

**Local Development Framework
Supplementary Planning Document**

**Financial Contributions
for
Sustainable Transport**

**Statement of
Community Consultation**

M S McNidder MBE DipArch DipTP RIBA FRTPI FCMl
Head of Development Services
Orchard House
Farrier Street

Worcester WR1 3BB

1. What is this document?

- 1.1 This statement sets out the steps that have been taken to involve relevant organisations, individuals and the residents of Worcester in the drafting of the Supplementary Planning Document (SPD) Financial Contributions for Sustainable Transport.

2. What has been done to inform relevant organisations, individuals and the residents of Worcester about this SPD?

- 2.1 A consultation leaflet and copies of the draft SPD issues and options report were made available from the 1st July 2005 with responses requested by 16th August 2005. Nearly a 1000 copies of the leaflet were distributed and over one hundred copies of the draft document were sent to developers, statutory consultees and to those requesting a copy.
- 2.2 A seminar was held at the City Centre Community Centre on 18th July 2005 to which over fifty developers and transport related organisations were invited. Twelve people attended and notes of the two hours of constructive discussion from this seminar are contained in appendix one.
- 2.3 Specific consultation was carried out with the Disability Advisory Panel and groups of young people but no specific responses were received from these groups.
- 2.4 Thirty-three leaflet response forms were received and eight letters commenting on the content of the full document were received. A précis of these comments and the City Council's response are contained in appendix two.
- 2.5 The consultation responses and the proposed changes to the SPD were considered and endorsed by the City Council's Planning Committee on 18th November 2005. The Planning Committee also recommended that the Head of Development Services advertise the intention of the City Council to adopt this SPD. The preferred options document was advertised for formal representations for five week period between 16th December 2005 and 20th January 2006. A copy of the advert is contained in appendix three.
- 2.6 Only two representations one of which registered a formal objection were received in response to this second round of consultation. Following negotiations and further proposed amendments to the SPD the formal objection was withdrawn. A précis of these comments and the City Council's response are contained in appendix four.
- 2.7 The Planning Committee considered the representations received as a consequence of the intention to adopt consultation and the proposed changes to the SPD on 16th March 2006. The Committee recommended that the Director of Development Services adopt the SPD as part of the City of Worcester Local Development Framework. A copy of the formal Adoption Certificate is contained in appendix five.
- 2.8 All specific consultees and those who responded to the consultations have been informed of the formal adoption which took place on 21st March 2006. A copy of the adopted SPD was made available at the customer services centre, the City Centre, St John's and Warndon Libraries for inspection. The document can be viewed on the City Council's website (www.cityofworcester.gov.uk) and copies can be purchased, priced
-

£15 plus 10% postage and packaging, from the Customer Service Centre, Orchard House, Farrier Street, Worcester, WR1 3BB.

APPENDIX ONE

Notes from the consultation seminar held on
18th July 2005 at the
City Centre Community Centre

Sustainable Transport Seminar 18th July 2005

Present: Peter Elliott, First Bus
Janet Wood, Member of the public
Georgia, City Centre Forum
Daniel Marston, Worcester City Highways Partnership Unit
Bob Pender, Worcester City Highways Partnership Unit
Marty Woodward, Worcester City Highways Partnership Unit
Mark Newton, Worcestershire County Cricket Club
Lesley Borthwick, Member of the public
Charles Rodway, Lansdowne Rodway Estates Ltd
Mike Sumpner, Worcester Civic Society
Jim Pithouse, Worcester City Council
Adrian Becker, Worcester City Council

Summary of points raised.

Where has the modal split data used come from?

How often is TRICS data updated?

Requirements for travel plans for some development proposals should also be included in the document.

The requirement for contributions for sustainable development may make some development sites unviable or affect the types of development proposals that come forward.

The recommendation of the meeting was that all development should be subject to these contributions and housing proposals should be included as soon as possible.

The land use mix is the key to reducing demand for travel.

Table 3.3 needs expanding and the use classes need explaining.

Is this just designed to raise money? Once the money has been paid it can be wasted. Proposals for bus subsidies need to be fully integrated with the plans of the Passenger Transport Group and this group should be referenced in the document.

Transport services need to have equal consideration with proposals for additional infrastructure.

Public transport needs modern infrastructure, e.g. real time information at bus stops.

Developers may be reluctant or uncomfortable providing contributions to pay private bus operators to provide services from which they derive a profit. Developers may be prepared to pay more to provide their own bus services.

When employment sites are redeveloped will only the difference between previous and planned travel demand be considered? Or will the development be treated like a greenfield site?

The accessibility stage of the calculation needs to be clearer.

Cycle racks and shelters are not used.

Travel patterns become set when a development is first occupied; therefore it is important that infrastructure and services for sustainable travel are available from the first day of occupation.

Commercial uses need to be defined on page one of the document.

Are Worcester City's proposals similar to practice in other local planning authorities? If similar contributions are not sought outside of the city we need to be sure these proposals will not drive development into neighbouring local authority's areas.

Will arbitration be offered if there is disagreement over the value of the contribution requested?

Needs to be clearer when a development will be expected to contribute to bus services.

Why is there no mention of rail services?

Need to consider whole journeys that involve more than one mode, e.g. walking and car or bus journeys.

APPENDIX TWO

Responses to consultation of the draft SPD
issues and options report
received in July/August 2005

Responses to consultation of the draft SPD received in July/August 2005.

Comments generally supporting the draft SPD or about matters unrelated to the document have not been included in this list of proposed responses.

Respondent	Comment	Response	Proposed revision to the document
Worcester City Council Economic Development Officer	Whilst I welcome the need to look at each site on its merits, this flexibility of commuted sum payments can also lead to confusion with an end figure that seems arbitrary	Government guidance requires that planning obligations related to individual planning applications and do not appear to be a tax on development. It would therefore be difficult to increase the certainty of contributions from any hypothetical development without it appearing that planners had predetermined the size of the required planning obligation.	No change proposed.
Worcester City Council Economic Development Officer	I was concerned to note that the only time “commercial viability” was mentioned was in connection to a bus services. I would like to see this consideration taken into account when looking at some sites that carry onerous redevelopment costs.	The phrases “the special nature of some developments” and “other material planning considerations” in para3.5 was intended to allow the flexibility to reduce contributions in cases where the financial viability of development would be compromised by the size of a planning obligation sought. The Council welcomes open book discussions about the viability of particular development proposals.	No change proposed.

Respondent	Comment	Response	Proposed revision to the document
Worcester City Council Economic Development Officer	The examples need to be more understandable	The final document will include accurate, fully explained and slightly simplified examples as the final part of the calculation can be deleted as it duplicates factors included in the TRICS calculation and to appraisal carried out by highways engineers.	Paragraph 3.6 has been completely re-drafted with correct and fully explained examples. Paragraph 3.2iv has been deleted to simplify the calculation.
South Worcestershire Primary Care Trust	The modal split data used in para3.2 is at variance with data produced by the Sustainable Travel Town project.	The final version of the document will use the Sustainable Travel Town data as this is the most up to date data available.	Paragraph 3.2ii has been redrafted using the modal split data produced by the Sustainable Travel Town project.
South Worcestershire Primary Care Trust	How have the cost factors in para3.2 been calculated?	The cost factors have been calculated by reference to the actual costs of implementing previous sustainable travel schemes. While the costs may be considered rather subjective they will apply equally to all developments and they are based on the best available information.	No change proposed.
South Worcestershire Primary Care Trust	Para 3.2 refers to parking restraint zones, a map showing these zones should be included in the final document.	The reference to the parking restraint zones has been deleted to simplify the calculation of the level of contribution.	Paragraph 3.2iv with the reference to parking restraint zones has been deleted.
South Worcestershire Primary Care Trust	The examples on page 6 should include full explanations of the calculation.	The final document will include accurate and fully explained examples with the final stage removed to simplify the calculation.	Paragraph 3.6 has been completely re-drafted with correct and fully explained examples.

Respondent	Comment	Response	Proposed revision to the document
South Worcestershire Primary Care Trust	The table at para3.3 seems to be at variance with the trips per 100m ² shown in the examples	The table at 3.3 will be expanded and made an appendix in the final document to provide greater clarity of the number of trips likely to be generated by different types of development in different locations. However TRICS calculations take account of a large number of variables and examples will vary depending of the specific characteristics of the proposed development.	Paragraph 3.3 has been deleted and appendix 2 has been added. Paragraph 3.2a has been expanded to include a reference to appendix 2.
South Worcestershire Primary Care Trust	The health benefits of sustainable travel modes should be incorporated into the sustainability appraisal.	Consideration will be given to adding an additional health objective to the sustainability appraisal. Measurement of an appropriate indicator for such an objective may however be difficult for the local planning authority.	A health indicator has been added to the social objectives section of the sustainability appraisal.
CB Richard Ellis	Have the cost factors used for different types of journeys been calculated internally or have they been benchmarked alongside similar costs produced by similar local authorities.	The cost factors have been calculated internally by reference to the actual costs of implementing previous sustainable travel schemes. While the costs may be considered rather subjective they will apply equally to all developments and they are based on the best available information.	No change proposed.

Respondent	Comment	Response	Proposed revision to the document
CB Richard Ellis	Developers should be able to calculate the size of likely contributions required for sustainable travel by reference to this document.	This is the intention of the document although the method of calculation must be flexible enough to allow each proposal to be considered on its own merits. As TRICS is constantly updated and every development is unique to some degree any calculations based on the document will only ever be general indicators of the likely value of sums that may be required to support sustainable transport.	No change proposed.
Local Resident	How is commercial development defined?	The planning definition of a particular type of development is made by reference to Town & Country Planning (Use Class) Order 2005. Para1.1 reproduces local plan policy TR14 with a note that “this policy applies to all non-residential development.	No change proposed.
White Ladies & Aston Parish Council	This SPD should be applicable to all development, including housing development.	This would require a change to local plan policy TR14. This will be considered when the transport chapter of the local plan is reviewed.	No change proposed.
Boreham Consulting	An accessibility study of the city should be carried out using Accession the DfT’s approved software for accessibility planning and transport accessibility levels established for every location within the city.	The accessibility of a proposed development is taken full into account when calculating the size of any financial contribution both by the TRICS calculation and by a specific assessment carried out by officers from the Highways Partnership Unit.	No change proposed.

Respondent	Comment	Response	Proposed revision to the document
Boreham Consulting	Trip rates derived from the TRICS database should be agreed with the developer.	The process of agreeing a section 106 agreement with a developer allows for such agreement.	No change proposed.
Boreham Consulting	95% of trips to food stores are part of longer trips and the calculation should recognise this.	TRICS is based on actual travel surveys conducted before and after developments have taken place. Factors such as trip chaining are therefore full taken into account when calculating the number of journeys generated by a particular type of development. The length of any link in a trip chain and the mode of travel is related to the location of the trip attractor, such as a food store, therefore it is as appropriate to apply this policy to food stores as any other sort of development.	No change proposed.
Boreham Consulting	Trips by car to a development have been ignored in the draft SPD. As of site highway works may be required to allow access by car the developer may be asked to pay the costs of the same journey once by car and once by a more sustainable mode.	The final document will use the actual modal share of walking cycling and bus trips within Worcester and not hypothecate these modes up to 100% of all journeys to a potential new development. The financial contribution to sustainable transport will therefore only relate to potential trips by modes other than the car.	Paragraph 3.2ii has been amended using modal share data obtained from research commissioned by the Sustainable Travel Town project.
Boreham Consulting	The cost factors for the different modes are not transparent.	The cost factors have been calculated by reference to the actual costs of implementing previous sustainable travel schemes. While the costs may be considered rather subjective they will apply equally to all developments and they are based on the best available information.	A note has been added to paragraph 3.2iii to explain how the cost factors have been derived to aid transparency.

Respondent	Comment	Response	Proposed revision to the document
Boreham Consulting	The trip rates indicated in the table on page 6 do not serve any purpose.	This table will be replaced by a more comprehensive appendix in the final document giving trip rates for different types of development in different locations. Without this information it will not be possible for developers to make approximate calculations of the likely size of contributions required from a particular development.	Paragraph 3.3 has been deleted and appendix 2 has been added. Paragraph 3.2a has been expanded to include a reference to appendix 2.
Boreham Consulting	Para3.4 needs updating to reflect publication of ODPM Circular 05/05	The final document will refer to the latest government circular available at the date of publication.	Paragraph 3.3 (previously paragraph 3.4) has been amended to refer to ODPM Circular 05/05
Lansdowne Rodway Estates Ltd	The calculations in para3.6 should be much clearer.	The final document will include accurate and fully explained examples as well as deleting the final stage of the calculation to help simplify the calculation.	Paragraph 3.6 has been completely re-drafted with correct and fully explained examples.
Lansdowne Rodway Estates Ltd	Redevelopment proposals should only be expected to contribute towards any calculated increase in journeys above those generated by the previous use.	Redevelopment is not the same as a change of use when such a calculation is appropriate. From a planning perspective the planning issues to be considered when a site is to be redeveloped are similar to an undeveloped site. Is the scale, use, visual appearance, etc of the proposal acceptable? If the traffic implications of the proposal are not acceptable then some mitigating measures such as a contribution to sustainable transport may be enough to make the proposal acceptable.	No change proposed.

Respondent	Comment	Response	Proposed revision to the document
		If there are special circumstances leading to redevelopment, non conforming uses for instance, or the costs of contributions are likely to make redevelopment unviable, the SPD does allow these factors to be taken into account when determining the level of contribution sought.	
	An explanation of the costs factors should be included.	The cost factors have been calculated by reference to the actual costs of implementing previous sustainable travel schemes. While the costs may be considered rather subjective they will apply equally to all developments and they are based on the best available information.	A note has been added to paragraph 3.2iii to explain how the cost factors have been derived to aid transparency.
Lansdowne Rodway Estates Ltd	There should be a way to challenge the sum requested for a particular development.	The size of contribution is agreed by the developer through a section 106 agreement. As this is an agreement that the developer enters into freely there seems no reason to have an appeal procedure.	No change proposed.
Lansdowne Rodway Estates Ltd	Developers should be able to offer to run their own subsidised or unsubsidised bus services instead of contributing to commercial bus companies services.	This could be agreed during negotiations over the size of any particular financial contribution sought.	No change proposed.

APPENDIX THREE

The intention to adopt advert placed in the
Worcester News and the Berrows Journal in
December 2005

**Planning and Compulsory Purchase Act 2004.
The Town and Country Planning (Local Development) (England) Regulations 2004.**

**Notice of Pre- Adoption Public Participation.
(Regulation 17 (2) (c))**

**Financial Contributions to Sustainable Transport
Supplementary Planning Document**

Worcester City Council intends to adopt the Financial Contributions to Sustainable Transport Supplementary Planning Document (SPD) as part of the Local Development Framework (LDF) for the City. The SPD sets out further guidance on the interpretation of Local Plan policy TR14 “Financial Contributions from developments to meet travel demand”, including the basis for calculating the value of these financial contributions. When the SPD is adopted it will form a Local Development Document within the Local Development Framework.

Copies of the SPD are available for inspection at the Customer Services Centre, Orchard House, Farrier Street, Worcester, during normal office hours Monday-Friday 8:30am to 5:00pm, Wednesdays 10.00am to 5.00pm and Saturdays 9:00am to 12noon. Copies have also been supplied to the City Centre, St John’s and Warndon Public Libraries and the document may also be viewed on the city council’s website www.cityofworcester.gov.uk.

If you wish to make Representations about the SPD these should specify the matters to which they relate and the grounds on which they are to be made. To help in the making of representations a form is available on the website or from the locations indicated above. All representations should be sent in writing to Planning and Economic Development Section, Development Services, Orchard House, Farrier Street, Worcester WR1 3BB, or emailed to ldf@cityofworcester.gov.uk. They may also be accompanied by a request to be notified at a specific address of the adoption of the SPD.

Representations must arrive before 6:00pm on 20th January 2006.

M.S. McNidder,
Head of Development Services,
Worcester City Council,
Orchard House,
Farrier Street,
Worcester

APPENDIX FOUR

Responses to the intention to adopt
consultation
received in January/February 2006

**Responses to consultation of the intention to adopt the SPD received
in January/February 2006**

Respondent	Comment	Response	Proposed revision to the document
CB Richard Ellis	There should be separate and lower unit costs applied for developments on sites within the town centre.	The reduced costs of providing sustainable transport infrastructure within the city centre are recognised at two separate points in the calculation of the required contribution. Once by the TRICS calculation, and once by consideration of the existing bus, cycle and pedestrian facilities within the vicinity of the development. Any additional steps to favour city centre developments may undermine other local plan policies and objectives.	No change.
CB Richard Ellis	A clear breakdown of the levels of sustainable transport infrastructure necessary to trigger reductions in the contributions required should be specified.	The aim of this policy is to provide the financial resources to secure facilities that will encourage residents and visitors to travel by means other than their car. What it is possible to provide and the expectations of the public will change over time. Too tightly defined a policy will prevent the city council from responding to such changes.	No change.

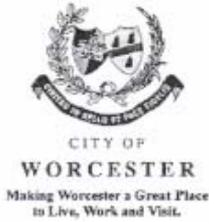
Respondent	Comment	Response	Proposed revision to the document
CB Richard Ellis	Why are additional contributions for cycle parking required as well as contributions towards sustainable travel?	Contributions for off site cycle parking are required by policy TR4 of the local plan when there is insufficient space within a development site to provide cycle parking. This is a separate local plan policy and relates to provisions that would normally be made within a development.	No change.
CB Richard Ellis	A definition of large scale development should be provided.	The document already makes clear that commercial development over 1000m ² is considered large scale. This comment refers to paragraph 5.3 which is about traffic calming requirements that may apply to residential as well as commercial development.	Paragraph 5.3 has been amended to include a definition of large scale development, over 1000m ² for commercial property and ten or more residential units.
CB Richard Ellis	Will contributions be sought for both traffic calming and sustainable travel and why?	The local plan contains separate policies on traffic calming and sustainable travel and these issues are therefore considered separately when determining a planning application. The applicability of the two policies is different, traffic calming to all forms of development and sustainable travel to commercial development only. It is likely that traffic calming will be required from residential development on more occasions than from commercial development but there may be circumstances when a	No change.

Respondent	Comment	Response	Proposed revision to the document
		commercial development could not be considered for approval without contributions to both traffic calming measures and sustainable transport.	
CB Richard Ellis	Will contributions to for park and ride facilities be sought separately and in addition to contributions for sustainable transport?	No	No change.
Worcestershire County Council Highways Partnership Manager	The proposed modal split data used in the calculation is for Worcester residents only and does not take proper account of journeys into and out of the city by non Worcester residents or the objectives of the Local Transport Plan.	Agreed	The modal split data used in the calculation of contributions for sustainable transport at paragraph 3.2b has been changed. Previous figures 6% bus, 3% cycle, 25% walk. Proposed new figures 26% bus, 5% cycle 13% walk. These are the target modal share figures in the Local Transport Plan for 2011. As the local plan was prepared up to 2011 it is appropriate that the interpretation of local plan policy such as this SPD should aspire to targets set for modal shares at the end of the plan period. The example calculations at paragraph 3.8 have been amended in line with the revised modal share figures.

Respondent	Comment	Response	Proposed revision to the document
Worcestershire County Council Highways Partnership Manager	There is no definition of the boundaries of the terms City Centre and Inner suburbs used in Appendix two. Should these terms be linked to the local plan parking restraint zones?	The terms City Centre, Inner Suburbs and Outer Suburbs are the ones used by the TRICS calculation. TRICS does not define these terms and could not do so as the data has been collected from a large number of traffic surveys and what is considered to be a city centre or inner suburb varies widely between different urban areas. It is essential a subjective classification which requires a common sense interpretation.	An additional paragraph (paragraph 1.7) has been included linking the TRICS terms city centre, inner suburbs and outer suburbs to the three Local Plan parking restraint zones and the map defining the boundaries of these zones has been included as appendix to the SPD.
Worcestershire County Council Highways Partnership Manager	The calculation would raise differing amounts from city centre, inner suburban and outer suburban, If development was equally spread 34% would be raised from the city centre, 26% from the inner suburbs and 40% from the outer suburbs.	This is bound to be the case if the calculation is based on TRICS data as commercial development in inner suburban locations has the largest number of local residents from which to draw customers. Local trips of less than two miles are more than twice as likely to be made on foot, than longer trips.	No change.
Worcestershire County Council Highways Partnership Manager	The SPD should indicate when it will be reviewed so that TRICS data and the costs of providing sustainable travel infrastructure are kept up to date.	Agreed	An additional paragraph (paragraph 1.8) has been included stating that the operation of this SPD will be reviewed annually in April of each year.

APPENDIX FIVE

Formal Adoption Certificate



WORCESTER CITY COUNCIL

Planning and Compulsory Purchase Act 2004

**The Town and Country Planning (Local Development) (England)
Regulations 2004**

**Contributions to Sustainable Travel Supplementary
Planning Document**

The above document, attached hereto, has been formally adopted as a Supplementary Document in accordance with Regulation 19 of the Town and Country Planning (Local Development) (England) Regulations 2004. It is now part of the City of Worcester Local Development Framework.

Signed: _____

M.S. McNidder MBE Dip Arch Dip TP RIBA FRTPI FCMI
Head of Development Services,
Orchard House,
Farrier Street,
Worcester
WR1 3BB

Date: _____

24th March 2006