



**The Bear Flat Association**

## **Beechen Cliff School**

### **Draft Travel Plan**

### **Comments and suggestions by the Bear Flat Association (BFA)**

#### **1 Introduction**

The draft Travel Plan accompanied the planning application (ref: 19/02796/FUL) for the creation of 33 parking spaces. BFA made representations to the Council in support of this application. Our statement included:

“Beechen Cliff School faces a difficult situation with some 200 staff (not to mention pupils, visitors etc.) and a tight site with little scope for parking, and now with casual parking no longer available just outside the campus.

“The draft Travel Plan and outline parking strategy, both submitted with the planning application, show that the School is grappling with the challenge, seeking measures to control parking and encourage the use of more sustainable modes of transport as alternatives to solo car travel. The implication of the two documents is that the School does not propose permanent use of the lower field for parking, nor any concession for parking on nearby residential streets.

“Against this background, the BFA supports the steps the School is taking to meet parking needs close to the School buildings and we do not object to this planning application for the creation of additional and repurposed parking spaces.”

We note that planning permission is conditional on:

“Within 6 months of the first use of the car parking spaces hereby approved, a Travel Plan will be submitted to and approved in writing by the local planning authority. The development shall thereafter be operated in accordance with the approved Travel Plan.

Reason: In the interest of encouraging sustainable travel methods in accordance with Policy ST1 of the Bath and North-East Somerset Local Plan.”

BFA would like to offer the following comments and suggestions to assist the School in completing the draft Travel Plan for approval by the Council.

The relevant policy context is noted in an Appendix, including Policy ST1 referred to above.

## **2 Aims**

BFA welcomes the aim of the draft Travel Plan “to improve the school impact on travel in the local community”.

The Plan appears also to have a more fundamental aim of promoting more sustainable travel behaviour that ties in with growing public concern about environmental damage and the climate emergency (declared by B&NES and many other Councils). This latter point might be added to the text.

## **3 Travel to and from School**

The Travel Plan could make more of the Odd Down Park and Ride which is now accessible by bus to and from Wellsway. Staff, visitors and parents from the south should be encouraged to use this.

More could also be made of the Linear Park in sections 3.2 and 3.3. This route offers a safe, traffic-free route from the east (via the two tunnels) and the west for cycling and walking. It might be useful for the School and BFA to cooperate in pressing for a crossing on Bloomfield Road to form a safer route from the Linear Park to the existing crossing near Kipling Avenue and on to the School.

The staff transport survey says some 74% of staff currently travel by car to School and 3% by public transport. Bear Flat is within the built-up area of Bath, within walking distance of the city centre for most adults, and close to Wellsway with its frequent bus services. It seems realistic for the School to aim for less use of the car by staff. It seems unlikely that staff will have to carry 60 class workbooks to and from School every day, so that walking, cycling or public transport should be reasonable options for many for much of the time. If teachers can demonstrate reduced use of their cars, this could provide a good role model for students and pupils.

The Travel Plan should encourage reduced car use by staff, students and visitors to and from the site. BFA seeks a stronger commitment to manage future travel

by staff and visitors, not just students and pupils. The setting of targets implied by the Action Plan is important. The Travel Plan should promote the achievement of a target for reducing car usage, and commit to monitoring it on an ongoing basis. Such a target might be tightened over time as progress is made.

#### **4 Parking at School**

BFA appreciates the need for Beechen Cliff School to provide appropriate parking provision for staff and visitors on-site so that it can function effectively as a School. The bold measure to control parking on the campus with a permit scheme is applauded. We accept that this will take time to bed in and be accepted.

The draft Travel Plan states that the School has 73 on-site parking spaces plus 4 mini-bus spaces. The current scheme will bring an additional 14 spaces and will therefore result in a total of 87 parking spaces. It would assist if the Travel Plan explained the rationale for the total figure of 87 parking spaces or stated that it was simply the most that are practicable.

BFA accepts this level for the time being. Any increase (if any land space is or becomes available) would be critically assessed against stated need and the efficacy of the Travel Plan and its implementation. The impact of any increase in School traffic on the surrounding area of Bear Flat, especially Kipling and Shakespeare Avenues and Alexandra Park, would be a major consideration. In recent years, Bear Flat has been subject to a significant amount of through traffic and on-street parking associated with the School, though there are signs this is easing with the RPZ introduced recently.

Indeed, BFA would wish 87 to be a 'high water mark' that might be reduced over time, with consequent benefits not only for the aims of the Travel Plan but also for the amenity and safety of the campus.

We note that a revised Travel Plan will be produced once further staff/student travel surveys have been undertaken and more detailed targets identified; and that this 'will enable a full examination of the impact of parking restriction changes on the local community.'

It would be helpful if the Travel Plan set out an overall target for vehicular movements, which is lower than in the past, and is consistent with available on-site parking space and the overall ambition to achieve more sustainable travel patterns. It would be useful if the numbers of vehicles accessing the School on a daily basis were counted and monitored periodically.

## **5 Travel Plan process**

In commenting on the Proposed Masterplan for Beechen Cliff School in 2017, when we called for an up-to-date Travel Plan, BFA said: "A Travel Plan is a process, not an event.". Consequently, it is encouraging to find that the Travel Plan is to be reviewed regularly. We could envisage a series of such documents, each reporting on progress since the previous iteration and re-setting targets and reformulating the action plan.

BFA backs the proposals to appoint a Travel Plan Champion, and to establish a School Travel Plan Working Group to oversee the further development and implementation of the Travel Plan. We support section 5.1 in envisaging measures to "encourage our pupils, students and parents to take active part in the Travel Plan."

The Government encourages the engagement of communities and local businesses in Travel Plans (see Appendix). The BFA would be happy to engage with the School to develop the Travel Plan, and foster the shift towards more sustainable travel behaviour. We could assist or collaborate on policy or even assist in practical ways, if the School would find that helpful. The BFA represents local residents and organisations and its membership and committees include those with relevant knowledge and experience.

## **Appendix: Local and National Planning Policy Context**

The **Bath and North-East Somerset Placemaking Plan** (July 2017) Policy ST1 (page 215) sets out principles to ensure the delivery of well-connected places accessible by sustainable means of transport. Page 222 concerns Development Management, Transport, Access and Parking, within which paragraph 627 states that developments should make a positive contribution towards the achievement of the Council's traffic reduction targets. This can be achieved by a number of means including: "occupiers of the development seeking to secure changes in the travel behaviour of employees, clients or other visitors by drawing up a workplace or school travel plan to be submitted to the Council ...."

The Government's **National Planning Policy Framework** (Ministry of Housing, Communities and Local Government July 2018 (NPPF)) states that the "purpose of the planning system is to contribute to the achievement of sustainable development". Sustainable development has three overarching objectives, which are in brief:

- Economic objective to help build a strong, responsive and competitive economy;
- Social objective to support strong, vibrant and healthy communities; and
- Environmental objective to contribute to protecting and enhancing our natural, built and historic environment .... minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

Section 9 of the NPPF addresses the promotion of sustainable transport. Planning policies should, among other things:

- Minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;
- Be prepared with the active involvement of local highway authorities, other transport infrastructure providers and operators etc. to align strategies and investments to support sustainable transport and development patterns; and
- Provide for high quality walking and cycling networks and supporting networks such as cycle parking.

Applications for development should:

- a) give priority first to pedestrian and cycling movements, and second, as far as possible, facilitate access to high quality public transport; and

c) create places that are safe, secure and attractive – which minimise the scope for conflict between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards.

The NPPF is supported by the Government’s **Planning Practice Guidance**, which contains a section: Travel Plans, Transport Assessments and Statements. Paragraph 6 [Ref ID: 42-006-20140306] states that travel plans, transport assessments and statements can positively contribute to:

- Encouraging sustainable travel;
- Lessening traffic generation and its detrimental impacts;
- Reducing carbon emissions and climate impacts;
- Creating accessible, connected, inclusive communities;
- Improving health outcomes and quality of life;
- Improving road safety; and
- Reducing the need for new development to increase existing road capacity or provide new roads.

Paragraph 7 of this document states that “Engaging communities and local businesses in Travel Plans, Transport Assessments and Statements can be beneficial in positively supporting higher levels of walking and cycling (which in turn can encourage greater social inclusion, community cohesion and healthier communities)”.

**Home to school travel and transport guidance** (Statutory guidance for local authorities, July 2014) includes:

Effective school travel plans, updated as necessary, put forward a package of measures to improve safety and reduce car use, backed by a partnership involving the school, education, health and transport officers from the local authority, and the police. These seek to secure benefits for both the school and the children by improving their health through active travel and reducing congestion caused by school runs, which in turn helps improve local air quality. Many travel plans are produced as a result of planning conditions. This highlights the need for all relevant departments (e.g. highways departments, planning departments, transport departments, children’s services, environment departments, and public health) to be fully engaged when addressing this duty.

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