**Wiltshire Climate Alliance**

**Wiltshire Local Plan Review Consultation**

**Supporting Evidence Consultation Response:**

**Local Plan Transport Review**

**SUMMARY**

* **Wiltshire’s emergency 2030 carbon neutral target needs to govern the Local Plan.**
* **Rising transport emissions need to reduce to a fraction to meet or near the target.**
* **Wiltshire Council has more control over transport supply/demand than housing.**
* **A transport strategy based on dramatic modal shift needs to drive the Local Plan.**
* **Current transport plans and strategies are outdated and unfit for this purpose.**
* **The Local Plan Transport Review fails to address the climate issue and its impact.**
* **It disregards the needed modal shift, and instead uses standardised assumptions.**
* **As a result, it predicts over-capacity and anticipates new road construction.**
* **It claims to prioritise mitigations in order: active travel – public transport – roads.**
* **The spending estimates imply the reverse actual prioritisation.**
* **The Transport Review supports housing locations based on car travel.**
* **It fails to reflect best practice and central guidance on climate and modal shift.**
* **A reduction of at least 25% in car travel is a benchmark for carbon neutral 2030.**
* **This is feasible, with modal shift, and makes highway upgrades unnecessary.**
* **The Local Plan should reflect vigorous rail, bus and MaaS strategies.**
* **Local Plan parking policies should be reformed, including ‘maximum’ standards.**
* **Local Plan policies should cover EV charging infrastructure and e-bike promotion.**
* **On transport grounds alone, the review draft Local Plan is unfit for purpose.**

**Introduction: Transport and Climate Emergency Action in Wiltshire**

**Wiltshire Council Climate Emergency Policy**

In passing, on 26 Feb 2019, Motion 13 Acknowledging a Climate Emergency and Proposing the Way Forward, the full Wiltshire Council noted, inter alia, “*it is imperative that we as a species reduce our CO2eq (carbon equivalent) emissions from the current 6.5 tonnes per person per year to less than 2 tonnes by 2030...* *Thus, governments at all levels: national, regional and local, must change legislation, standards, infrastructure and their approach, to meet the need to reduce CO2eq emissions…*”. Full Council believes that, “*1. Wiltshire Council recognises it cannot and should not wait for national governments of any political party to act where it can take action itself. 2. It is important for the residents of Wiltshire that its Council commits to reducing CO2eq emissions and works towards carbon neutrality as quickly as possible…. 4. The consequences of global temperature rising above 1.5°C are so severe that preventing this from happening must be humanity’s number one priority. 5. Bold climate action by Wiltshire Council will demonstrate real leadership and can deliver economic benefits in the County in terms of new jobs, economic savings and market opportunities, as well as improved well-being locally and for people worldwide.*”

Full Council called on the Cabinet to, inter alia:

*“1. Acknowledge that there is a ‘Climate Emergency’.*

*2. Pledge to make the County of Wiltshire carbon neutral by 2030.*

*6. Continue to work with partners in the private sector and civil society across the County and region to deliver this new goal through all relevant strategies and plans*”.

This obligation obviously applies to the Local Plan Review, as the framework for growth, spatial planning, land-use and housing before and after the 2030 carbon neutral target is reached. With the right spatial strategy, the target is still achievable; with the proposed one, it is not.

The pressure on Wiltshire to go carbon neutral, from UK’s international treaty obligations, central government and its own concerned citizens, can only be expected to increase year on year. There may well be pressure, too from citizens and businesses whose own perceived short-term private interests conflict with this commitment. And it is well-known that delays to initiatives will bring the need for abrupt and urgent action. Wiltshire Council needs to act early, and lead with clear commitment, communication and public education.

**Highways, Transport and Waste**

These are policy areas vital to meeting the target. Transport emissions are some 40% of Wiltshire’s total (all the Council’s own emissions, some 1%). Unlike Housing, where specific growth targets are being imposed by central government. As the Highway Authority, and a Local Transport Authority, Wiltshire Council has extensive powers over network management, parking, Traffic Orders, and transport infrastructure policy and investment, including the ability to draw down large-scale capital funding from central government including DfT and MHCLG.

At least one Wiltshire Council senior officer is in the Association of Directors of Environment, Economy, Transport and Planning (ADEPT). The January 2021 ADEPT report, ‘A blueprint for accelerating climate action and a green recovery at the local level’, supported also by the Local Government Association of which Wiltshire Council is a member, refers to such priorities as “1*. Invest in low-carbon and climate-resilient infrastructure*” and “*4. Make it easy for people to walk, cycle or use public transport and to work remotely / flexibly*”.

The ‘Addressing Climate Change and Biodiversity Net Gain’ report released as part of the Local Plan Review makes the point that in Wiltshire transport is responsible for some 40% of all emissions, so it is absolutely fundamental to tackle this issue as a matter of urgency. Yet the proposals in the Plan, particular in the north and west of Wiltshire, are based on the presumption of car-based development along a highway corridor, in stark contrast to the shift in thinking at a national level. The Climate Emergency is not even mentioned until p.36 of the Wiltshire Local Plan Transport Review (‘WLPTR’), in an Appendix, and “more explicit consideration of the carbon reduction agenda” is considered to be one the ‘next steps’ proposed in Section 4.4 of the document. This is completely the wrong approach to future planning with a net zero target in mind. Environmentally sustainable development should be the underlying premise for the Local Plan Review and not an afterthought.

We would suggest that a revised version of the Local Plan be informed by the report from the RTPI ‘Net Zero Transport: The role of spatial planning and place-based solutions’ <https://www.rtpi.org.uk/netzerotransport>

**Lack of a new Local Transport Plan – LTP4**

In a response to a Cabinet 19 May 2020 Question from Colin Gale (Pewsey Community Area Partnership), the response of the Cabinet Member for Highways, Transport and Waste stated, “The *Council is currently developing its 4th Local Transport Plan – LTP4 - (largely shadowing the Local Plan Review). LTP4 will comprise a core strategy document supported by a number of daughter documents including a Freight Management Strategy*.” and added, “*Timetables for the Review of the Local Plan and the Local Transport Plan are both affected by the current pandemic due to the difficulties associated with consultation. The working assumption for the Local Transport Plan (and associated Freight Strategy) is that there will be drafts to share in Autumn 2021*.”

Wiltshire’s first full LTP (LTP1), published in July 2000, covered the period 2001/02-2005/06. The second Wiltshire LTP (LTP2) covered the period 2006/07 – 2010/11. The current LTP covering 2011 to 2026 was published in March 2011- ten years ago, and two-thirds of the way back in its scope.

Although it paid lip-service to climate change LTP3 was developed long before the 2030 carbon neutral Wiltshire target. It did not quantify modal shift from private car to active travel and public transport. Its plans for these modes have been severely under-implemented compared with road building on the A350. Little has changed in terms of modal share. LTP3 is now unfit for purpose in the context of the climate and biodiversity emergencies.

The contents of LTP3 are entirely incompatible with “Addressing Climate Change and Biodiversity Net Gain” in many details and the main thrust. As an emerging plan, the Local Plan needs to take precedence over the ageing LTP3. This makes current plans and spending under LTP3, such as the proposed A350 Melksham bypass, highly problematic.

Transport and the location of housing and commercial development are intimately linked. It is regrettable that the public phase of an LTP4 process has not started, as the previous iterations took at least two years to from initial consultation to completion.

Consultees are having to piece together the transport implications of the Local Plan Review proposals piecemeal, from the Spatial Strategy, Community Area and Supporting Documents.

Strategic Planning should liaise with Transport to speed up the initial LTP4 process, especially if widespread rejection of the Local Plan Review proposals leads to a re-drafting, but in any case.

Local Plan policies relating to transport should reflect the need for reducing the need/demand for travel, urgent modal shift to active travel, public transport, demand management for road capacity, and the corresponding choices of location for development.

**Other transport-related plans missing or out-of-date**

**Wiltshire rail strategy**

In response to a Council 26 February 2019 question From Councillor Ian Thorn, Calne Central Division, the Cabinet Member for Highways, Transport and Waste stated, “*With funding from Swindon and Wiltshire Local Enterprise Partnership, we are currently developing a ‘Swindon and Wiltshire Rail Strategy’ which is planned to be completed by Spring this year. It is anticipated that, following review and further consultation, this will form part of a Wiltshire LTP4 to be developed over the next two years or so.”* Two years later there is no public evidence of review and this WCA representative knows of no consultation, though the SWLEP report was published in Summer 2019.

At a minimum, the recommendations of the SWLEP Rail Strategy by the consultants Systra, and in view of the climate emergency the “best of the rest” with medium policy scores and deliverabilities should be incorporated into the Local Plan Review on the default assumption that they will be adopted by Wiltshire Council and incorporated into LTP4 in due course. The implications for the spatial strategy should be worked in.

**Integrated Transport**

The same response continued, “*At the local level, Core Policy 63 in the Wiltshire Core Strategy includes that: Packages of integrated transport measures will be identified in Chippenham, Trowbridge and Salisbury to help facilitate sustainable development growth…Transport strategies may also be developed for other urban and rural areas in the Plan area.*”

An equivalent policy should be in revised Local Plan Review proposals, but with the elements of the packages clearly identified, not left for the future, since this identification was a task for the earlier Core Strategy. Transport strategies for the market towns and rural areas should be identified, with their main features outlined in enough detail to see their implications for development, evaluate them, and allow the community to support the authority in developing and implementing them within the very first years of the Plan.

**Walking and Cycling Strategies**

LTP4 is to include a review of Cycling & Walking Strategy, with a timetable still not yet clear.

The current “Wiltshire Local Transport Plan 2011-2026 Cycling Strategy” was first scheduled to be consulted on and published in 2011/2012. It came out in March 2014. A review of the strategy, and its fifteen Town Cycle Network Plan, shows that only a minority of its policies and measures have been implemented. It does not, of course, reflect the latest government policies and guidance such as Gear Change and LTN 1/20. It does not reflect the contribution of cycling to modal shift to active travel as part of climate emergency-responsive planning and transport strategies. An updated Cycling Strategy will need to be more ambitious.

A Walking Strategy was to have been produced in 2014 in parallel with the Cycling Strategy. At the time of writing, this WCA representative has been unable to find any such document or verify whether one was published.

The Local Plan and LTP4 should both include walking and cycling strategies as supporting documents. Preparation of drafts and consultation on them should start urgently. The location of development and designs for new settlements should follow best practice in promoting active travel and managing the demand for motoring and the supply of road capacity and parking space. Walking and Cycling Strategies should be integrated with the Rights of Way Improvement Plan/Countryside Access Plan and the soon-to-emerge Green and Blue Infrastructure Strategy. See below.

**Wiltshire Countryside Access Improvement Plan (CAIP)**

The 2015-2025 CAIP (‘Rights of Way Improvement Plan 2’) was described in the Wiltshire and Swindon’s Countryside Access Forum’s July 2019 review, “Maintaining the Rights of Way Network in Wiltshire: the Need for a Post Austerity Recovery Plan (PARP)” (Caf-row-paper-final-5-july-2019-pdf) as being in need of a refresh, and “*It is recommended that these recommendations are included in the amendment of the CAIP due in 2020*.” The review gives a detailed account of under-investment, under-funding and under-staffing.

Instead of post-austerity mode, we are now in a post-pandemic recovery plan mode. We are also in a climate emergency planning mode. Countryside access takes on a new importance and, while much of the Public Right of Way network may stay mainly for leisure, health and wellbeing uses, these are vital in themselves. Some rights-of-way may become important links in active travel and “blue and green infrastructure” networks, and require investment.

Strategic Planning should liaise with Wiltshire’s Rights of Way and Countryside Service to procure the overdue refresh of the CAIP, and incorporate this into the new Local Plan with appropriate policies, so that development contributes to enhancing this vital built and natural capital asset.

**Green and Blue Infrastructure Strategy**

References to the “emerging” Green and Blue Infrastructure Strategy (‘GBIS’)appear to be incorrect, sing the term ‘emerging’ applies to strategies etc. published in draft form. There are piecemeal references and excerpts distributed through the Local Plan Review documents, in particular illustrative maps in the area plans. Green infrastructure has been described as a multifunctional network, with bodies of water adding the ‘blue’ element.

This is welcomed as a positive and necessary element of a carbon-neutral-2030 Local Plan. It is unclear, though, which corridors and tracts in the network will accommodate active travel (walking and cycling) links – and it is vital that they do, given the new urgency of modal shift.

The GBIS should be published for consultation, and form an integral part of the Local Plan Review proposals. The place of active travel should be central to the GBIS, with demanding targets for its support for these. Corridors should be added to the GBIS along all Wiltshire’s active, disused and planned canals, and its live and disused railway lines. It should show how GBIS network links in the town-based plans connect into and through the surrounding rural areas.

**Comments on the Wiltshire Local Plan Transport Review**

The Atkins document “Wiltshire Local Plan, Transport Review January 2021” (‘WLPTR’) is regrettably not an LTP, but just an item of transport planning support using Wiltshire’s strategic transport model. However, it uses standardised national assumptions on trip generation and traffic growth. It acknowledges the uncertainty introduced by the COVID-19 pandemic, lockdowns and changes, but not the possibility of proactive “build back better” policies influencing travel habits and the mix of modes. It ignores the very likely onset of proactive transport policy changes resulting from Wiltshire’s ‘Climate Emergency’ target.

**Introduction (section 1)**

There have been changes in working and shopping habits resulting from the COVID-19 pandemic, some of which may endure. It would therefore be unwise to base future travel demand on 2018 traffic conditions.

**Assessing the impacts of local plan growth (section 2)**

There has been insufficient modelling and analysis to accurately assess the full impacts in respect of transport. For instance, Site 1 in Chippenham is a proposed development which it is acknowledged would “be likely to generate one-way traffic flow that exceeds 1,800 vehicles per hour” [LPR Sustainability Appraisal, Annex II, p.12]. While it is admitted that this will have a ‘moderate (significant) adverse effect’ this transport impact has not been taken into account in objective SA 5 (Minimise our impacts on climate change). There is no reference to the carbon generation from increased traffic, despite the evidence which shows that transport in Wiltshire is responsible for 40% of emissions. By disregarding the carbon generated by its transport impacts the site is then deemed to have only a ‘minor adverse effect’ in respect of SA 5.

**Highway improvements**

As a result of the large inherent uncertainties in the emerging post-pandemic situation and the current Wiltshire climate emergency, the assessments in the WLPTR have a high level of spurious accuracy. It is regrettable that there is no sensitivity analysis to test variations to the assumptions.

The mapped indications of near-capacity and over-capacity road links have a value as indicators of locations where modal shift via active travel and public transport may need to be priorities.

Estimates are available from nearby and comparable public authorities that have made similar commitments to become carbon neutral by 2030. Even those that have committed to a 2050 date have provided 2030 or 2035 interim targets for transport emissions and details of the measures needed to achieve these.

Bath and North East Somerset excluding Bath has a population density of 324 per sq. km, compared with Wiltshire’s 207 per sq. km including the large unpopulated Salisbury Plain. The September 2019 “B&NES Climate Emergency Study Discussion Pack” shows these requirements for reducing transport emissions, using the ‘SCATTER Stretch’ criteria:

**“*Distance reduction:*** *25% reduction in passenger-km per person per year.*

***Significant modal shifts****: 7% Reduction in car travel.*

***Shift to zero carbon cars****: 76% EV, 14% PHEV, 10% Petrol/Diesel.*

[etc.]”

The April 2019 Bristol study, “City of Bristol Carbon Neutrality” scenario for “net zero” has:

**“Population and journey growth:** Radical steps to reduce vehicle numbers and usage by 25% including mass uptake of public and other mobility solutions.”

There is no available evidence that Wiltshire’s 2030 carbon neutral requirements for transport emissions reduction will be substantially different from these. Rural areas currently have relatively high car dependency compared with large cities. It is already clear from studies dome outside Wiltshire

The Local Plan should not base any of its spatial strategy or policies on assuming that highway upgrades such as bypasses and the duelling of sections of the A350 will in fact take place. It should not base its transport assumptions on the ten-year-old LTP3. Routes for such highways should no longer be safeguarded. In the transition from the pandemic emergency to directly and fully addressing the climate and biodiversity emergencies, there should be a moratorium on these schemes.

**EV charging infrastructure**

A mass shift to EV ownership for private cars and light commercial and good vehicles is anticipated and is to be welcomed.

The Local Plan should give details and include policies requiring urgent development of EV charging infrastructure across the county.

However, it needs to recognise that this mass shift will take place too late to bear the main burden of carbon reduction from the transport sector. New petrol and diesel cars will be available until 2030, and hybrids after that. A significant proportion of Wiltshire’s driving population buys used cars, at various price points. Measures to reduce car travel overall are of comparable importance.

**Mitigating impacts of Local Plan Growth (section 3)**

Despite the assertion (3.1 and Appendix A, Table A-2) that active travel has the highest priority, with public transport medium and highways measures the lowest, the strategy proposes spending £31.7 million on walking and cycling, £10.5 million on public transport and £347.6 million on highways schemes. This is ‘predict and provide’ – the discredited philosophy of the last century – on a grand scale. It is also a fallacy to assume that the conversion to ‘clean’ fuels for transport will enable legally binding decarbonisation targets to be met. Those bodies that have done detailed investigations into this area have found that mitigation will need to include significant changes in transport patterns and in assumptions about private car use. For instance:

House of Commons Science and Technology Committee “Clean Growth: Technologies for meeting the UK’s emissions reduction targets**”** [HC 1454] (August 2019):

“*The Government’s current long-term targets for decarbonising transport focus heavily on reducing exhaust emissions and increasing sales of low-emissions vehicles, rather than delivering a low-emissions transport system. In the long-term, widespread personal vehicle ownership does not appear to be compatible with significant decarbonisation. The Government should not aim to achieve emissions reductions simply by replacing existing vehicles with lower-emission versions. Alongside the Government’s existing targets and policies, it must develop a strategy to stimulate a low-emissions transport system, with the metrics and targets to match. This should aim to reduce the number of vehicles required, for example by: promoting and improving public transport; reducing its cost relative to private transport; encouraging vehicle usership in place of ownership; and encouraging and supporting increased levels of walking and cycling. The Government should commit to ensuring that the annual increase in fuel duty should never be lower than the average increase in rail or bus fares.”* (Paragraph 131)

Committee on Climate Change “Policies for the Sixth Carbon Budget and Net Zero” (December 2020):

In Box 2.2 of this document (p.66) there is a summary of the role of Local Authorities in local transport policies. Some of these are shown below: Wiltshire’s Transport Review needs to consider these points and incorporate them into the mitigation measures which are being proposed.

*“•****Planning policy*** *can steer spatial and local planning that favours housing and commercial developments in the right places to reduce traffic and support efficient logistics.*

*•****Investment in walking and cycling networks*** *and development of Local Plans and Transport Plans to deliver modal shift from cars to active and public transport. These can also identify locations for consolidation centres near road links and urban micro-consolidation centres.*

*•Introduction of* ***low-emissions zones*** *that set minimum standards for carbon and other emissions.*

*•Planning and support for installation of* ***EV charging networks*** *across their jurisdictions.*

*….*

*•They can use* ***parking powers*** *under Traffic Regulation Orders to repurpose parking spaces for car clubs, cycle parking and EV charge points and use parking charges to discourage private car use and promote public transport…*

*•LAs can* ***work jointly with bus operators*** *to provide a bus network that is rapid, reliable and affordable (e.g. through a bus strategy and bus quality partnership) …”*

When Wiltshire Council declared a Climate Emergency in February 2019 they resolved to implement best practice methods to limit Global Warming to less than 1.5°C. There is little evidence of best practice being considered in this Transport Review, and a far more radical approach will be needed to ensure that transport emissions in Wiltshire contribute to the ‘carbon neutral by 2030’ target adopted by the Council.

**Walking and cycling measures (3.2)**

Reference should be made to the Local Cycling and Walking Infrastructure Plan (LCWIP) which (presumably) is being prepared to detail the exact plans for improving walking and cycling infrastructure. Improvements to walking and cycling will need to cover all the settlements in Wiltshire, and links between the settlements, not just links within the 3 principal settlements.

It is unclear which schemes are being included in the proposals. There needs to be a breakdown of what is proposed across the principal settlements for the £31.69 million total given in Table G.1.

There is new cycle infrastructure for the three principal settlements shown on Figures 3-1 through 3-3, including ‘on-carriageway cycle lanes’ and ‘segregated two-way cycle track’. A number of questions arise in respect of these maps:

* Detailed design should continue for these schemes.
* The LCWIP should identify the road space to construct these schemes to DfT’s LTN 1/20 Cycling Infrastructure Design standards, or a locally appropriate interpretation.
* It should be clarified whether the cost of all of these schemes included in the costs given in Appendix G.

In paragraph 3.2.1 there is reference to providing “safe, well-signed routes to railway stations from across the three principle settlements of Chippenham, Trowbridge and Salisbury”. As well as this, consideration needs to be given to other routes to serve employment sites, schools, shops, town centres and other amenities.

**Rail Strategy (3.3.2)**

Access to existing stations is important, but the Transport Review should also give consideration to further rail improvements. This very limited section on the rail strategy needs to be considerably expanded.

Twenty years ago, Wiltshire County Council’s Local Transport Plan suggested ‘Priority’ new stations at Wootton Bassett, Corsham and Wilton as well as ‘Possible’ new stations at Lacock, Holt, Staverton, White Horse, Codford, Wylye, Dinton, Porton and Alderbury. (WCC LTP1, Fig 3.6.6).

The more recent SWLEP Rail Strategy Report’s recommendations for new stations in Wiltshire included Corsham, Devizes Parkway, Porton & Wilton (the latter being subject to results of study on Porton). (see SWLEP Rail Strategy Main Report [July 2019] on <https://swlep.co.uk/about/our-strategies>)

As a minimum, the Local Transport Review needs to reflect the aspirations – which Wiltshire Council presumably supported - in the 2019 SWLEP Rail Strategy.

**Bus Strategy (3.3.3/3.3.4)**

This section should be expanded to include reference to Salisbury, in particular how routes can be extended/improved to serve the expanding settlement. It would be appropriate to refer to the role which Park & Ride sites, and associated bus services, might be able to contribute to modal shift.

The consideration of ‘Dynamic Demand Responsive Transport’ (DDRT) is welcome, this is one of the options which could be particular suitable for some of Wiltshire’s scattered rural communities. Across Wiltshire there are households which do not have access to a car, and public transport must be maintained and enhanced across Wiltshire.

**Missing section: ‘Mobility as a Service’ (MaaS).**

‘MaaS’, or Mobility as a Service refers to the integration of various forms of transport services into a single mobility service accessible on demand.

When responding to a questionnaire sent to local authorities who are members of the Western Gateway Sub-national Transport Body in 2020 Wiltshire Council’s response to the question “*How much are you thinking about Future Mobility e.g. Mobility as a Service (MaaS), connected vehicles, Active travel measures within your local area?*” included the reply that “*Wiltshire’s priorities are currently set out to maximise economic growth in those large towns where it can be accommodated more sustainably and where MaaS, Active Travel and commercial frequent public transport can be supported.*” (see December 2020 Agenda and Supporting Papers, WGSTB-Partnership-Board-Combined-Papers\_Dec-16-2020-3.pdf, at <https://westerngatewaystb.org.uk/about/board-meetings-and-minutes>/)

Given the statement that MaaS can be supported there should be to a section to cover the possibilities. This might include reference to existing Car Clubs across Wiltshire – such as Co-Cars in Salisbury – and consideration as to how these could be expanded both in larger and in smaller settlements. Various models for shared mobility – including Car Clubs, Bike share and Mobility hubs - are covered at CoMoUK’s website at <https://como.org.uk/>.

**C2 Parking policy recommendations**

This appendix reports that there was a recommendation from Atkins in 2018 that there should be a review of car parking processes, that a data bank should be built up and that this should help to inform the car parking strategy across Wiltshire. Furthermore “*Once these next steps have been implemented and a good understanding of the parking situation within each principal settlement has been developed, a robust parking policy that aids in the reduction of car trips into the principal settlement and market town centres can be established. It is recommended that these parking policies are used to help manage traffic demand and to mitigate the impacts of growth in each town*.”

It is important to undertake this step because not only is a reduction in car parking spaces, and a modal shift from the motor car, needed to cut carbon and congestion, but there is also the possibility that some town centre car parks could be developed as brownfield sites. For example, in Salisbury this has been proposed (in the Salisbury Central Area framework) for car parks at Salt Lane, Brown Street and part of Central car park.

Therefore, this review is needed as a fundamental pre-requisite to the Local Plan Review.

**Missing section: Residential car parking strategy**

The net zero transport report from RTPI referred to above gives some guidelines regarding how a modal shift from the private car can be achieved – for example (p.41) “*Car ownership is discouraged through the design of the public realm and the ‘decoupling’ of private parking from new home sales. Active and public transport are increasingly the most convenient, affordable and desirable option for travel outside the neighbourhood, with shared car clubs and demand responsive transport providing for journeys where active and public transport are not an option*.”

A radical shift is needed from Wiltshire Council’s current ‘minimum’ parking standards, such as the following:

* A policy or SPD to reduce parking spaces allocated to residential development. It is suggested that a ‘Zonal’ approach be developed, see for example the SPD recently adopted (5/1/2021) in Bournemouth & Poole (available on the web at: <https://www.bournemouth.gov.uk/planningbuilding/PlanningPolicy/Planning-Guidance/BCP-Parking-Standards-Supplementary-Planning-Document.aspx>)
* Discouraging car ownership through the design of the public realm and the ‘decoupling’ of private parking from new homes sales. Parking spaces for private vehicles in new development could be made available on a leasehold basis, located at least 5 minutes’ walk from most dwellings.
* Parking for car share vehicles, and stops for public transport (which may be demand responsive) would be more conveniently located than parking for privately owned vehicles.

The Local Plan should set **maximum** parking standards instead of minimum, complementing the allocation of new housing to sites with lower car dependency. As Campaign for Better Transport stated in their 2014 consultation response, Consultation\_Response\_DCLG\_Planning\_max\_parking\_standards\_260914.pdf, “*There is strong evidence of the effectiveness of maximum parking standards, in reducing congestion and traffic … “There is much evidence of the benefits of maintaining maximum parking standards. In many areas, including but not restricted to large cities, parking policies are a valuable way of ensuring the best use is made of land and that new housing does not contribute to local congestion. Across the country, traffic levels have not grown over the past decade, and in London they have fallen, partly due to the 40-year history of setting clear maximum parking standards across the city. London's economy and the health of its local town centres have not suffered from these measures – in contrast, the evidence is that by promoting higher density development, and encouraging businesses to locate near public transport hubs, there is greater efficiency and less of the 'hollowing out' seen in other towns and cities*.”

The Local Plan should incorporate Car-free Housing. There is a heritage of homes without private or nearby on-street parking, such as terraces in towns such as Bradford on Avon and many others. But there is a severe shortage of modern car-free or low-car housing developments even in Wiltshire’s principle settlements and market towns. It is open to the Planning Authority to require developers to make housing car-free by design and through restrictive covenants. This measure will very significantly reduce the carbon impact of new houses and the carbon budget of their occupiers. Car-free Housing should incorporate secure bicycle storage including conventional power sockets for charging e-bikes. Another advantage is that land area is not taken up by garages, driveways, turning areas etc. This means that a higher density is achievable for a given land-take. In turn, the total housing requirement for the county can be met with fewer and/or smaller sites. Naturally it implies that such housing sites will be in or near the centres of towns, close to shops, etc. and preferably close to main public transport facilities. A quota of at least one third of all new housing being Car-free is achievable and this, or a specific fraction to be determined, should be included in the Local Plan, both as a headline figure and as site-specific proportions.

**E-bikes – an emerging new transport mode**

With new battery technologies and developments in the bicycle market, there has been sustained and explosive growth in sales of electrically assisted pedal cycles – e-bikes – in the EU and in Britain. The major part of cycle sales by value, and in many cases the majority by quantity, are e-bikes. This is in spite of supply shortages due to worldwide demand, tariff barriers on China and Brexit complications. Most cycle retailers in Wiltshire stocking e-bikes report customer waiting lists running into the 50s to 100s, and many months long. They are experiencing severe stock problems, and having to order ahead into 2022 or even later.

Under UK rules, most e-bikes count as pedal cycles (exempt from license, etc., and limited to motor assistance under 15mph). Members of the public are using them in new ways, and in particular are engaging actively in modal shift for journeys of five, ten miles and often far longer. Speeds near to 15mph are easily maintained. A 5 to 7-mile commute can be achieved in half an hour. The often underestimate time overhead of accessing and waling to/from parking places is reduced with cycling and e-biking.

The contribution of e-bikes to carbon neutrality should be reflected in the Local Plan. The transport model used in the WLPTR should be revised to reflect scenarios for uptake and use of e-bikes. The Local Plan should include e-bike promotion policies, just as it should for EVs. The role of cargo e-bikes in substituting for “white van” deliveries should be included.