

**TOWN AND COUNTRY PLANNING ACT 1990  
TOWN AND COUNTRY PLANNING (GENERAL PERMITTED  
DEVELOPMENT PROCEDURE) ORDER 1995 - TO DATE  
PLANNING AND COMPENSATION ACT 1991  
TOWN AND COUNTRY PLANNING ADVERT REGULATIONS 1994  
PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS)  
ACT 1990  
APPLICATIONS FOR PERMISSION FOR DEVELOPMENT**

These are reports and recommendations by Officers for consideration and resolution by the County Planning Authority.

All the applications in respect of the proposals specified in this report will be available for inspection by the Members of the Committee prior to and during the meeting at which the said applications will be considered.

The Background Papers relating to each application, including forms, plans, relevant correspondence, Development Plan and guidance documents are available for public inspection during normal office hours

**INFORMATION REPORT BY HEAD OF PLANNING SERVICES**

**MOBILE CLASSROOMS**

**1. PURPOSE OF REPORT**

- 1.1 To inform members of advice from the County Clerk on the need for planning permission for the siting of temporary / mobile classrooms on County Council land, and future procedures to be adopted in relation to such proposals.

**2. BACKGROUND**

- 2.1 In recent weeks, officers of the Planning, Education and Design Services sections have been reviewing the approach to the processing and notification of proposals to site temporary classrooms on County land.
- 2.2 In connection with this review, the County Clerk has been approached for an opinion on the need for planning permission in connection with the siting of such classrooms, in particular to provide an interpretation of whether the placement of 'mobile' units actually constitutes operational development or a change of use of land, obliging the submission of an application.
- 2.3 The definition of 'development' often gives rise to complex legal argument, and the County Clerk's research into the situation has led to conclusions which oblige a different approach to the handling of temporary classroom proposals.

**3. CONCLUSIONS**

- 3.1 The County Clerk has looked into the legal planning situation in considerable depth and concludes that the temporary siting of the majority of types of mobile classrooms within school grounds would not normally fall within the definition of development. Unless there are recognisable operational developments such as access works, hardstandings and drainage or other works which have the potential of creating a permanence to the building, losing its 'mobile' and 'temporary' character, then no operational development is considered to be involved. It is also considered that no change of use is involved which constitutes development.
- 3.2 On the basis of the County Clerk's advice, it is likely that there will be few instances where temporary mobile classrooms will require planning permission.
- 3.3 It is intended to introduce a simplified procedure of notifying Planning Services of proposals for temporary mobile classrooms, so the need for planning permission and other related consents can be assessed on a case by case basis. The net result should be a need for fewer formal applications and a speeding up of procedures, which will be to everyone's benefit.

**4. RECOMMENDATION**

- 4.1 That members note the conclusions of this report.

**A. O. PHILLIPS  
HEAD OF PLANNING SERVICES**

**A REPORT BY THE HEAD OF PLANNING SERVICES**

**Conwy Unitary Development Plan  
Consultation Draft**

**1. Introduction**

- 1.1 The purpose of this report is to seek a Council response to the consultation draft of the Conwy UDP. The Plan was published in April 2001 and responses are invited by 18th May 2001. As a neighbouring local authority, Denbighshire County Council is a statutory consultee. An advance copy of this report has been forwarded to meet the deadline, subject to any changes made by the Planning Committee.
- 1.2 This report only seeks to provide an overview of the Plan and to highlight any key concerns with regard to aims, strategy and the subsequent policies and proposals. Minor matters will be addressed in discussions between Officers of the two local planning authorities.

**2. Background**

- 2.1 Conwy County Borough Council has published its draft UDP which is the subject of a 6 week public consultation exercise ending on 18th May 2001. Unlike the Denbighshire UDP consultation exercise, no public exhibitions are programmed to take place. However, advance publicity has been undertaken in the form of a leaflet in the Council Tax demand and neighbour consultations have been undertaken in the vicinity of allocations.
- 2.2 The UDP covers the 15 year period from 1998 to 2013. It covers the whole of the County, with the exception of that part of the Snowdonia National Park which falls within the County boundary. When adopted, it will supersede the Aberconwy Draft Local Plan, the Colwyn Borough Local Plan, the Llandudno / Conwy District Local Plan, the Conwy version of the Clwyd Structure Plan and the Gwynedd Structure Plan.
- 2.3 The UDP is a full consultation draft, but is not a deposit plan, comprising a written statement and proposals maps and also a number of background papers. It contains a strategic Part 1 and a more detailed Part 2.
- 2.4 Members may recall that Conwy County Borough Council submitted both objections and representations of support to the Denbighshire UDP at deposit stage. Objections included firstly, the type of development permissible at St Asaph Business Park and at the extension to the east of the Business Park and secondly, the lack of recognition of areas of landscape on the western edge of Denbighshire through a new landscape designation.

### **3. Comments on the Draft UDP**

#### **3.1 Part 1**

3.1.1 The Plan's strategy was developed through a series of meetings with representatives of business and community groups. In terms of accommodating future growth these were translated into the following:

- to concentrate development in the main urban areas
- to concentrate development along main transport routes
- to concentrate on previously developed land and land already committed for development

3.1.2 The Strategy of the Plan is therefore broadly similar to that of the Denbighshire UDP.

3.1.3 There are some 13 strategic policies covering the major policy areas in the Plan and these are generally supported. The key strategic policies include ST7 which makes provision for the creation of 6,440 jobs and policy ST12 which makes provision for 4500 additional dwellings (these are dealt with later in the report).

3.1.4 The major issue relates to policy ST8 which identifies two 'opportunity sites' at Llanfairfechan and east of Abergele for 'major inward investment / large-scale employment'. The Abergele site comprises 20 hectares of land to the south of Pensarn / Belgrano. It is of concern that no detailed policy is contained in Part 2 of the Plan to provide guidance on the scale and type of development which would be acceptable.

#### **3.2 Part 2**

##### **3.3 Ch 5 The Natural Environment**

3.3.1 The policies seek to protect the most valuable resources of the Plan area ie countryside and natural area, environmental quality, the undeveloped coast and wildlife resources and are generally supported. A review of green barriers has been undertaken with the objective of more strategic and long term green barriers. This complements the approach taken in the Denbighshire UDP and is welcomed.

3.3.2 Much of the County has been designated as an Area of Landscape Value which generally reflects the previous Special Landscape Area. One exception is an area of land to the west of Henllan, broadly between the area around Nantglyn and the area around Groesffordd Marli. It is surprising that the Denbigh Moors area within Conwy County Borough is attached the same landscape value as much of the remainder of the County yet Conwy CBC objected to the fact that the Denbighshire section of the Moors did not have specific landscape designation, in view of its claimed national importance having been identified by the Hobhouse Report.

3.3.3 DCC has concerns over the need, justification (not based on all Wales LANDMAP methodology) and extent of the Area of Landscape Value (ALV). DCC will reserve judgement on this pending the outcome of the Inspector's recommendations to landscape issues in the Denbighshire UDP.

3.3.4 However, the policy as it stands is too stringent and should be amended as follows: Policy should refer to areas of 'Local' or 'County' Landscape Value to acknowledge these are not areas of National / statutory landscape value. The policy as worded is too restrictive and should be amended to reflect the local status of the designation. Suggest deletion of 'only' in second sentence and the addition of criteria 'or the need for a development outweighs the importance of the designation'. This will be an

important addition as certain forms of development e.g. Quarrying, telecommunications and wind turbines may well have a 'material adverse effect upon characteristics which justify the designation' as a ALV but these developments should not be subject to a blanket embargo across great swathes of land in Conwy.

### 3.4 Chapter 6 - The Built Environment

3.4.1 The Plan seeks to preserve and enhance buildings and sites of architectural merit or historic interest and is generally supported.

### 3.5 Chapter 7 - Industry and Offices

3.5.1 The Plan seeks to identify and safeguard a sufficient supply of appropriate industry and office land in suitable locations, the diversification and strengthening of the rural economy and encourage the re-use of redundant and underused land and buildings and is generally supported.

3.5.2 Based on the combination of past take up rates and likely changes in the population and workforce and seeking to maintain unemployment at 3% there is a need to provide some 6,440 jobs over the Plan period. In view of economic problems and the potential of objective 1, an allowance of 50% for flexibility and choice of sites has been applied. Taking a mid range job density of approximately 40 jobs per ha, this results in a requirement of approximately 120 ha. The Plan allocates 98 ha of land for high quality industry and office development and 22 ha of land for local industry and office development.

3.5.3 The second largest allocation comprises 16 ha of land at Abergele East between the Rhuddlan Rd roundabout and Pensarn for B1, B2 or B8 development. The site lies alongside the western edge of the 'opportunity site' at Abergele East, and both sites are served by a new road running from the A55(T) / A547 Rhuddlan Road roundabout to the A548 coast road at Pensarn. Some 30.6 ha of land is also allocated for high quality B1, B2, & B8 development at Tir Llwyd, Kinmel Bay to be accompanied by improvements to St Asaph Avenue (set out in para 3.11.1). It is considered that the development of this site should also be accompanied by improvements to the A547 from its junction with St Asaph Avenue to Rhuddlan. In total this represents a considerable build up of employment land along the eastern part of the coastal strip and will need to be monitored over time in terms of assessing implications for employment allocations in Denbighshire and possibly developing a co-ordinated approach.

3.5.4 Policy IND4 comprises a similar criteria based approach to DCC's policy EMP12 in respect of large employment development proposals which are unable to be accommodated either within development boundaries or on allocated sites. However, this Council's policy is considered to be more stringent, incorporating safeguards relating to the unacceptable loss of agricultural land, landscape etc, avoiding speculative proposals, ensuring it is for one large development and placing limitations on the time limits of any planning permission. It is considered that policy IND4 should also incorporate such safeguards.

### 3.6 Chapter 8 - Tourism

3.6.1 The Plan seeks to retain and develop a variety of good quality tourist accommodation and support the development of a range attractions and facilities and is generally supported. The safeguarding of Foryd Harbour in policy T13 for a tourist and leisure development is welcomed as this complements policies in the Denbighshire UDP.

3.6.2 Policy T16 provides a criteria based approach to proposals for 'large scale holiday villages'. Given that much of the County is either in the National Park or has been identified as an Area of Landscape Value it would appear that there would be relatively few suitable sites for such a £100m development in terms of landscape impact. Furthermore, the first criteria requires that the development is 'completely self contained in terms of the likely services and facilities required by its residents' which it is considered would limit the potential spin offs to the local economy in terms of shops, services and restaurants etc.

### 3.7 Chapter 9 - Retailing

3.7.1 The policies seek to firstly, maintain and enhance Llandudno's role as a sub-regional shopping centre and Colwyn Bay's role as a main shopping centre and secondly, strengthen the vitality, attractiveness and viability of various shopping centres. Amongst others, land is safeguarded for food / convenience at the Bee Field in Abergele and for bulky and in bulk goods/warehousing to the east of Abergele. This latter site is also allocated for strategic high quality industry and office development and it is not clear whether industry / office or retail development would take priority.

3.7.2 This Council notes that whilst the Plan seeks to direct new retail development to town centres, it does not provide a clear criteria based policy with which to assess retail proposals outside town centres.

### 3.8 Chapter 10 - Housing

#### Housing Requirement / Provision

3.8.1 The Plan seeks to provide a sufficient amount and distribution of housing, restrict new dwellings outside urban areas / villages and assist all sections of the community to secure suitable housing and is generally supported.

3.8.2 Provision is made for 4500 additional dwellings over the Plan period. A policy led approach has been adopted which seeks to reduce the housing growth requirement in view of the amount of developable land becoming scarce in certain areas along the coast. The Plan sets out to reduce housing growth levels from 10.6 % in the 90's to 9% over the Plan period (300 dwellings per annum). This is a similar % increase to the Denbighshire UDP. The requirement is met in the following ways:

♦	Conversion of existing buildings	(80% assumption of past trends)	754
♦	Committed housing sites	(431 small sites / 2423 large sites)	2,854
♦			
♦	Windfalls	(sites of 10 units or more)	167
♦	Brownfield sites	(35% assumption)	646
♦	New allocations		708
	Sub Total		5,129
	Less discounted committed housing sites		-629
	Total Housing Requirement / Provision		<b>4,500</b>

- 3.8.3 A 'land resource survey' of the Plan area, adapted from the English National Land Use Database has been undertaken to assess the likely contribution from brownfield sites. Of the identified brownfield land only some 35% is likely to be developed over the Plan period. The figures exclude any land or sites that might be accounted elsewhere in the above table, in order to avoid double counting.
- 3.8.4 The Plan states that it could make provision for 4421 dwellings which is marginally less than the requirement of 4500 dwellings without making new allocations. However, the Plan considers that this would result in an over-concentration of development in the Towyn & Kinmel Bay sub-area which would grow by some 1200 dwellings or 35 % over the Plan period. To provide greater locational housing choice, some 629 dwellings in this sub-area have been discounted from the above table and provided elsewhere in the County in the form of new allocations.
- 3.8.5 The Council appreciates Conwy's concerns about the level of commitments in the Towyn / Kinmel Bay Sub area but would suggest that even though some 600 dwellings have been discounted, they could still be implemented during the Plan period as there are no policies in respect of de-allocating or not renewing permissions. This is an area of the UDP which will need to be monitored over time to determine if there will be any implications for housing provision in the Rhyl area in the first review of the Denbighshire UDP.

#### Housing in Minor Settlements

- 3.8.6 The Plan identifies, by a symbol on the proposals maps (but no development boundary) , a number of minor settlements within which individual dwellings will be permitted in the form of infill or rounding off provided that it is to satisfy proven local need and that there are no vacant dwellings / building plots / buildings to be converted in the settlement. This Council would question the appropriateness of introducing 'local need' aspects to the policy in the context of current and proposed planning policy guidance in Wales which does not require local need to be proven.

#### 3.9 Chapter 11 - Community Facilities & Services

- 3.9.1 The Plan seeks to ensure the provision of quality recreation facilities and open space to meet community needs and health, educational and cultural facilities and the provision of appropriate telecommunications, renewable energy and waste treatment.

#### 3.10 Chapter 12 - Minerals

- 3.10.1 The Plan seeks to enable the winning and working of minerals in accordance with identified needs whilst safeguarding the environment.

#### 3.11 Chapter 13 - Transport

- 3.11.1 The Plan seeks to encourage the development and use of integrated modes of transport which are less damaging to the environment and manage the highway system in a sustainable manner.

3.11.1 In terms of road improvements there are a number of schemes in close proximity to Denbighshire and these are:

- A548 to A547 Pensarn to Rhuddlan Road Bypass
- A547 to A548 Rhuddlan Rd to SE of Abergele (Llanfair Rd) Bypass
- A548 St Asaph Avenue / Towyn Rd, Kinmel Bay Improvement
- A547 to A55 Tollbar to Abergele Improvement
- A548 Kinmel Bay Railway Bridge Improvement

3.11.2 This Council would only comment that not all of these schemes appear on the proposals maps.

#### 4. **CONCLUSIONS**

4.1 The Council welcomes the publication of the draft UDP and wishes Conwy CBC well in progressing the Plan. Generally speaking the Council supports the strategy, policies and proposals of the Plan which are either complementary to or do not harm this County. Nevertheless, there are a number of concerns, as outlined above, which the Council wishes to raise at this draft consultation stage.

#### 5. **RECOMMENDATION**

5.1 That this report be forwarded to Conwy County Borough Council, as this Council's response on the draft Conwy UDP.

5.2 That this Council objects to:

- i. policy ST8 regarding the opportunity site to the east of Abergele, as detailed in para 3.1.4 of this report.
- ii. policy IND4 regarding large scale employment development, as detailed in para 3.5.4 of this report.
- iii. policy E6 regarding Areas of Landscape Value, as detailed in para 3.3.4 of this report.

**A REPORT BY THE HEAD OF PLANNING SERVICES**

**National Assembly for Wales**  
**Consultation Draft Revised Technical Advice Note 18 Transport**

**1 Introduction**

- 1.1 The purpose of this report is to seek a Council response to the National Assembly for Wales' (NAW) Consultation Draft Revised Technical Advice Note 18 Transport. This document was published in late March by NAW and responses are sought by 21st May. An advance copy of this report has been sent to NAW to meet this deadline and any further comments on or changes to this report will be duly forwarded.
- 1.2 Planning Services has also sought to co-ordinate responses from other sections, and the response of the Head of Highways & Transportation is incorporated in this report.

**2 Background**

- 2.1 Planning Guidance in Wales is primarily contained in Planning Policy Wales which is supported by a series of 19 Technical Advice Notes (TAN's). Members will recall that a report on the Draft Revised Planning Policy Wales (PPW) document was presented to the Planning Committee on 25th March. The first revision of the TAN on Transport has been written to complement the Draft PPW.
- 2.2 The revised TAN is intended to 'promote the Assembly's objectives for better integration between planning and transport and between different transport modes and achieving more sustainable patterns of development. It provides practical advice on how unitary development plans and decisions on new developments can help to achieve these objectives'.
- 2.3 The main changes to the advice include the following:
- revision of the TAN structure to emphasise the Assembly's land use planning and transport priorities;
  - a new section providing advice on the integration between land use planning and transport including the relationship between UDP's, Local Transport Plan's (LTP's), climate change and local air quality and road traffic reduction;
  - a new section providing advice on the location of development including specific advice on rural areas and accessibility;
  - updated and additional advice on walking and cycling, public transport and traffic management, demand management and car parking;
  - a new section providing advice on mobility issues and access for the disabled;
  - updated advice on planning for transport infrastructure including new sections on freight, railways and mitigation of environmental impacts;

- a new section on implementation, providing advice on access to roads, transport assessments, planning conditions, planning obligations and travel plans

### 3 General Comments

- 3.1 The provision of revised guidance which seeks to bring about a closer integration of land use and transport planning, a reduction in the amount of travel by car and a more sustainable pattern of travel is welcomed both from a planning and highways & transportation service point of view.
- 3.2 The format and content of the TAN does not seem to provide 'technical' advice, which is the intention of the NAW. Instead the document seems to represent an unsatisfactory compromise of policy and further explanation or advice.
- 3.3 The document raises important questions over the relationship between local *highway* authorities and local *planning* authorities particularly as much of the 'advice' is concerned more with highways and transportation issues and measures such as on-street parking which are primarily dealt by legislation other than planning legislation.
- 3.4 The document makes reference to many measures such as Local Transport Plans, Green Transport Plans, Accessibility profiles, etc, which need to be taken on board or incorporated in UDP preparation. This will result in UDP's becoming large, complex and overcomplicated documents with resulting delays in preparation or review. This scenario would be contrary to Assembly's guidance in para 5 and 10 of PG(W)UDP's that they should be clear, concise and precise. Indeed, para 23 states '*.... the Secretary of State will be prepared to intervene to delete or modify policies which cover other topics or which are over - detailed*'. The Council considers that in order for UDP's to be prepared, adopted and reviewed in reasonable time is for development plans to be a broad framework of planning policies from which other strategies, measures etc can be undertaken and implemented.
- 3.5 The TAN follows on from and generally mirrors the guidance and advice in PPG 13 England. However, both Planning Services and the Head of Highways & Transportation consider that it often omits the detail which is necessary for the policy objectives of government. Whereas English PPG's include figures in terms of the percentage of development on brownfield land, minimum housing densities and maximum car parking standards, the TAN's provide only general guidance.
- 3.6 The Head of Highways & Transportation considers that the TAN does not provide a sufficiently Welsh dimension in terms of recognising the rural character and poor transport infrastructure of much of Wales, including Denbighshire and the implications for local authorities in applying NAW guidance and technical advice.

### 4 Specific Comments

#### 4.1 Unitary Development Plans and Local Transport Plans

##### Para 7

The guidance is unclear as to whether the preparation of a Local Transport Plan is a statutory requirement.

Para 9

Whilst accepting that many transport issues are strategic, involving several authorities, the collaborative working arrangements which exist in Wales may not be robust enough to address difficult issues. In Wales there is no formal framework for Regional Planning Guidance or Regional Transport Strategies as there is in England.

Para 10

It is accepted both from a planning and highways & transportation point of view that there is a need for Local Transport Plan's and UDP's to be consistent and integrated in terms of strategy, policies and projects etc. However, it is not accepted that they can always be prepared or reviewed in parallel. To undertake public consultation on the two documents together may cause confusion with the public and be logistically difficult. Furthermore, a UDP must be the subject of several stages of public consultation and a public inquiry into objections which does not appear to be the case with LTP's. It would be unreasonable to hold up development plans until local transport plans are either prepared or reviewed. As development plans take longer to prepare and adopt it would also be unreasonable to hold up preparation of a LTP.

Para 11

The guidance states that UDP's and LTP's should be subject to appraisal to ensure that the measures they propose are sustainable. However, it is not clear whether this is an environmental appraisal or a sustainability appraisal and how the two differ.

Para 13

It is accepted that the Town & Country Planning Act 1990 places a duty on local planning authorities to include policies on the management of traffic. However, the advice in the draft TAN states that this applies whether there are direct or indirect implications for land use. This represents a considerable departure from and merging of the established distinctions between matters traditionally dealt with by local highway and planning authorities respectively. The advice does not provide sufficient information for local planning authorities to determine the type of indirect implications which should be incorporated in a UDP. This may place lpa's in a difficult position resisting the inclusion of a whole host of measures, policies and schemes in UDP's such as on street parking policies and charges.

Para 14

It is accepted that UDP's should include policies and proposals on the overall development of the transport network and related services. However, the guidance could usefully specify that this should only relate to instances where there are land use and planning implications. The guidance specifies that 'policies and proposals ..... may include the co-ordination of public transport services, ...' which is not considered to be a planning matter.

The guidance states that '*UDP's should include an indication of the time scale and priorities for transport policies and proposals which should reflect that contained in the LTP.* It could be interpreted that UDP's are becoming promotional documents and are being used to add 'legitimacy' to other plan's by incorporating aspects within a statutory document / process. This is at odds with the guidance in PG(W)UDP's which points to UDP's being a land use planning framework containing precise rather than lengthy, complex, vague or over-detailed policies. It is considered that incorporating too much detail from other Plan's and strategies could unnecessarily delay UDP preparation.

## 4.2 Location of Development

### Para 18

The guidance should clarify in the second bullet point what is meant by 'significant' in terms of new housing schemes containing a mix of uses including shops, services and where appropriate employment development.

## 4.3 Rural Areas

### Para 21

It is suggested that additional guidance could be provided on the balance between promoting the re-use of rural buildings (eg as part of farm diversification schemes or for housing) and sustainability in terms of reducing reliance on the private car. Neither draft Planning Policy Wales nor this advice note provides clear guidance on which should be considered a priority in policy terms.

## 4.4 Accessibility

### Para 23

The need to ensure that new development is accessible is appreciated. However, in terms of the preparation of accessibility profiles the guidance is unclear as to whether their preparation is highways or planning responsibility. In terms of planning applications the guidance could encourage or require the promoters of 'major' developments to undertake them.

## 4.5 Walking & Cycling

### Para 24

Whilst welcoming the importance of walking as part of a sustainable transport and land use system it is disappointing that a National Walking Strategy has not yet been prepared.

First bullet point: The Council does not consider that it is the function of UDP's to audit existing provision for pedestrians. This is the responsibility of the local highway authority in drawing up LTP's or advising on UDP proposals and planning applications, where appropriate.

Second bullet point: It is not considered to be the function of UDP's to 'promote' initiatives which encourage walking such as safe routes to school unless a specific project has land use implications which need addressing.

Ninth bullet point: It is accepted that UDP's and planning applications can bring about pedestrian routes providing a secure pedestrian environment along river banks, canal towpaths or disused railways. However, as written, the guidance fails to point out the role and responsibilities of many others in bringing about and maintaining such routes.

## 4.6 Cycling

### Para 25

The advice refers to the National Cycling Strategy target of doubling by 2002 (based on 1996 figures) the number of trips made by cycle. With less than a year to go it would have been useful if the advice note or the PPW document had considered whether or not this was likely to be achieved and if not what other measures could be introduced.

Para 26

The sixth bullet point refers to '*... the reallocation of carriageway to cyclists*' which appears to contradict the seventh bullet point '*segregation of cyclists away from the carriageway where possible ...*'.

4.7 Public Transport

para 28

The guidance states that '*Where enhanced public transport services or infrastructure is necessary to serve a new development, but provision on a commercial basis is not viable, a contribution from the developer towards an agreed level of service or infrastructure provision may be appropriate*'. Whilst this arrangement is welcomed, the guidance should be more strongly worded so that it becomes a requirement. It is also unclear whether this is ultimately to be achieved through planning or highways and transportation legislation. Experience with allocations in the Denbighshire UDP has highlighted the difficulties in seeking to bring about integrated transport, particularly the provision of public transport facilities and services, as part of major development schemes. Further technical advice would be welcomed.

4.8 Demand Management

Para 40

The issue of managing the demand for transport through measures such as road user charging and workplace parking levy are not considered to be applicable to most of Wales (as accepted in the guidance). Furthermore the guidance refers to these in the context of local transport plans rather than UDP's as it is not a planning matter.

4.9 Car Parking

Para 43

It is accepted that co-operation should take place between neighbouring local authorities in preparing a common parking strategy which maintains the existing competitive position between town centres. However, it is not considered that voluntary collaboration provides a strong enough basis to make real progress in reducing car parking levels, compared to formally produced RPG.

Para 44

Whilst recognising the need to reduce car parking (particularly in town centres), with the aim of bringing about a more sustainable pattern of travel, the guidance should recognise that car parking charges are a valuable source of revenue to local authorities.

Para 46

The guidance directs that minimum parking standards are no longer appropriate but does not provide maximum parking standards as in the case of PPG 13 in England. The advice could suggest a range of 'benchmark' figures or advice on the drawing up of suitable standards for different areas. The Head of Highways & Transportation is also concerned about the implications of reducing on-site car parking in terms of encouraging on-street parking in the local neighbourhood. The need mitigation measures either in terms of ensuring a reduction of car usage associated with the development or in terms of parking restrictions, residents parking schemes and other measures to manage the impact on the locality will have to be considered and possibly funded by the developer.

#### 4.10 Mobility and Access for the Disabled

##### Para 50

It is suggested that 'persons with disabilities' is a more appropriate term.

#### 4.11 Roads

##### Para 53

The guidance states '*Local authorities should use UDP policies and development control decisions to reduce the need to use trunk roads and other through routes for short local journeys, particularly where they form part of the strategic network*'. However, it is debatable whether a UDP could realistically reduce existing traffic levels on trunk roads, rather than not bringing about additional traffic. There may also be instances where alternative routes to trunk roads may have considerable environmental, safety and amenity considerations eg. Colwyn Bay. St. Asaph.

The guidance specifies that '*Local authorities should identify these through routes as corridors for movement adjacent to which development will be resisted*'. However, this appears to contradict para 3.4.2 of Draft Planning Policy Wales which points to the success of economic development along the A55 corridor being maintained.

##### Para 56

The guidance appears to suggest that road improvement or new road proposals for local roads in the primary route network should be set out in the UDP to provide the means to examine both the need and the alignment. However the guidance does not specify whether this is in addition to or in place of consultation and approval procedures under highways legislation.

##### Para 59

The advice provides little guidance on the considerations to be taken into account in the provision of roadside service areas.

#### 4.12 Aviation

##### Para 67

It is unclear why DETR, rather than the NAW should be consulted on UDP proposals relating to airports and aerodromes.

#### 4.13 Transport Assessment

##### Para 78

The guidance should specify what constitutes 'major' development in terms of the submission of transport (impact) assessments.

#### 4.14 Travel Plans

##### Para 84

The wording of the advice '*Travel Plans may be prepared by the owners and operators of existing or proposed developments.....*' is not considered to be strong enough. If the Assembly is serious about the production of Travel Plans then it should be a requirement to produce them when submitting a planning application. Further technical advice is required on the need for, methods of preparation and content of Travel Plans.

## 5 **CONCLUSION**

5.1 The Council welcomes firstly, the need to move towards sustainable development and the greater integration of transport and land use planning and secondly, the preparation of revised guidance on the issue of transport. However, concern is expressed about:

- the relationship between and timing of the reviews of Planning Policy Wales and the supporting TAN 18 on Transport.
- the confusing relationship between and duties of local highways authority and local planning authority.
- the lack of comprehensive and clear technical advice on key aspects of achieving the Assembly's objectives in terms of transport.
- the incorporation of what appears to be policy guidance in a document which is intended to provide advice only.
- the additional burdens being placed on UDP's which may make them larger and more complex documents and take longer to prepare and adopt.

## 6 **RECOMMENDATION**

6.1 That this report be forwarded to the National Assembly for Wales as this Council's response on the draft Technical Advice Note 18 on Transport.

**A REPORT BY THE HEAD OF PLANNING SERVICES**

**DATE OF SITE VISITS**

**1. PURPOSE OF REPORT**

- 1.1 To advise Members of the likely date of any Site Visits requested by the Planning Committee.

**2. DATE OF THE SITE VISITS**

- 2.1 In consultation with Legal and Administration, it has been decided that the **Wednesday afternoon 30th May 2001** is most suitable. This date has been provisionally booked.
- 2.2 You are advised, therefore that any site visits arranged today will take place **On Wednesday 30th May 2001 (Afternoon - times to be advised).**

**3. MEMBERSHIP OF THE SITE VISIT PANEL**

- 3.1 This will depend on Political Balance and will include the Chair and Vice Chair of the Committee and the relevant Local Member(s)

**4. RECOMMENDATION**

- 4.1 **That Members agree to the Site Visits being held on Wednesday 30th May 2001**