

Appendix C to Local Plan Committee 11.12.2023
Active Travel Supplementary Planning Document (SPD) Consultation (6 September – 4 October 2023)
Schedule of Representations

9 Respondents

Who was consulted

Between 6 September 2023 and 4 October 2023, the draft Active Travel SPD was published for consultation in accordance with Regulation 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The SPD was publicised through written / email consultations with statutory consultees, general consultees on our database, other relevant stakeholders, individuals and organisations who have expressed a wish to be consulted or have previously made comments, as set out in the Statement of Community Involvement.

Respondent	Representation (officer summary)	Response	SPD Modifications
Introduction			
Natural England	Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment. Natural England agree with your conclusion that neither an SEA nor an HRA are required for the Active Travel Supplementary Planning Document.	Noted	No change required
Susan Allen-Shepherd	Without dates and figures the 1.5 degree temperature increase ceiling is unmeasurable and hence is not a SMART objective.	Comments noted – comment reference to all climate SPD introductions	No change required
Sir Bob Russell	Officer Summary: Active travel routes should not be at the expense of, nor to the detriment of, other users of the King’s Highway. Pedestrians greatly outnumber cyclists, but pedestrians are being discriminated against in order to satisfy the whims of the cycling lobby. I am all in favour of promoting cycling and	Comments noted. The Active Travel SPD will supersede the Cycle Strategy SPD. The Active Travel SPD aims to ensure that all modes of active travel	No change required

	<p>pedestrian routes but not when they are to the detriment of other users of the King's Highway. Cyclists represent less than 5% of travel. Let's put things into perspective. Examples of cycle schemes also included in representation, including RTS, narrowing of pavements in Head Street to create a cycle lane, and East Hill.</p>	<p>including walking, wheeling (trips made by wheelchairs, mobility scooters, pushchairs and adapted bicycles) are taken into account in development proposals in addition to cycling. This will ensure that all modes of active travel benefit from safe and sufficient routes.</p>	
National Highways	<p>We have reviewed the supporting document related to those two above-mentioned SPD. In relation to these, Draft Climate Change and Active Travel Supplementary Planning Document/s. As we understand, SPDs are material considerations in planning decisions. National Highways do not have any comment on these above-mentioned SPDs.</p>	Noted	No change required
Historic England	<p>I can confirm that while we do not have any specific comments to make at this stage, we will be interested in receiving subsequent consultations on these and related documents.</p>	Noted	No change required
Colchester Cycle Campaign	<p><u>Officer Summary</u>: Thank you for giving us the opportunity to comment on the draft of this comprehensive document. We agree with all the points made. These are our additional observations (see below/full rep for full submission).</p>	Comment noted	No change required

Essex County Council	<p>Officer Summary:</p> <p>Throughout the SPD: As well as making reference to LTN1/20 it would also be beneficial to reflect the forthcoming Manual for Streets (3) (MfS) update will reflect a stronger consideration as part of the Active Travel England's (ATE) assessment of planning applications. MfS will remain a good practice guide, but ATE have commented that they will be using the MfS in assessing active travel schemes, with a recommendation that it should inform local design guidance.</p> <p>It would be helpful if the SPD included page numbers.</p>	<p>As the revised Manual for Streets has not yet been published, reference to the document has currently been included in the further guidance sections in the SPD.</p> <p>Further reference to the current and forthcoming document has been added to Chapter 3.</p>	<p>Add following text to Chapter 3: <u>Manual for Streets</u>, first published by the Department for Transport in 2007, provides advice for the design of residential streets. A revised Manual for Streets is currently being developed which will update the existing Manual for Streets and Manual for Streets 2 and will provide guidance for local authorities on designing residential and busier urban streets.</p> <p>Page numbers added.</p>
2. The Active Travel SPD			
Susan Allen-Shepherd	<p>Officer summary:</p> <p>Non-polluting frequent public transport is key. Unfortunately, public transport is always being reduced, whilst we are being encouraged to not travel by car. There needs to be reliable public transport every 10-15 minutes in a big urban area or every 20 minutes between rural conurbations and the city to make it practicable. Networks of small feeder buses are needed. Rural areas do not have any meaningful transport in the evenings.</p>	<p>Comments noted. The active travel SPD acknowledges the importance of additional considerations in relation to integration of active travel modes with public transport. It is acknowledged that it is an important factor in reducing dependency on the</p>	<p>Add following text to p.21: <u>Public transport interchanges should be designed using the principles outlined above to ensure that they are accessible for all, safe and secure, comfortable and attractive.</u></p>

	<p>Not everyone is in a position to walk or cycle: either time constraints e.g., getting various children to different schools; age; disabilities; things to carry – luggage / shopping.</p> <p>The lack of thought about interchanges between means of transport makes it very difficult. Lack of lifts / escalators / powered walkways, somewhere to leave luggage when going to the toilet accessed down steep narrow staircases, being unable to keep an eye on your belongings in luggage compartments on public transport. Lack of seating when waiting and queuing.</p>	<p>private car, particularly when longer journeys are involved.</p> <p>A sentence has been included in the section on 'Integration with public transport' to ensure new public transport interchanges are designed to be accessible by all.</p>	
3. National Context			
Susan Allen-Shepherd	<p>Alternative options and rural access.</p> <p>The devil is in the detail. Without looking at all aspects of delivery of the strategy and joining all the loose ends, admirable intentions will fail.</p> <p>I believe more sustainable fuels are available with minimum conversion costs, so plan B is needed to combat the risks of the high costs of electric vehicles; lack of materials to make batteries; and to avoid the waste of scrapping older vehicles early and to have more flexible approach to converting in the intervening years.</p> <p>Whilst trying to reduce use of private transport in cities this must not be to the detriment of access to facilities from rural area</p>	Comments noted	No change required

<p>Essex County Council</p>	<p>It might be worth referencing recent changes to the Highway Code (January 2022), which strengthens active travel. The key changes to the Highway Code cover eight new rules about vulnerable road users and can be viewed in more detail here. A 'hierarchy of road users' has been introduced that prioritises those most at risk on our roads. Prior to this, all road users were on an equal footing so were equally responsible for their own safety and the safety of other road users. Now, drivers must be aware that pedestrians, cyclists, horse riders, carriage drivers and motorcyclists, as the most vulnerable road users, should take priority over cars. The full hierarchy prioritises road users in the following order: Pedestrians, Cyclists, Horse riders, Motorcyclists, Cars and taxis, Vans and minibuses, HGVs.</p> <p>It may also be worth referencing Planning Practice Guidance which supports the NPPF and provides guidance regarding:</p> <ul style="list-style-type: none"> ○ Overarching principles on Travel Plans, Transport Assessments and Statements ○ Travel Plans ○ Transport Assessments and Statements 	<p>Reference to the hierarchy of road users in the Highway Code has been added to Chapter 2 and the further reading section.</p> <p>Reference added to Planning Practice Guidance in Chapter 3 and the Further Reading and References section.</p>	<p>Add following text to Chapter 2: <u>Changes to the Highway Code in January 2022 includes a new section on the 'hierarchy of road users'.</u> <u>The concept places road users most at risk at the top of the hierarchy. Those road users are pedestrians, in particular children, older adults and disabled people, cyclists, horse riders and motorcyclists, with particular importance on children, older adults and disabled people being more at risk.</u></p> <p>Add following text to Chapter 3: <u>Planning Practice Guidance adds further context to the National Planning Policy Framework (NPPF). Guidance is available on a number of subjects including Travel Plans, Transport Assessments and Statements.</u></p>
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	<ul style="list-style-type: none"> ○ Transport evidence bases in plan making and decision taking 		
4. Local Context			
Susan Allen-Shepherd	<p>Whilst infrastructure to increase the uptake of cycling is admirable, the plans for it shouldn't destroy unique and valued environments such as Crouch Street (the western end in particular). A good amount of car parking is needed to maintain its village in a city feel, surely this is possible as there are already cycle lanes in place, just a bit of tidying up is needed. Also, I among many people use and appreciate the underpass as it takes us away from the traffic and the need to wait in a large throng to cross the road.</p>	Comments noted	No change required
Essex County Council	<p>Essex Transport Policy, page 13: LCWIP paragraph. Probably worth noting that ECC is currently in the process of consulting on a refresh of its existing LCWIP's across all districts. Colchester LCWIP was out to consultation until 29th September 2023. Following this, ECC will look to update its Strategic LCWIP network. An update reflecting the above – even in general terms would be helpful.</p> <p>Essex Transport Policy, page 13: Reference should be made to the Essex Local Transport Plan (LTP3, 2011) and the forthcoming Essex Local Transport Plan 4 (LTP4), which will replace the LTP3. This sets out the county's transport policy but importantly the priorities</p>	<p>Comments noted. Sentence added to highlight the consultation in September 2023.</p> <p>Paragraph added at the start to highlight the Local Transport Plan.</p>	<p>Amend text on p.13: 'The <u>Colchester</u> Local Cycling and Walking Infrastructure Plan (LCWIP) was developed in 202118. This...' <u>The Colchester LCWIP refresh was consulted on in September 2023.</u></p> <p>Add following text to p.13: <u>The Essex Transport Strategy: the Local Transport Plan for Essex was published in June 2011. This strategy is the overarching transport plan for Essex and sets out the</u></p>

	<p>include schemes that support the uptake in active travel, and improve the health and wellbeing of the population. LTP policies also seek to encourage the use of more sustainable forms of travel. LTP4 is scheduled for consultation in 2024 and will place a greater emphasis upon the provision and use of sustainable transport and the decarbonisation of the transport network.</p>		<p><u>aspirations for improving travel in the county. The LTP sets out the focus on schemes that support the uptake of active and sustainable travel to enable and encourage healthy choices within our communities for their improved health and wellbeing.</u></p>
<p>5. Active Travel Infrastructure in Colchester</p>			
<p>Susan Allen-Shepherd</p>	<p>Active Travel needs in Tiptree. Tiptree's Neighbourhood Plan tried to improve various aspects of rural transport. In particular, the fact that the bus provision doesn't lead to sustainable travel. The idea of a circular bus for in Tiptree travel and a park and ride style facility for travellers to the railway stations and elsewhere and for workers coming into Tiptree was considered. We were wrongly advised that we couldn't compete with the number 91 bus service, maybe we should have been advised to set up a club. But talk of "dial a ride" services does not cover the need for everyday transport needs that could be provided on a regular basis.</p> <p>Tiptree has various ideas about Active Travel in Tiptree and improving the street scene here. There needs to be an overall strategy for Tiptree through its</p>	<p>Comments noted – The principles set out in the SPD relate to the whole of the Colchester administrative area. The SPD acknowledges that the opportunities for specific active travel requirements of the rural communities can be identified through partnership working with the Parish and Town Councils. Further clarification added to the start of Section 6.</p> <p>A link to the Essex Bus Strategy has also been included in the SPD.</p>	<p>Add following text to first part of Chapter 6, p.15: <u>'The principles set out in this SPD relate to the whole of the Colchester City area.'</u></p>

	Neighbourhood plan and consultation with the parish council as efforts through the Local Highways Panel are piecemeal and are often rejected without considering the bigger picture and monies that could be obtained from Active Travel Schemes.		
Colchester Cycle Campaign	Officer Summary: National Cycle Network (NCN) Route 51 now only goes to Wivenhoe. The extension to Harwich was clipped from the network. As well as routes 1 and 51, route 13 runs north from New Farm Road, Stanway to near Wells next the Sea, Norfolk.	Noted. Text in Section 5 paragraph 4 updated	Add following text to Section 5: 'National Cycle Network (NCN) Routes <u>1, 13</u> and 51 run through the Colchester City area city linking Colchester to Tiptree and Harwich to Oxford. '
6. The elements needed to encourage active travel			
Susan Allen-Shepherd	Fully agree	Noted	
British Horse Society	Officer Summary: We wish to see equestrians included in new or improved provisions proposed within Colchester City Councils Local Plan unless there are evidence based reasons for their exclusion which cannot be overcome. When considering the Active Travel SPD where plans are made for "improvements" for walkers and cyclists using existing ways to which equestrians have a legal right of access (bridleways and byways for example) these "improvements" should not be to the detriment of the legal users (including horses). We believe that a number of policies, reviews, guidelines and objectives indicate that this request is	Local Plan Policy DM1 requires all development to be designed to provide a healthy living environment where healthy lifestyles can be promoted including green space and creating attractive opportunities for activities including walking, cycling, horse riding and formal sport. Further text to be added to the section referring to Public Rights of Way and legal users.	Add following text to Chapter 5: page 14: <u>All legal users should be considered where plans are made for improvements to a route for active travel modes, on the Public Rights of Way network.</u>

	<p>considered to be entirely valid by organisations other than the Charity.</p> <p>(for full submission see letter)</p>		
Colchester Cycle Campaign	<p>Officer Summary: Routes to school – we feel that this section should be strengthened.</p>	<p>Further detailed information on new school design is contained in the Essex Design Guide. Reference has been included at the end of this section.</p>	<p>'All <u>new</u> schools should be located within...' 'In addition to the environmental benefits...active travel, and health and well-being.'</p> <p><u>'The School Design Guidance contained in the Essex Design Guide provides additional information, ensuring health and wellbeing principles are applied to development including features to support sustainable accessibility across all user groups.'</u></p>
Colchester Cycle Campaign	<p>Officer Summary: The SPD should point to a dynamically updated map of current Local Cycling and Walking Infrastructure Plan (LCWIP) schemes to help when making requests for planning gain for a particular development.</p>	<p>A link has been provided to the webpage that hosts the LCWIP information. The section on p.16 aims to ensure that routes provided within a new development link with other routes outside of the development area, including LCWIP routes. To</p>	<p>Amend text on p.16: 'Routes within a new development should link with existing and proposed pedestrian and cycle routes outside of the development area, <u>including those routes shown on the Colchester</u></p>

		<p>ensure this is clear, the text has been reworded to state this.</p>	<p><u>Local Cycling and Walking Infrastructure Plan (LCWIP) and any refresh of this plan,</u> therefore providing onward connections to key destinations. Proposed routes include those routes shown on the Essex County Council Colchester Local Cycling and Walking Infrastructure Plan (LCWIP) and any refresh of this map.</p>
<p>Colchester Cycle Campaign</p>	<p>Officer Summary: Paragraph on page 16 beginning 'All new developments that are expected..' could be strengthened. The responsibility to 'provide links' could be seen as ending immediately on the boundary of a development.</p>	<p>Comments noted. Amended second paragraph under 'Provision of Good Quality Infrastructure in New Developments' to clarify.</p> <p>Additional information has been added on the type of segregation and what is</p>	<p>Amend text on p. 15: All new developments... on the site itself and provide links to the <u>nearest surrounding network, ensuring there are no gaps in the active travel infrastructure when where appropriate</u> linking the development to key local amenity destinations.</p> <p>Amend text on p.17: <u>'It is recommended that</u> Where possible, pedestrians, cyclists and</p>

	<p>We are also concerned about the ‘Comfortable’ paragraph on page 17. The ‘where possible’ in relation to segregating cyclists and pedestrians is too weak. May we suggest using the wording in Gear Change and/or LTN 1/20?</p> <p>On page 17 it says that surfacing should be level, smooth and well maintained’. Various cycling projects in Colchester are destined not to achieve their potential because the path is actually more undulating than the road.</p> <p>Direction signs during Cycle Town 2009-11 were put on square posts with the result that they all still face in the</p>	<p>recommended as per LTN/120 with ‘where possible’ removed.</p> <p>Split the first bullet point into two and expanded on the ‘comfortability’.</p> <p>Additional information added about the legibility of the wayfinding and securely attached to posts within the</p>	<p>traffic should be segregated <u>in line with guidance in LTN 1/20</u>. The appropriate type of segregation will be dependent on the location, type of road, and the volume and flow of traffic.’</p> <p>‘Active travel routes should be constructed to appropriate widths, <u>considering comfort for all users with differing speeds and room for safe overtaking</u>. More...’</p> <p>Amend text on p.16:</p> <p>‘Routes should be legible, easy to find, and easy to follow. Signage and wayfinding should be <u>placed securely on posts, be</u> continuous and legible providing information on key destinations <u>and travel time</u>. Signage can also act as a promotional tool to highlight the existence of <u>active travel</u></p>
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	right direction. Is there any way the SPD can touch on this?	last bullet point on the 'Accessibility for all' section	walking and cycling routes and shortcuts.
Will Bramhill	<p>Shared transport</p> <p>On page 22 mention is made of car clubs. While these are the ideal it has proved hard to establish a culture in which they take root, let alone thrive. As someone who could easily give up owning a car, I think we should put greater stress on ordinary commercial car hire, with the planning authority ensuring that car hire depots are evenly spread throughout the city in areas where returning a vehicle at 9pm on a winter's night does not lead to a fear of being robbed (I'm thinking of the hire premises in Hawkins Road and Magdalen Street). Could the city council produce a plan for optimum cover by hire firms and offer incentives for hire companies to start business in those areas?</p>	<p>Comments noted</p> <p>To encourage take up of car clubs, further information has been included on location. CoMoUk have produced guidance on Car Clubs and a link is provided to this web page in the SPD.</p>	<p>Add following text on p.20 '...proposals, particularly in urban areas. <u>Car clubs are best located in areas where there are good public transport links and active travel infrastructure...</u>'.</p>
Improvements to Existing Infrastructure			
Susan Allen-Shepherd	Fully agree. There must be adequate provision in the sustainable areas outside the body of the city.	Comments noted. The principles set out in the SPD relate to the whole of the Colchester administrative area. Text added to Chapter 6 for clarification.	Add following text to first part of Chapter 6, p.15: <u>'the principles set out in this SPD relate to the whole of the Colchester City area.'</u>
Cycle Parking			
Susan Allen-Shepherd	Fully Agree	Noted	No change required
Colchester Cycle Campaign	<u>Officer Summary</u> : The current Essex parking guide is out of date.	Comments noted.	No change required

	<p>We would like to see all new homes have secure and accessible cycle parking either on the property itself or as part of a community parking scheme (lockable bike hangars funded in similar way to residents' car parking schemes). They should be high quality: at present developers put in place cheap sheds which last as little as two years.</p> <p>Cycle parking should be conveniently placed and accessible at all times, which rules out the use of garages unless they have extra room and a secondary specific cycle exit with no step. The ideal is a bespoke room.</p> <p>Current planning conditions appear to bar householders from erecting Asgard (or similar) cycle containers at the front of their homes. Is there any way the SPD can alter these so that structures can be put up without planning permission?</p> <p>Is there a way that the SPD can cover the funding of cycle parking (hangars) in nearby neighbourhoods?</p>	<p>The Essex Parking Guidance review is currently being consulted on and includes standards for cycle parking for all types of development. The guidance is referred to in Local Plan Policy.</p> <p>Permitted development rules cannot be amended by SPD.</p> <p>The SPD does not cover funding of infrastructure not associated with new development. However, provision of cycle parking in existing neighbourhoods is supported in the SPD where a need is identified locally.</p>	
Sustainable Travel, Promotion and Community Projects			
Susan Allen-Shepherd	Fully agree	Noted	No change required
Essex County Council	Essex is in the process of developing a Mobility Hubs Implementation Guide, reference to this future document could be made – this is currently in draft and should be ready by the end of the year.	Further information added and reference has been included to the guidance available on the Essex Design Guide as the Mobility	Add text to p.21: 'Mobility hubs bring together various forms of shared transport, public transport, active transport in spaces

		Hubs Implementation Guide is not currently available.	<p>designed to improve the public realm. <u>This can offer sustainable, flexible, accessible and cost effective 'first or last mile' connections to the nearest bus or railway services.</u></p> <p>Larger developments could consider <u>adopting a mobility hub approach,</u> which co-locates mobility options and other community facilities. This could include <u>bicycle and vehicle parking and access to a range of shared electric vehicles...</u></p> <p><u>Guidance is also available in the Essex Design Guide and Ffurther guidelines...</u></p>
7. Planning Application Expectations			
Susan Allen-Shepherd	It is important that ECC highways can support local needs on planning applications without the risk of being sued for costs by developers.	Noted	No change required
Colchester Cycle Campaign	Officer Summary: Discouraging motor traffic – this is the other side of the coin to encouraging active travel modes. In making observations on planning matters, we see that developers rely on Trics formula to estimate the likely level of motor traffic. In our view applying Trics data leads to an underestimate and the resultant vehicle movements deter people from cycling.	Comments noted. Essex County Council is the Highway Authority and provides advice on mitigation of impact on the highway network. Local Plan Policy refers to developments that	No change required

	Planning applications should take into account the level of intensity of contractors' traffic during any construction.	generate significant movement requiring Transport Assessments in line with the latest ECC policies.	
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