

Ms Kelly Gibbons
Planning Services
Herefordshire Council
Blueschool House
Blueschool Street
Hereford
HR1 2LX

27th October 2022

Dear Kelly

Introduction

On September 1st 2022, BDW received comments from the Active Travel Officer in respect of the application referenced 221378 for the approval of details reserved by Condition 8 (Travel Plan) attached to planning permission referenced 150930 at Land at Hildersley Farm, Hildersley, Ross on Wye. The Officer's comments are as follows:

"This plan is information led but weak and vague. These are the previous comments regarding the travel plan -

Marketing- Please forward contact details for the TPC and interim contact.

- ***Requires additional support to trial sustainable modes.***
- ***Each household to receive at least four free return tickets for travel to Gloucester/ Hereford***
- ***Each household to receive a discount voucher from a local bike shop to cover a free full service or equivalent.***

These options should be reviewed with the view to either provide these options or provide something of the equivalent"

This letter seeks to reasonably respond to the Officer's comment to agree a way forward and allow the formal discharge of the planning condition.

Current Commitments by BDW to encourage and promote sustainable travel:

To date, as part of the proposed development, several strategies have been offered to encourage a shift from private car to active and sustainable transport modes including:

- A high level of marketing and promotion in favour of active and sustainable transport modes;
- The provision of a Residents Welcome Travel Information Pack;
- An annual Travel Plan Newsletter;
- Personal Travel Planning support;
- Provision of EV charging points;
- Provision of information on car sharing, public transport services and walking and cycling routes.

In addition to this, the signed and agreed Section 106 agreement sets out that a transport contribution will be provided as follows:

- £1,966 for each 2 bedroom Open Market Unit;
- £2,949 for each 3 bedroom Open Market Unit;

- £3,932 for each 4 bedroom Open Market Unit

All index-linked in accordance with clause 3.12 of this Deed to provide the following Transport Facilities:

- A contribution to upgrade A40 southern footpath for shared use between the fire station and eastern access point by Hildersley Farm to tie in with Model Farm active travel accesses.
- Upgrading the bus stops for Hildersley including real time information to full specification bus stops. The bus stops should also include secure cycle parking.
- Upgrading of the existing bus stop/shelter adjacent to the fire station including secure cycle parking.
- A contribution toward a formal crossing at A40 end of the 'Town and Country' trail to allow access to Hildersley which will link in with the northbound shared use path along the A40 toward the Tanyard Land development and enhance the safer route to school network.
- Traffic regulation order for waiting restrictions around Ashfield Park Primary School.

From the above commitments, it is clear that BDW, as a developer, are taking responsibility in promoting and encouraging the use of sustainable and active transport modes. We feel that the Officer's request for additional support and financial incentives fails against the six policy tests for planning conditions set out under Paragraph 56 of the NPPF which are; necessary, relevant to planning, relevant to the development to be permitted, enforceable, precise and reasonable in all other respects.

Response to Active Travel Officer's Comments:

Additional support to trial sustainable modes

The Active Travel Officer's request for additional support to trial sustainable transport modes is a request that is separate from planning policy and guidance which focuses on promotion. We agree that changing the habits around travel mode choice is difficult; however, the request for additional support from BDW to trial sustainable modes is unreasonable and not relevant to this planning permission. Alternatively, the Council should seek support from the Government to trial other methods of reducing car reliance. As set out above, BDW have agreed to several strategies to encourage and promote sustainable transport modes, in line with national and local planning policy, and any additional requests would place a disproportionate burden on BDW.

Each household to receive at least four free return tickets for travel to Gloucester/ Hereford

The Active Travel Officer has requested that each household receive at least four free return tickets for travel to Gloucester/Hereford.

The planning application referenced 213469 which seeks the discharge of condition 19 (Travel Plan) relating to the residential development at Land to the east of the A40 Ross on Wye Herefordshire is directly comparable to this planning application. Having reviewed the submitted and approved Travel Plan prepared by Vectos, the strategies in place are; the provision of Travel Packs, a Travel Plan Coordinator as well as marketing and consultation. No incentives are provided to residents to encourage a switch in transport modes. Should the Active Travel Officer like to stand by his request, we request that justification be provided on why each household should receive four return bus tickets. From the above, we consider that the request is unreasonable in all respects and places a disproportionate financial overhead on BDW compared to other developers/developments of a similar nature.

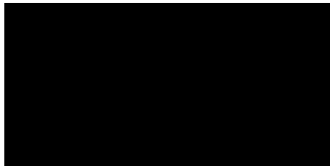
Each household to receive a discount voucher from a local bike shop to cover a free full service or equivalent.

The Active Travel Officer requests a discount voucher to a bike shop to cover a free full service or equivalent. We feel that this request is wholly unreasonable. A voucher covering a free full service or equivalent would be used by residents for bike maintenance and would therefore not be relevant to the planning application. Further to this and as set out above, the planning application referenced 213469 which seeks the discharge of condition 19 (Travel Plan) relating to the residential development at Land to the east of the A40 Ross on Wye Herefordshire is comparable to this application and no incentives were requested as part of this application. In addition, we request that the Active Travel Officer provide justification as to why the voucher should be incorporated as part of the Travel Plan.

Conclusions

Several commitments have already been made by BDW through the Outline Planning Permission, the submitted Travel Plan as well as the Section 106 Agreement to ensure that the proposed development at Hildersley Farm is compliant with both national and local policy and encourages the use of active and sustainable transport modes opposed to the use of the private car. BDW are willing to engage and continue working with the Active Travel Officer as well as the Planning Officer to come to an agreement in terms of a suitable arrangement to allow the discharge of the planning condition.

Kind regards,



Freya Rideout
Planner