Copenhagen.	NO	This comment is not related to the purpose of the Transport SPD.

	Part 5, Section 3	It is good that the proposal will give developers a financial incentive to avoid increasing traffic volumes, but we are concerned that this money received through the section 106 will then get spent by the Council on expanding the road space when it needs to be spent on behavioural change and active mobility provision.	YES	LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors.	
	General	Planners should not be duped into thinking that electric vehicles will 'solve' the emissions or congestion issues. They still create small particulate, especially PM2.5, emissions from road, tyre and brake wear. They still create traffic congestion and crashes which are economic costs and sources of economic loss.	NO	This comment is not related to the purpose of the Transport SPD.	
	General	We are not in a position to submit a detailed response to the draft but would make the following points. The TSPD should: <ul style="list-style-type: none"> • set out a clear vision for a sustainable city which takes account of LCC's declared Climate Emergency • demonstrate an ambition to reduce demand for private vehicles and car ownership, • focus on enabling active travel, i.e. walking and cycling in connection with public transport • demonstrate an understanding that streets are for living in, not merely for travel, and that this is facilitated through prioritising pedestrians, cyclists and users of public transport in designing streets, rather than balancing all users traffic • ensure that 20 mph is the norm in residential areas • actively use reduction in availability of parking to discourage car use. <p>We would like to see an ambitious, radical vision for Leeds where dealing with the Climate Emergency is the number one policy objective. This TSPD should clearly demonstrate the council's determination to tackle the problem of car dominance.</p> <p>Add two further Key Objectives along the lines: <ul style="list-style-type: none"> • Quantifying the transportation consequences for Climate Change of a proposed development by assessing the (medium-term) transport emissions that it is likely to generate. • Facilitate the switch to electric vehicles by providing dedicated charging infrastructure for each house where it is reasonable to expect the use of a car. </p>	YES	LCC to provide additional text on the climate emergency, but no further action is required on the other points as they are covered in the Transport SPD.	
	Part 1, Section 2.6, Paragraph 2.6.1		NO	Climate assessments can be undertaken as part of the planning application case dependent. The required number of electric vehicle charge points is provided in the Transport SPD.	
	Part 2, Section 10	The merits of trees (and vegetation) are referred to in 10.1.4, 10.1.9, 10.1.10 and 10.3.3 (for example). However, overall there appears to be an absence (in this section) of explicit requirements for, or inducements to, maximise the provision of trees.	NO	No changes required. This comment is focused on landscaping.	
	General	I write to broadly support the Leeds Cycling Campaign's response. At a time of Climate Emergency, and mounting local Nox and particulate pollution, changes to transport policy must be both rapid and radical. Car use must be minimised, but that process must include difficult carrots as well as easy sticks. It is clear that the Dutch model which includes tubes, trams and segregated cycling can not readily be replicated in Leeds, but there is a strong case for 1 limited underground tunnelling to de-bottleneck key parts of the rail system, 2 aggressive road pricing in the central area - to include ICE vehicles of all types - unlike the current feeble proposals 3 park and ride provision to be dramatically upgraded - and at more points of the "clockface" 4 cycling to be given priority on arterial routes - segregated lanes with robust policing of parking and unofficial taxi ranks 5 free secure and accessible cycle parking has to be a planning requirement for all modifications or new build workplaces within 2km of the city centre for all apartment developments anywhere in the city (again why not learn from our continental neighbours about secure underground storage / parking?) 6 sort out the cycle route at Thwaites Mill /Skelton Grange - too many crossings and the iron steps are a complete turnoff.	NO	This comment is not related to the purpose of the Transport SPD.	
	General	As an aside, getting rid of the toothless and incompetent West Yorkshire PTE /Metro and having the city take back control of its bus routes would be a huge boost to how integrated the transport can be. Finally in this summary: make any railway-related Planning changes in Leeds conditional upon 7 increased cycle storage at all stations in the city 8 freely available cycle travel on commuter rail routes in the city.	NO	This comment is not related to the purpose of the Transport SPD.	
	General	The following commentary is in relation to the sections or content that refers to The Car Club which would be of particular interest to Lynsey McGarvey. Additional Supporting Measures: Enterprise has extensive experience of the policies and policy context in which a car club can prosper and grow to deliver the benefits required for the relevant city/local authority. Would you consider... <ul style="list-style-type: none"> • Car Club vehicles being used extensively by the council itself for staff business travel, providing carbon and financial savings • Car Club vehicles promoted to businesses in the cities including as part of any work place parking levy • Car Club vehicles embedded in the council's transport strategy and connected with other mobility providers via Mobility as a Service applications and physical infrastructure in close proximity (Mobility Hubs) Hierarchy of Parking Types 1.1.2. The hierarchy of parking types are set out below, with the level of consideration being higher towards the top of the list. These act as a framework for decisions to be made, however it is accepted that local circumstances may require the hierarchy to be adapted to suit. Disabled car parking; Local resident car parking; Cycle, motorcycle and car club parking; Local business essential car parking/servicing need; Park and Ride; Short stay shopper/visitor car parking; and Commuter car parking: Car club is third in the 7 point hierarchy but below local resident car parking. We should argue given our role is reducing parking pressure, carbon and improving air quality etc we should be at the same level of local resident parking, alongside cycle parking, Car Club Definition. <p>The SPD uses the following definition "Car Club – Definitions - 9.1.18. Approved Car Club Provider means the holder of the Leeds City Council Car Club Contract." Would you consider being more descriptive in the SPD indicating that the provider is one providing "a fully managed and owned fleet, not including any diesel cars" Car Club EV's We are a positive and supportive business partner of Leeds City Council and will match the council's ambition to transition to a full ev council, owned, operated or rented fleet. We would support the ambition to provide 20% EV's in the Car Club (subject to the provision of charging infrastructure) before the end of 2020.</p>	NO	General comment.	
	General	General comments: - Surprised not more reference to the Leeds Clean Air Zone and anti-idling awareness - Very short section on Public transport especially considering this is one of the SPDs that this collated document supercedes. Noted that it is linked to Policy T2 but would benefit from greater influence in here - frequency of service and accessibility, consider linking to other relating sites and the likely journeys building users are going to want to make, connectivity between bus and rail. - Cycle facilities section re: minimum widths and access – consider widening minimum requirements, especially when designing access for those with disabilities - Re: Park & Ride - Consider connectivity to other services/modes, other existing travel hubs and key locations; open up flexibility of service operator to serve park and ride stops. Opportunity to link this more to the public transport section, to add links/ examples of existing P&Rs and outline strategy/ plans for future - Car club and car share section - acknowledge other providers e.g. Enterprise car club with marked bays in the city, and make distinction between Car clubs which people hire on short term basis from onstreet bays and carshare/pool communities e.g. liftshare, FAXI for sharing as driver or passenger in existing owned vehicle. - Taxi provision – suggest that inclusion in CAZ be referenced and impact this may have on accessibility / charging (also consider relevance of information in travel planning section relating to impact of organisational fleet and suppliers, deliveries, opportunities for last mile delivery solutions, consolidation centres, staff shuttle buses etc.) - EVCPs - Use class 'Education' – Is this across all phases of education from primary to HE? Would be helpful to include guidance relating to the use of EVCPs – e.g. accessibility – i.e. public or private use, costs to charge, guidance to provide waiting bays in locations where use will be high? - Note electric bike charge point guidance - 2 socket plug for every 20 long stay spaces. Where to be located – internal / external? examples? - Valuable to include (links to) Leeds' WY scale Travel Survey headlines to outline local and regional trends in travel behaviour.	NO	General comments. WSP propose to review the location of the public transport improvement section in the Transport SPD. There are specific chapters addressed to pedestrian and cyclist movements, and therefore, no further action is required. A significant amount of the Public Transport and Developer Contributions SPD has been removed and not incorporated within the new Transport SPD with the introduction of LCC CIL policy. It is understood that the CIL policy has made much of the policy contained within the Public Transport and Developer Contributions SPD redundant in the current political climate, with the exception of the infrastructure requirements. LCC to review the proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanism for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors. Other comments already covered in the Transport SPD.	
	General	I do not have the time, nor do I have the expertise, to comment in detail on such a long and technical document. However, I have read the comments from the consultants who were commissioned by Leeds Cycling Campaign, and I would like to echo their concerns, with regards to the lack of ambition in the document, particularly in light of the declaration of a Climate Emergency in 2019. I would like to refer you to the Leeds Cycling Campaign response - http://www.leedsyclingcampaign.co.uk/TSPD-response and I would ask you to seriously consider the points that are raised, including their suggestion that the document requires a complete re-write in the context of a recently declared Climate Emergency. My assumption is that if this document is so weak in terms of prioritising travel by bike, it will be similarly weak with regards to making Leeds a better place to walk around. I appreciate that the Council operates within severe financial constraints - and that much responsibility lies with central Government - with regards to providing sufficient finance to invest in changes that will make Leeds a "city where you don't need to own a car" - as you have recently begun to suggest. However there is still there is clear prioritisation of more efficient modes of travel - walking, cycling and public transport - with very clear ambitions and suggested actions to, at the same time, reduce car use. It would appear from the analysis provided by the consultants that this document is nowhere near this. I would therefore encourage you to take on board their feedback and to think about how you can come up with a document that is fit for purpose in a Climate Emergency.	NO	This comment is not related to the purpose of the Transport SPD.	

General		Overall comment: I feel that the whole approach taken in this document is wrong. At a time when the world needs to change its transport strategy, it seems strange that the council is creating a gigantic inflexible document which will guide transport planning for the next 10 years. Are we saying that the standards set here will be applied in 2030 when cars will be electric and, hopefully, sustainable or public transport will be the mode of choice for most journeys? I suggest a complete rethink, producing a document which is flexible and adaptable within the policies set out in the adopted core strategy as adapted to reflect the council's declaration of a climate emergency. How about a series of documents on individual issues/subjects, perhaps linked to and amplifying individual CS policies? Designed landscape format for ease of use online and individually updateable? It could be bound into a single doc if required or be a loose leaf reference tool.	NO	This comment is not related to the purpose of the Transport SPD.	
Part 3, Section 2.10	Part 3 Parking [2.10 Car Club and Car Share] Page 103 The section has been constructed in such a way that it is open to misinterpretation. 2.10.1 states car sharing - this would be better defined as lift sharing, wycarshare is after all powered by Liftshare 2.10.2 states car club - this would be better defined as carsharing, the umbrella for all providers delivering a convenient (typically per hour) rental service for: a) people who don't have a requirement for a vehicle of their own but at times need one b) people who have a vehicle they really don't need and as a result of access to this service can be convinced to sell their car and operate in effect as a) above c) people who have multiple vehicles in their household who as a result of access to this service can be convinced to reduce the number of cars they own These definitions would then carry through this section and in other parts of this document as needed 2.10.3 re: Leeds City Council Car Club Provider A single provider strategy as the wording suggests will stifle innovation and offers no opportunity for market forces to operate which is essential for any service, be it established or developing as is the case with new mobility. Station-based / round-trip, free floating, peer-to-peer / personal are all forms of carsharing and in its vision to be the Best Council Leeds should be 'open for business' for all forms of mobility who can deliver a safe and secure service that has the potential to help reduce congestion and improve sustainability (do more with less) Launching, testing, iteration - only through this process which is underpinned by an implicit commitment to share data will Leeds City Council understand which services are best deployed where in order to meet it's social and environmental ambitions 2.10.6 In line with above further consultation should be conducted by Leeds City Council to understand the parking requirements of all the forms of carsharing and to think more creatively beyond the stated design. I am concerned there is no reference in the document to smart parking solutions such as those being used in other parts of Yorkshire.		NO	No change required. These are industry standard definitions.	
General	TCS have commissioned work on the car parking needs and economic impacts of commuter car parking on the City Centre, as part of their understanding of how their car parks operate. This work includes an analysis of the economic performance of the City Centre, car parking supply/demands and the delivery of public transport/other non-car modal access over the past 10 years, with projections on future growth and demand. This work will be shared with LCC within the next month; the key findings of this work show that over the past decade: 1. The provision (and availability) of long stay car parking spaces in the City Centre has been reducing, and this is projected to continue to reduce over the next few years. 2. Modal split data demonstrates that public transport accessibility into Leeds has "flattened", despite recent public transport infrastructure interventions. 3. Car modal split has reduced slightly, although there has been no discernible reduction in transferring commuters out of their cars into other modes. 4. There has been no growth in peak hour traffic into/out of Leeds, and on the contrary more people are travelling outside the peak hours to avoid increased journey times. 5. Given the number of vehicles coming into Leeds has changed very little, this suggests there is an ongoing demand for parking spaces. 6. Leeds' economy grew by 35% and is forecast to grow by a further 21% over the next ten years. 7. It is estimated that in combination the office sector, along with the retail/food & beverage and leisure have, created in the order of 12,800 – 16,700 new FTE jobs in the City Centre. 8. The future labour market trends suggest a significant growth in jobs, with unimplemented planning consents and allocated sites likely to deliver a further 22,000 – 29,000 new jobs. In summary, there is clearly strong job growth within the City Centre, which is projected to continue and is a key objective of LCC's growth strategy, but which is not met by the provision of commuter car parking, which is in fact declining. (We believe this evidence will assist LCC in formulating an appropriate and sound car parking strategy (and parking) for the City Centre, and we would propose to share this information with LCC, with a view to on collaborating agreeing modifications to the City Centre parking policies of the Transport SPD prior to its adoption. Considering the findings of TCS's commissioned work, it is important that the car parking policies for the City Centre are founded on an objective understanding of the economic needs for car parking, and the environmental implications of that car parking. In this regard, it is notable that the majority of the car parking aspects of the SPD (ie, Part 3 of the SPD) simply carries over the text of LCC's previous Parking SPD (January 2016). As a consequence, the parking policies of the emerging Transport SPD are unchanged from four years ago, and notably there is no objective update to that policy nor any evidence to reflect changing circumstances. These are matters that are considered further below. These representations go on to consider the following key issues: 1. Whether there is a proper understanding of car parking needs in the City Centre, and most notably commuter car parking, and whether this is represented in the draft SPD? 2. Whether the policy is underpinned by objective evidence? 3. Whether the car parking policy addresses the ambition for sustainable (ie, Zero carbon modes) travel, especially by the car? 4. The changing environment especially travel by electric vehicles?		NO	This comment presents background information and data in Leeds.	
General			NO	General comment, although they do suggest that the parking policy for the city centre should change	
Part 3		Within the City Centre Core, the SPD states there is a "presumption that the re-provision of existing public commuter car parking between and within the Public Transport Box, Core and Fringe [areas] of the City Centre is acceptable providing that no net increase in public parking occurs." It is noted in the SPD that a policy to limit the supply of commuter car parking is promoted in order to achieve two objectives, namely (i) reduce congestion during peak periods and (ii) support sustainable planning (ie environmental impacts of vehicle emission, namely, carbon and air quality) objectives. LCC adopted an interim parking policy (in December 2016) ³ (IPP) which has allowed temporary use of cleared development sites for commuter parking given they have a positive economic impact on businesses, albeit on the basis of a managed reduction of these temporary spaces through planning consents. The managed reduction in temporary commuter car parking is predicated on a policy approach adopted in the IPP which is aimed at reducing the number of long stay commuter spaces over a 5 year period (2017 – 2022), and informed by a review of public transport provision, including investments in LCC's park and ride schemes, new rail franchises and interventions aimed at improving bus access in the City. On this basis, temporary (fixed for five year) planning permissions were granted for circa 3,500 long stay car parking spaces in 2017, but with the objective of reducing those car parking spaces over a managed period between 2020 and 2022 with the ultimate objective of removing all temporary commuter car parking by 2022, albeit subject to a review at that time as to whether temporary commuter car parking was still required. The managed reduction in temporary car parking was predicated on the expected improvements to public transport infrastructure proposed to come forward, and most notably an anticipated significant increase in rail investment (para 3.6.1 of the IPP). It was recognised ⁵ at the time of this managed policy that reducing temporary commuter car parking would have a negative effect on business and the City Centre economy, unless there was improved access to the City Centre through significant improvements to public transport. It was also noted that at the time of the new policy, LCC were mindful of the adverse effects of closing or reducing commuter car parks on local businesses and, therefore, there was a need for a wider and more balanced transitional arrangement to the position outlined in the interim parking SPD 2016. Clearly, the IPP adopted in 2016, after LCC's Parking SPD recognised that there was a direct correlation between temporary commuter car parking and the public transport infrastructure improvements that may come forward improving accessibility in the City Centre. The draft Transport SPD is silent on the adequacy of the current level of commuter car parking, and its ability to satisfy the economic objectives for growing the City Centre's economy, other than for a brief recognition of the possibility of a 'modest increase in permanent public commuter car parking', suggested to be capped at 900 spaces, and strategic car parking needed to serve the Holbeck area. Both of these are again simply carried over from the previous Parking SPD.	NO	No changes required. However, it is noted that LCC should a policy / position to find a suitable balance on car parking stock in the city centre without hindering the economy.	

Part 3		<p>In view of the above, the draft Transport SPD is not sound, given LCC's recognition of the link between the effects on business and reduction and the provision of commuter car parking, and the fact that the SPD is not underpinned by any assessment of car parking demand/need, nor any understanding of the public transport infrastructure changes that may have taken place since the adopted Parking SPD. Notwithstanding this, the work commissioned by TCS shows that there is a projected strong economic growth in the City Centre and there is a projected reduction in commuter car parking that is economically unsustainable and unwarranted. Moreso, the TCS work also demonstrates that the pace of change of public transport infrastructure has been modest. Despite the Transport SPD suggesting that commuter car parking needs will be reviewed, this will not be until 2022. TCS, therefore, suggest that an immediate review of commuter car parking demands and needs is undertaken, along with an analysis of the economic impact of commuter car parking, given the evidence already gathered by TCS (see above); this work should be carried out alongside an understanding of the impact of any recent and future public transport infrastructure interventions. The above work is necessary in order to determine an appropriate and sound approach to commuter car parking in the City Centre. Without this work the SPD is unsound, in that it has not been positively prepared, it is not justified and therefore not consistent with national policy.</p>	NO	No changes required. However, it is noted that LCC should a policy / position to find a suitable balance on car parking stock in the city centre without hindering the economy.	
Part 3		<p>It is suggested in the draft Transport SPD that managing commuter car parking in the City Centre, especially on cleared sites, is necessary in order to both minimise congestion and support sustainable travel. In relation to the latter matter (sustainable travel), the environmental impact of car parking relates to carbon implications and air quality impacts of car movements, and whether they contribute to the overall environmental objectives of LCC which is aimed at decarbonisation and improved air quality within the City, as part of the wider objectives of responding to climate change. It is notable that the approach to car parking within the City Centre has not changed since the Parking SPD was published in 2016. This is despite a very clear change in policy relating to climate change objectives, as expressed most recently in a local context with LCC's declaration of a 'climate emergency' in March 2019, which sets the objective of achieving net zero carbon in the City by 2030. To achieve the Council's net zero carbon target will require a fundamental change to the approach to future development and planning policy plays a key role in this respect. There is a fundamental change in Government policy aimed at decarbonising the car industry, with the recent announcement (4th February 2020) of the Government's commitment to ban the sale of petrol, diesel and hybrid cars in the UK by 2035 at the latest. The Review of LCC's policy relating to car parking in the City Centre is a clear opportunity to encourage more environmentally sustainable public commuter car parking in the City Centre, both in terms of any future redevelopment of permanent commuter parking, as well as the provision of temporary commuter car parking. There are opportunities through a 'stick and carrot' policy approach to encourage commuter car parking to be more environmentally appropriate. This can be achieved through positive planning policies, aimed at encouraging future commuter car parking spaces which accommodate electric vehicles. Evidently, car parking that is future proofed for electric vehicle use will respond to one of the fundamental reasons (ie, environmental impact) of why LCC consider commuter car parking inappropriate. Where commuter car parking is future proofed for electric vehicle charging purposes, and managed for such use, this form of commuter car parking would be entirely appropriate in the city centre, and should not be discouraged, unless it was proven to cause some form of planning harm. TCS recommend that a policy which supports environmentally sustainable car parking is necessary, and would be beneficial to the economy of the city centre, and wish to work with LCC to identify an appropriate policy that would encourage more sustainable forms of, as well as innovation in commuter travel by car. Without such an approach, the opportunity to encourage electric vehicles within publicly accessible commuter car parks in the City Centre will otherwise be lost.</p>	NO	No changes required. However, it is noted that LCC should a policy / position to find a suitable balance on car parking stock in the city centre without hindering the economy.	
General		<p>It is clear that the proposed policy of the Transport SPD, where it relates to commuter car parking, is merely a continuation of an old policy that no longer represents the new climate change agenda (reflected in LCC's climate emergency declaration and the changes to the environmental objectives underpinning LCC's reviewed Core Strategy, which was adopted last year). We consider that fundamental changes are required to the car park policies of the Transport SPD to address these matters, including a recognition for extending the period for temporary commuter car parking, and support for, as well as a greater encouragement, of electric vehicle commuter parking. There is a lack of objective, quantifiable evidence that underpins the current strategy. There is no apparent assessment of the need for commuter car parking or the anticipated public transport improvements that have underpinned the managed approach to temporary commuter car parking set out in the IPP. Restraining commuter parking to inappropriate levels will have an adverse impact on business and the overall economy of the City. Furthermore, the policy as currently worded, which is a simple carry-over of an old policy, fails to take on the opportunity to encourage a more sustainable forms of commuter car parking within the City Centre.</p>	NO	No changes required. However, it is noted that LCC should a policy / position to find a suitable balance on car parking stock in the city centre without hindering the economy.	
General		<p>It is difficult to make reference to issues that are not covered in this document. In order to impact on carbon emissions due to cars, trains, buses and even aeroplanes it is necessary to promote electric and/or hybrid engines OR to reduce the volume of traffic on our streets. There are good examples of other University towns which do not allow undergraduates to bring cars to the City e.g. Cambridge. With 80,000 students in Leeds this could have a significant impact on emissions and has already been piloted. As a best City, a review of existing schemes which have already been successful or are being looked at would be useful. You cannot claim to be the best if you are not aware of what the rest of the country is thinking or has already done. In my view more emphasis should be on reducing traffic volume and then also on switching from diesel and petrol fuels. This twin approach might be feasible in impacting on a more climate friendly City of Leeds.</p>	NO	This comment is not related to the purpose of the Transport SPD.	
General		<p>Can I just say that to put so much emphasis onto a consulted to list paragraphs, page numbers etc makes a complete mockery of this consultation as nobody is going to take the time to respond. I suggest therefore that you at least target the questions that you want answers to! Leeds has serious issues with air pollution and traffic. As a cyclist I hate cycling the 3 miles into Leeds through headlighting due to huge trucks, diesel spewing buses etc. You need to take brave action now to solve this.</p>	NO	This comment is not related to the purpose of the Transport SPD.	
General		<p>It is not helpful that this online response form asks for a precise reference for each comment offered by respondents. Though commendable in its aim to bring together in one place all extant guidance on transport planning in Leeds, there are fatal defects running right through the document such that it is misleading to comment on the detail without regard to the overall effect of the guidance. Part 1 Introduction Pp 2-6.</p> <p>The Introduction states the Councils' ambition to be the "Best City" in the UK. This is a lofty ambition which sets high standards for any document which will be a cornerstone in the realisation of that ambition. I would expect this ambition to be embodied in a clear vision of what being the "Best" looks like and for there to be very clear guidance to those expected to deliver this. I would also expect such an ambitious city to be on the leading edge of innovation and to be demanding best practice. As a leader, Leeds should be prepared to innovate, take risks and learn from mistakes. Sadly, the consultation draft does not paint such a picture. Throughout the document there are references to other guidance documents, many of which are very good in their fields. However, the draft is seldom clear on which parts of these other guidance documents it thinks best, leaving it to the reader (i.e. developers) to choose for themselves. Where clear examples are given these are often not best practice. If Leeds is to be the "Best" and most sustainable City in the UK then it must be prepared to be a leader in exploring practice that is new to or emerging in the UK. Nowhere in the document could this be said to be the case. In short the ambition to be the "Best City" is betrayed by a document that is totally lacking in ambition or any real conviction. It is rather a recipe for more of the same. In the light of the declared climate emergency the draft should be laying down the requirements that will lead to the achievement of our climate aims and giving a clear lead to developers and others on what is expected in order to:</p> <ul style="list-style-type: none"> • significantly reduced demand for private motor vehicle use and car ownership • restrain motor traffic growth • create motor traffic free residential development, both large and small • create walking and cycling routes that fit into a fully comprehensive cycle and pedestrian network plan linking to key local and urban destinations • secure that all new developments prioritise walking and cycling over motor vehicles • create public transport hubs throughout the city that are integrated with the cycle and pedestrian network • ideally create local delivery hubs across the city to facilitate zero carbon last mile delivery by cargo bikes and electric vehicles. <p>None of the above are seriously considered in the draft and for this reason the Council should look again at the whole document against the background of its own aspirations for the future and of the Climate Emergency.</p>	NO	No change required. It would not be efficient to review the whole Transport SPD at this stage.	

Representation	Part / Section / Paragraph	Comment	Action (Y/N)	Explanation	Further Comment
Gordon Maclay	Part 3, Section 3.2	Delete the row "Motorway Retail Service Stations", but keep the row "Motorway Service Stations".	YES	This Section has been updated to reflect the new Policy for Electric Vehicle Charging Infrastructure EN8 in the Core Strategy. WSP recommend this comment is checked to ensure consistency with EN8.	Correction: change "motorway Retail Service Stations" to "Retail"
	Part 3, Section 3.2	Change where the table refers to "1 per 10 parking spaces ensure electricity infrastructure is sufficient to add more 1 per 10 additional ducted Bays" to "1 EVCP and one ducted bay per 10 parking spaces (ensure electricity infrastructure is sufficient for EVCP and ducted bays) - 4 occurrences in this Section. Retail - 1 EVCP and one ducted bay per 10 parking spaces - Rapid charge points may be substituted for equivalent power output of fast charger.	YES	This Section has been updated to reflect the new Policy for Electric Vehicle Charging Infrastructure EN8 in the Core Strategy. WSP recommend this comment is checked to ensure consistency with EN8.	
	Part 3, Section 3.3, Paragraph 3.3.2	Delete the wheel stop from the figure.	YES	This Section has been updated to reflect the new Policy for Electric Vehicle Charging Infrastructure EN8 in the Core Strategy. WSP recommend this comment is checked to ensure consistency with EN8.	
	Part 3, Section 3.4	Change title to "The Minimum Specification". Change 32amp to 7KW. Inset Diagram (provided in Consultee Response) - but change title to read Type 2, 7KW AC.	YES	This Section has been updated to reflect the new Policy for Electric Vehicle Charging Infrastructure EN8 in the Core Strategy. WSP recommend this comment is checked to ensure consistency with EN8.	
	Part 3, Section 3.5	Large car park' change title to Load Balancing, delete the first bullet.	YES	This Section has been updated to reflect the new Policy for Electric Vehicle Charging Infrastructure EN8 in the Core Strategy. WSP recommend this comment is checked to ensure consistency with EN8.	
Influencing Travel Behaviour Team	Part 4 Travel Plans	Tracked change amendments to Part 4 Travel Plans to streamline and update advice. Revise Travel Plan fund wording and revert to previous sum for TP fund Reference to Vision Zero strategy	YES	Part 4 Travel Plans has been updated to meet the requirements of the ITB team.	
Structures	Part 2, 3 Carriageway widths Paragraph 4.2 Vertical Clearances Paragraph 7.2 Emergency Services Appendix A - Street Design Specification	New clause requested re carriageway widths Replace clause 4.2.1 Amend clause 7.2.4 Amend clauses 3.2.1; 3.3.7; 3.4.1; 3.4.2; 3.5.6; 3.6.3; 3.8.2; 3.8.11. New clause after 3.7.2	YES	Requirements of Structures Team as adopting body	
Highways Development	General - references throughout SPD Paragraph 4.2 Vertical Clearances	Review emphasis of wording throughout document in relation to Climate Emergency Add pedestrian vertical clearance requirements back in Reference DfT route assessment tool, Healthy Streets, etc to support change in emphasis re Active Travel Culs-de-sacs - recognise benefits of short streets with pedestrian and cycle connections	YES	Omitted from consultation draft in error	
Planning Policy	Part 3, Section 3.2	Identify difference between policy EN8 and guidance Add policies CCS, EN8 and AIR1 to policy section Amend all references to use classes	YES	For clarity	
Transport Strategy	Part 1 Part 5	Update Policy section to take account of adopted Connecting Leeds Transport Strategy and Climate emergency (removing reference to CAZ). Reference 20 minute neighbourhoods and Vision Zero. Also reference Elected Mayor, WYCA Connectivity Plan and Bus Strategy. Update table in Cumulative Impact Part 5 to account for SAP amendments Reference new National Policy and Guidance eg LTN1/20, new MIS, changes to Highway Code, etc Cumulative Impact Policy needs to allow spend on Sustainable Transport Schemes to offset traffic congestion	YES	Updates to local policies need reflecting in document	
Flood Risk Management	Appendix A - 4 Drainage Procedures	Amendments to add in the Lead Local Flood Authority and update wording	YES	Updates to local position needs reflecting in document	
S38 Adoption Team	Appendix A - table A-3	Amend acceptable materials for shared surfaces Allow use of permeable block paving for small areas	YES		



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