

Transport SPD Pre Adoption Consultation

Main issues raised and Council's response

List of Respondents

Rep Ref No	Respondent
1	Action for Yorkshire Transport
2	Alex Monamon
3	CEG
4	Commercial Boat Operators Association
5	Enterprise Car Club
6	Environment Agency
7	Fore Consulting
8	George E Hall
9	John Hacker
10	Leeds Civic Trust
11	Leeds Living Streets Group
12	Leeds Teaching Hospitals NHS Trust
13	Natural England
14	Nigel Jones
15	Pell Frischmann
16	Pickard Properties
17	Rothwell & Carlton Neighbourhood Forum
18	Sue Howard
19	The Coal Authority
20	Town Centre Securities Plc
21	Various Clients - Johnson Mowat
22	Via Solutions
23	West Yorkshire Combined Authority

Rep Ref No	Other / Internal Respondent
24	Systra on behalf of National Highways (Simon Jones)
25	Tim Hart, Planning
26	John Booth
27	Influencing Travel Behaviour (ITB)
28	Highways Development (HDC)
29	HDC
30	Planning Policy / Urban Design
31	Rachael Elliot - ITB
32	Transport Strategy

Representations Received to Consultation on Transport SPD

Rep Ref	Representor Name	Agent	Document Ref	Summary of Comments	LCC Response
1	Action for Yorkshire Transport - Mark Parry		Part 2: Street Design Guide	<p>Page 39, 2nd para: Pedestrians should be the first priority, over cyclists and then motorists on ALL roads as in the new Highway Code.</p> <p>Page 46, 1st table section: Cul-de-sacs are limited to 200 metres in length. But there are small street networks of over 200 metres from the main road access that do exist successfully – Redhall Crescent in Leeds 11 is an example. The new local travel neighbourhoods create such situations. We are not sure why this restriction is necessary.</p> <p>Page 50: We are opposed to dropped kerbs as these encourage pavement parking.</p> <p>Page 52: We don't think cars and people in the same space mix. Do the cars need to be there?</p> <p>Page 67: Pedestrians need a minimum junction width if they are to cross the road safely. The wider the opening the faster vehicles turn into the side road.</p> <p>Page 107: There is no mention of limiting the number of parking spaces per property in an effort to encourage a modal shift away from car use. See page 139.</p> <p>Page 110: We doubt it is within the Council's power to keep the pavements clear of vehicles, but the problem is the elephant in the room here.</p> <p>Page 116: No mention of the aim to effect a modal shift away from car use. If successful then fewer parking spaces would be needed, so should tighter restrictions be considered?</p> <p>Page 121, Charging Policy: It is good that the Council wants to c</p>	<p>Amended to look at function of the road / street.</p> <p>This guidance is not definitive (ie should) but is good practice for limiting traffic movements / aiding refuse collection, etc – no change.</p> <p>Level surface and shared surface streets do not have full kerb upstands but do need to be designed to ensure pavement parking does not occur – no change required.</p> <p>Added – designs which limit vehicle access into these spaces will be supported.</p> <p>Amendments made to restrict junction width and require pedestrian refuges on wider junctions.</p> <p>Requirements on dimensions if provided – no change</p> <p>Comment – no change but potential for new pavement parking legislation</p> <p>Commentary added on modal shift.</p>

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				<p>charge more than the bus fare, but if the commercial car parks are charging yet more then why charge less when you could charge more? Should a policy of taxing employer provided spaces be introduced, then the guidance may have to change. Page 126, 2nd bullet point: The fee should not exceed the local bus fare. Page 136: Looking to the predicted future use of fully automated cars, it is possible more people would use car clubs reducing the need for parking on such a large scale. Page 139, Car free development: We are confused by the following contradiction: Residential developments which discourage the ownership of cars in locations within Central Areas and Controlled Parking Zones (CPZ's) are encouraged [NfL Principle 25]. Residential developments which do not adequately provide for their parking requirements will not be accepted. Page 143, On Street Provision: of electric charging points. Instead of avoiding trips hazards we suggest there should be NO trailing cables across the pavement which would obstruct push chairs and mobility scooters. Page 172, table 4-26: Remind us what GFA stands for. Appendix A: This is about materials and construction. We couldn't see any mention of low carbon materials. Page 268: The 6th line down, complaint should read compliant.</p>	<p>Comment – no change – parking demand management measures being reviewed by others.</p> <p>P&R not in competition with local bus – no change Agreed – minor wording amendments Wording changed to clarify</p> <p>This may not be feasible in all cases – no change</p> <p>Added in footnote</p> <p>Included in text already. Standard details subject to review to include here too. Corrected.</p>
2	Alex Monamon			<p>There are lots of typos, sentences and references that don't make sense. The document will need to be thoroughly reviewed so that residents and professionals are able to understand and follow it. I assume this will be an official document? It should be easy to read and follow, punctual and grammatically correct!</p>	To be reviewed and formatted
3	CEG			<ul style="list-style-type: none"> Structure of the Draft SPD: The purpose of the Draft SPD is to provide clear guidance that supports the development plan. As currently written, the Draft SPD does not achieve this. CEG 	The purpose was to amalgamate and update 4 SPD's and provide guidance on cumulative impact. The

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				<p>recommends that in relation to the plethora of referenced secondary guidance, this is condensed and its status clearly identified.</p> <ul style="list-style-type: none"> • Role of the Draft SPD: In summary CEG supports the overarching aim of the Draft SPD in that it seeks to support the implementation of the development plan and help facilitate the Council's target of being carbon neutral by 2030. However, it also needs to be alive to the commercial realities developers and landowners face as the city transitions through this period. CEG urge the Council take a more holistic view in considering the very real implications of this. • The flexibility of the guidance: The city is a varied geography, facing different transport and connectivity challenges and opportunities across the authority. The SPD should be alive to this and allow for clear flexibility, facilitating balanced design solutions that have consideration for competing pressures. This is specifically notable in relation to matters surrounding connectivity and street design. • The implications of the proposed Cumulative Impact Levy: CEG has concerns around the introduction of this new levy as it has the potential to create unnecessary financial burden on developments, contrary to national guidance. It is recommended that information regarding the Council's review as to the appropriateness of this levy following the first round of SPD consultation (where this was raised by numerous parties as a concern and risk to investment and growth), is shared. Structure of the Draft SPD At over 280 pages the Draft SPD is at risk of not fulfilling its aim of providing a structured supplement to the development plan in order to set out useable guidance. It is suggested that the more technical sections and national 	<p>SPD serves this purpose. A wholesale review has not been undertaken – no change</p> <p>The SPD is taken in the context of the core strategy and site allocation plan – including site requirements which have been subject to public inquiry – no change</p> <p>The SPD recognises different challenges and will not be a constraint on good development.</p> <p>This is not a levy or a new policy. Cumulative Impact has been addressed through the core strategy and SAP.</p> <p>Other matters – comments – no change</p>

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				<p>guidance and standards could be included as annexes to the main document or cross referenced with links in order to produce a more accessible and clear statement of supplementary policy for Leeds. Paraphrasing of other policy documents and standards should be avoided to ensure greater policy certainty and easier interpretation. Role of the Draft SPD</p> <p>The ultimate role of the Draft SPD is to provide guidance that helps the Council in the implementation of the development plan. In effectively doing so, it will support the Council in achieving the strategic aims of tackling climate change and stimulating sustainable development. CEG strongly supports the Council as it works to make the city carbon neutral by 2030. It does however need to be recognised that it is a journey, with work needed to support the changes in behaviour and infrastructure that will facilitate this. CEG is currently delivering development within the Temple District, seeking to create a sustainable district that is not car dominated. The Council needs to be alive to the commercial realities of delivering such projects whilst the city is currently within the transitional journey to becoming carbon neutral. In the context of the Temple District, the need for such awareness has recently been evidenced in relation to a pending planning application for temporary car parking on Globe Road/Water Lane. This is a significant risk for CEG. In the interim, against a background of a need for inclusive sustainable growth, investment and new jobs in the city centre, on a case by case basis a more flexible approach is needed for now and during this transitional period. This may mean higher levels than the maximum scheduled on Page 130 of transitional dedicated commuter parking, on a reducing basis and a recognition of commercial requirements for establishing new vibrant employment areas (such as the Temple District). The SPD in respect of car parking guidelines should allow for exceptional cases for dedicated transitional car parking to be justified if part of a holistic sustainable development proposal, supported by robust travel planning and the terms of provision and reduction of which can lawfully be regulated by planning condition or planning obligation. The need for transitional car parking to</p>	

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				<p>serve new commercial areas in the city centre and in particular the Temple District, is tied very closely with travel planning. CEG is very supportive of robust travel plan requirements for developments as an essential part of the toolkit to encourage much higher levels of active modes of travel and use of public transport. For more complex developments which are phased over a significant period or comprise a mix of uses there should be an acknowledgement in the SPD that at application stage an umbrella travel plan or travel plan framework document should be submitted and approved. This would then allow specific travel plans underneath the umbrella Travel Plan to be prepared for individual buildings and / or occupiers to meet the requirements of their own circumstances and subsequently be far more effective. At present this route is not envisaged in the Draft SPD and it should be modified accordingly. Measures and amends as suggested above would allow the SPD to better fulfil its role and overall aim. Flexibility of the Draft SPD Linked closely to the above comments regarding the role of the Draft SPD is the rigidity with which the document will be applied to development proposals. As is stated at page 5 of the Draft SPD; "The Transport SPD should be used for any residential street typically serving up to 700 dwellings, for mixed use developments, and for industrial/commercial scheme. Above this threshold early engagement with the City Council is encouraged to establish an appropriate set of design standards". However, the geographic area of the authority is extremely varied, experiencing differing constraints and opportunities. By way of example, the Temple District is unique in that the historic fabric of the area and its locality in the city centre heavily influence the character, design and operation of development. In response to the unique challenges of the area, CEG, in consultation with Council officers and other stakeholders, has prepared the Leeds Temple Sustainable Transport and Movement Strategy ('Temple STMS'). The Temple STMS sets the strategy to 'support a thriving economic, living and cultural development.. .through the provision of world class sustainable transport networks, placemaking and demand management measures". In its</p>	<p>Decision taken to remove framework plans and provide site specific information and measures at outline application stage – no change</p>

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				<p>production consideration has also been had for the schemes coming forward within the wider locality and which are likely to impact upon the transport strategy for the Temple District. Working to understand such implications is critical to effectively masterplan an area. It is the production of such document, which reflects the very individual and closely analysed considerations of an area, which should guide development. The Draft SPD should be amended to provide sufficient flexibility to take an area based approach to establishing the strategy for sustainable transport and movement. The importance of considering highways and transport matters at the same time as other aspects of the design of the development is acknowledged at page 28 of the Draft SPD and, both the Consultation Report issued as part of this consultation and the Draft SPD, reference the requirement to consider planning applications on their merits on a case by case basis.</p> <p>However, the document also sets out rigid and blanket requirements. In relation to street design this is evidenced at page 31 of the Draft SPD which sets out the express principle of "no trade-offs". It is understood that there may be absolute requirements for reasons of highway safety or regulatory compliance but it is submitted that generally it is preferable to allow for some innovation and creativity in arriving at an acceptable proposal for a new streets where the overall balance is positive albeit there may be challenges to overcome. In specific relation to landscaping and trees in the highway, the benefits of green streets and landscaped public realm with trees is fully acknowledged and welcomed by CEG. However, it must be recognised that planning for trees in the highway is very different for a green field or cleared and re-purposed site compared with an existing built up area that is being redeveloped, such as the Temple District. The result is that such provision varies greatly in terms of feasibility, practicality and subsequently cost. Whilst the SPD is not absolute in prescribing trees in the highway adjacent to all development sites, it would be preferable if there was express recognition of there being instances where tree planting is not the most suitable solution;</p>	<p>LCC's position is that these factors including safety are of prime importance, especially in light of the Leeds Vision Zero Strategy – no change</p>

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				<p>proposed Highways Cumulative Impact assessment in the Transport SPD and refine the mechanisms for introducing a levy based upon the cumulative impact of developments on various key corridors and receptors." It does not appear that the policy has significantly changed despite this review. Therefore, it would be helpful to understand what review has been undertaken and its conclusion, in particular, whether and how the first round of consultation responses have been taken into account. If the intention of the Connecting Leeds Strategy and the SPD is to encourage lower car use, particularly in the city centre, then its title does not reflect this because it is focusing instead on vehicle journey delays. If the objectives are to improve journey times by public transport and improve access to jobs or visitor attractions rather than reduce traffic congestion itself, then this element of the SPD appears to have the wrong starting point and is probable that city centre developments will be penalised even when they are more sustainable, for the reason that they are located in areas where congestion is already high. It could be interpreted that this policy is in essence an extra targeted levy that is additional to the Community Infrastructure Levy ('CIL') and to site-specific planning obligations under Section 106 of the Town and Country Planning Act 1990 ('TCPA'). These result from an established legal and policy position as they deal both with general enhancements on a case by case basis or mitigation measures required to render a particular planning application acceptable. As the Draft SPD states, the lawfulness of any particular planning obligation is assessed through legal criteria and so too would the new levy as a planning obligation. Contrary to this general position, the SPD requires (page 203) that: ".Any site requirement for a direct impact which demonstrates through a Transport Assessment process that the direct mitigation is not required will instead be expected to fund a cumulative impact at that junction following the process outlined above". The net effect therefore is that for any development site highlighted as being proximate to the Draft SPD's schedule of identified congested junctions, a new levy will be charged. At present the Draft SPD is not clear on the criteria as to how this</p>	<p>reasonable, proportionate and directly related to the development and this is the best mechanism found to meet these requirements – no change</p>

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				<p>new proposed levy is to be allocated, is it via a highway-based engineering scheme or a public transport/active travel mitigation package in an indeterminate location? Furthermore, it appears that the proposed new levy is likely to overlap with the CIL Regulation 123 list. This approach appears to be promoting 'double dipping'. The Council has assessed the Cumulative Impact Levy on a 'business as usual approach', as detailed within the representation made on behalf of CEG in response to the first draft of the SPD, this approach does not take into account the immediate and strong alternative policies that the response to the Climate Emergency requires, where there is a reduction and not a growth in trips overall but rather uses the historic Leeds Transport Model with data that assumes the growth and business as usual scenario. On a development by development basis, embedded mitigation (schemes designed directly into a development such as improved public realm, pedestrian and/or cycle access, additional bus stops) will not be taken into account within this proposed levy mechanism, only the worst case is modelled and, in those circumstances will result in an over-estimate of development impact. This element of the Draft SPD also seeks to ensure that windfall sites in the vicinity of the identified junctions will pay the levy but at that stage other developers may also have made contributions; there is a lack of clarity as to how this would work and whether it the levy will relate to a particular scheme or if rebates will be required. The Draft SPD (page 203) refers to more detailed work being required at the time of any pre-application submission by an applicant to "agree required mitigation and cost". In summary, this element of the document is insufficiently worked through to give any certainty or clarity to an applicant which could create a further barrier to investment.</p> <p>Whilst the general thrust of the Draft SPD is supported as it seeks to guide the implementation of the development plan and support the Council's strategic aims around climate change and delivering sustainable development, it currently lacks clarity or flexibility to effectively enable this. It is an overly lengthy document which is framed within a context that does not reflect</p>	No change

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				<p>the transitional journey the city is on to becoming carbon neutral. Whilst right to be aspirational, it needs to support and facilitate inclusive growth and investment today, enabling the behaviours and infrastructure required to achieve its strategic aims. In particular we urge the Council to review the flexibility of the guidance contained within the document and robustly consider the commercial practicalities of implementing the document as currently drafted. There is real concern that it could act as a potential barrier to investment, sustainable development and inclusive growth rather than a facilitator.</p>	
4	Richard Horne. Planning Officer – Commercial Boat Operators Association (CBOA)			<p>The Commercial Boat Operators Association (CBOA) represents operators of freight carrying vessels in the UK's inland and estuarial waterways and is accepted by the Government as the representative industry body. It is also the prime trade organization involved in sustaining and promoting freight carriage on our waterways for economic and environmental reasons. CBOA would like to comment on the above consultation that there is scope for use of the waterways (both the Aire and Calder Navigation and Leeds and Liverpool Canal) for provision of urban deliveries and collections, or 'last mile' as sometimes called. This has successfully been implemented in both London and Utrecht, Netherlands. Utilising water transport into the city for onward local delivery, avoids increasing the use of the urban road network and avoiding the associated additional congestion and emissions. Paris is also considering a similar barge delivery service. With the London case, waste is regularly collected on the Regents Canal by barge (see https://irecycle.london/about-irecycle-london/). DHL have also implemented a commercial launch service on the Thames for local delivery of parcels by DHL cargo bikes to the district (see https://www.dhl.com/globalen/delivered/sustainability/urban-logistics-river-boat.html). Hospital supplies are also brought into London from Dartford by barge, then unloaded at Butler's Wharf near Tower Bridge and taken to St. Thomas' and Guy's hospitals by cargo bike. The hospitals actually report that the service is quicker than by road, with a saving of 1500 road miles each week with 3 trucks, each truck emits about 708kg of CO2 which</p>	Comments supported - reference to waterways added to Travel Plan checklist.

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				<p>can be saved each week. The Utrecht case involves delivery of beer barrels/cases and other goods by barge (see http://www.bestfact.net/zero-emission-beer-boat-in-utrecht/). The barge is also electrically powered. Cargo bikes are mentioned in the SPD, but I could not see reference to how they are to be used. Perhaps the London case above can be used as an example of how this may be of use to further combat road congestion and reduce emissions in Leeds – and perhaps this can be promoted? CBOA hopes that provision for this can be included in the SPD. If you would like more information or assistance with this I would be pleased to help</p>	
5	Keith Kelly, Enterprise Car Club			<p>(page 182) • In agreement with LCC, specify the number of dedicated car club bays the development will provide and show on a site layout plan. • Dedicated car club bays will need to be reserved for the sole use of Leeds City Council's preferred supplier(s), provided at ground floor level, accessible 24/7 to car club members. • Car club bays should include electric vehicle charging points and adjacent cycle stands (Sheffield) wherever possible. The charging points should be selected in consultation with the City Council and their selected car club operator. They should be dedicated to the car club operator at the dedicated bay and be covered by a suitable maintenance and repair agreement to ensure car club operations are high quality and reliable. Page (194) Upon Commencement of Development to pay the Car Club Contribution of £ (pounds) to cover the provision of the car club. This may include financial support from the developer for the early months of operation when car club operation will be loss making, resident numbers at the development will be low and the number of car club members at the development will be growing.</p>	<p>Text added.</p> <p>Any funds provided are for resident usage not pump priming – no change</p>
6	Environment Agency			<p>As highlighted in our first response to the SPD, we strongly support many of the aspirations of this SPD. In our previous response we highlighted relevant technical advice and suggested where we consider additions to the text should be made to enhance and clarify the SPD to further it in meeting its stated objectives. We also provided links to evidence to support our statements. We note that many of the points we provided</p>	

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				<p>under the first draft consultation have been marked as general comment in the WSP consultation summary. We are disappointed that our suggestions to incorporate further reference to the environmental factors that should both be protected and enhanced through the development of the city's transport and street scene have not been considered further. We would further highlight the following: Page 3 - we note reference to the 2004 document Sustainable Drainage in Leeds remains. 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 EN5 which refers to the removal of culverting wherever practicable and appropriate. Any revised document would need to advise that it is not 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. Reference to this should be made in the Transport SPD. Page 10 - under the NPPF section - The following should be included: In the revised NPPF (Feb 2019) Chapter 9 promotes sustainable travel. Para 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.</p> <p>Page 20 – we maintain that it would be worthwhile to include reference to cross-cutting policies from the Leeds Core Strategy / Local Plan and not just the policy related to parking standards. For example, policy G9 should be included within this section. This is a key biodiversity policy in the Core Strategy and must be considered for transport schemes and developments to ensure they incorporate/contribute to biodiversity enhancement/net gain.</p>	<p>Removed reference to 2004 guidance</p> <p>Para 102 of the NPPF has been added in full.</p> <p>Other Local Plan policies are covered by other SPD's and not a policy to be amplified in this SPD – no change</p>

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				<p>Conforming to this policy will also facilitate the wider objectives on climate change and improving health and wellbeing.</p> <p>Page 28 - Objective 5 - this should be improved to include biodiversity net gain. This would be in line with NfL principles 55-60.</p> <p>Page 37 – The final section in relation to flood risk, reference should be included to the sequential test - to avoidance of areas at flood risk1 . Where there is a need to raise land, consideration should be given to the carbon footprint involved in importing and landscaping the required volume of material.</p> <p>Page 86/87 - we note that there will be technical requirements for turning heads. Given the concentrated pollution likely to result turning manoeuvres we 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.</p> <p>Page 227 – we recommend including a requirement that all drainage grates for surface water drains should be marked to clearly indicate that the waters drain to river to encourage responsible behaviours.</p> <p>Page 260 – this section should refer to highway drainage should not drain direct to surface water sewers without prior treatment, including SuDS, to prevent oils and other pollutants draining to river. We trust the above comments are useful in the preparation of this SPD.</p>	<p>As above – no change</p> <p>SPD not covering development principle – no change</p> <p>Added to document</p> <p>Added to document</p> <p>Already covered – no change</p>
7	Fore Consulting			<p>Subject, Paragraph and Page Number Comment General Comment</p> <ul style="list-style-type: none"> • The structure of the document is not reader-friendly – it is unnecessarily long and difficult to navigate. The document requires more careful formatting and the removal of duplication/near-duplication text. In particular: <ul style="list-style-type: none"> o Paragraphs should be numbered for ease of reference. o No differentiation between what is policy and what is supporting text. o Footnotes with cross references to provide supporting documents with ease should be provided. o Figure captions look like titles at points, need reformatting. 	<p>Document to be re-formatted</p>

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				<p>o Blank pages are not necessary (e.g. (e.g. pg27, pg106).</p> <p>o General formatting of titles, tables, bullets are not uniform (e.g. section 3: parking)</p> <p>Part 1 – Introduction Page 5</p> <ul style="list-style-type: none"> • The SPD notes that the council is promoting 'Active Travel Neighbourhoods'(ATNs) as a means of encouraging walking and cycling, however there is no further mention of these within the document to support their introduction in Leeds i.e. no information is provided on design considerations or examples. • The SPD notes that new infrastructure for cyclists should link to existing routes, as shown on the City Connects Interactive Map. The map is outdated and does not show existing facilities e.g. new cycle facilities are provided along Elland Road (adjacent to the Stadium) but the map does not show this provision. The map requires updating to support cyclists. <p>Part 2 – Section 5 Junctions and Visibility Pages 71 and 72</p> <ul style="list-style-type: none"> • The use of DMRB-type stopping sight distances for where speeds are unknown, but on roads where a speed limit of 30mph or lower applies is questioned. It is our understanding that Manual for Streets-type requirements should be the default requirement in urban areas. <p>Part 2 – Section 8 Pedestrian Movements Page 88</p> <ul style="list-style-type: none"> • Clarification whether the width of a footway needs extending if only provided on one side of the carriageway. <ul style="list-style-type: none"> • State which locations will require guard railings. <p>Part 2 – Section 10 Public Transport Page 97</p> <ul style="list-style-type: none"> • Do minimum requirements need to include seating, provision for disabled people. <p>Part 2 – Section 13 Designing for Disabled People</p> <ul style="list-style-type: none"> • Design of road crossing provision not discussed. Aids for blind and partially sighting at crossings should be outlined (e.g. tactile cones). <p>Part 3 – Park and Ride Page 125</p> <ul style="list-style-type: none"> • No mention of Stourton Park & Ride within the document. • No future ambition for Park & Ride in Leeds, only generic information is provided. The SPD should provide clearer goals 	<p>Added reference to design principles</p> <p>Map to be updated – passed to LCC Transport Strategy team - no change</p> <p>Decision made to use DMRB on primary distributor roads – remove secondary distributor roads from map</p> <p>No change required</p> <p>No change</p> <p>Added</p> <p>Added section on crossings</p> <p>Stourton added in Not the place to set the strategy – no change</p>

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				<p>and actions for future Park & Ride sites in Leeds. See reference to West Yorkshire Connectivity Infrastructure Plan. Part 3 – Section 3 Electric Vehicle Charging Points - Table 3.20 Page 144</p> <ul style="list-style-type: none"> • Table 3.20 for 'Office/Retail/Industrial/Education notes 'Charging points for 10% of parking spaces ensuring that electricity infrastructure is sufficient to enable further points to be added at a later stage'. No guidance is provided for the expected number of points to be provided at a later stage. The SPD should provide clarification on what future provision is expected. <p>Part 3 – Section 5 Cycle Parking Pages 155, 156 and 157</p> <ul style="list-style-type: none"> • Cycle repair facilities – The SPD should provide clarification on what type of repair stand (i.e. recommended style) is expected to be provided. • Clothes lockers - The SPD should provide clarification on what provision is expected for speculative developments. • Electric Bikes – The requirement for Twin 13amp sockets to be provided for every long stay cycle space is too generic and does not take into consideration development specifics. For example, in residential developments residents may choose to charge their e-bike battery within the curtilage of their own dwelling rather than in the cycle storage area. The SPD should provide clarification on what provision is expected for different types of development. • The cycle parking standards for Warehouse/Storage appear to have changed. The current adopted Parking Standards SPD states that 1 short-stay space per 2000sqm is required, with a cap of 20 and that 1 long-stay space per 1000sqm is required for Warehouse/Storage. This represents a doubling of cycle parking required for such developments, and we would question the evidence for such a change in LCC's guidance. <p>Part 4 – Section 1 Why is a Travel Plan required? Page 171</p> <ul style="list-style-type: none"> • Bullet point 1 under the header 'Travel Plans are required to meet the requirements of Leeds Core Strategy Policy T1 and T2, Connecting Leeds Transport Strategy and address the Climate Emergency' The weblink has been removed so provides no useful information. 	<p>Subject to projected demand</p> <p>Changed to repair tools – any style of stand</p> <p>No change</p> <p>No change</p> <p>No change – in line with LTN 1/20</p> <p>Weblink re-inserted</p>

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				<p>Part 4 – Section 2 Travel Plan Thresholds – Table 4.26 Page 172 - 174</p> <ul style="list-style-type: none"> • General Industrial is repeated twice within Table 4.26 on page 172 and again on page 174. Whilst the descriptions differ for each, the threshold and unit remain the same. • The standards for ‘places of worship, religious instruction, church halls and community centres’ appear to have changed. The adopted Travel Plans SPD states that Travel Plans are ‘not normally required – exceptional circumstances only’ for these uses. The Travel Plans SPD presents a more flexible approach than the requirements set in the draft Transport SPD. <p>Part 4 – Section 2 Other Extensions and development below the indicative threshold Page 172 - 174</p> <ul style="list-style-type: none"> • The wording relating to proposals for extensions requiring a Travel Plan remains unclear. The use of 'and' in the second bullet point requires both elements to be met for existing buildings which don't already have a Travel Plan, yet the first sentence implies that a Travel Plan is required if the existing premise and extension exceed the threshold. • The statement ‘Where a Travel Plan would help address a particular local traffic problem’ is too vague. What constitutes a local traffic problem and are there examples of where a Travel Plan has been required only for this reason? <p>Part 4 – Section 3.2 Travel Plan Stages and Figure 4.1 Page 177 - 178</p> <ul style="list-style-type: none"> • A new flow chart has been introduced which is more detailed by demonstrating a greater number of processes needed at each stage Pre – App, Application, Implementation and monitoring. The SPD fails to provide commentary for each of these stages, as previously set out in the Travel Plans SPD. It is considered that this information was valuable for those not familiar with producing Travel Plans. The Travel Plans SPD also includes clearer information on support from the council. This information should be re-provided. • Figure 4.1 notes a ‘Tool Kit of Measures’ weblink but none is provided. 	<p>Different use classes – no contradiction – change to reference commercial, business and service. Amended</p> <p>Added “together” to clarify</p> <p>No change</p> <p>Added requirement for site audit but these matters are covered in site checklist – no further change</p> <p>To be added</p>

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				<p>Part 4 – Section 4 Contents of a Travel Plan – Table 4.2 Page 179 -184</p> <ul style="list-style-type: none"> • No information is provided in relation to the type of Travel Plan required for an application. There is no reference to the Framework approach that is usual for larger/phased/mixed-use developments. • Section 4.2 notes a new requirement for a checklist to be submitted with each Travel Plan. Whilst the checklist is useful, it is not supported that this should be a requirement to validate/approve a Travel Plan. The current format of the checklist provided in Table 4.2 is unorganised. The contents of the checklist are either too specific or not specific enough to be easily adopted for all types of development. Clearer guidance should be provided. Table 8.1 of the approved Travel Plans SPD provides a clearer framework for preparing Travel Plans. • Important Sections such as ‘ Residential Travel Plan Fund’ and ‘Securing the Travel Plan’ have been inadequately summarised and do not provide specific requirements for those developing the Travel Plan e.g. the cost per dwelling for the RTPF, the cost the Travel Plan review fee, information on what is anticipated to be required for financial penalties/remediation measures. • Table 4.2 notes under ‘Targets, Monitoring and Review’ that ‘10-20% reduction in lone car driving over a period of three years is considered achievable’. This target is considered to be over-ambitious, and no evidence is provided as to where this has been achieved over a period of three years. <p>Part 4 – Section 6.1 Approval of Travel Plans Page 187</p> <ul style="list-style-type: none"> • As noted above, it is considered that the checklist in its current format is not suitable for providing guidance for those implementing Travel Plans across various types of development. <p>Part 4 – Section 6.2 Travel Plan Review Fee Page 188</p> <ul style="list-style-type: none"> • Clear information should be provided to the Applicant regarding the breakdown of the Travel Plan Review Fee when calculated by LCC ITB. <p>General Comments on Section 4</p>	<p>Removed – no change</p> <p>Change – checklist not needed to be submitted but will be used to ensure all necessary information is included in submitted TP. Summary table added.</p> <p>Text updated 2022 figures inserted.</p> <p>Text amended to allow 3 – 5 year period for achieving targets</p> <p>No change</p> <p>No change</p>

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				<ul style="list-style-type: none"> • The adopted Travel Plans SPD provides useful information in Section 6 regarding 'Travel Plan Types'. This information was useful in determining the type of Travel Plan required to support an application. The draft Transport SPD fails to provide such guidance. • No guidance is provided in relation to contributions sought for the Leeds City Car Club Provider. This is mentioned briefly in Section 7. The previous Draft Transport SPD (issued for comments in 2020) provided clear guidance on where the contribution was required and the cost overall. • No guidance is provided on the logistics of implementing the Residential Travel Plan Fund. The RTPF is to be paid by Section 106 agreement but to be managed, delivered and audited by the appointed TPC. There is no clear guidance how the TPC can access the funds from LCC, or how this should be appropriately managed. The 2020 draft Transport SPD sets out the RTPF more clearly than currently presented in Table 4.2. 	<p>No change</p> <p>No change</p> <p>No change</p>
8	George E Hall			<p>I accept that this SPD seeks to achieve and composite previous design guidance and welcome the aspects of updating these. The Spd is acknowledged to be "Technical in nature" , 271 pages plus appendices . My concern is that this is likely to result in fewer responses to this consultation, confirmed by only 70 previous respondents which are noted in the WSP Consultation Report. The Structure of the document and legislation and policy were helpful as was the "Sign posting" of National Guidance documents. The West Yorkshire Transport Strategy 2040 is clearly an aspiration and the integration of this SPD and therefore WYCA decisions are reliant on that authorities acceptance of the Leeds Transport plan .I see no evidence that this SPD will inhibit the 2036 Strategic Economic Plan and believe it supports priority 4 The "Connecting Leeds Transport Strategy" is an aspiration only Mass Public Transport and improvements of the Bus mode of Travel has not been a success from the Leeds City Council perspective . Whether the vision of the Mayor of West Yorkshire who now has that responsibility will affect the outcomes of this Spd is unknown and any contributions from Leeds City Council, via CIL or other</p>	

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				<p>income streams must be ringfenced to ensure our city benefits. Section 10 Public Transport really does miss the point that operators hold the key to frequency and reliability the “Bus Partnership” is flawed and “Quality Bus Contracts” has to be the preferred option of the council and WYCA I strongly support those matters of design which encompass “Place making “ which particularly recognises “Local Identity” . In this regard section 5 is noted but other outer areas have their issues which are not the same as the City Centre . Clearly those Preparing or reviewing their Neighbourhood plans must enhance and influence decision making now or in their policies.</p> <p>Overall the Spd has a tendance to say “May “ and “Should” or were necessary or if possible , such statements are neither firm or reassuring . Planning Balance is not a reason to undermine public trust.</p> <p>The Key objectives of the Spd set out on page 28 support the principles of Place making however principle 15 (Nfl principle) may be the starting point for new development but needs to be retrospectively applied to existing development and community extensions that exceed 10 dwellings. In this regard the Councils officers must be required to consult the wider community there cannot be any “Trade-offs” .</p> <p>I am particularly concerned with the statement Road Safety Orders MAY be required when assessing development proposals and what is meant by “the end user” . In my view a safety audit should be a formal requirement which is included for ALL major developments The scope of RSA 1 and RSA2 is limited and experience shows that such safety audits exclude the wider highway network . Grimes Dyke appears to be considered an exemplar development however the poor design on the main access point (A64) frequently floods and road users move into the centre of the highway to avoid spray—this is a major road safety concern</p>	<p>Comment- no change proposed</p> <p>Reviewed and amended where appropriate</p> <p>Comment- no change proposed</p> <p>Required on all major off-site works – but not on all internal layouts – no change</p>
9	John Hacker TPS			<p>In relation to Part 4.2, Table 4.2, the following comments are made: Under Residential sites, it is noted that a Residential TPC should be in posts "until five years post full occupation or until the Residential Travel Plan Fund (RTPF) is fu</p>	Amended

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				<p>lly spent." The later part of this statement is potentially open ended and wouldn't be accepted by a residential developer, in the basis that the RTPF may never be fully spent. It is our view that the later part of the statement should be removed.</p> <p>It is stated that "sustainable travel information must be provided on the sales/marketing website for the development". In our experience, whilst this is desirable, it is not always possible. It is our view that this wording to be amended to reflected this, rather than stating that it is something which must happen.</p>	<p>Changed to should</p>
<p>10</p>	<p>Martin Hamilton Leeds Civic Trust</p>			<p>We welcome the opportunity to review this document and recognise that as the previous separate documents were (in some cases) significantly out of date, a refresh is timely. We also acknowledge that SPDs are primarily tools for council officers, developers but also (as a way of testing the suitability of planning applications) residents and stakeholders. As such they "flesh out" and operationalise higher level strategic planning policy. In that sense, they cannot contradict these higher-level policies but, nonetheless, the tone of the SPD does provide an important indicator of the overall approach and ethos of the authority. Thus our view is that the document would benefit from a clear set of overarching principles. What kind of a city is the SPD promoting in the light of the climate emergency? One of the answers to this question must be a city in which there has been a step change away from the dominance of the private motor vehicle in the city, placing other forms of transport (including walking, public transport and cycling) at the top of any pyramid of priorities. All of the measures included in the SPD should be sense checked against this over-riding imperative.</p> <p>The SPD should be more strongly tied to the Connecting Leeds Transport Strategy which does provide the principles which it is intended should be delivered through application of the SPD. We are particularly keen to see the principles set out in Transport Strategy's section on "Prioritising Healthier Streets" reflected in the SPD, including the promise "to build on the 20-minute neighbourhood concept". We feel that the tone and detail of the</p>	<p>Added in "prioritising healthy streets" from Transport Strategy</p>

Rep Ref	Representor Name	Agent	Document Ref	Summary of Comments	LCC Response
				<p>document needs significant amendment to respond in particular to the Climate Emergency and the Council's stated aims in this regard. Specifically this should include the Connecting Leeds Transport Strategy and its vision for Leeds to be a city "where you don't need a car".</p> <p>We also have a comment on process. The documents that this replaces were clearly out of date – two of the documents are 11 and 12 years old respectively. If this document is expected to have a similar lifespan, then it must be fit for a net zero carbon Leeds by 2030. As drafted, this is not the case. Where existing strategic policy acts as an impediment, review and changed needs to be fast tracked (for example the Core Strategy does not explicitly reflect climate emergency). More generally, we would favour a mechanism for on-going review to ensure that latest thinking and standards can be adopted on a dynamic basis. Whilst we understand the logic of having everything in one document there is a danger that this has resulted in a document which is unwieldy and hence more difficult to keep up to date. In addition many of the policy documents which underpin the SPD are out of date and due for renewal, (e.g. Design Guide for Streets, CWIS1 and 2011 census data), and others such as Neighbourhoods for Living (2015) do not reflect the societal changes which have taken place under the pandemic, not least in relation to transport patterns and the importance of the concept of 'place' to our health and wellbeing.</p> <p>We have not considered every clause in this long document but rather have identified a few key areas (of detail and of principle) to illustrate how we feel the document could be strengthened to meet clear external challenges.</p> <p>We consider that the proposed new car parking standards are little changed from existing policy and are essentially demand led. It is disappointing that in the introduction (p6), the SPD says car parking provision should be based on EXPECTED car ownership (and parking provision) at APPROPRIATE levels. This is an encouragement to high levels of provision. However, to meet climate change objectives, there needs to be a radical reduction in car usage and reducing parking overall has to be a</p>	<p>Local Plan review being undertaken but limits on ability to pre-empt this. No change</p> <p>Follow planning procedures for SPD updates.</p> <p>Minor changes to wording to show car parking is to be limited.</p> <p>Parking guideline wording strengthened</p>

Rep Ref	Representor Name	Agent	Document Ref	Summary of Comments	LCC Response
				<p>key component of this approach. Similarly, our view is that charging for parking is an effective way of reducing demand. There has been little change in these policies from the 2020 draft. Future parking standards need to marry with both existing and 'in the pipeline' initiatives (e.g. the closure of City Square) but also support longer term aspirations. If the authority's policy is to double bus patronage, then parking policy must support this objective by reducing parking supply. This part of the SPD can be strengthened in number of ways. For example, the policy states: P122. New Permanent Public Car Parks Within the City Centre Core and Fringe parking areas there is a presumption that the re-provision of existing public commuter car parking between and within the Public Transport Box, Core and Fringe is acceptable providing that no net increase in public parking occurs. This does not apply to cleared site car parks situated on development sites (see below). A modest increase in permanent public commuter car parking above this, but not exceeding 500 spaces over the Local Development Plan period, may be permitted in certain circumstances. Our view is that there should be a presumption against re-providing existing public commuter car parking with travel to work moving to more sustainable modes (walking, cycling or public transport or Park & Ride for those where other modes are inappropriate). There has been no change to this policy. With regard to new car parks, this policy states: P122 New short and medium stay public car parks may be accepted to support the vitality of the City Centre as a visitor and retail attraction. Planning conditions on opening times, length of stay and pricing will be required in order to ensure that these car parks do not create adverse demand for peak period travel into the City Centre. Proposals relating to car parking for Leeds Railway Station will be considered on their own merits in the context of promoting rail Park and Ride and future High-Speed rail connections. Although the policy wording has changed from 'will' and 'encouraged' to 'may' and 'accepted', this does not reflect the view that there should be presumption against the provision of any new short and medium stay car parks in the city centre core and fringe. Table 3.17 on page 130,</p>	<p>Core Strategy policy – not able to change this</p> <p>Residential standards reduced in fringe to 0.5 space per dwelling max.</p>

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				<p>outlines parking standards for new developments. Our view is that parking provision remains far too generous for all of the city centre locations outlined (Public Transport Box, Core and Fringe). The “fringe” category, which is considered to need more parking than the city centre core, is in fact the location where most development is taking place. It would be a mistake to allow significant car parking in this area. The policy on temporary parking on cleared sites states the following: Temporary Parking on Cleared Sites P124. Policy T1 of the Core Strategy outlines the need to limit the supply of commuter car parking in areas of high public transport accessibility, such as the City Centre. The continuation of a policy which limits the amount of commuter parking on cleared sites is necessary in order to minimise congestion during peak periods and support sustainable travel. Policy LPP3 gives the details regarding cleared site parking. Our preference would be for a presumption against any temporary parking in these locations. However, we note that the Core Strategy already suggests that this is an acceptable use and outlines criteria for judging suitability. In these circumstances, we would suggest that permissions for temporary parking sites are limited to one year, and that the Core Strategy policy (along with other similar legacy policies) is reviewed at the earliest possible opportunity. There has been no change to overall parking policies from the draft. p139/140 Car Free Development: “Residential developments which discourage the ownership of cars in locations within Central Areas and Controlled Parking Zones (CPZs) are encouraged [NfL Principle 25]. Residential developments which do not adequately provide for their parking requirements will not be accepted.” Is there a contradiction here? Does this need more explanation?</p> <p>EV Charging Points: it is suggested that avoiding trip hazards should be made more specific to state that there should be NO trailing cables across the pavement which would obstruct wheelchairs, mobility scooters, those with limited vision and push chairs.</p> <p>Our view is that the overall thrust of the document still promotes too much of a “car/motor vehicle first” policy. In particular: P39.</p>	<p>Noted. No change</p> <p>Clarified</p> <p>Added text</p> <p>Changes made</p>

Rep Ref	Representor Name	Agent	Document Ref	Summary of Comments	LCC Response
				<p>Streets need to accommodate various types of movement in a convenient and safe manner. The needs of motorised traffic must be balanced with those of pedestrians, cyclists and users of public transport who are of all ages and abilities. The design of the street needs to be appropriate for its function and may vary along its length. Streets should also be designed so that these form an attractive environment, responding to their context by forming a natural hierarchy that is clear and legible to all users who share the same space. Our view is that this should be expressed differently. Surely the default is to prioritise walking, cycling and users of public transport in designing streets, rather than balancing all users? This would follow the thrust of the New Highway Code and the Connecting Leeds Transport Strategy. Examples of how this might be achieved:</p> <ul style="list-style-type: none"> • Shared Space (table 2-4) and Level Surface (table 2-5) design speeds should be 10mph, rather than 15mph in the SPD. • We welcome the reduction for Connector Streets (p43) to 20mph from the 25mph in the previous consultation draft. • We would also suggest that industrial road design speeds should be a maximum of 20mph not 25mph. We suggest that the relation between design speeds and envisaged speed limits should be clarified. The design speed is presumably intended to make the speed limit self-enforcing. The design speed presumably cannot be less than the speed limit for safe use. We also consider that there are opportunities, through changes to road design practice, to improve the pedestrian experience. Examples of this include: • Page 73: Junction Layouts: Considerably more effort could be made to reduce splay radii on all these road types in order to reduce the pedestrian crossing widths on all side roads and increased perceived pedestrian safety. • Page 79: Speed Restraints: Reducing acceptable design speeds should also be another element of speed restraint and not just a focus on speed bumps. • Page 88: Crossing Points: The text seems to suggest that there are locations where it is not necessary or appropriate. This begs the question. "Where is this not appropriate?" Can we not 	<p>Changes made</p> <p>No change, MfS research showed no reductions in speed below 23m.</p> <p>No change – not good practice to traffic calm in industrial zones.</p> <p>Not required – no change</p> <p>Notes cover reductions – no change</p> <p>No change</p> <p>Changed to “as appropriate”</p>

Rep Ref	Representor Name	Agent	Document Ref	Summary of Comments	LCC Response
				<p>make this requirement for all junctions where there are pedestrian crossing points?</p> <ul style="list-style-type: none"> • Page 69: Crossing Points: The text highlights the need for dropped kerbs at crossing points. Should this not also require tactile paving at crossing points as well? • Page 69: Crossing Points: The text suggests that for pedestrians needing to cross junctions with larger radii curves on the junction mouth, the crossing point should be moved back from the junction mouth. This requires pedestrians to walk further and reducing junction radii would both slow traffic and bring pedestrian flows closer to a typical 'straight-along' desire line. There have been no changes here. <p>P46 Table 2-3 First section: What is the difference between a cul-de-sac and a single exit estate road which can be more than 200m long? A further explanation needs to be given as to why cul-de-sacs are limited to 200m length?</p> <p>P50 Level Surface Street and P52 Home Zones: this arrangement will require very careful design to prevent inappropriate parking.</p> <p>P92 Shared use cycleways: these are counter to the government's "Gear Change" strategy and, where unavoidable, there may be a need to build in design features to slow cyclists. Other sections of the SDP could also be amended in a similar way. The overall design approach for all new developments should be to enshrine something approaching "home zone" standards, even if the official designation cannot technically be achieved (for example on new housing estates).</p> <p>We feel that too much new housing in the UK (and in Leeds) is built around car use, with residents having little choice but to drive for almost every journey. This is certainly the case with many of the new schemes being promoted as part of the East Leeds Extension.</p> <p>Greater consideration should be given to specific elements which could help make up a non-cardependent housing development. We would commend to the Council a checklist for new housing developments prepared by Transport for New</p>	<p>No change</p> <p>No change (included in text)</p> <p>Looped road layout – no change</p> <p>No change</p> <p>Agreed – no change</p> <p>No change – reviewed previously in light of LTN 1/20</p> <p>This SPD is trying to change this – no change</p>

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				<p>Homes - this is available at and appropriate elements could be included in the revised SPD.</p> <p>There has been no change in this area to reflect the aspirations of the Connecting Leeds Transport Strategy and more recent residential design initiatives. We welcome the inclusion of the section concerning public transport p96- 99. However, we feel that more needs to be said about the role of public transport in providing mobility for the whole community. The SPD is an important tool in engineering a more holistic approach to public transport provision. Footpaths to bus stops and stations need to be lit to provide safe routes at night and in the winter. There also needs to be a much more robust approach to articulating how a development plugs into a broader public transport strategy. The travel plan section in the draft SPD provides a lot of detail but does not seem to fit into any strategic approach. Any large-scale development should not be permitted unless frequent and convenient public transport to the city and local centres (or an appropriate local transport hub) is designed into the scheme and delivered from the outset when the first homes are occupied. This SPD should be seen as the practical mechanism to boost cycle patronage in the city. All of the operational and technical requirements within the document should be viewed through that prism. Our concern is that this overarching ethos is missing from the document. Whilst cycling is mentioned, it is too often viewed as subordinate to car use, which remains a priority for the SPD. Our overarching sense is that the sections that refer to cycling provision, in particular technical specifications (encompassing road and development design, technical considerations regarding junctions, segregation, shared surfaces etc.) either do not reflect internationally-leading (or even in some cases) nationally leading best practice, or else do not appear to aspire to them. More up to date thinking (e.g. Waltham Forest Mini-Holland scheme) has shown how high streets can retain (and indeed increase) footfall whilst prioritising cycling and walking. The SPD needs to be aspirational, adopt best practice and propose its own.</p>	<p>Reviewed but not fully in line Leeds Policy eg Accessibility Standards – no change</p> <p>Added</p> <p>The Connecting Leeds Transport Strategy is better placed to cover this. No change</p> <p>Added cycle to consideration of alternative junction layouts – Part 2, Section 5</p>

Rep Ref	Representor Name	Agent	Document Ref	Summary of Comments	LCC Response
				<p>Where new developments are concerned (for example the East Leeds Extension where thousands of new homes are envisaged over time), we would expect developers to be required to design these settlements in such a way that they contribute to the emerging Leeds Cycle Network, rather than producing cycle routes that do not look any further than the edge of the settlement in which they are being created and simply attempt to plug into what is already there.</p> <p>Why have the paragraph numbers which were present in the 2020 consultation draft been removed? These are useful not just in responding to the consultation but in the final document for use by all involved in discussions regarding new developments. Therefore, we suggest that they should be reinstated.</p> <p>The data quoted on p4 is presumably from the 2011 census. We suggest this is too out of date to be relevant and so should either be replaced with more up-to-date estimates or 2021 data (when available).</p> <p>Definitions of Roads P38: There are a number of road type terms in use which are not defined here: 'major route network' and 'key route network'. P67 also refers to a 'strategic route' but this does not appear in the definitions. P 38 'Connector Streets' should be in bold</p> <p>P39 1st para "forms" should be "form"</p> <p>p172 Should state what GFA stands for.</p> <p>p268 6th line down "complaint" should read "compliant"</p> <p>Appendix A: We couldn't see any reference to low carbon materials.</p> <p>Appendix C is missing.</p>	<p>Contributions are being sought – no change</p> <p>To be re-added</p> <p>No more up to date census data available (and 2021 data won't be representative) no change</p> <p>Changed</p> <p>Changed</p> <p>Changed</p> <p>Changed</p> <p>It is already referenced – no change</p> <p>To be Available online</p>
11	Leeds Living Streets			<p>We would like to make the following key points.</p> <p>1. Leeds declared a Climate Emergency in 2019. The SPD refers to this but absolutely does not reflect the scale of change needed to tackle our transport-related greenhouse gas emissions.</p>	<p>Transport Strategy matter – no change</p>

Rep Ref	Representor Name	Agent	Document Ref	Summary of Comments	LCC Response
				<p>2. Infrastructure decisions made today will substantially determine the achievement of the statutory climate goals in years to come. A substantial shift away from car-dependent development is essential. This will not be facilitated by this SPD.</p> <p>3. The SPD is based on a range of existing policies and documents, some of which are now several years old and due to be replaced. How will these updated guidance documents be incorporated into the SPD?</p> <p>4. The SPD refers to the recently adopted Transport Strategy, but remains a very heavily car-dominated document and does not reflect some of the key policies. For example The SPD notes that the Transport Strategy “ aims to make Leeds a city in which you do not need a car, and this is also the case for all new developments across Leeds.“ This is however not reflected in the SPD; nor is the target to reduce car mileage by 30%, which is fundamental to achieving our climate emergency goals.</p> <p>5. Research has demonstrated some quite fundamental changes in our behaviour since the pandemic, particularly in relation to daily commuting habits. In addition we are learning more about the importance of “place” in fostering health and well-being. Modern concepts such as Active Travel Neighbourhoods and 20 Minute Neighbourhoods should be core to new developments, but are barely mentioned in the SPD.</p> <p>6. In conclusion we consider that the SPD is not fit for purpose as it does not promote or support the very fundamental changes needed to move beyond car-dependency, which are essential both for our health, and the health of the planet.</p>	<p>This SPD expands on existing planning policies. When these change this will be subject to review.</p> <p>Some further amendments to parking standards and prioritisation of NMU provision made.</p> <p>The standard details are being updated and will be web based when finalised, currently available on request. The local plan review will provide strengthened policies related to the Climate Emergency. Some changes in emphasis made. SPD covers requirements for all modes and includes the hierarchy of users. No change.</p> <p>Reference has been included to 20 minute neighbourhoods in the SPD but currently there is no planning policy requirement for new developments to deliver these. No change.</p> <p>The SPD has been amended to prioritise the needs of pedestrians, cyclists and public transport. No further change.</p>
12	Leeds Teaching			<p>1. Street Design Guidance - Leeds Teaching Hospitals agrees with LCC in favouring road designs (including layouts and materials) that are more conducive to use by non-car users following their car-trip reduction strategy. Wider footways;</p>	<p>Comment- No change required</p>

Rep Ref	Representor Name	Agent	Document Ref	Summary of Comments	LCC Response
	Hospitals NHS Trust			<p>segregated cycle lane provision and use of shared space and high quality public realm materials will be to the fore. Our design teams will be aware of this when preparing their proposals. As a healthcare institution we welcome street layouts that encourage the general population to walk and cycle more, helping people to exercise and therefore improving their health. Leeds Teaching Hospitals also strongly agrees with the need to design speed restraint measures into the new development roads, in order to increase road safety levels, especially for the most vulnerable users.</p> <p>2. Parking - Leeds Teaching Hospitals operates a major acute hospital site (LGI) that is partially within the 'city centre core' and partially on the 'city centre fringe'. This hospital must operate safely and continuously for the adequate care of our patients and to serve the community who may require our acute services. Many staff work shifts and need to travel to the site at times where no public transport is available or get called to work with very short notice. Therefore, it is vital that LCC clarifies that for medical related uses, additional car park facilities for medical staff should be permitted on cleared sites within the LGI area. The inability to provide increased parking facilities in future vacant /cleared sites within LGI could affect the Trust operations, not permitting some potential staff to access the site at the aforementioned times / situations. Therefore, the Trust may not be able to retain or attract the required staff, which will impact on the quality of the services provided. Preventing new car parking sites within the LGI site would potentially affect the Trust's ability to decant facilities, wards and other hospital operations (temporarily and permanently) into new and purpose built hospital buildings. Flexibility is therefore required to move car parking around this site to facilitate the provision of high quality care and new development of the hospital.</p> <p>b) General Considerations - The LTH is fully committed to promote the use of alternative modes of transport to single occupancy vehicles when possible and it is prepared to provide the required parking facilities. Nevertheless, we expect LCC to negotiate sensibly on this matter if the relevant evidence is</p>	<p>This is not LCC policy – travel planning measures can be reviewed to address site specific matters.</p> <p>Site specific matters will be dealt with through the planning process.</p> <p>Maximum parking standards in the core and fringe support the Transport Strategy for Leeds as the location benefits from good accessibility by</p>

Rep Ref	Representor Name	Agent	Document Ref	Summary of Comments	LCC Response
				<p>presented to the Highways and Planning officers and that reference to a degree of flexibility on the parking figures for healthcare-related uses could be included in the Transport SPD document.</p> <p>3. Travel Plans - The LTH is fully committed to sustainable transport and believes in the positive influence that Travel Plans make on the way staff and users travel to site. Nevertheless, it is considered that it would be very difficult to secure the penalty fees (as envisaged by this SPD) adequately via a Section 106 agreement. It is hard to define future targets and objectives, as there is always a degree of uncertainty and many factors influencing travel behaviour that are beyond the reasonable control of a developer or employer. Whilst, as previously stated, the developer should show commitment to the Travel Plan measures, it seems excessive to define fines for multiple transport-related elements of a development. It is suggested that instead additional flexibility and post development negotiation should be allowed for and referenced in the SPD. More detail is required on how the penalties' fees are calculated and agreed, and how the Travel Plan monitoring process may be implemented.</p> <p>4. Highways Cumulative Impact The SPD includes a long list of allocated sites from the LCC Site Allocations Plan (SAP), which are mainly residential, although there are some employment uses which whose developers will have to contribute to at least one cumulative impact scheme (with the lists of all potential link and junction-related schemes being also identified in the SPD). The SAP did not allocate any site specifically for health facilities as "providers plan for their own operating needs and local demand". Leeds Teaching Hospitals Response It should be accounted that the Trust is not a private / commercial organisation and therefore potential Highways Cumulative Impact contributions are unlikely to be justifiable.</p>	<p>alternative modes of transport to the private car.</p> <p>See section 6 of Part 4 to see how sanctions will be negotiated. No change.</p> <p>Any significant development will need to demonstrate this on its merits. No change.</p>
13	Natural England			Do not wish to make a comment	No change

Rep Ref	Representor Name	Agent	Document Ref	Summary of Comments	LCC Response
14	Nigel Jones			No comment	No change
15	Liam Bradley, Pell Frischmann			Shouldn't speed tables be routinely provided at pedestrian and cycle crossings of minor roads at junctions, along with coloured / textured surfacing, to formalise the priority given to pedestrians and cyclists in recent updates to the highway code? This is shown as being avoided Section 8 and Figure 27, whereas Figure 28 wrongly gives the impression of pedestrian priority at a through road crossing. Examples of such crossings are shown in LTN 1-20 Figures 10.6, 10.12 and 10.13	Reference to junction design in LTN 1/20 added. Figure 27 removed.
16	Walton & Co on behalf of Pickard Properties			<p>1. Introduction 1.1 This representation is submitted on behalf of Pickard Properties in relation to the Transport Supplementary Planning Document ("SPD") Pre-Adoption Consultation Draft.</p> <p>1.2 Leeds City Council ("the Council") published its Draft Transport SPD for consultation in January 2020. The Council are now consulting on the pre-adoption draft and anticipate that the SPD will be adopted in summer 2022.</p> <p>1.3 The purpose of the SPD is to assist with more targeted use of the current Adopted Core Strategy and Saved Policies, of 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.</p> <p>1.4 Once adopted the SPD will form part of the Leeds Development Plan and will superseded the following adopted SPDs: • Street Design Guide SPD (August 2009) • Parking SPD (January 2016) • Travel Plans SPD (February 2015); and • Public Transport Improvements and Developer Contributions (August 2008)</p> <p>1.5 In March 2019 the Council passed a motion to declare a Climate Emergency and called on the government for funding and powers to make Leeds Carbon Neutral by 2030. Paragraph 1.1.2 of the draft SPD states: "To achieve the necessary carbon reduction this Council is serious about promoting sustainable transport and travel across Leeds and making new developments "sustainable" in the broadest possible</p>	

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				<p>meaning of the word. Measures to reduce reliance on fossil fuels and promote cleaner electric vehicle technology are included.”</p> <p>1.6 The Council indicate that the SPD reflects the climate emergency by requiring: • Highway trees in new development • Reducing city centre parking standards for residential development • Incorporating a guidance note on electric vehicle charging points to supplement policy EN8 • Improved cycle infrastructure guidance</p> <p>2. Lawfulness as an SPD 2.1 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 a matter of law, not planning judgment¹. This is the case even where the document contains statements that might otherwise be included in an SPD or other local development document. In Skipton Properties² J Jay found: 75 "First, if the document at issue contains statements which fall within any of (i), (ii) or (iv) of regulation 5(1)(a), it is a DPD. This is so even if it contains statements which, taken individually, would constitute it an SPD or a residual LDD. This conclusion flows from the wording ‘one or more of the following’, notwithstanding the conjunction ‘and’ between (iii) and (iv).” 2.2 Pursuant to Regulation 5, a document which contains statements regarding: (i) The development and use of land which the local planning authority wants to encourage during any specified period; or (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> <p>3. Comments on the SPD 3.1 Notwithstanding the above, Part 3 – Parking, Table 3-17: Car Parking Guidelines is split in to core areas, fringe areas and elsewhere. The guidelines for the core</p>	<p>Council considers statements within SPD do not extend to those matters set out in Reg 5 2012/767 Regulations which require the document to be a DPD</p>

Rep Ref	Representor Name	Agent	Document Ref	Summary of Comments	LCC Response
				<p>area and the fringe area are expressed as a maximum number of spaces. The parking space guidelines for “elsewhere” are described as expected figures. 3.2 Part 3 – Guidelines for Allocation of General Parking Spaces states: “Outside the Core and Fringe areas of the City Centre, the guidelines define typical levels of parking, allowing for flexibility for reduced or increased parking dependent on the individual location, expected levels of car ownership, public transport accessibility, walking catchment, and specific end user. It should be noted that significant departures from these levels of parking may be accepted where clear and justifiable reasons can be demonstrated and that there will be no detrimental impact on surrounding streets.” 1 R (Skipton Properties) v Craven District Council [2017] EWHC 534 (Admin), paragraph 63, and R (Wakil) v Hammersmith and Fulham LBC [2012] EWHC 1411 (QB), paragraphs 81 and 82 2 R (Skipton Properties) v Craven District Council [2017] EWHC 534 (Admin) “Within the Core and Fringe, the guidelines are stated as the maximum that would be permissible. Accordingly, there is no expectation that a minimum level of spaces should be provided, as long as it can be demonstrated that this would not result in detrimental problems on the local highway.” 3.3 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 sites’ situation. In sustainable locations sustainable forms of transport should be encouraged above private car ownership.</p> <p>3.4 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</p>	<p>Tightened wording to support reductions in parking levels across the city.</p>

Rep Ref	Representor Name	Agent	Document Ref	Summary of Comments	LCC Response
				<p>more car parking which goes against the Leeds Carbon Neutral strategy.</p> <p>Where there is a problem with on-street parking the Council should use its powers to implement 'permit parking zones' for residents, the on- street parking issues are often caused by none residents parking on street as free commuter car parking. No minimum standard should therefore be required.</p> <p>3.5 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> <p>4. Suggested Amendments 4.1 The documents should be withdrawn as a draft SPD and subject to examination by the Secretary of State as a DPD. 4.2 Notwithstanding this, we consider that the Guidelines for Allocation of General Parking Spaces should be amended as follows: Outside the Core and Fringe areas of the City Centre, the guidelines define typical levels of parking, allowing for flexibility for reduced or increased parking dependent on the individual location, expected levels of car ownership, public transport accessibility, walking catchment, and specific end user. It should be noted that significant departures from these levels of parking may be accepted where clear and justifiable reasons can be demonstrated and that there will be no detrimental impact on surrounding streets. Within the Core and Fringe, the guidelines are stated as the maximum that would be permissible. Accordingly, there is no expectation requirement that a minimum level of spaces should be provided, as long as it can be demonstrated that this would not result in be detrimental problems on the local to highway safety. A lack of on street parking is specifically not a reason to require on site car parking. 4.3 In relation to table 3-17 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</p>	<p>LCC have a responsibility for network management and road safety. Aspirations for reduced parking are supported but need to acknowledge current issues. No change</p> <p>Resident permit parking supported in areas of all day high non resident demand where issues are likely to be experienced. Reference added in Part 3.</p> <p>No minimum standards – no change</p> <p>As above – no change</p>

Rep Ref	Representor Name	Agent	Document Ref	Summary of Comments	LCC Response
				<p>“maximum spaces” under “Elsewhere” as is the case with the Core and Fringe columns</p>	
17	P Ellis Rothwell Neighbourhood Forum and Carlton Village Neighbourhood Forum			<p>This is a response to the above consultation from both Rothwell Neighbourhood Forum and Carlton Village Neighbourhood Forum. Prior to making comment on the document it seems pertinent to mention that it is very substantial and detailed and is not configured in a manner that allows easy interpretation by the general public and indeed it is a good example of how to avoid community involvement rather than to encourage it. Recourse to some element of none or less technical format should have been exercised in order that the process was more inclusive and transparent and this would have better reflected the aspirations of the LCC Statement of Community Involvement. The document for the most part reads as a specification and unless one happens to have an intimate technical knowledge of street design for example it is difficult to make useful comment. However there are a number of issues which have been identified and these are as follows, generally ordered to reflect the structure of the document.</p> <p>Introduction The aims of the Transport Supplementary Planning Document are supported, but it is hoped that the requirements can be consistently and more rigidly applied than previous and perhaps more fragmented frameworks and guidance. The need for sustainability, forward thinking and whole life costing is paramount. Sustainable measures should not be dismissed on the basis of analysis that does not consider whole life implications. In short the criteria described allied to everything from aesthetics to low carbon design have great merit, but will only succeed if the criteria are applied and the resources are available in terms of managing and policing the process. Design Guidance Integration of new streets and trees On Page 35 it says, “All new housing layouts should be designed to maximise health and wellbeing in the design and layout. This should incorporate “Green Street” principles by encouraging integration of new street trees wherever possible on all street types”. There should be some expansion of the term “wherever possible”</p>	<p>Noted. Technical document.</p> <p>Support principle – no change</p>

Rep Ref	Representor Name	Agent	Document Ref	Summary of Comments	LCC Response
				<p>because on developments and proposed developments in our area, street trees appear to never even be considered usually on the basis of maintenance implications and yet “Green Street” principles maintain that these sorts of issues can be designed out. Clarity is needed to ensure these considerations are not summarily ignored.</p> <p>Street Hierarchy On page 39 in respect of the potential for “Rat Runs” it is stated that “appropriate measures” will be required to minimise the domination of the street by through traffic. It is thought more detail should be provided here in respect what to avoid and also the care that needs to be taken when a new development site is essentially an extension to an existing site and where a new carriageway becomes dominant and impacts on the existing site.</p> <p>Legislation and Policy - Design and Access Statements. It is felt that the criteria in respect of these statements need to be explicitly described as the quality of Design and Access Statements is extremely inconsistent at the present time and particularly in respect of more modest levels of development.</p> <p>Cycle Facilities</p> <p>The extent of provision for cycle facilities is generally supported. However a comment made within the introduction to the document (page 6) reiterates government policy in relation to car parking and says that unnecessary car usage should be managed “by locating new housing in locations which are accessible by public transport and have access to local facilities on foot and by bicycle”. What can be included in the document to ensure this governmental requirement is absolutely obligatory as recent development applications in our area appear to have ignored the whole concept of connectivity by foot or bicycle?</p> <p>Landscape and green Infrastructure Considerations within the Highway On page 101 it says good design begins with retention of valuable landscape and this is entirely correct. The fact that retention of mature trees do give immediate effect and provide better integration into a scheme’s setting is in no doubt as is the statement related to the generations it would take to replace</p>	<p>Added – layouts should support the principles of active travel neighbourhoods.</p> <p>Planning validation criteria – no change</p> <p>Allocated sites come through the local plan process. Updated guidance to officers. No change.</p> <p>Wider planning matter – no change</p>

Rep Ref	Representor Name	Agent	Document Ref	Summary of Comments	LCC Response
				<p>them notwithstanding their impact on carbon sequestration. However recent examples in our area suggest that these views are not presently being treated seriously and it is thought that if the document is going to mention such matters that it should contain much more rigid and obligatory requirements to ensure that mature trees on development sites are more rigidly protected i.e. that road systems and housing configuration are directed by the locations of such specimens and not the other way round resulting in unsatisfactory losses.</p> <p>Correctly the value of green infrastructure it is stated on page 103 with the example of hedges being a barrier to pollution etc., but there is also the issue of local green linkages to enhance bio-diversity credentials. Disparate planting schemes may assist in pollution protection and act as mechanisms to slow down traffic, but they are also the “highway” that potentially allows wildlife to migrate between different areas and this factor needs to be mentioned as a consideration.</p> <p>Verges Similarly on Page 104 where road verges are discussed there should at least be some consideration of bio-diversity in a paragraph dominated by mowing strips and dimensions</p> <p>Health and Wellbeing This section on page 105 extols the virtues of good landscape treatment and highlights how it can greatly contribute to physical and mental wellbeing. It cites advantages particularly with reference to trees, of masking noise levels, providing shade, reducing local wind speeds and reducing stress all of which is true, but another health and wellbeing aspect allied to landscape is related to the support of wildlife It is stated in for example Wildlife Trust’s literature that seeing birds and butterflies near homes reduces stress , fatigue anxiety and depression , and therefore it is felt this aspect should be included when referring to health and wellbeing. In other words the configuration of landscape design in new development needs to better recognise the impact of wildlife on mental health.</p> <p>Car Parking- Part 3 (Including Garages and Driveways - Part2) Car parking in “out of centre” developments is a significant issue and it is evident that in the past not enough account has been</p>	<p>Other planning policy relates – no change.</p> <p>Other planning policy relates – no change.</p> <p>Not supported – No change</p>

Rep Ref	Representor Name	Agent	Document Ref	Summary of Comments	LCC Response
				<p>taken of what could be described as sustainability issues. Dwellings need to be adaptable to meet the varying types of occupation resulting from the natural cycle of family life and this inevitably means an increase in car ownership. (Hopefully Climate change initiatives will reduce levels of car ownership, but that is by no means certain) On page 107 it is indicated that garages are not a reliable source for car parking provision and this issue is exacerbated by allowing developers to include integral garages in their housing designs making it much easier for them to be converted to living space. Developments should be encouraged to have separate garages and planning approval for conversion should factor in the parking predictions for particular locations. In Table 3.17 (Dwelling Houses) it is indicated that visitor parking is not appropriate in core areas and on page 107 it is stated that driveways shall preferably be sufficiently long for 1 or 2 cars and while agreeing that intermediate lengths of driveways are not appropriate (eg.1.5 cars),driveways should accommodate not less than three cars. The provision of inadequate lengths of driveways coupled with lack of visitor parking must surely result in an impact on the street scene and access, something that is all too obvious in recent developments in our area. In addition should a new development be adjacent a school then lack of adequate provision almost guarantees that access will be impeded and result in many of the unsatisfactory aspects that are outlined on page 118. It is crucial that if the above deficiencies are not treated seriously that the width of roads on developments is enhanced to not less than the wider of the considerations included in Table 2.2 (Type 1 Connector Streets)</p> <p>Complementary Forms of Transport Intervention Travel Plans The whole ethos of travel plans and what is proposed is fully supported, but again there is an issue of sustainability and future impact. Page181 says that a commitment must be made to undertake "annual monitoring within three months of the initial occupation and annually thereafter for a minimum of 5 years post full occupation" In our area a commercial development had</p>	<p>LCC works with new operators where issues are identified. No change</p>

Rep Ref	Representor Name	Agent	Document Ref	Summary of Comments	LCC Response
				<p>a Travel Plan, but eventually the way the buildings were being used including staffing levels changed dramatically resulting in issues such as remote and inappropriate parking and the original travel plan began to be irrelevant. It is thought that the issue is not time related but scope of use related and that it should be incumbent on those responsible that travel plans are adjusted to suit changes in the way buildings are used and operated and the 106 agreement process for funding adjusted accordingly.</p> <p>Highways Cumulative Impact Proposed approach On page 202 there is reference to cumulative impact contributions and having to meet the three legal tests for Section 106 contributions. It is further said that it is essential that the payments are necessary to make the development acceptable in planning terms are directly related to the development; and fairly and reasonably related in scale and kind to the development. This certainly should be true but recent development activity in our area shows a process that is markedly random and certainly not transparent resulting in agreements that have little obvious local connection and it is thought that a much more open and transparent methodology needs to be adopted when such agreements are configured (particularly as they are often associated with aspects that are fundamental to local communities).</p> <p>Materials and Construction Conservation Areas Page 224 indicates the care that needs to be adopted when development occurs in Conservation Areas and this is a laudable aim and is fully supported. However the way highways for example are maintained over time in these areas and the importance attached to the Conservation Areas by those involved in determining planning applications is not consistent with the views expressed within the SPD. Wording related to Conservation Areas needs to also account for on going maintenance.</p> <p>Adoption Procedures Utilities' Services On pages 231 to 234 there is much information about utility services and equipment allied to specific locations and for example avoidance of impact in conservation areas. In the light of recent works to install fibre</p>	<p>Part 5 sets out the congestion hotspot junctions and the sites expected to fund mitigation. LCC Highways comments are made available on the planning portal. No change.</p> <p>LCC Highways Policy covers this point. No change.</p> <p>This SPD relates to new development rather than retrofit.</p>

Rep Ref	Representor Name	Agent	Document Ref	Summary of Comments	LCC Response
				cables in many parts of Leeds and the resultant aesthetic turmoil, or as page 236 describes in the context of services and trees, “Unco-ordinated spatial chaos of individual trenches”, it would seem prudent to refer to this specific utility installation. In our area whether the location was in a Conservation Area (or not) made little difference and the aesthetic impact was considerable in respect of the public highways. Planted Areas The use of common utility enclosures in respect of new development is supported and such provision in existing locations should not automatically be dismissed from consideration on the basis of cost, both from the perspective tree protection and also to avoid the issues described under utilities’ services.	Utilities works are managed by NRASWA team and are subject to permits.
18	Sue Howard			My only comment is regarding the SIZE of the standard parking space. It has remained at 4.8 x 2.4m since I can remember being in the planning profession, since 19 90 at least. We all know cars have got much bigger since then. Is this to be yet another missed opportunity to increase the size of spaces? I see electric charging point spaces are proposed 2.6m wide, but these will be relatively few compared to standard spaces. See Communal Parking pg 139.	This is a minimum requirement meets national practice. Some flexibility for residential buffers is included in SPD. Don’t want more unnecessary tarmac! No change. Policy EN8 requires 100% EV provision for residential parking spaces.
19	Coal Authority			It is noted however that this current consultation relates to a Transport SPD and I can confirm that the Planning team at the Coal Authority have no specific comments to make on this document.	Noted. No change.
20	Town Centre Securities			TCS are a key investor in Leeds City Centre, with 60% of its diverse commercial land holdings in the City, including: • Merrion Estate – 1,000,000 square feet of retail, leisure, hotel, carparking and offices; • Clarence Dock car park; • Retail and residential mixed-use blocks on Vicar Lane, Eastgate and Harewood Street and Central Road; • Retail and leisure and offices at 123 Albion Street; and • Whitehall Riverside - land with planning permission (Ref: 13/02619/OT) for offices and multi-storey car park, and separate temporary planning permission (Ref: 17/01491/FU) for long stay, commuter car parking.	

Rep Ref	Representor Name	Agent	Document Ref	Summary of Comments	LCC Response
				<p>TCS's landholdings in Leeds City Centre include the following three car parks, which are operated by CitiPark and provide commuter, as well as short/medium stay parking:</p> <ul style="list-style-type: none"> • Merrion Centre and First Direct Arena; • Whitehall Road; and • Clarence Dock. <p>CitiPark adopt technology as a point of difference in its business, whether that be car parking, EV charging or energy production. The CitiCharge initiative aims to introduce generic electric charging across all of their car parks and beyond. The first 50kW rapid charger was installed in the Merrion Centre car park, the first of its kind in central Leeds. The CitiCharge business is developing plans to offer EV charging capability as a B2B and B2C service in the parking, retail and commercial sectors. CitiPark is currently trialling an emission based parking tariff in one of its London car parks, which if successful will be rolled out across the network. They have three solar farms on their Leeds and Manchester car parks. CitiPark's environmental integrity in the way they operate their car parks is well recognised, and they were awarded 'Go Ultra Low' company status in December 2017. In view of their City centre commercial and car parking estate, TCS have a vested interest in the policies that affect the City Centre function, as well as its vitality and viability. TCS are therefore interested in LCC's Transport SPD, and notably the approach to car parking in the City Centre. On this basis TCS submitted representations on the first consultation for the Transport SPD in a letter dated 17th February 2020 prepared by Quod. In 2020 TCS commissioned Optima and Quod to undertake studies on the car parking needs and economic impacts of commuter car parking on the City Centre. This work culminated in the production of the following two documents, both of which were shared with LCC in May 2020: • 'Long Stay Parking Study' dated 5th May 2020 prepared by Optima; and • 'Economic Growth Report' dated May 2020 prepared by Quod. The key findings of the documents are:</p>	

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				<p>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 coming years;</p> <p>2. Modal split data demonstrates that public transport accessibility into Leeds has “flatlined”, despite recent public transport infrastructure interventions;</p> <p>3. Car modal split has reduced slightly, although there has been no discernible reduction in transferring commuters out of their cars onto other modes;</p> <p>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;</p> <p>5. Given the number of vehicles coming into Leeds has changed very little, this suggests there is an ongoing demand for parking spaces;</p> <p>6. Leeds’ economy grew by 35% and is forecast to growth by a further 21% over the next decade;</p> <p>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 –to 16,700 new FTE jobs in the City Centre;</p> <p>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 to 29,000 new jobs.</p> <p>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 matched by the provision of commuter car parking, which is in fast decline. Considering these findings, 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 and as stated in the original 17/2/20 Quod letter, it was notable that the majority of the car parking aspects of the initial draft 2020 SPD simply carried over the text of LCC’s previous Parking SPD (January 2016). Disappointingly, this still remains the case in the March 2022 SPD and therefore the parking policies of the emerging pre-adoption Transport SPD are unchanged from six years ago</p>	<p>Studies pre-date the changes in transport during and post pandemic and need verification. The Connecting Leeds Transport Strategy was adopted in October 2021 and aims to impact on these forecasts.</p>

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				<p>and notably there is no objective update to that policy, nor any evidence to reflect changing circumstances.</p> <p>The Transport SPD remains 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 500 spaces, and strategic car parking needed to serve the Holbeck area. Both of these are again simply carried over from the original 2016 Parking SPD.</p> <p>It was suggested in Quod's 17/2/20 representations letter that commuter parking needs should be reviewed sooner than 2022 (as was stated in the first 2020 draft of the SPD with regard to the temporary use of cleared development sites for parking). The current pre-adoption draft of the SPD is still suggesting a 2022 review. TCS therefore re-iterates 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 - this work should be carried out alongside an understanding of the impact of any recent and future public transport infrastructure interventions. This 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 (NPPF para 35 refers). In the 17/2/20 Quod letter TCS also recommended "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> <p>In the WSP Consultation Response report (page 47 of 49), it is stated that the above recommendation is not accepted and no</p>	<p>LCC's Transport Strategy is clear that city centre commuter car parking needs to reduce to support more sustainable transport modes including rail, bus (including park and ride), cycling and walking to support all 3 pillars of the Best Council Plan. No change.</p> <p>This review only relates to the cleared site commuter car parking policy. No change.</p> <p>Referred to LCC Transport Strategy – 25/5/22</p>

Rep Ref	Representor Name	Agent	Document Ref	Summary of Comments	LCC Response
				<p>changes are required. WSP does however state that “However, it is noted that LCC should a [sic] policy / position to find a suitable balance on car parking stock in the city centre without hindering the economy.” This statement has not found its way into any changes in the SPD itself though. Therefore whilst the Council’s advisors (WSP) acknowledge the point on a balance being required on car parking stock so as to not hinder the economy, unfortunately there appears to be no stated mechanism (in the Transport SPD or by reference to other means) with which to do this.</p> <p>TCS strongly re-iterates and recommends that such a balance must be found because restraining commuter parking to inappropriate levels will have an adverse impact on business and the overall economy of the City. TCS would welcome the opportunity of discussing the above representations with LCC with a view to establishing a car park policy that supports an appropriate level of commuter car parking which adopts sustainable technologies.</p>	
21	Johnson Mowatt – Various Clients			<p>1.0 INTRODUCTION</p> <p>1.1 This response has been prepared on behalf of a number of housing development industry clients actively operating in the Leeds District. This joint submission has been prepared with input from Optima, on behalf of the following companies: Avant Homes Barratt David Wilson Homes Bellway Homes Miller Homes Persimmon Homes Redrow Homes Taylor Wimpey</p> <p>1.2 Johnson Mowat has, and continues to, represent all of the above-named companies during the Core Strategy, Core Strategy Selective Review preparation and examination process, and individually during the Site Allocations Plan (SAP) preparation and examination process. Likewise, Optima Highways and Transportation Consultancy Ltd (Optima) has and continues to provide highways expertise for a number of the above-named companies in past and ongoing development projects in the District.</p> <p>1.3 A thorough review of the LCC Transport SPD Consultation (Transport SPD) has been undertaken including a comparison with the initial 2020 consultation draft and an assessment of the</p>	

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				<p>changes and justification for the changes (or lack of changes) against our previous consultation response. This response provides a detailed analysis of the Transport SPD broken down into the four component parts (Street Design Guidance; Parking; Travel Plans; and Highways Cumulative Impact), highlighting continued concerns and issues of the development industry, using site specific examples, where appropriate.</p> <p>1.4 Throughout Section 2 of this response, recommendations are made of how the Transport SPD could be amended to ensure compliance with National Policy, and the successful and achievable delivery of the aims of creating excellent new places for people to live, work and play. Where our recommendations to the initial consultation draft have not been taken on board, and where relevant, our previous recommendations are repeated.</p> <p>Response to Leeds Transport SPD Second Consultation Draft 7</p> <p>1.5 From an administrative stance, the updated consultation draft has removed all paragraph numbers from the document. Given the length of the SPD (271 pages excluding Appendices, glossary and acknowledgements) and the future reference to specific parts of the SPD in Reports, it would be helpful if the SPD could include paragraph numbers within each section for ease of navigation and potentially any closer scrutiny via planning inquiries at a later date.</p> <p>1.6 It is welcomed that two of our previous recommendations have been accepted relating to the inclusion of an 'external distributor road' within the definitions and standards, and the amendment of Type 3 streets to have traffic flows of no more than 100 two-way vehicular movements.</p> <p>1.7 Whilst the minor changes are welcomed, the majority of our recommendations have not been accepted, the reasons for which on a number of occasions is explained by WSP as being "because LCC have requested such specifications." This is not considered to be a wellreasoned, or justified explanation. Further detail on this point is explained in section 2 of this response.</p> <p>Response to Leeds Transport SPD Second Consultation Draft 8</p> <p>2.0 TRANSPORT SPD RESPONSE</p> <p>2.1 Comparison with Initial Consultation Draft SPD</p>	

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				<p>2.1.1 Optima has undertaken a thorough review of the WSP Leeds Transport SPD – Consultation Report and the Second Draft Transport SPD to ascertain if the representations made to the Initial Draft Transport SPD have been considered and led to changes to the SPD.</p> <p>2.1.2 Whilst several of the recommendations for changes to the Initial Draft Transport SPD have been taken on board and resulted in changes, there are still key matters for concern remaining and these are brought out in the sections below and recommendations are provided in bold type.</p> <p>2.1.3 This response concentrates on the key matters for concern identified in relation to the Initial Draft Transport SPD. 2.2 Concerns with Second Draft Transport SPD</p> <p>2.2.1 Whilst it was identified at the first consultation that there needed to be some further work done on the formatting of the Transport SPD as both section numbers and paragraph numbers were repeated across each of the parts it is now noted that all paragraph numbers have been removed.</p> <p>2.2.2 As is good practice, it is recommended that the SPD is reformatted to provide paragraph numbers. This will also enable it to be more easily referenced in technical work produced to accompany planning applications and appeals.</p> <p>Part 2 – Street Design Guidance 2.2.3 Page 38 of 280 of the Second Draft Transport SPD contains Definitions and Standards (of Roads) and it is noted and welcomed that the term ‘External Distributor Road’ has been introduced in line with the recommendation made during the first consultation. Response to Leeds Transport SPD Second Consultation Draft 9</p> <p>2.2.4 Table 2-4 (page 49 of 281) provides the parameters for a Shared Surface Street and it is noted and welcomed that the recommendation made during the first consultation has been accepted and the table now states that “Type 3 streets should have traffic flows of no more than 100 twoway vehicular movements per hour (peak)”.</p> <p>2.2.5 There were two main issues identified during the first consultation with the guidance contained at Part 2 of the Initial Draft Transport SPD. The first issue related to it being more</p>	<p>To be re-formatted prior to publication</p> <p>Comments considered but not accepted – no change</p>

Rep Ref	Representor Name	Agent	Document Ref	Summary of Comments	LCC Response
				<p>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. It is noted that none of our recommendations made on these issues have been accepted.</p> <p>2.2.6 In relation to the number of vehicular access points that are preferred/required, WSP states in its Leeds Transport SPD – Consultation Report that the word ‘preferred’ is used and therefore this is not prescriptive and site specific circumstances will dictate this in practice.</p> <p>2.2.7 Experience demonstrates that much reliance is put on the requirements of an SPD when LCC is considering planning applications and development proposals. It is recommended that the Transport SPD specifically recognises that site specific circumstances will dictate the number of accesses that, in practice, can be provided and that this will be taken into account when considering planning applications and development proposals.</p> <p>2.2.8 From consideration of the WSP Leeds Transport SPD – Consultation Report, it appears to be the case that WSP was responsible for the drafting of the Initial Draft Transport SPD. In relation to all recommendations regarding road space requirements, WSP’s response is that “The new widths for carriageways have been requested by LCC.” No detailed justification is given to the adoption of increased road space requirements in the Transport SPD over and above those contained within the Street Design Guide SPD.</p> <p>2.2.9 Therefore no further evidence has been provided to back up the need for this enhanced requirement for a Type 1: Connector Street, which is in excess of what is recommended in MfS. MfS 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 Response to Leeds Transport SPD Second Consultation Draft 10 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</p>	<p>Preferred is not prescriptive, we can not identify all circumstances that would lead to this not being an issue – no change</p> <p>Practice and use has lead to current width requirements. No change</p> <p>Practice and use has lead to current width requirements. No change</p>

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				<p>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.</p> <p>2.2.10 No clear evidence has been provided in relation to the enhanced requirements for Type 2 and 3 Streets. 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 continues to be based on that contained in the Street Design Guide SPD i.e. 4.8m.</p> <p>2.2.11 The Second Draft Transport SPD has introduced the requirement to provide segregated provision for cyclists on Type 1 – Connector Streets with no option for shared facilities. Whilst a Type 1 Street can serve up to 700 dwellings, these are often used as the principal access into developments with far fewer dwellings.</p> <p>2.2.12 Section 9 of the Second Draft Transport SPD deals with Cycle Facilities (page 92 of 281) and states that “In quiet residential streets, most people will be comfortable cycling on the carriageway even though they will be passed by the occasional car moving at low speeds.” In many locations, even if a Type 1 Street is provided, there will be no requirement for segregated provision for cyclists. It is recommended that the requirement to provide segregated provision for cyclists on all Type 1 Streets is removed and shared provision is retained as an option with a minimum width of 3.0m.</p>	<p>Practice and use has lead to current width requirements. 4.8m does not allow on-street parking to occur therefore pavement parking is a significant issue where streets are this narrow. No change</p> <p>Introduced to comply with LTN 1/20 – shared provision should be a last resort.</p>

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				<p>Response to Leeds Transport SPD Second Consultation Draft 11</p> <p>2.2.13 It is noted that the previous recommendation to remove the maximum length for a cul-de-sac has not been accepted with WSP stating that “No change required. This comment will be dictated by the number of dwellings proposed.” This does not take account of certain sitespecific constraints that may be encountered and therefore the recommendation remains. It is recommended that there is no maximum length for a cul-de-sac stated within the Transport SPD.</p> <p>2.2.14 The previous recommendation on the use of verges containing trees being considered on a site-by-site basis has not been accepted and WSP’s Consultation Response simply states that “No change required. LCC promote [sic] the West Yorkshire Combined Authority’s “Green Street” guidance.”. There is nothing to suggest within the ‘Green Street’ guidance that the provision necessarily needs to be wholly within adopted highway and, in fact, WYCA’s document ‘Green Streets Principles for the West Yorkshire Transport Fund’ states at paragraph 1.11 that “Each project is unique and the opportunities for green blue infrastructure will vary considerably. In some circumstances, the wider corridor may offer mitigation opportunities that the immediate transport corridor itself can’t offer.”</p> <p>2.2.15 There are alternatives to creating green streets which include trees planted in land managed by the on-site greenspace agreement. This would provide for better trees that are at less risk than those in the verge. This text requires a more flexible approach to achieve better outcomes. 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.</p> <p>2.2.16 The previous consultation response covered the issue of junctions and visibility and the circumstances where the visibilities based on MfS are applicable. It was recommended that the criterion that a route is not a Distributor Road or Strategic Route be removed from the list of when MfS visibility requirements apply and that the map at Appendix D was also not required.</p>	<p>Long culs-de-sacs offer poor solutions for residential developments and LCC wish to limit this impact. No change.</p> <p>This is an initiative to increase the number of street trees and general trees to address the climate emergency declared by Leeds City Council. No change.</p> <p>Appendix D is being amended to remove secondary distributor roads</p>

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				<p>2.2.17 In its consultation response, WSP appears to accept this recommendation but states that “WSP recommend [sic] that the values contained at paragraph 5.2.11 are updated. Although, the map at Appendix D is still required.” Response to Leeds Transport SPD Second Consultation Draft 12</p> <p>2.2.18 The values contained at paragraph 5.2.11 remain unchanged in Table 2-10: Visibilities Derived From “Manual for Streets” and this was not the subject of the original recommendation (note also that the Second Consultation draft retains references to paragraph numbers that have since been removed). The original recommendation therefore still stands. It is recommended that the criterion that a route is not a Distributor Road or Strategic Route be removed from the list of when MfS visibility requirements apply (page 67 of 281). The map at Appendix C is also not required.</p> <p>2.2.19 The requirement for a minimum clear opening of 2.6m at a garage door was questioned with a recommendation that a minimum width of 2.4m is retained in the Transport SPD (carried forward from the Street Design Guide SPD). This recommendation was not accepted and there is no other justification from WSP apart from “The minimum clear opening of 2.6m has been requested by LCC.”</p> <p>2.2.20 As was set out in the previous consultation response, 2.4m is in line with a design 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.</p> <p>Part 3 – Parking Section 3 – Electric Vehicle Charging Points</p> <p>2.2.21 Previous comments relating to the initial draft remain valid. There is continued objection to the onerous ‘one EVCP per parking space’ requirement, when it is considered appropriate to require one EVCP per dwelling, which is the requirement for the majority of authorities.</p> <p>2.2.22 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</p>	<p>Removed criterion. Map amended and referenced under movement/place function</p> <p>2.6m widths are available as standard. No change.</p>

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				<p>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. Response to Leeds Transport SPD Second Consultation Draft 13</p> <p>2.2.23 The consultation Draft SPD continues to include a table (Table 3-20) which includes a 32 Amp Charge Point for residential developments. Our recommendation to reduce this to a 16 AMP per space has not been considered.</p> <p>2.2.24 There is no up to date viability information, or infrastructure considerations despite our previous comments. It has been established that at the Core Strategy Review Examination, LCC officers informed that the viability report £100 costings of EVCP were based on the lower amp socket, and one charge point per dwelling. The viability information has not been updated.</p> <p>2.2.25 The change to include reference to 'load balancing' for residential charge points is welcomed, which allows a supply of 16 amps per space to be acceptable, and therefore will allow for a 32 amp charge per dwelling (assuming two parking spaces and therefore two charge points are required). This change however is not reflected in Table 3-20, which continues to include a 32 Amp Charge Point per space.</p> <p>2.2.26 Concerns regarding EVCP for visitor spaces on residential schemes (at a ratio of 1 charge point per 10 visitor spaces) remain unanswered and there have been no changes to the SPD. In the main, visitor spaces within residential development are provided on-street, within adopted highway, either informally where carriageway 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.</p> <p>2.2.27 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</p>	<p>Comment passed to planning policy. No change</p> <p>The reduction for load balancing does not apply to single spaces, therefore the table in 3-20 is correct – no change.</p> <p>Detail to be agreed through S38 adoption on a case by case basis. LCC are pursuing a provider for on-street EV charging hub provision. No change</p> <p>No change supported</p>

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				<p>cost of a 32 Amp EV outlet is more than double that of a 13 Amp EV outlet. Given the current energy crisis that the Country is in, it is important that overly onerous EVDP requirements are not imposed, causing unnecessary additional cost to residents and the development industry. It is recommended that Table 3-20 is amended for residential schemes to account for the inclusion of load balancing. Housebuilders have been successfully providing EVCP's on residential schemes since the adoption of Policy EN8, and the Council have accepted the equivalent of a 32Amp charge per dwelling rather than per space. This acceptance needs to continue, and not be altered by the adoption of the Transport SPD.</p> <p>Table 3-20 therefore needs amending to either refer to a 16 Amp charge point per space, or an Response to Leeds Transport SPD Second Consultation Draft 14 overall 32 Amp charge point per dwelling. Suggested alternative wording is set out below. Use Class 13–16amp (Standard) Charge Points 32amp (Fast) Charge Points Rapid Charge (minimum 50kW) Residential 1 per parking space* 1 per 10 visitor spaces Equivalent of 1 32 Amp charge point per dwelling (load balancing system will allow a supply of 16 amp per space) - * the provision requirements would be changed if the Core Strategy is amended.</p> <p>Part 4 – Travel Plans</p> <p>2.2.28 The previous response included a recommendation that Residential Travel Plans are monitored only until full occupation or for one year post occupation for smaller developments (less than 200 dwellings). WSP does not accept this recommendation stating that “There is a charge paid to the Council to monitor this.” This does not cover the point that was being made, that it was a very onerous requirement 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. However, the requirement to monitor for at least five years post occupation is no longer contained within the Second Draft Transport SPD and the omission is welcomed.</p> <p>Part 5 – Highways Cumulative Impact</p>	<p>This is still a requirement in the draft SPD No change</p>

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				<p>2.2.29 Various observations and recommendations were made in relation to highways cumulative impact, all of which appear to have been accepted by WSP with a response of “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.”</p> <p>2.2.30 These recommendations and WSP’s acceptance of them, do not however appear to have been reflected in the Second Draft Transport SPD.</p> <p>Response to Leeds Transport SPD Second Consultation Draft 15 It is recommended that LCC carries out the review of the proposed Highway Cumulative Impact assessment and refines the mechanism for introducing a levy prior to any adoption of the Transport SPD. The mechanism for introducing a levy should be the subject of appropriate consultation.</p>	<p>LCC reviewed the mechanism post first consultation, minor changes made to reflect current local plan and SAP, no substantive change to methodology. No change.</p>
22	Via Solutions			<p>Many thanks for allowing us to make further comments on the above document (2022 draft). We have reviewed the Transport SPD Consultation Report prepared by WSP. From this, we have found the explanation made against the comments we made on the 2020 draft and created the attached tracker document which will hopefully aid review. We have modified our 2020 submitted document to do this. To assist we have added the page numbers from the 2022 draft (in red text) against the references from the 2020 one and then added to the right, the WSP explanation column and a further column for our further comments. We have generally made further comments on those items we raised in 2020 where WSP gave a negative response, but there are several positive ones which we have had to comment on as the action has not been implemented and we have questioned this. The absence of paragraph annotation in much of the 2022 draft does not aid further review or referencing either now or in the future (such annotation is often used by Council officers and ourselves when making opinions on proposals in documents / reports) – it is hoped this will be rectified in the final version. We also note in much of the 2022 text there are still references to the paragraph annotation in the 2020 draft but no such</p>	<p>Final document to be re-formatted to include paragraph numbers</p>

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				<p>annotation now exists so all very confusing. These should either be removed or updated to the new paragraph references (if any).</p> <p>LCC still insist on requiring DMRB to be used on certain Secondary Distributor Routes based on outdated definition. The designation of particularly the secondary distributor (blue) routes historically was related to whether they were a gritting route / winter maintenance hierarchy and not related to their usage per say. For example, many of such routes in the south east of the District carry less than 5000 vehicles per day and so are lightly trafficked. This whole approach is too simplistic and in dire need of review.</p> <p>The wording is likely to lead to overly prescriptive road designs with no design variation to suit topographic or environmental Circumstances</p> <p>We have already had 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”</p> <p>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 MfS2 refers) otherwise excessive.</p> <p>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</p> <p>The table for Type 4 Streets increases the minimum carriageway width from 3.1m to 3.3m – why?</p> <p>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</p> <p>Current guide requires 4.8m width for first 10m so why the increase to 5.5m – this is excessive for low key / small scale developments.</p>	<p>Removed requirement related to strategic and distributor roads. Map retained and amended to remove secondary distributor roads.</p> <p>Non standard layouts accepted subject to agreement and RSA. No change</p> <p>Removal of “to be acceptable for adoption...”</p> <p>Visibility re HGV/buses – no change</p> <p>Shared space min width relates to: 5.5m c’way + 2m pedestrian route + 0.6m hard margin = 8.1m. No change</p> <p>3.3m road width - MfS p80 – Widths between 2.75 and 3.25m should be avoided in most cases...</p> <p>Home Zones – comment added back in to table re excessive forward visibilities</p> <p>Amended private drive to 4.8m subject to 2 way passing (tracking).</p>

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				<p>Also to ask for pedestrian / cycle linkages may not be practicable</p> <p>P59-60. 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. The useful guidance on widths of 4.8m and 4.1m appears to have been removed – why?</p> <p>The previous response misses the point and makes no account of the comments in MfS2 on the use of MfS in preference to DMRB...The word “rural” only appears in the SPD when it quotes MfS2 to be used in urban and rural situations (page 14) and nowhere else this leading officers and practitioners to think the SPD does not apply on more rural low speed roads (whereas MfS does). It refers to MfS 1 and 2 but then takes the default attitude of using DMRB where it considers MfS does not apply - this is a flawed and backward approach and not in accordance with MfS2</p> <p>Page 80 – “the full forward visibility for the appropriate design speed should still be provided”. A bend with a centre line radius of say 10m would result in an average speed of circa 10mph and a design speed on the bend of circa 12mph not 19mph which is what 23m equates to. So the guidance still asks for full forward visibility even around a bend which limits speed to much lower levels. This should be reviewed and amended. How can you consult under the Highways (Road Humps) Regulations 1999 (see page 80) when dwellings are not sold / occupied? Needs clarification or if not part of the SPD, be removed.</p>	<p>Good practice, supporting Transport Strategy and other policies- no change.</p> <p>Industrial turning head locations to be reviewed</p> <p>Practice and use has led to current width requirements. 4.8m does not allow on-street parking to occur therefore pavement parking is a significant issue where streets are this narrow. No change</p> <p>DMRB adopted where appropriate on LCC network</p> <p>Full forward visibility for appropriate design speed required at bends. No change</p> <p>Removed reference to road hump regulations 1999.</p>

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				<p>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 P128-123. One use is still missing namely assisted care / sheltered type residential accommodation.</p> <p>Table 3.20 still shows 1 charging point per residential parking space – whilst this might be reasonable for parking for apartments, this is totally unrealistic for a housing development for same reasons as our earlier comment – this should be amended. Ditto for visitor spaces on an estate.</p> <p>RTPF- It is not clear whether this has been reviewed in the new draft.</p> <p>Cumulative Impact- This section appears to be the same as the 2020 draft? Therefore, our previous comments still apply. In addition, in the light of the effect of the pandemic on peak hour flows and journeys to work, the whole concept of these contributions and the need for the same should be reviewed to determine whether they are still required.</p> <p>Elsewhere in the WSP document reference is made to the application of stopping sight distances (SSD) and visibility splays. Other parties pointed out that in fact Manual for Streets indicates that the Y- distance part of the visibility splay need only be equal to the SSD and not to the SSD + 2.4m bonnet length. This was endorsed by WSP in their explanation but clearly when you now look at Table 2-10 on page 71 of the 2022 draft the bonnet length has been added which is contrary to Manual for Streets guidance – can a reason for this be supplied please? We would hope that this consultation process is not the end of the matter and further dialogue with interested parties will be forthcoming</p>	<p>Maps still considered appropriate- no change.</p> <p>Sheltered accommodation covered by general residential. EVCP as per core strategy EN8 – no change</p> <p>RTPF wording updated</p> <p>Cumulative Impact Methodology reviewed – no change</p> <p>MfS Para 7.6.4 states that for shorter stopping distances it is recommended that the bonnet length is included. Y distances are in this table have not changed from Street design Guide. No change.</p>
23	West Yorkshire Combined Authority			<p>Thank you for sharing the Leeds Transport Supplementary Planning Document with us. As the statutory transport authority for the region, we ask to be involved in the final preparation of document please to ensure consistency of guidance, particularly the implications for street design for public transport users.</p>	

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				<p>As a compendium of policies, we support the ambition of Leeds City Council as Highway Authority to create excellent new places for people to live, work and play which are designed to promote healthy active lifestyles and understand the purpose of this updated Transport Supplementary Planning Document (SPD) is to achieve this aim in practice.</p> <p>In practical terms we would suggest creating a more succinct and easily navigable document or several 'guides' that may support its application and assist those looking to apply the policies within.</p> <p>We would also like to better understand how far the SPD will contribute towards the ambition of being net zero. There is still an emphasis on car as the primary means of transport within the SPD. The Combined Authority set a for becoming net zero carbon by 2038, with significant progress by 2030; the Carbon Emission Reduction Pathway (CERP) study commissioned to develop our actions to meet these ambitions identified transport as the largest emitting sector, particularly relating to road transport, resulting in a need to innovate technology and reduce car journeys through modal shift.</p> <p>The policies within the Leeds Transport SPD need to recognise the magnitude of these challenges and reflect the need to significantly reduce private car reliance, as well as support technological advances such as increasing the rate of electric vehicle uptake through more ambition requirements for new development. Further specific comments on individual policies will follow, although we recognise this is beyond the consultation deadline.</p>	<p>Formatting to be reviewed to make document easily navigable.</p> <p>Amplifies Local Plan Policies in relation to sustainable travel.</p> <p>Transport SPD amplifies existing policy – does not set new policies. Wording changes have been made to prioritise NMU and public transport use. Guidance needs to cover car use too.</p> <p>No change.</p>
24	Systra on behalf of National Highways, Simon Jones			<p>A summary of the previous response (where relevant), along with the JSJV's review of the revised Transport SPD and the Consultation Statement is below.</p> <p>Consultation Statement</p> <p>The Consultation Statement, written by WSP and available as part of the new consultation, provides details on all responses received on the initial draft Transport SPD.</p>	

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				<p>National Highways' comments (along with all other consultees) are listed in a table at the end. The table has columns on whether action is required with a Yes / No answer, and then a column with comments on (provided by WSP). All of National Highways' comments are listed as requiring no action, other than the comment relating to highways cumulative impact. The comment by WSP reads "<i>LCC to review the proposed Highways Cumulative Impact assessment in the 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).</i>"</p> <p>The JSJV would comment that, upon review of the revised Transport SPD, no change has been made to the text relating to highways cumulative impact. The JSJV would therefore suggest that further comments (below) relating to this section of the Transport SPD are necessary and justified.</p> <p>Part 1 - Introduction</p> <p>Under the Local Policy Legislation and Policy subheading, the revised Transport SPD references the Leeds Core Strategy where "Leeds City Council will actively pursue the implementation of a number of bus-based Park and Ride sites at the outer ring road and close to the motorways, to create extra capacity for parking with reduced congestion impacts. Rail based Park and Ride will also be supported and actively pursued". JSJV would comment that whilst bus-based Park and Ride sites at the outer ring road and close to the motorways, will create extra capacity for parking and <i>potentially</i> reduced congestion impacts on the local road network, the same is not necessarily true for the SRN. Indeed, pre-pandemic, the Temple Green Park and Ride site was an influence in congestion blocking back to the M1 at junction 45 in the morning peak period.</p> <p>Of particular note is the reference to Policy T2: Accessibility Requirements and New Development. This policy within the Core</p>	

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				<p>Strategy asks readers to see Appendix 3 which has specific accessibility standards to be used across Leeds. Policy T2 of the Core Strategy is further described in Section 10 of the revised Transport SPD where guidance is given on what constitutes an adequate public transport service.</p> <p>Similar references to Policy T2 were included in the initial draft Transport SPD, albeit under different paragraph references.</p> <p>National Highways did not previously comment on this section. However, since February 2020, Leeds City Council has adopted the Connecting Leeds Transport Strategy which sets a vision for Leeds to become a city “where you don’t need a car, where everyone has an affordable zero carbon choice in how they travel”. We are wholly supportive of this vision. National Highways has also recently published ‘Net zero highways: our 2030 / 2040 / 2050 plan.’ The document covers National Highways’ commitment to developing and implementing a programme to improve public transport operations on the SRN, promotion of walking and cycling and measures to reduce the need to travel.</p> <p>JSJV would suggest that these documents, along with National Highways’ commitment to cut emissions from the SRN prompt comments on this section and the accessibility standards within Appendix 3 of the Core Strategy.</p> <p>This is also the reason behind further comments on Travel Plans below.</p> <p>JSJV would note that this consultation relates to the Transport SPD only and that the Core Strategy is an adopted document.</p> <p>As noted above, since the original consultation on the SPD (and indeed the Core Strategy), LCC has adopted their Connecting Leeds Transport Strategy and in the introduction to the SPD, it is stated that “to achieve the necessary carbon reduction this Council is serious about promoting sustainable transport and travel across Leeds and making new developments</p>	

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				<p>“sustainable” in the broadest possible meaning of the word”. However, for industrial and distribution / warehousing development in the main urban area, the accessibility standards only require development to be located within a 10-minute walk of a bus stop (presumably with any service frequency). This contrasts with a requirement for offices to be located within a 5 minute walk of a bus stop with 15 minute service frequency. It is unclear why people in different jobs would be expected to accept a lower standard of public transport provision. In addition, this policy position for industrial and distribution / warehousing development in the main urban area would appear to be at odds with the new transport strategy vision and in achieving net zero through the promotion of sustainable transport. It is a particular concern for National Highways given that industrial and distribution / warehousing development is often located adjacent to the SRN and this policy position would appear to build in car dependency at these sites in the Plan period. JSJV also notes that there do not appear to be any minimum standards for cycling (for example proximity to a segregated or traffic-free route) and that this could be considered, particularly to improve access to industrial sites.</p> <p><u>JSJV would suggest that accessibility standards should be the same for all employment uses within the main urban area to ensure that there is an affordable zero carbon choice (in accordance with the Leeds Transport Strategy) for all development types which are adjacent to the SRN.</u></p> <p>As noted above, the revised Transport SPD will supersede the Public Transport Improvements and Developer Contributions (August 2008). This 2008 document set out:</p> <ul style="list-style-type: none"> • When an application for new development in Leeds will be required to make a contribution toward public transport improvements or enhancements • What type and level of contribution will be required 	<p>The Transport SPD does not set the core strategy accessibility standards. This comment will be passed to Planning Policy for consideration as part of the Local Plan Review. No change</p>

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				<ul style="list-style-type: none"> • What legal and financial procedures will be in place to regulate the contributions made • The range of public transport infrastructure improvements and enhancements for which contributions will be used <p>The document states that developments which have a significant local travel impact will be subject to requiring a contribution towards public transport enhancement schemes. Section 5.2 sets out the methodology which should be used to calculate the necessary contribution.</p> <p><u>JSJV would comment that public transport improvements and developer contributions are no longer included in the Transport SPD. This is a concern for National Highways as the removal of this funding requirement may lead to developers not funding public transport improvements. Similarly, to above, this could increase the likelihood of car dependency at development sites. The removal of this requirement also conflicts with the vision for the new transport strategy. JSJV would suggest National Highways request for guidance on public transport improvements and developer contributions to remain in the Transport SPD or for a replacement approach to be included.</u></p> <p>Part 2 – Street Design Guidance</p> <p>This section relates to street design parameters and therefore is not relevant to National Highways.</p> <p>Part 3 – Parking</p> <p>Previous Response</p> <p>As noted above, the JSJV reviewed the initial draft Transport SPD in February 2020. A summary of the findings is provided below.</p> <p>Car Parking – Park and Ride</p>	<p>CIL superseded the requirements for PT Developer Contributions in April 2015. There is still a requirement in Part 2 Public Transport for the Developer to fund any public transport service enhancements and entry point improvements to make the site accessible.</p> <p>The cumulative impact policy allows for infrastructure improvements to support public transport, walking and cycling. No change.</p>

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				<ul style="list-style-type: none"> • Generally supportive of the principles around car parking set out in the SPD • Noted a reference in the SPD to proposals relating to car parking for Leeds Railway Station and that the impact of the proposed HS2 station would need to be fully assessed and mitigated • Supported the principle of promoting rail Park & Ride to reduce the reliance on private car trips however noted that the proposed locations (at Holbeck Urban Village or South Bank) would have a significant impact on the M621 junctions 3 and 4 so the impact would need to be fully assessed and mitigated accordingly • A desirable characteristic of a Park & Ride site was listed as a location at the intersection of radial and orbital routes. This could include junctions on the SRN so the impact of a new Park & Ride on radial and orbital routes would need to be assessed and mitigated accordingly <p>Car Parking – Car Club and Car Share</p> <ul style="list-style-type: none"> • Supportive of measures that support the uptake of car sharing and car clubs <p>Car Parking – Roadside Facilities</p> <ul style="list-style-type: none"> • Noted the specific parking requirements and methodology for calculating parking provision for new motorway service areas, motorway rest areas, truck stops and trunk road service areas in line with the Circular 02/2013 <p>Revised Transport SPD</p> <p><u>Car Parking</u></p> <p>As above, National Highways' previous comments relating to Park & Ride, Car Club, Car Share and Roadside Facilities are included</p>	

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				<p>in the list responses in the Consultation Statement, with a 'No Action' comment assigned to them.</p> <p>While a specific immediate 'action' was not envisaged, it is important to ensure that National Highways' comments are considered in the revised version of the Transport SPD.</p> <p>A large part of National Highways' previous response was in relation to rail Park & Ride facilities to support HS2 in Leeds. Since the previous response was issued, the eastern leg of HS2 to Leeds has been scrapped and therefore these comments are no longer relevant. Therefore, the JSJV would suggest National Highways comment that:</p> <ul style="list-style-type: none"> • While a large rail Park & Ride facility to support HS2 is no longer necessary, future proposals relating to conventional rail car parking for Leeds Railway Station would still need to be fully assessed and mitigated accordingly • There is a need for the impact of new public Park & Ride facilities on radial and orbital routes to be assessed (particularly their impact on queuing vehicles on the SRN mainline), and mitigated accordingly (as per previous response) • The specific parking requirements and methodology for calculating parking provision for new motorway service areas, motorway rest areas, truck stops and trunk road service areas should be in line with the Circular 02/2013 (as per previous response) <p>When comparing the parking standards set out in this updated SPD document with the previous parking standards (January 2016), it is notable that there are some differences, all of which are considered acceptable:</p> <ul style="list-style-type: none"> • The maximum number of spaces is lower than previously for restaurants and cafés, drinking establishments, hot food takeaways and houses of multiple occupation 	

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				<ul style="list-style-type: none"> • The maximum number of spaces for residential dwellings has reduced and is easier to interpret • New requirements for EV charging points at petrol filling stations, motorway service stations, hotels, health clubs and gyms, public car parks and drive through restaurants • Cycle parking requirements have increased for several land uses and the requirement for shower and locker provision has been introduced over a certain threshold <p><u>JSJV would suggest that National Highways is broadly supportive of the standards set out in Parts 1 to 3 of the document (notwithstanding our above comments in relation to industrial and distribution / warehousing development accessibility standards) and should consider future planning applications with these standards in mind.</u> This will help to ensure that new developments are in locations that encourage sustainable travel behaviour and make the best use of public transport capacity or that developers fund measures to make the site accessible. It will also help to minimise the need for highway infrastructure to mitigate the impacts of development.</p> <p>Part 4- Travel Plans</p> <p>Previous Response</p> <p>The below text summarises National Highways' previous response to the Travel Plan section of the initial draft of the Transport SPD:</p> <ul style="list-style-type: none"> • Supportive of the continued use of Travel Plans and the importance of the partnership approach outlined in Section 4.3 • Noted 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) 	<p>Noted. No change</p>

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				<ul style="list-style-type: none"> Recommended measures around monitoring and reviewing Travel Plans e.g. survey timescales and the need to have a plan of measures in the event targets are not met <p>Revised Transport SPD</p> <p><u>Comments relating to previous response</u></p> <p>As above, National Highways' previous comments relating to Travel Plans are included in the list of responses in the Consultation Statement, with a 'No Action' comment assigned to them. The explanation for this is listed as 'general comment'. JSJV would suggest reiterating the need for initial targets to match the levels assumed in any capacity assessments undertaken in the Transport Assessment, as this is not mentioned in the revised Transport SPD.</p> <p>The initial draft of the Transport SPD noted that the production of Travel Plans will ideally represent a partnership approach between the Applicant / Developer, the City Council, West Yorkshire Combined Authority and Highways England. National Highways' previous response supported this approach as it enables appropriate measures to facilitate the delivery of sustainable development to be identified. However, the partnership approach to the production of Travel Plans is no longer noted in the revised version of the Transport SPD. JSJV would suggest that this is a concern for National Highways, and request that the mention of a partnership approach remains in the updated version of the Transport SPD, as understanding the strategy for the sustainable access to sites is important in understanding <i>residual</i> trips on the SRN.</p> <p><u>New comments</u></p> <p>JSJV would suggest that the publishing of the Connecting Leeds Transport Strategy and National Highways 'Net zero highways: our 2030 / 2040 / 2050 plan' (as described above) puts more emphasis on the importance of Travel Plans and therefore prompts further comments by National Highways.</p>	

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				<p>When compared to the initial draft SPD, the revised SPD contains new information on:</p> <ul style="list-style-type: none"> • What a Travel Plan should contain (the requirements include a use class and site-specific list) • What the annual Travel Plan Monitoring Reports should include and how they should be produced <p>JSJV would suggest that the requirements are generally in line with what National Highways would be looking for in a Travel Plan.</p> <p>However, JSJV would suggest that National Highways request for the SPD to note that measures in Travel Plans should link to the Core Strategy and, in particular, the accessibility standards discussed above.</p> <p>The updated SPD notes that annual surveys and monitoring reports should be produced using LCC's preferred monitoring tool and templates. Consistency throughout surveys and monitoring reports could allow for easier comparison of site data across the area.</p> <p>JSJV would suggest that National Highways welcomes this approach and requests that LCC grants National Highways access to this data when available. Access to the database could provide benefits such as evaluating whether trip rates and targets proposed by developers are realistic as part of the ongoing development control process, identifying the impact of Travel Plan measures and highlighting good practice which could be advised or rolled out to other similar sites.</p> <p>JSJV would comment that whilst National Highways has been providing input to Travel Plans secured as part of the planning process for several years, JSJV is not aware of any evidence of the impacts of travel planning at sites near to the SRN, despite this potentially useful resource (which should be led and funded by developers in accordance with Section 106 agreements). JSJV would hence welcome an approach from LCC which seeks to</p>	

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				<p>make better use of this data, particularly given the importance of modal shift in decarbonising transport in the short to medium term.</p> <p>Part 5 - Highways Cumulative Impact</p> <p>Previous Response</p> <p>The below text summarises National Highways' previous response to the highways cumulative impact section of the initial draft of the Transport SPD:</p> <ul style="list-style-type: none"> • Supportive of proposals that seek to identify and mitigate the cumulative impact of developments on the SRN • Listed junctions where congestion is worsening, and which will likely require mitigation in the future • Broadly supportive of the proposed alternative methodology in the SPD to facilitate funding from developments to support mitigation schemes due to cumulative impacts • Noted that at locations where there is no committed National Highways funding, it is likely that private developer contributions towards schemes would facilitate future development that is required • Noted that consultation with National Highways would be required where a contribution to the cost of a mitigation scheme on the SRN was identified and the need for all mitigation schemes to be subject to Stages 1-4 of the Road Safety Audit process. <p>Revised Transport SPD</p> <p>As above, National Highways was broadly supportive of the proposed alternative methodology in the SPD to facilitate funding from developments to support mitigation schemes due to cumulative impacts.</p> <p>For reference, the proposed alternative methodology can be summarised as follows:</p>	

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				<ul style="list-style-type: none"> • Relevant to developments which result in 10+ peak hour trips through a congested junction (as identified in the SAP and does not warrant funding direct mitigation in its own right) then a proportion of the cost of appropriate mitigation will be sought • Total number of additional trips modelled through congested junction(s) (using Leeds Transport Model, averaged between the peak hours) for the SAP period (including any background growth) will be taken as required to fund the total cost of mitigation required • The proportion of trips from the development (averaged between peak hours) of the total number of additional trips (as above) will be used to establish the proportion of the total cost of the mitigation works • Individual developments may have to contribute to more than one cumulative impact scheme <p>As an example, if a development of 150 dwellings puts 50 peak hour trips through a congested junction which is modelled to have an additional 200 trips through it for all SAP allocations (including background growth) then that development would be expected to fund $50/200 \times 100 = 25\%$ of the total cost of required mitigation.</p> <p>It should be noted that LCC has some high-level estimates of mitigation costs for some of the congested junctions, but more detailed work is stated as being required at the time of pre-application submissions by the applicant.</p> <p>Table 3.2 of the Transport SPD lists junctions where the site allocation requirements are identified as having 'direct impact' and/or 'cumulative impact' and will therefore have to provide 'direct contributions' and/or 'indirect contributions.' The junctions on the SRN which are identified as requiring direct or indirect contributions from developers are:</p> <ul style="list-style-type: none"> • M1 junction 46 (direct contributions from 2 sites, cumulative contribution from 1 site) 	

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				<ul style="list-style-type: none"> • M1 junction 47 (cumulative contribution from 1 site) • M62 junction 26 (direct contribution from 1 site and cumulative contribution from 1 site) • M62 junction 28 (direct contributions from 1 site and cumulative contribution from 4 sites) • M62 junction 30 (cumulative contribution from 1 site) • A1(M) junction 46 (direct impact from 1 site) • M621 junction 1 (direct contribution from 1 site and cumulative contribution from 2 sites) • M621 junction 2 (cumulative contribution from 4 sites) • M621 junction 3 (cumulative contribution from 1 site) <p>JSJV would suggest that National Highways continue to be broadly supportive of the mechanism outlined in the SPD to calculate the percentage of the cost of the required mitigation scheme that developers will be required to contribute.</p> <p>However, there are a number of matters which require clarification:</p> <ul style="list-style-type: none"> • There are several instances in the list above where a cumulative contribution from one site is required. This would infer that one site only will fund any required scheme. JSJV recommends that the process for the funding of mitigation when only one site is required to make a cumulative contribution is clarified. • Table 3.2 states that no scheme was identified at M1 junction 45 due to “delivery of the planned scheme”. Whilst a Road Investment Strategy scheme was delivered at junction 45 in 2017, there remain operational concerns at the junction due to the Park & Ride site and the high occupancy vehicle lane reducing the stacking capacity 	

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				<p>available for downstream flows on Pontefract Lane. As part of the East Leeds Impact Study, short term and long term improvements at M1 junction 45 were identified as being required to mitigate Local Plan impacts. JSJV recommends that Table 3.2 and the Infrastructure Delivery Plan are updated to account for the outcomes of the East Leeds Impact Study. It is also recommended that Local Plan sites which have not yet been granted planning permission, which could potentially provide a cumulative contribution to the short-term scheme at junction 45 are identified in Table 3.2.</p> <ul style="list-style-type: none"> Other than schemes identified as part of the East Leeds Impact Study and the cumulative impact work currently being undertaken around M62 junction 28, the JSJV is not aware of any work which has been undertaken to establish the scale of the schemes required to mitigate the impacts of the Local Plan on the SRN. It is unclear what the mitigation schemes would be, when they would be required, how much they would cost, and whether they would be deliverable. There may also be junctions which require mitigation from multiple applicants, but it is unclear which applicant would be required to undertake the detailed work to design the mitigation scheme. JSJV therefore suggests that National Highways welcomes an approach which would make it clear on who will undertake this work, and when, so that there is a greater degree of certainty over how the schemes for identified junctions will be delivered and the potential sums involved for all parties. A further concern with the proposed approach is that significant impacts from developments may be experienced on the SRN before all development has come forward, and hence contributions received. JSJV would suggest National Highways clarify with LCC how this will be managed. 	<p>Change table to reference East Leeds Impact Study. However no sites can be added to fund the scheme as these were identified at SAP stage when site requirements were set. The requirement would however apply to windfall sites.</p> <p>Noted- LCC to continue to liaise with NH as required</p>

				<p>Summary and Conclusions</p> <p>This review has highlighted the following issues that should be addressed before the revised Transport SPD can be considered acceptable:</p> <ol style="list-style-type: none"> 1) The SPD should directly reference Appendix C of the Core Strategy which covers accessibility standards. 2) It is suggested that accessibility standards should be the same for all employment uses within the main urban area. Minimum standards for cycling could also be considered (albeit that these are out with the SPD). 3) An approach to replicate the developer contributions towards public transport set out in the superceded 'Public Transport Improvements and Developer Contributions' SPD should be included so that developers are clear on the funding required for new development and car dependent developments are avoided. 4) While a large rail Park & Ride facility to support HS2 is no longer necessary, future proposals relating to conventional rail car parking for Leeds Railway Station and any other Park & Ride site would still need to be fully assessed and mitigated accordingly. 5) Car parking levels associated with new motorway service areas, motorway rest areas, truck stops and trunk road service areas should reflect the guidance set out in Circular 02/2013. 6) References to a partnership approach between the Applicant / Developer, the City Council, West Yorkshire Combined Authority and Highways England in relation to site Travel Plans should remain in the revised SPD. 7) Initial Travel Plan targets should match the levels assumed in any capacity assessments undertaken in the accompanying Transport Assessment. 	<p>Noted- LCC to continue to liaise with NH as required</p> <p>Accepted- standards referenced directly</p> <p>Part of Core Strategy- no change</p> <p>Superseded by CIL- no change</p> <p>Noted- no change</p> <p>Not covered by SPD, national guidance to apply- no change</p> <p>Accepted- added to TP Checklist</p>
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Rep Ref	Representor Name	Agent	Document Ref	Summary of Comments	LCC Response
				<p>8) The Travel Plan should set out the measures (and associated funding for them) should targets not be met.</p> <p>9) The SPD should note that measures in Travel Plans should link to the Core Strategy, and in particular the Core Strategy T2 accessibility standards.</p> <p>10) There are several instances where a cumulative contribution is required from one site. LCC should provide National Highways with information on how this will be managed.</p> <p>11) Table 3.2 and the Infrastructure Delivery Plan should be updated to account for the outcomes of the East Leeds Impact Study.</p> <p>12) Local Plan sites which have not yet been granted planning permission, which could potentially provide a cumulative contribution to the short-term scheme at junction 45 should be identified in Table 3.2.</p> <p>13) LCC should provide National Highways with an approach on who will undertake the work to design and cost the required Local Plan mitigation schemes, and when this work should be undertaken.</p> <p>14) It is possible that significant impacts on the SRN may be experienced before all development comes forward, and hence before all contributions are received. LCC should provide National Highways with an approach for how this will be managed.</p> <p>Furthermore, the possibility of LCC sharing data from their Travel Plan monitoring tool with National Highways on a periodic basis should be investigated.</p>	<p>Sites to be treated on their merits- no change</p> <p>Included in TP checklist- no change</p> <p>TP introduction clearly references Core Strategy T2. Infrastructure improvements more relevant to Accessibility standards -no change</p> <p>Noted- LCC to continue to liaise with NH as required- no change</p> <p>Table updated</p> <p>No sites can be added as these were identified at SAP stage when site requirements were set. The requirement would however apply to windfall sites- no change</p> <p>Noted. LCC will liaise with NH as required- no change</p> <p>Noted, LCC will liaise with NH as required- no change</p>

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					Noted- LCC support partnership working with NH- no change
25	Tim Hart		Part 3: Parking 2.6	Disabled parking guidelines – residential – flexibility on provision in city centre locations needed. Also needs to reflect building regs	Change to 5% of parking spaces or minimum of 2 disabled parking spaces
26	John Booth		Part 2: Street Design Guide Visibility Splays	Wet weather speeds still referenced in visibility splay assessment contrary to CD109 Highway Link Design	Remove reference to wet weather speeds
27	ITB		Part 2: Street Design Guide, table 3.9	1:20 parking for pupils not in line with LTN 1/20	Revert to 1:10 for primary and secondary schools in line with LTN 1/20
28	HDC		Paragraph numbers referred to but no numbering in document	Paragraph numbers referred to but no numbering in document	Amend / remove references 5.2.11 and others
29	HDC		Part 2: Street Design Guide	Appears to suggest we are not accepting garages as parking spaces – is it correct?	Garages can count so long as they are not sole provision. Remove “a double will count as one space” to prevent confusion.
30	Planning Policy		Part 2: Street Design Guide – Section 11. Tree Lined Streets	Reflect NPPF, remove reference to American evidence. Height of shrub planting	Additional references added Insert comment regarding low level hedge planting to ensure they don't cause masking and a public safety issue.
31	Rachael Elliot - ITB		Part 4: Travel Plans	Reference to 6,3 TP Review Fee not correct Box on flow chart missing Amend wording re unspent RTPF	Corrected to current year Flow chart revised Unspent RTPF to be allocated by LCC to sustainable travel projects / infrastructure.

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32	Transport Strategy		Part 3 Parking	<p><i>Effective parking management is one of the key policy outlined in the Connecting Leeds Transport Strategy to help meet our decarbonisation targets and becoming net zero by 2030. Different parking management measures can reduce vehicle dominated environments especially in central urban areas. More effective management of core and fringe parking not only promotes modal shift to other more sustainable forms of transport but also allows more sustainable urban developments and enhanced public realm in the remain space. The continued provision of city centre or fringe commuter parking on cleared site and potential expansion would lead to more cars entering the city which is at odds with the Parking Policy objectives</i></p>	<p>Fringe included in area where there will be a presumption against the use of vacant or cleared sites for commuter parking.</p>