Matter 5: Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network

1 Question - Whether Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network is positively prepared, justified, effective and consistent with both national policy and the LPSS.

1.1 The Council considers that Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network is positively prepared, justified, effective and consistent with both national policy and the LPSS

1.2 The NPPF at paragraph 35 defines the meaning of "positively prepared", "justified", "effective" and "consistent with national policy". It states:

> "Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:
>
> a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
>
> b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
>
> c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
>
> d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

Positively prepared

1.3 The policy is positively prepared with its development aiding the delivery of sustainable transport measures necessary to mitigate the potential transport impacts of the Local Plan: Strategy and Sites ("LPSS") spatial strategy, which meets the area's objectively assessed needs. It does this by providing a mapped network which is the starting point for the identification of improvements which could be funded and/or provided by new development. The development of, or contribution to, this infrastructure sits alongside any site-specific requirements identified in the site allocation policies or further requirements identified as part of the planning process.

<u>Justified</u>

1.4   It is justified in that it is an appropriate strategy, using the best available evidence, with the mapped network achieved by combining three evidence sources, namely Surrey County Council's ("SCC") *Guildford Local Cycling Plan* (Surrey County Council, undated circa 2015), Guildford Borough Council's ("GBC") *Guildford Route Assessments Feasibility Study* (Transport Initiatives and Urban Movement, 2020) and Guildford Borough Council's concept proposals for the routing of the Sustainable Movement Corridor ("SMC"). For example, the Guildford Local Cycling Plan represents the area outside the Guildford urban area, whereas the Guildford urban area is represented by the Guildford Route Assessments Feasibility Study as this produced a denser network in this area and is a more appropriate and up-to-date evidence source.[1] Likewise, the inclusion of GBC's concept proposals for the routing of the SMC was necessary to take forward these concept proposals from the LPSS and show how the routing of the SMC ties in with the wider cycle network proposals.[2]

1.5   It is acknowledged that these studies and routings represent a point in time and that proposals for cycling infrastructure are evolving given the increased policy importance nationally and locally. As such, the policy allows for a future Local Cycling and Walking Infrastructure Plan ("LCWIP") to become the primary consideration in relation to the mapped network, acknowledging that this is forthcoming. It is anticipated that the LCWIP, as an updated evidence source, will either be consistent with or an improvement on those routes and infrastructure represented on the Policies Map and become the primary consideration for development proposals.

1.6   The policy makes clear that whilst the mapped routes represented on the Policies Map are the starting point for the identification of improvements, provided and/or funded by new development, development proposals are also required to deliver the site-specific requirements for cycle infrastructure identified in site allocation policies and also any further requirements identified as part of the planning application process. This provides direction that the Policies Map should be used in conjunction with the relevant site allocation policy to identify potential infrastructure opportunities. The final element, 'further requirements identified as part of the planning application process' acknowledges that further, or alternative, routes or infrastructure to that suggested on the Policies Map could be identified, potentially stemming from future SCC proposals, smaller-scale interventions identified at a local level, or borne out of stakeholder and public consultation during the development management process.

1.7   Acknowledging this, the Council proposes a main modification which will clarify this intention as described at paragraph 2.6 and 2.7 below.

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[1] The Guildford Cycle Route Assessments Study (2020) was produced as part of feasibility work looking at the introduction of a bike share scheme in Guildford. As such, the remit of this was limited to the Guildford urban area as opposed to the whole borough.
[2] The illustrative route of the SMC was first published in the GBC-LPSS-25a examination document, of the LPSS examination. The route was then included within the Strategic Development Framework SPD (2020) but remains illustrative.

<u>Effective and consistent with both national policy and the LPSS</u>

1.8   The Council considers the policy is effective. Whilst not anticipating the whole of the mapped network to be delivered over the plan period, it is considered that the network is capable of being delivered over the plan period. The mapped network provides a common starting point which sets out where it could be appropriate to develop a cycling connection or where current infrastructure could be upgraded should the opportunity arise. With an up-to-date cycle network policy, developer contributions are anticipated to be more straightforward to secure. The policy also sets out and clarifies the various mechanisms for the delivery of improvements resulting from new developments.

1.9   In addition, the policy also allows for a future LCWIP to become the primary consideration in relation to the mapped network. A future LCWIP will also help prioritise routes further for delivery, therefore developer contributions could be focussed on one strategic link (if it met the necessary tests, described in paragraph 2.8 below) as opposed to securing smaller funding contributions for various small-scale upgrades which may have less impact on modal shift.

1.10   In terms of cross-boundary strategic matters, whilst the Council considers the duty to cooperate is not engaged in the development of this plan, the mapped routes themselves were developed in close consultation with stakeholders. The SCC Guildford Local Cycling Plan (2015) was developed by SCC with the Council's involvement and other stakeholders and was part of a wider project to identify a network across the county which was formulated with other Surrey borough and district councils i.e., cross boundary. The Guildford Route Assessments Feasibility Study (2020) was prepared by the Council with involvement from SCC and other local stakeholders. The Council has also taken part in LCWIP workshops for Mole Valley District Council, Rushmoor Borough Council and Farnham Town (Waverley Borough Council). These neighbouring LCWIPs considered cross-boundary routes, with the opportunity for the Council to comment to this effect.

1.11   Finally, the Council considers that the policy is consistent with national policy and the LPSS. The National Planning Policy Framework states, at paragraph 106 that "Planning policies should:

    …

    d) provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking (drawing on Local Cycling and Walking Infrastructure Plans);"

1.12   Similarly, the LPSS states, within Policy ID3: Sustainable transport for new developments that

    "(2) New development will be required, in so far as its site's size, characteristics and location allow, to maximise:

    (a) the provision of high-quality, safe and direct walking and cycling routes within a permeable site layout, with priority over vehicular traffic, that facilitates and encourages short distance trips by walking and cycling
    …

(c) the improvement of existing cycle and walking routes to local facilities, services, bus stops and railway stations, to ensure their effectiveness and amenity

…"

1.13 Therefore, the introduction of Policy ID10 ensures further detail is given to both of these high-level policies in terms of cycling infrastructure

2 Supplementary Question 5.1 - Are the mapped routes adequately justified and would the network be effective?

<u>Justified</u>

2.1 The mapped routes are justified by the Council's ambition to promote active travel and cycling in particular and realise Government ambitions for a significant uplift in cycling for short journeys.

2.2 It was considered necessary to provide a mapped network, in part, due to the current state of the cycle network in Guildford borough, which is described in the LPSS at para 2.14 as follows 'There is a fragmented and disjointed network of cycle routes, consisting of routes both on and adjacent to local roads, with the latter often comprising shared lanes for pedestrians and cyclists. Many cycle lanes and tracks are narrow and some are unattractive to the average cyclist.'

2.3 The opportunity exists to upgrade this infrastructure alongside delivering new provision. The development of a comprehensive Guildford borough cycle network will improve the coherence, directness, safety, comfort and attractiveness of the routes, which will support the Council and Government's ambitions.

2.4 The mapped network which will appear on the Policies Map is an appropriate strategy, based on proportionate evidence. The mapped network contained within the Policies Map has been developed by combining three evidence sources, SCC's Guildford Local Cycling Plan, the Council's Guildford Route Assessments Feasibility Study and the Council's concept proposals for the routing of the SMC.[3] This method takes into account the most up-to-date cycling plans for the borough, including a more dense network for the Guildford urban area as explained further in paragraph 1.4 above.

2.5 Reasonable alternatives have been considered, including in the Regulation 18 consultation, where the 'alternative option' stated that 'The Policies Map will be updated using only Surrey CC's Guildford Local Cycling Plan.' This would have focussed the map on one evidence source but would have produced a less dense network in the Guildford urban area. The concept routing of the SMC was added following feedback to the Regulation 18 consultation and is helpful is showing how the routing of the SMC ties in with the wider cycle network proposals.

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[3] The illustrative route of the SMC was first published in the GBC-LPSS-25a examination document, of the LPSS examination. The route was then included within the Strategic Development Framework SPD (2020) but remains illustrative.

<u>Effective</u>

2.6   As acknowledged above in paragraph 1.7, the Council proposes a main modification to Policy ID10(1) as follows:

Policy ID10, paragraph (1)

"The routes and infrastructure which comprise the Comprehensive Guildford Borough Cycle Network, including the cycle elements of the Sustainable Movement Corridor, as represented on the Policies Map, will be the ~~basis and~~ starting point for the identification of improvements, primarily for utility cycling, provided and/or funded by new development."

2.7   This is intended to further emphasise, along with the supporting text in the reasoned justification, that the principle of the policy and the mapped routes is to start engagement showing where it could be appropriate to develop a connection or upgrade the current infrastructure. In this respect, the mapped network as reflected in the Policies Map does not represent a fixed and inflexible end state. The mapped network is not intended to be geographically precise or definitive in terms of the level of infrastructure provision. It takes the form of a concept level map, with further work required on each route or connection to establish feasibility and further design choices.

2.8   Given current levels of investment it is not expected that the whole of the network would be delivered in the Plan period. It is considered that developments will progress at different timescales over the lifetime of the Plan and any developer contributions would be related to the development. Planning obligations are required to meet the tests set out in Regulation 122 of the CIL Regulations, namely that they must only be sought where they meet all of the following tests: a) necessary to make the development acceptable in planning terms; b) directly related to the development; and c) fairly and reasonably related in scale and kind to the development. With an up-to-date cycle network policy, developer contributions are anticipated to be more straightforward to secure but, given there will be pockets of the borough where there may not be any development proposals, or the tests above would not be met, this may not be applicable to all areas of the borough (albeit investment may come from other planned projects by Surrey County Council as the Local Highway Authority, or others).

2.9   Therefore, despite not anticipating the whole network to be delivered over the plan period, it is capable of being delivered. It is considered that the network is effective as the starting point for improvements and that these can be secured and delivered via the mechanisms identified in the policy. The current shift in Government policy, regional and county level transport policy towards decarbonisation and the promotion of active modes, indicates that the UK could be on the cusp of reorientation in public investment towards cycle infrastructure, which this policy will support. In addition, the Local Transport Authority will now be required to bring forward highway schemes in general with appropriate cycle infrastructure.[4] The mapped network could be used to establish a

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[4] See page 24 of Gear change: a bold vision for cycling and walking (publishing.service.gov.uk)

case for investment, combined with the developer contributions secured, or improvements to be provided on a site or delivered directly by a developer under licence.

2.10   In terms of the level of infrastructure to be provided, it is important to note that the design of cycle infrastructure will need to be appropriate to the constraints, traffic volumes and speeds of the route and would not always involve segregated cycle lanes. Cycling infrastructure can include high quality cycle tracks segregated from motorised and pedestrian traffic, crossings, low traffic neighbourhoods, 20mph speed limits and modal filters, dependant on location. In instances where the road network is constrained, off-road routes may be more appropriate. Whilst the highest level of infrastructure should be sought for the connection, in line with the standards set out in the Government's Local Transport Note 1/20 Cycling Infrastructure Design, the mapped network should not be interpreted to solely illustrate segregated cycle lanes for all routes.

2.11   The forthcoming development of a LCWIP by Surrey County Council as the Local Transport Authority will become the primary consideration in place of the current mapped network. Therefore, the policy allows for this where it states:

   5) "Development Proposals are expected to have regard to updated plans prepared by Guildford Borough Council and/or Surrey County Council which detail local cycling infrastructure improvements, such as a Local Cycling and Walking Infrastructure Plan."

2.12   In addition, a future LCWIP will also help prioritise routes further for delivery, therefore developer contributions could be focussed on one strategic link (if it met the tests above) as opposed to securing smaller funding contributions for various small-scale upgrades which may have less impact.

2.13   See para 1.10 in relation to effective joint working on cross-boundary strategic matters