

Plymouth Community Diagnostics Centre, Colin Campbell Court

Transport Statement

University Hospitals Plymouth NHS Trust

Project number: 60691383

December 2023

Quality information

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1. Introduction

Context

- 1.1 AECOM was commissioned by Universities Hospitals Plymouth NHS Trust ('The Trust') to prepare a Transport Statement (TS) to accompany the planning application for a new Community Diagnostic Centre (CDC) located at Colin Campbell Court, in Plymouth City Centre.
- 1.2 The development is located at Western Approach, at the south western half of the Colin Campbell Court car park. The development site encompasses a vacant brownfield site and part of the car park to provide a new facility for the provision of diagnostic health services.
- 1.3 Some spaces at Colin Campbell Court car park will be lost to accommodate this proposal, the CDC scheme will provide five accessible parking spaces.
- 1.4 Colin Campbell Court car park is situated at the western edge of Plymouth City Centre, locally referred to as the 'West End'. The car park is owned and run by Plymouth City Council (PCC). Its location is presented in **Figure 1-1**.

Community Diagnostic Centres

- 1.5 Community Diagnostic Centres (CDCs) are facilities that provide checks, scans and tests in one place, designed to achieve early diagnoses for patients and timely treatment and intervention. They aim to deliver additional diagnostic capacity by providing quicker and more convenient access for patients and reducing pressure on hospitals.
- 1.6 CDCs offer more place-based, person-centred approaches to care, removing some of the known barriers to access. For example, CDCs could reduce the time and cost associated with travelling to hospitals by being set up in more convenient locations. It is planned that CDCs will assist in reducing backlogs in care. To realise this ambition, 92 centres have already opened in a variety of settings throughout the UK from football stadiums to shopping centres. CDCs are central to providing health provision in the UK.

BREEAM

- 1.7 The proposed development has been assessed in reference to the latest BREEAM guidance. BREEAM is a scheme for assessing the sustainability credentials for the built environment. Two BREEAM topics relate specifically to Transportation and are considered within this TP.
 - Tra01 'Transport assessment and Travel Plan; and
 - Tra02 'Sustainable transport measures'.
- 1.1 For each topic, a number of credits are available which contribute towards the overall BREEAM rating for a new development.
- 1.8 As required by the BREEAM scheme therefore, a site-specific Travel Plan (TP) which has been produced and included within **Appendix A**. this document provides a long-term management strategy which encourages more sustainable travel. It also includes measures to increase or improve more sustainable modes of transport and movement of people and goods during the building's operation.
- 1.9 The TP should be read in conjunction with this TS which has been prepared to inform the planning application. Both documents seek to contribute to the assessment of the development proposals in line with the latest BREEAM guidance.
- 1.10 To achieve TRA01 it is required that, 'No later than concept design stage, undertake a site specific Transport Assessment (or develop a Travel Statement) and draft Travel Plan which can demonstrably be used to influence the site layout and built form'. The requirements are set out in Table 1-1 alongside the location of the information.

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Criteria	Location of information
a: If relevant, travel patterns and attitudes of existing building or site users towards cycling, walking and public transport, to identify relevant constraints and opportunities.	Framework Travel Plan
b: Predicted travel patterns and transport impact of future building or site users.	Transport Statement
c: Current local environment for pedestrians and cyclists, accounting for any age-related requirements of occupants and visitors;	Framework Travel Plan
d: Reporting of the number and type of existing accessible amenities, within 500m of the site	Framework Travel Plan-
e: Disabled access accounting for varying levels and types of disability, including visual impairment.	Transport Statement
f: Calculation of the existing public transport Accessibility Index (AI)	Framework Travel Plan
g: Current facilities for cyclists	Framework Travel Plan and Transport Statement -

Site Context

- 1.11 The proposed development will be situated on brownfield land which was previously a retail premises, which was demolished in 2022 (**Figure 1-2**) and part of Colin Campbell Court Car Park (**Figure 1-3**).
- 1.12 Current access to the premises is achieved from a two-way vehicular access from Western Approach, to the south of the proposed site and through the car park, via a two-way road onto Market Avenue. These routes provide access to the car park as well as rear servicing for the nearby existing retail and commercial units.

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Figure 1-1: Site Location

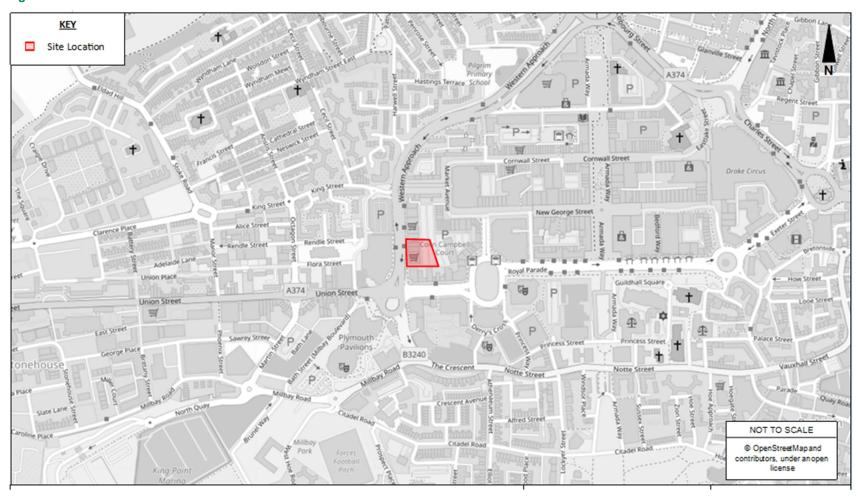


Figure 1-2: Proposed Site



- 1.13 To the rear of the proposed premises, there is currently a Plymouth City Council (PCC) operated public surface level car park, known as Colin Campbell Court. The car park provides 251 spaces which includes provision for disabled users and motorcycles.
- 1.14 Parking at Colin Campbell Court (**Figure 1-3**) is classified as a short stay car park and requires payment, for up to three hours during the "day-time" opening times of 0800-1800hrs Monday to Sunday. There is evening charging between 1800-2200hrs, with an "up to two hours limit", with free overnight parking until 0800hrs.
- 1.15 Colin Campbell House lies to the east of the site with a further parking area beyond. Private parking is currently situated in front of Colin Campbell House, which is outside of the City Council's jurisdiction and charging regime.
- 1.16 Given its location within the city centre, the proposed development land is located in an area with a high level of accessibility and a range of footways, cycle paths and public transport services.

Figure 1-3: Site Context



- 1.17 There has long been an aspiration to develop this site. A planning application was submitted and approved in 2006 for a mixed-use scheme to provide retail related (class A1/A3), leisure (class D2), institution (class D1) and residential accommodation (159 units), together with provision for access, servicing and parking. The permission for this scheme has now expired but this does set the principle for development, enhanced by the site allocation within the Plymouth and South West Devon Joint Local Plan (2014 2034).
- 1.18 A TS has recently been prepared by AECOM for a temporary CT scanner located on part of the Colin Campbell Court Car Park, this will be removed once the proposed CDC development opens.

Consultation

- 1.19 A pre application process was undertaken with Plymouth City Council, whereby it was agreed that TS was the most appropriate form of assessment for the scheme.
- 1.20 Outstanding comments are provided in **Table 1-2**, along with a response.

Table 1-2: Pre Application Comments

PCC comment	Response
We would prefer to see a continuous side road crossing, flush with existing pavement surface levels to prioritise pedestrian movement	Provided as shown in Figure 4-2 (Appendix B)
It is important to ensure that adequate pedestrian routes are provided through the existing CCC pay and display car park	Provided as shown in Figure 4-2 (Appendix B)
At present the existing area to the rear of the building is very much cardominated and not conducive to increased pedestrian activity/movement.	Provided as shown in Figure 4-2 (Appendix B)
In addition, what consideration has been given to pedestrian movements taking place between the CDC building and the temporary CT facility if there is a transitional period between the buildings as the permanent facility opens? At present there doesn't appear to be any clear legible route between these buildings	It is not anticipated that any movements will be required between the two facilities. A route has however been provided as shown in Figure 4-2 and Appendix B.
It is also questioned whether or not there is sufficient space provided for motorists reversing out of the bank of accessible car parking spaces.	A tracking exercise has been undertaken and provided in Figure 4-3

Report Structure

- 1.21 Following this Introduction, this report provides:
 - **Planning context** details of the planning policy which will influence the approach to assessment and the proposal itself. A review of relevant planning applications is also included;
 - Baseline Transport Network Information includes an inventory of the local highway network and highway safety and a review of the accessibility and sustainability of the site;
 - **Development Information** this chapter provides an overview of the development, its operation, layout and details of the proposed parking arrangements;
 - Trip generation a first principles trip generation assessment is presented; and
 - Summary and conclusions.

2. Relevant Policy Review

Introduction

- 2.1 This chapter provides background information with regards to national and local planning policy, planned transport schemes which will impact on the development of the site and planning applications in the area. National and local planning policies strongly encourage the use of public transport and support development which reduces the need to travel by car.
- 2.2 In March 2014 the Department for Communities and Local Government (DCLG) launched the planning practice guidance (PPG) web-based resource. This enabled all planning guidance to be delivered in a single on-line portal which provides links with National Planning Practice Framework (NPPF). In addition to referring to the DfT guidance therefore, the TS has also been prepared with regards to the NPPF and PPG documents.
- 2.3 This section considers the following policy documents:
 - National Planning Policy Framework (NPPF) (2021);
 - Planning Practice Guidance (March 2014);
 - Manual for Streets 2 (2010);
 - The Plymouth and Southwest Devon Joint Local Plan (JLP) (2014 2034);
 - Plymouth City Council The Plymouth Plan (2014-2034);
 - Plymouth City Council Development Guidelines SPD (2020);
 - Plymouth City Council Plymouth Local Transport Plan (3) (2011 -2026); and
 - NHS University Hospitals Plymouth NHS Trust Sustainable Development Green Plan (2020-2025).

National Policy

National Planning Policy Framework, NPPF (2021)

- 2.4 The National Planning Policy Framework (NPPF) was first published in 2012 and most recently revised in July 2021. This revised Framework replaces the original document and subsequent revisions, dated July 2018 and February 2019, and sets out the Government's planning policies for England and how these are expected to be applied at a local level. It provides a template within which locally prepared plans for housing and other development can be produced.
- 2.5 The original Framework produced in 2012 brought together around 1,000 pages of planning policy and guidance into a single document. Critically, the document established a 'presumption in favour of sustainable development'.
- 2.6 The revised Framework, 'makes a number of structural changes, in particular dividing the document into clear chapters; incorporates policy proposals on which the Government has previously consulted; and incorporates additional proposals on which this document is consulting'. It is clear that the presumption in favour of sustainable development remains at the heart of the Framework.
- 2.7 The NPPF highlights the importance that transport infrastructure and transport related policies have in facilitating sustainable development and promoting wider health and sustainability objectives. 'Section 9 Promoting sustainable transport' outlines the key transport policy considerations. It states that transport issues should be considered at the earliest opportunities when planning development so that:
 - "The potential impacts of development on transport networks can be addressed;
 - Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage are realised – for example in relation to the scale, location or density of development that can be accommodated;
 - Opportunities to promote walking, cycling and public transport use are identified and pursued;

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- The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
- Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places."
- 2.8 It is emphasised that development should "give priority to pedestrian and cycle movements"; "address the needs of people with disabilities and reduced mobility in relation to all modes of transport"; "create places that are safe, secure and attractive"; and "designed to enable charging of plug-in and ultra-low emission vehicles in safe, accessible and convenient locations".
- 2.9 Importantly for assessing transport impacts of proposals now refers to highway safety as well as capacity and congestion. This change was made in order to make it clear that "designs should prioritize pedestrian and cycle movements, followed by access to high quality public transport (so far as possible) as well as to reflect the importance of creating well-designed places".
- 2.10 The NPPF states that, "All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a Transport Statement or Transport Assessment so that the likely impacts of the proposal can be assessed".
- 2.11 In assessing sites that may be allocated for development in plans, or specific applications for development, the document states that:
 - Appropriate opportunities to promote sustainable transport modes can be, or have been, taken up, given the type of development and its location;
 - Safe and suitable access to the site can be achieved for all users; and
 - Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.
- 2.12 Importantly, paragraph 109 states "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."
- 2.13 Within this context, applications for development should still give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas, facilitate access and the use of high-quality public transport, address the needs of people with disabilities and reduced mobility.
- 2.14 It is important that development proposals create places that are safe, secure and attractive, minimising the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards. Developments should also facilitate the efficient delivery of goods, and access by service and emergency vehicles and also designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

Planning Practice Guidance March 2014

- 2.15 On 6th March 2014 the Department for Communities and Local Government (DCLG) launched the planning practice guidance (PPG) web-based resource. This enabled all planning guidance to be provided in a single on-line portal which providing links with NPPF. The PPG contains guidance on Travel Plans, Transport Assessments and Transport Statements in relation to decision taking processes for Local Authorities. The section aims to provide advice on when Transport Assessments and Transport Statements are required, and what they should contain but does not but is not as prescriptive on the detail as the former DfT guidance.
- 2.16 As per the previous DfT Guidance (Guidance on Transport Assessments, 2007), the scope and level of assessment required to support development proposals will vary between sites and in accordance with the NPPF, in particular paragraph 32, the scale of assessment will be dependent on the amount of traffic generated by the development proposal, as well as taking into account the local highway conditions.
- 2.17 The PPG puts the emphasis on to the relevant highway authorities and transportation professionals to agree what evaluation is needed in each instance on a case by case basis.
- 2.18 The National Planning Guidance states that "maximum parking standards can lead to poor quality development and congested streets" and suggests that local planning authorities to "seek to ensure parking

provision is appropriate to the needs of the development and not reduced below a level that could be considered reasonable".

Manual for Streets 2 (MfS)

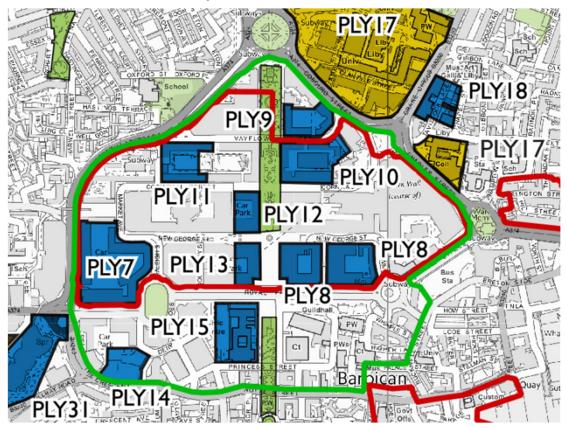
- 2.19 The "Manual for Streets" document was launched in March 2007. The document provides guidance on the design of residential streets in England and Wales. A second iteration "Manual for Streets 2: Wider Application of Principles" was subsequently published in October 2010.
- 2.20 The overarching purpose of MfS is to increase the quality of life through good design which creates people-orientated streets. It highlights the importance of interactions between all road users. It states that 'Streets should not be designed just to accommodate the movement of motor vehicles. It is important that designers place a high priority on meeting the needs of pedestrians, cyclists and public transport users, so that growth in these modes of travel is encouraged'.

Local Policy

The Plymouth and South West Devon Joint Local Plan 2014 – 2034 (Adopted March 2019)

- 2.21 The recently adopted Plymouth and South West Devon Joint Local Plan (JLP) is a joint Plan between Plymouth City Council, South Hams District Council and West Devon Borough Council which looks ahead to 2034. The three councils have joined up to create this plan which will replace all previous development plans in each local council and Plymouth to create one document. It integrates with and completes work that was previously being undertaken separately by these three Local Planning Authorities.
- 2.22 The JLP has seven sections with section four setting out the Strategy for the Plymouth Policy Area, considering Plymouth's strategic role, area-specific strategies for the City's three growth areas, as well as site allocations.
- 2.23 The Plan also incorporates a range of other longer-term plans and planning processes that have previously been developed separately, including the following:
 - Local Transport Plan;
 - Local Economic Strategy;
 - Waste Strategy;
 - Health and Wellbeing strategies;
 - · Children and Young Peoples Plan;
 - Sustainable Communities Strategy;
 - Visitor Plan; and
 - Vital Spark Cultural Strategy.
- 2.24 The PCC website states that, "this coordinated approach will allow the city to have a single voice on its strategic priorities and help all key partners to pull together in the same direction".
- 2.25 Provision for Colin Campbell Court is included within Plymouth's Joint Local Plan (PLY7), as shown in Figure 2-1.

Figure 2-1: PLY7 Site Allocation Boundary



2.26 Policy PLY7 states that, "Land at Colin Campbell Court is allocated for high-quality residential led mixeduse development which will transform the western approach to the City Centre and establish a new residential community. Provision is made for in the order of 300 new homes as part of this mix".

"Development should provide for the following;

- A positive first impression of the city from Western Approach;
- A more intensive form of development with strong street frontages and a range of active ground floor uses, including retail;
- Ground floor uses which create activity throughout the day and into the evening;
- A more urban scale of development with an average building height of between 5 to 6 storeys with accented and landmark buildings on key corners;
- Alignment of development blocks to the city grid pattern with a network of streets which provide improved connectivity between City Centre and the proposed Millbay Boulevard;
- The retention and refurbishment of the Art Deco Colin Campbell House, where it is practicable and viable to do so:
- High quality public realm throughout the site maximising opportunities to create an accessible public open space as a focal point for the community;
- Improvements to the pedestrian / cycling crossing point across Western Approach;
- Public parking to support the West End, provided in a way which does not dominate the street scene;
- Consideration of the potential to open up Frankfort Gate for vehicular access; and
- Opportunity to better connect the West End of the City Centre with Millbay as part of a scheme to improve the junction of Union Street and Western Approach".
- 2.27 It is acknowledged that this development provides a smaller scheme on part of the car park, however the deviation from the aspiration of the Local Plan should be acknowledged.

2.28 Elements of the above policy, such as improved connectivity and access or public realm improvements remain relevant and should be considered within the context of this proposed development.

Plymouth City Council - The Plymouth Plan (2014-2034)

- 2.29 The Plymouth Plan sets a shared direction of travel for the long-term future of Plymouth, bringing together a number of strategic planning processes into one place. This relates to the city's transport needs and the aspiration to be a healthy and prosperous city with a rich arts and cultural environment. The Plan thereby incorporates the Plymouth-specific elements of the Plymouth and South West Devon JLP.
- 2.30 Policy HEA6 of the Plan commits to delivering a safe, efficient, accessible, sustainable and health-enabling transport system. This will include delivering the Strategic Cycle Network and facilities for cyclists which encourage both recreational cycling and the greater and inclusive use of cycling as a primary mode of transport. In addition, Plymouth City Council aim to work with regional partners, agencies and public transport operators to deliver an integrated transport system across all modes covering key locations within and adjoining the Plymouth Travel to Work Area.
- 2.31 Policy HEA9 of the Plan relates to delivering accessible health services and clinical excellence. The city will continue to develop as a location of national and international excellence in clinical and medical science, where everyone has access to the health care they need by:
 - Focusing on integration and joining up services that benefit the people of Plymouth and those who use local services and improving the sustainability of the health and care system.
 - Ensuring that all communities in the city have access to high quality primary care services, with provision of technology-enabled care where appropriate.
 - Supporting the development and emergence of Derriford Hospital as a regional centre of excellence for clinical specialisms that reflect its strengths, aspirations and the health needs of the people of Plymouth and wider population.

Plymouth City Council Development Guidelines SPD July 2020

- 2.32 The Plymouth and South Devon Development Guidelines Supplementary Planning Document (SPD) July 2020 was adopted by Plymouth City Council on 22 June 2020, West Devon Borough Council on 9 June 2020 and South Hams District Council on 16 July 2020.
- 2.33 The SPD has been prepared by the three local authorities to amplify and give guidance on the implementation of the policies of the Plymouth and South West Devon Joint Local Plan (JLP). The document will be a material consideration in the consideration of planning applications pursuant to Part 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended.
- 2.34 The SPD is intended to be used by all members of the community, as well as those directly involved in the development industry and the document is divided into sections which reflect the structure of the JLP for ease of reference.
- 2.35 Chapter 8 is concerned with Transport and Infrastructure and the guidance provided within this chapter supports polices DEV29 to DEV31 of the JLP. The SPD notes that the guidance should be considered alongside;
 - The NPPF, NPPG and the site-specific policies set out in the JLP;
 - Guidance Note: Residential Parking (2012), The Chartered Institution of Highways and Transportation (CIHT) and the Institute of Highway Engineers (IHE);
 - Manual for Streets: Designing and modifying residential streets and Manual for Streets (2007 and 2010); and,
 - Designing and modifying non-trunk roads and busy streets; and, Design Manual for Roads and Bridges (DMRB).
- 2.36 This site is located within the PCC unitary authority boundary; therefore, PCC are the Local Highway Authority.

- 2.37 In terms of transport, the document provides detail on how developments should be set out and the number of parking spaces for vehicles (including Electric Vehicle Charging) motorcycles and bicycles. It also provides information on Travel Planning and Transport Assessment.
- 2.38 The SPD sets out guidance to be followed in terms of the size of parking spaces (**Table 2-1**) and the number of spaces allowed for each development type.

Table 2-1: Minimum parking space dimensions

Parking Space	Minimum Dimensions
Parking bay	2.4m x 4.8m
Parallel parking space	2.0m x 6.0m (3.0m x 6.0m if a HGV loading bay)

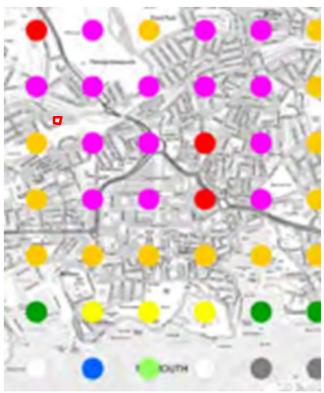
- 2.39 The document which presents indicative car parking provision for a range of land uses. There is no clear land use which could be applied to the proposed development. D1 Doctors and Health Services (excluding hospitals) and C2 Hospitals could be used to generate the number of parking spaces for this development, should that be required.
- 2.40 Importantly, the document states that 'any application that proposes a lower or higher level of parking will be required to provide evidence to justify this proposal'. This means that departures from standard can be proposed subject to justification.

Table 2-2: Indicative car parking provision

Type/size of development	Indicative parking provision	
D1 Doctors', dental and veterinary surgeries and other	1 space per practitioner, 1 space per 2 additional staff and	
health services (excluding hospitals)	2 spacers per consulting rooms.	
C2 Hospitals	1 space per 4 staff + 1 space per 3 visitors	

- 2.41 The SPD outlines a methodology for calculating maximum car parking provision for non-residential development based upon the overall accessibility of the site and the above table, having regard to public transport journey times. These levels of provision include both operational and non-operational parking.
- 2.42 A map is provided within the SPD which sets out the accessibility of a given site. An extract of the plan is presented in **Figure 2-2**, with the site location shown in red.

Figure 2-2 : Accessibility by Public Transport % of people within 30 minutes



2.43 The 'pink dot', which is closest to the site location, represents a site accessibility 'score' of 70 - 79%. A calculation is then undertaken in order to work out the number of spaces allowed, as set out in **Table 2-3**.

Table 2-3: Accessibility Parking Score

Guidance	Score
Calculate the site's 'accessibility per cent score' (from plan within the SPD)	70-79%
Subtract this score from 100 to calculate the sites accessibility	21 -30
Assume a mid point	(100-75) 25
Add 20 per cent	45%
Multiply this percentage by the indicative car parking standard identified in Table 2-2	Maximum parking provision

- 2.44 Taking account of the accessibility standards a parking provision of 45% of the parking standards in **Table 2-2** would be appropriate in this location.
- 2.45 Disabled parking should be provided at 10% of the total number of spaces, prior to the above reduction being calculated.

Car Free Development

- 2.46 The SPD provides information as to when a car free development could be acceptable. It states that the Local Planning Authority will consider:
 - The location and accessibility of the site;
 - Any existing residents parking schemes;
 - The proximity of the development to public transport;
 - Whether there are good cycle links;
 - The potential for overspill parking and the potential impact on the surrounding areas; and
 - Any proposed measures or features of the development designed to enable and ensure that car-free living can be achieved throughout the design life of the development.
- 2.47 Whereas the SPD guidance leans towards car free residential development, the principles are considered to be very relevant and therefore car free developments, whereby visitors make use of City Centre public car parks, are common in this City Centre location.
- 2.48 Providing only essential operational parking, such as disabled provision and drop off spaces is therefore considered to be appropriate in this location and is consistent with a range of recent developments in the City Centre environs. This is a positive measure to reduce unnecessary car use by balancing travel in favour of sustainable modes. Those with limited access to alternatives will be able to park in Western Approach. A drop off point will be provided on site for those with mobility needs.

Disabled / Accessible Parking

- 2.49 The document recommends that parking for motorists with disabilities should be located as close as is practical to the main pedestrian entrance of the development. Referring to the document 'Inclusive Mobility', the SPD states that a maximum distance of 50m from the main entrance is permitted for disabled parking.
- 2.50 It states that provision for such parking is included within the calculated parking levels above and should be calculated on the basis of the size of the car park before any reductions / additions have been applied. It should be included as a minimum of 10 per cent of the overall provision.
- 2.51 Provision for dementia-friendly parking spaces should be considered with appropriately marked out spaces, lighting and signage.

Cycles and Motorcycles

2.52 Secure motorcycle parking should be included within all new developments and should be provided in line with the IHE's Guidelines for Motorcycle Parking. The SPD states that 'dedicated number of spaces will be

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- evaluated in the assessment of the overall parking provision for the site. Where included, motorcycle parking should be well lit, covered and contain stands that allow the vehicles to be securely anchored'.
- 2.53 The document presents the approach to cycle parking which should be taken. It states that, 'All cycle parking incorporated into new developments should meet the following criteria: secure; convenient; clearly visible; well signed; well lit; easily accessible; step free; and preferably covered, in accordance with minimum standards'.
- 2.54 High quality and conveniently located, secure cycle parking should therefore be incorporated into new developments in accordance with published minimum standards (**Table 2-4**). Any deviation from these criteria and standards must be explicitly justified.

Table 2-4: Minimum Cycle Parking

Type/size of development	Minimum cycle parking provision	
All Uses	25 per cent of the indicative car parking provision (before any discounting on the basis of	
	PT accessibility) or 1 space per 8 employees, whichever is greater.	

Electric Charging Infrastructure

2.55 The Joint Local Plan seeks to support the use of sustainable transport measures which includes the use of electric vehicles (EV). The document recommends, as replicated in Table 2-5, that EV charging points should be incorporated in new developments to help reduce the carbon footprint and to promote the use of green energy sources.

Table 2-5: EVC Provision

Development type	Minimum provision
Staff parking provision for Workplaces	A scheme to be produced detailing how at least 25 per cent of parking bays to be provided with dedicated freestanding weatherproof standard charging points. 50 per
Workplaces	cent of all other spaces to be serviced with passive wiring to allow future charging point
	connection.

- 2.56 The document states that 'on a case-by-case basis, but particularly for larger developments, the LPA may seek, in the provision of the development, communal charging facilities and details of their ongoing maintenance. The level of existing charging infrastructure provision in the surrounding area will be taken into consideration'.
- 2.57 Travel planning is discussed in detail within the document, it states that, 'For a definitive view on whether a travel plan will be required, developers should seek early advice from the Transport Planning Team at PCC in Plymouth and from the Highways Development Management Team at DCC in South Hams and West Devon.
- 2.58 Decisions about whether or not a development will require a travel plan will be made on a case-by-case basis and will depend on the nature and travel impacts of the development'. Furthermore 'In Plymouth where a travel plan is required, a travel plan management and audit fee will be payable to the LPA by the developer.'

Plymouth City Council - Plymouth Local Transport Plan (3) (2011-2026)

- 2.59 Plymouth's third Local Transport Plan (LTP3) was produced to cover the period 2011 2026 and replicates the city's growth agenda as detailed in the Local Development Framework. There are two main parts to LTP3 as detailed:
 - Transport Strategy which outlines the local policy and guidance and details the problems and opportunities that exist, and the role transport has in improving peoples' lives.
 - Transport Implementation Plan which outlines the measures that will be developed and potential delivery timeframes and identifies details of the Northern Corridor Whole Route Implementation Plan (WRIP).

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- 2.60 The LTP3 states how it will be essential to increase the efficiency of the transport network so that it is environmentally and economically sustainable so as to maximise the benefits of growth. It describes how a more densely populated city with the promotion of sustainable communities and mixed-use development on the main transport corridors provides the opportunity to improve transport infrastructure. It also creates the right environment for increasing the market for public transport and enabling people to choose walking and cycling more often.
- 2.61 One of Plymouth's local transport objectives includes making walking, cycling and public transport the desirable choice by providing more opportunities and encouraging increased uptake of travel by active modes, walking and cycling to promote healthy lifestyles. It also aims to provide an attractive range of travel choices for more people.
- 2.62 Transport considerations and proposals including new infrastructure, improved connectivity, enhancement of public transport provision, provision for walking and cycling, and encouraging the use of sustainable modes have been very important in developing Area Action Plan (AAP) proposals and securing the adoption of AAPs and the Local Development Framework Core Strategy as deliverable.

NHS University Hospitals Plymouth NHS Trust Sustainable Development Green Plan 2020-2025

- 2.63 The NHS University Hospitals Plymouth NHS Trust Sustainable Development Green Plan sets out a shared vision for the Trust to work towards 'a greener future'. The plan forms a key part of the Trusts sustainable healthcare strategy to ensure services remain fit for purpose by identifying waste reduction opportunities, financial savings and meeting national priorities such as a reduction in carbon emissions.
- 2.64 The Trusts objectives towards a more sustainable future are to achieve:
 - A reduction in the Trust's carbon footprint by 20% by 2025 (and work towards net carbon zero by 2030);
 - 10% net biodiversity gain by 2025;
 - 85% avoidance of waste going to landfill by 2025;
 - 70% score in NHS Sustainable Development Assessment Tool (SDAT) by 2025; and
 - Embed sustainability into every Trust service and activity by 2025.
- 2.65 Proposals for transport sustainability within the plan cover a broad strategy ranging from material to behavioural changes. One area targeted by the plan is to change existing vehicles fleets to low emission vehicles by targeting a carbon reduction in the existing Trust fleet of 20% by 2025. Another area aims to utilise Trust-wide staff awareness and engagement campaigns to encourage staff to shift to sustainable modes when travelling to work where possible, thereby reducing staff reliance on petrol and diesel cars to travel to work with a target of a minimum 10% reduction by 2025.
- 2.66 The plan further outlines that the delivery of new building projects should be to net zero carbon standards, in addition to BREEAM or similar accreditation standards. This will be supported by the development of the Trusts own sustainability standard for new build schemes, enhancing the BREEAM standard, to improve environments for patients and staff.

Planning Considerations

- 2.67 The proposed site is located in an area with a substantial planning history. There has long been an aspiration to develop on Colin Campbell Court car park, details of the three most recent planning applications are provided below.
 - A temporary planning application for a CT scanner was submitted in July 2023. It is proposed that the
 CT scanner will be located on Eastern side of the car park on a vacant site. It is planned that this
 scanner will cease operation when the Community Diagnostic Centre is operational.
 - The most recent full planning application was submitted in 2021 and approved in 2022 for a Health and Wellbeing Centre. It was planned that this facility would provide Primary Care Services, consolidating Community and Clinical spaces within a single location. It included a range of services to cater for up to approximately 2,500 patients per day, providing a range of essential medical services. As part of the

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- scheme, three existing local GP surgeries were planned to be relocated to the proposed development. Community facilities were also planned.
- A planning application was submitted and approved in 2006 for a mixed use scheme to provide retail
 related (class A1/A3), leisure (class D2), institution (class D1) and residential accommodation (159
 units), together with provision for access, servicing and parking. The permission for this scheme has
 now expired but this does set the principle for development, enhanced by the site allocation within the
 Plymouth and South West Devon Joint Local Plan (2014 2034).

Extant Development

- 2.68 As stated previously, planning consent was granted in 2022 for a 'Health and Wellbeing Centre' on this site.
 This development was subject to a thorough Transport Statement and Pre-Application exercise.
- 2.69 This proposal included the development of the southern half of the Colin Campbell Court car park to provide a new facility for the provision of Primary Care Services, consolidating Community and Clinical spaces within a single location.
- 2.70 This larger development scheme was planned to serve approximately 2,500 patients per day, providing a range of essential medical services, consolidated in a single location. As part of the scheme, three existing local GP surgeries were to be relocated to the proposed development alongside community facilities.

A person trip generation was presented within this TS, based on utilising the TRICs database. The resulting weekday peak hour Person Trip Generation is presented in **Table 2-6**.

Table 2-6: Weekday peak Hour Person Trips

	Arrivals	Departures	Total
08:00-09:00	301	143	444
17:00-18:00	150	235	385

2.71 A mode share calculation was then applied to the generated person trips using travel surveys undertaken of current patients, at the GP surgeries (which were planned to be moved) (Table 5-3). These mode share statistics were used in order to understand the number of vehicles that may be generated by the development.

Table 2-7: GP Surgery Mode Share

Mode	%
Walk	47
Car	40
Public Transport	7
Taxi	3
Other	3

2.72 When this mode share was applied to the number of generated trips, the following number of trips was forecast (**Table 2-8**)

Table 2-8: Mode Share

		Arrivals					Departures				
Time Period	Walk	Car	Public Transport	Taxi	Other	Walk	Car	Public Transport	Taxi	Other	
06:00-07:00	2	2	0	0	0	0	0	0	0	0	
07:00-08:00	41	35	6	3	3	8	6	1	0	0	
08:00-09:00	142	121	21	9	9	67	57	10	4	4	
09:00-10:00	173	147	26	11	11	148	126	22	9	9	
10:00-11:00	166	142	25	11	11	162	137	24	10	10	
11:00-12:00	148	126	22	9	9	168	143	25	11	11	
12:00-13:00	118	100	18	8	8	149	127	22	10	10	

13:00-14:00	111	95	17	7	7	103	88	15	7	7
14:00-15:00	139	118	21	9	9	133	113	20	8	8
15:00-16:00	150	127	22	10	10	155	132	23	10	10
16:00-17:00	131	111	19	8	8	149	127	22	10	10
17:00-18:00	70	60	10	4	4	110	94	16	7	7
18:00-19:00	28	24	4	2	2	49	42	7	3	3
19.00 -20.00	18	15	3	1	1	37	31	5	2	2

2.73 In order to complete a sensitivity check, the forecast number of users of the site was profiled against the profile of arrivals and departures generated by TRICs, with the current mode share applied. When comparing **Table 2-8** and **Table 2-9**, the numbers of arrivals and departures are broadly comparable.

Table 2-9: Arrivals and Departures (3,000 People Per day and TRICs arrival / departure profile)

		Arrivals						Departures				
Time Period	Walk	Car	Public Transport	Taxi	Other	Walk	Car	Public Transport	Taxi	Other		
06:00-07:00	2	2	0	0	0	0	0	0	0	0		
07:00-08:00	40	34	6	3	3	7	6	1	0	0		
08:00-09:00	138	117	21	9	9	65	55	10	4	4		
09:00-10:00	168	143	25	11	11	143	122	21	9	9		
10:00-11:00	162	138	24	10	10	156	133	23	10	10		
11:00-12:00	144	123	21	9	9	163	138	24	10	10		
12:00-13:00	115	98	17	7	7	144	123	22	9	9		
13:00-14:00	109	92	16	7	7	100	85	15	6	6		
14:00-15:00	136	115	20	9	9	129	109	19	8	8		
15:00-16:00	146	124	22	9	9	150	127	22	10	10		
16:00-17:00	128	109	19	8	8	144	123	21	9	9		
17:00-18:00	69	58	10	4	4	107	91	16	7	7		
18:00-19:00	27	23	4	2	2	47	40	7	3	3		
19:00-20:00	17	15	3	1	1	35	30	5	2	2		

Summary

2.74 The proposed development is situated in a location that fits well with policy directions locally and nationally. The site has been subject to a number of recent planning applications, which have been approved.

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3. Baseline Network Information

Introduction

- 3.1 The site, as shown in **Figure 1-1**, is located in an area with high accessibility and a range of footway, cycle paths and public transport services.
- 3.2 This chapter provides an overview of the premises. It sets out details of the current use, the local highway network and also the accessibility by sustainable modes.

Current Use

3.3 Colin Campbell Court is a PCC operated public surface level car park (Figure 3-1) offering 251 spaces, with provision for disabled users. There are also 20 motorcycle bays.

Figure 3-1: Colin Campbell Court Car Park



- 3.4 Parking at Colin Campbell Court is classified as a short stay car park and requires payment, for up to three hours during 0800 -1800hrs Monday to Sunday. Evening charging between 1800 2200hrs, up to two hours, with free overnight parking until 0800hrs.
- 3.5 Private parking is currently situated in front of Colin Campbell house, which is outside of the City Council's jurisdiction and charging regime.
- 3.6 A report produced on behalf of PCC entitled 'Parking Supply and Demand Study Future Parking Demand' states that "Utilisation data from March 2017 to April 2018 indicates that Colin Campbell Court has an average weekday occupancy of 34 at 09:00hrs and 129 at 12:00hrs. The 2030 forecast occupancy is expected to increase to 42 at 09:00hrs and 143 at 12:00hrs".

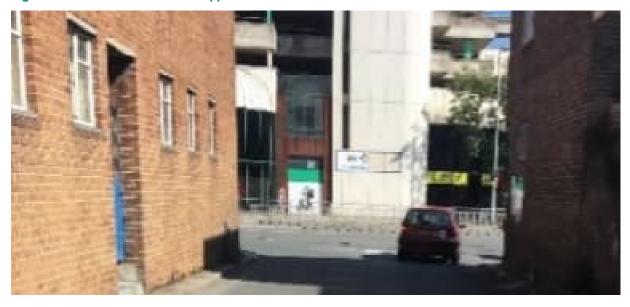
Site Access

3.7 Access to the site is provided towards the south west, from Western Approach, and also to the north east of the premises, from Market Avenue.

Western Approach Access

- 3.8 Access from Western Approach into the car park is provided as a standard junction arrangement allowing two-way vehicular movement and a formalised break in the bus lane.
- 3.9 There are no footways leading from Western Approach, along the access road or into the car park, as can be seen in **Figure 3-2**.

Figure 3-2: Access from Western Approach



- 3.10 The route into the car park is of relatively poor standard with commercial bins stored along part of its length, at the rear of buildings fronting on to Union Street.
- 3.11 The junction forms the start of the 'West End', locally known as the 'Independent Quarter' and is signed with a 20mph speed limit. Dropped kerbs are provided across the access but no tactile paving. Sign clutter is evident as can be seen in **Figure 3-3**.

Figure 3-3: Crossing and signage



Market Avenue Access

3.12 The access into Colin Campbell Court from Market Avenue car park (**Figure 3-4 and 3-5**) is a two-way arrangement with no footway provision. At the rear of retail units, adjacent to the access, the car park perimeter service road involves a right-angled turn which affords limited forward visibility.

Figure 3-4: Market Avenue Access



Figure 3-5: Market Avenue Access



Local Highway Network

3.13 The site is accessed by vehicles via the A374 Western Approach which runs between North Cross roundabout and Union Street, and via Market Avenue.

Western Approach

3.14 Western Approach, shown in **Figure 3-6** and **Figure 3-7**, is a classified primary route with the A374 forming part of the city centre perimeter road network. It provides two lanes of traffic and a bus lane in both directions, thus ensuring bus priority and maintaining journeys times. All crossings are signalised and the speed limit is 30mph.

Figure 3-6: Western Approach (Facing North)



Figure 3-7: Western Approach (Facing South)



3.15 Currently two signal-controlled pedestrian crossings are available at Western Approach, with a staggered signalised crossing to the north (**Figure 3-8**), and to the south a series of signalised crossing points at the junction of Western Approach and Union Street (A374) (**Figure 3-9**).

Figure 3-8: Crossing towards the North of Western Approach



Figure 3-9: Crossing at the Junction with Union Street



Market Avenue

3.16 Market Avenue provides access to the city centre. It has recently been remodelled to provide a more attractive environment for pedestrians and cyclists and is constructed using Home Zone / Shared Space principles with level surfaces throughout. Planters and bollards are used to separate pedestrians from traffic (Figure 3-10)

Figure 3-10 Market Avenue (North of Car Park Access)



Personal Injury Accident Information

- 3.17 In order to assess the safety of the surrounding highways, an analysis of Personal Injury Accident Data (PIA) has been undertaken within the vicinity of the site. Crash Map, an online mapping tool which records and displays PIA accidents has therefore been interrogated for the last full five years (2017- 2022) to understand where there are any issues in the area local to the site. The location of accidents within the vicinity of the site is shown in **Figure 3-11**.
- 3.18 No accidents were recorded at either the A374 Western Approach access or the Market Avenue access of any severity. It is evidenced that there is a cluster of accidents at the junction with A374 Western Approach / Union Street approximately 80m south of the site access. Although the results show 10 incidents in this area it is considered that this level of incidents is commensurate with the type of road and the volume of vehicles using it.
- 3.19 One slight accident occurred on Market Avenue approximately 50m north of the site access, and a total of six slight incidents have occurred on Raleigh Street to the east of the premises which connects with Market Avenue.
- 3.20 The PIA record in the immediate vicinity of the site, where the majority of walking and cycling trips will occur does not indicate that there are any issues that could give rise to safety concerns for residents.

Plymouth Market Frankfort Gate Wonda African Food Store Soul Food Vendor King St isbon Bakery and McDonald's Tribal Voice Plymouth Plymouth parking A LR GRILL HOUSE Delta Delta Grecian Taverna New George Burger King Western Approach Car Park Э 5 A374 Colin Campbell Court Car Park 2 City Furnishers Plymo 0 St Luke's Western Approach Dunya Restaurant Strobe Nightclub Popworld - Plymouth **TimberVault** outh Random Art Corner Best Kebab П Union St 8 The Union Rooms
- JD Wetherspoon Grosvenor Casino

Figure 3-11: Personal Injury Accidents

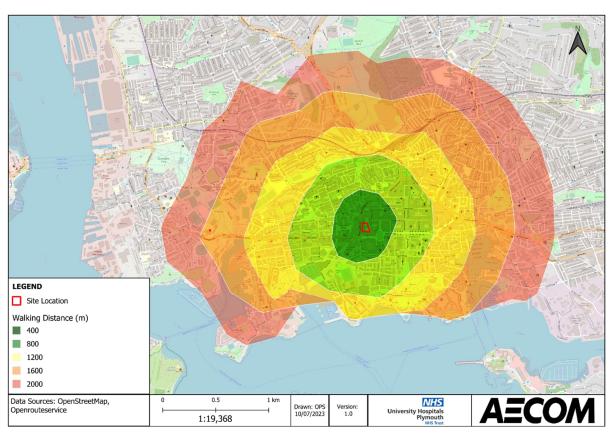
Source: Crashmap.co.uk

Access by Sustainable Modes

Walking and Cycling

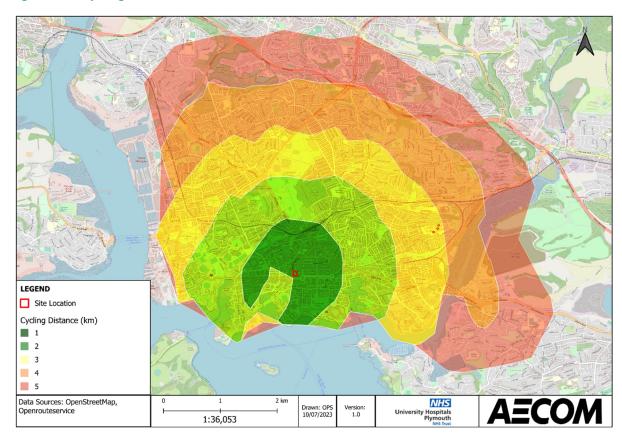
- 3.21 The car park can be accessed on foot via the A373 Western Approach and Market Avenue. However, there are no existing pedestrian facilities in place, such as footpaths or crossing points at either of the accesses or throughout the existing car park. Street lighting is available both within the car park and at the access points.
- 3.22 **Figure 3-12 and Figure 3-13** present the distance from the site which can be accessed by foot within 2km¹ and by bike within 5km, representing an approximate 25 minute journey time.

Figure 3-12: Walking Isochrones



¹ A 2km distance has been used for walking as this has been based on 5-minute walking time intervals as a proxy for 400 metre intervals. The tool used to produce the intervals did not use measurements of less than 1 km, however further detail was needed for the walking isochrones. Therefore, using an assumed walking speed of 1.4 m per second, time was used instead of distance to differentiate intervals. Based on the above speed assumption, walking 84 metres would take one minute. 400 (referencing 400 metres) / 84 equates to 4.76, therefore, by rounding this figure up, 5 minute intervals were used as a proxy for 400 metre intervals.

Figure 3-13: Cycling Isochrones



- 3.23 This demonstrates that a range of local amenities and public transport services are available near the proposed site, including Drake Circus shopping centre and Plymouth Railway Station and are both situated within recommended walking or cycling distances.
- 3.24 As the majority of the City Centre is pedestrianised there are multiple routes to and from the premises. Footways route the length of Western Approach with signalised crossings to the north and south of the proposed development site.
- 3.25 Cyclists are able to use the dedicated bus lanes on the A374 Western Approach in order to access the car park, but some cyclists may prefer to reach the car park from Market Avenue as it provides a lower traffic route. However, there are not currently any cycle parking spaces within the car park.
- 3.26 Two National Cycle Network (NCN) Routes run through Plymouth, NCN 27 which runs along Millbay Road approximately 500m to the southwest of the site and NCN 2 which runs along North Road West approximately 700m to the north of the site. NCN 27 connects north eastern Plymouth, along the coast to the west side of Plymouth city centre, while NCN 2 links Ivybridge, Plympton and Plymouth.

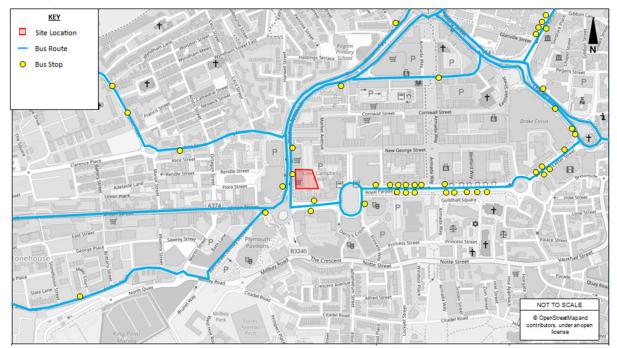
Access by Public Transport

Bus

- 3.27 The site has access to a range of bus routes with the nearest pair of bus stops (Western Approach Stop 1 and 2) to the premises being situated on the A374 Western Approach approximately 50m and 80m north of the site access (A374 Western Approach) respectively.
- 3.28 Four bus services call at Western Approach Stop 1 and route to destinations including Tavistock, Plympton and Plymouth City Centre. Western Approach Stop 2 provides access to 24 bus services to destinations such as Mount Batten, Derriford and Sherford.
- 3.29 The main bus corridor in Plymouth is situated on Royal Parade and has a total of 16 bus stops that offer a wide range of services across Plymouth and the surrounding areas, (**Figure 3-14**). Royal Parade is accessible within 400m east of the site, reached by a 5 10 minute walk.

3.30 The nearest bus stops and routes are shown on **Figure 3-14**. **Figure 3-15** replicated from the PCC website and provides an indication of the number of services that use Western Approach. With a few exceptions, all buses from the north and west of the city, and some from the east, travel along Western Approach.

Figure 3-14: Local bus stops and services



3.31 The nearest bus stops on Western Approach south-bound are on-road, within the bus lane, and therefore any waiting bus will temporarily block the passage of another. However, as these stops serve Royal Parade, which is essentially the terminus for most services operating within the City, existing stops are more likely to be used for passengers alighting a bus and not waiting to board as they will only be able to travel to two further stops.

Figure 3-15: Bus services in Plymouth



3.32 **Table 3-1** provides a summary of the bus services which are available from bus stops on the A374 Western Approach, which is within walking distance of the proposed site (as presented in **Figure 3-14**).

Table 3-1: Local bus services

Service Number	Bus Route	Weekday Frequency
20 / 20A	Plympton – Lee Mill – Ivybridge – Royal Parade	Every 60 minutes
48	City Centre to Wembury via Cattedown, Plymstock	Every 60 minutes
42 / 42A / 42B / 42C	City Centre to Derriford Hospital / Mainstone / Woolwell / Tamerton Foliot via Mutley - Mannamead - Derriford Hospital	Every 10 – 20 minutes
1 / 1A	Plymouth – Tavistock	Every 20 minutes
8/9	City Centre to Efford via Lipson Vale	Every 15 minutes
11	Plymouth – Bodmin Parkway - Padstow	Every 60 minutes
12 / 12A	Plymouth to Bude via Saltash, St Mellion, Callington, Stoke Climsland, Launceston, Whitstone	Every 60 minutes
13	City Centre to Saltash Passage via Weston Mill	Every 60 minutes
16	City Centre to Kings Tamerton via North Prospect, Kings Tamerton, North Prospect, Milehouse	Every 30 minutes
2 / 2A	Saltash to Mountbatten Pier via Plymstock Broadway	Every 15 minutes
27	City Centre to Eggbuckland & Crownhill via Higher Compton, Deer Park, Culver Way	Every 60 minutes

33	Royal Parade to Ford and Keyham via Railway Station, St Levan Road, Admiralty Street, Station Road, St Levan Road, Railway Station	Every 30 minutes
35 / 35A	City Centre to Ham & Beacon Park via Mutley, Peverell, Ham Green, Merrivale Road, Peverell, Mutley	Every 30 minutes
43	City Centre to Ernesettle via Milehouse, St Budeaux	Every 20 minutes
44	City Centre to Whitleigh & Holly Park via Mutley, Crownhill	Every 30 minutes
48	City Centre to Wembury via Cattedown, Plymstock	Every 60 minutes – First bus at 10:15
50 / 51	Derriford to Derriford via Estover, Leigham, Milehouse, St Budeaux, Transit Way, Crownhill	Every 20 minutes
70 / 70A / 70B	Plymouth (Royal Parade) to Cremyll via Stoke Village, Torpoint, Cawsand, Millbrook	Every 60 minutes
72 / 72A	Plymouth to Polperro via Saltash, Looe	Every 60 minutes
60 / 61	Plymouth to Efford via Honicknowle	Every 30 minutes
36	Plymouth to Devonport via City College	Every 10 – 30 minutes
59	Plymouth to Southway via Shaugh Prior	Every 180 minutes
200	Plymouth - Coypool Park & Ride	Every 20 minutes

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Rail

3.33 Plymouth Railway Station is located at North Cross, approximately 1km from Colin Campbell Court. The station is on the cross-country Penzance to Edinburgh line and is managed by Great Western Railway. It offers connections to London Paddington, Penzance, Exeter, the Midlands and Northern England, as well as more local destinations.

Recent Local Transport Projects

- 3.34 A desktop review of local transport projects has not revealed any highway improvement schemes being proposed in the immediate vicinity of the site.
- 3.35 Western Approach car park was upgraded in 2011/2012 which included a pay on foot system and customer services office situated within the car park.
- 3.36 Parking spaces were remarked to conform to modern standards with additional provision for disabled and dementia friendly parking.
- 3.37 As part of the Council's long term plan to regenerate Colin Campbell Court, and to improve connections, via the Millbay Boulevard to the City Centre, the footbridges connecting the car park to The Pavilions (2018) and at Frankfort Gate (2020) have been removed.
- 3.38 At Frankfort Gate the former signalised crossing was upgraded with paving enhanced to form an improved environment.

Summary

- 3.39 In summary, car free development in this location is deliverable as the site is located in a very accessible location, as shown by Plymouth's accessibility map (**Figure 2-2**).
- 3.40 Public transport provision within close proximity of the premises will provide an opportunity for active travel to be incorporated in multi-modal sustainable trips as people will walk to and from public transport nodes. The site is located on one of the highest frequency bus corridors in the city and there are a number of stops located within walking distance.
- 3.41 In terms of cycling, there is a strong level of provision of infrastructure within close proximity of, and indeed adjacent to, the premises, highlighting the potential for cycling to replace short car journeys to and from the site. This is supported by Planning Policy Guidance (PPG) 13, which recommends 5km, equivalent to 20 minutes, as a suitable distance for cycling trips. Whilst this document has been superseded in planning terms, this advice is still considered relevant in regards to movement and accessibility.

3.42 The premises is located in close proximity to residential areas and a wide range of complementary land uses. In terms of the sustainable transport network, there are high quality pedestrian, cycle and public transport links to and from the area. On the basis of these conditions, it is considered that strong opportunities exist to travel sustainably to and from the premises by alternative means to the car, therefore supporting the case for development in this location.

4. Development Information

Introduction

4.1 This chapter presents the proposed scheme masterplan and provides information regarding parking, servicing and operation of the facility.

Service provision

- 4.2 CDCs are facilities that provide checks, scans and tests in one place, designed to achieve early diagnoses for patients and timely treatment and intervention. They aim to deliver additional diagnostic capacity by providing quicker and more convenient access for patients and reducing pressure on hospitals.
- 4.3 The Trust requires additional diagnostics capacity to reduce pressure on the acute site at Derriford. This is in line with the strategic aims of the Future Hospital Programme, preventing the elective and non-elective pathways adversely impacting one another. This additional capacity will be necessary as the Trust seeks to achieve the 99% target of patients receiving diagnostic testing within six weeks.
- 4.4 The Plymouth CDC will provide significant diagnostic capacity in terms of imaging, physiological measurement, pathology, and other services. Patients will come from the Plymouth area to utilise the facility.
- 4.5 Specifically, the CDC will provide the following services:

Imaging

- Computerised Tomography (CT);
- Magnetic Resonance Imaging (MRI);
- o Ultrasound; and
- X-ray.

Audiology

- Audiological assessments;
- Fittings; and
- Follow-ups.

Physiological Measurement

- Echocardiography;
- Vascular Imaging;
- Electrocardiogram (ECG);
- Ambulatory blood pressure monitoring;
- Pacemaker clinic;
- FeNo and Lung Function Tests, Spirometry including broncho-dilator response, some sleep investigations, Simple field tests; and
- o Neurophysiology.

Planned Opening Times

4.6 It is planned that many of the services will be open for seven days a week, between 08.00hrs and 20.00hrs, as presented in **Table 4-1**.

Table 4-1: Proposed opening hours

Opening Times	
08.00-20.00	7 days a week
09.00 - 17.00	5 days a week (Monday- Friday with some Saturday working)
09.00 - 17.00	5 days a week (Monday- Friday)
	08.00-20.00 08.00-20.00 08.00-20.00 08.00-20.00 09.00 - 17.00

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Staff

- 4.7 Statistics regarding staff numbers and facilities is provided within the business case, produced by the Trust. These numbers have been used to generate approximate staff numbers. **Table 4-2** presents the number of WTE (Whole Time Equivalent) staff employed at the site.
- 4.8 These staff will work a number of different shifts across the day. It is unlikely that all of the staff will be at the facility at all times.

Table 4-2: Number of WTE staff

Availability		Staff per Scanner	Scanners	Total WTE
7 Days	MRI	11.15	2	22.3
7 Days	СТ	9.68	2	19.36
7 Days	X ray	5.81	1	5.81
7 Days	Ultrasound	6.85	4	27.4
		Staff		
7 Days	Admin and Clerical	18.64		18.64
7 Days	Phlebotomy	2.24		2.24
7 Days	Advanced Practitioner	2.24		2.24
5 Days	Physiological Measurement Staff	30		30
Total				128 (Rounded)

Patients

4.9 Statistics regarding the number of patients is provided within the business case, produced by the Trust. These forecasts have been used to generate approximate patient numbers. **Table 4-3** provides an estimate of the number of patients per year.

Table 4-3: Patients

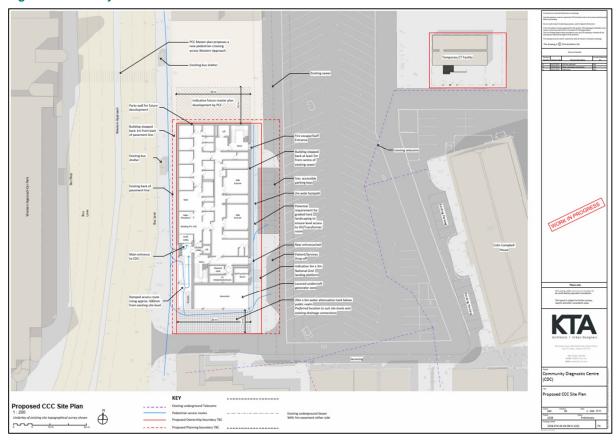
Average Patients per month (per year)

		•		,
Availability Days	Facility	2023/2024	2024/2025	2025/2026
7	MRI			750
7	СТ	1,012	1,012	2,833
7	X ray			750
7	Ultrasound	1,179	1,179	3,300
7	Plain X Ray			750
7	Echocardiography			750
7	Electrocardiogram			750
5	Blood pressure monitoring			17
5	Spirometry			175
5	Simple Field Tests			35
5	Audiology Assessments			166
5	Electroencephalography			146
5	Some sleep investigations			105
5	Pacemaker clinic			333
7	Phlebotomy			417
5	FeNo and Lung Function Tests	175	175	175
5	Point of care testing	5,677	5,677	7,948
	Total	8,043	8,043	19,400

Site Layout

- 4.10 A schematic layout of the premises is shown in **Figure 4-1** (A larger plan is included in **Appendix A**). The design team has incorporated the needs for:
 - Accessibility / people with additional needs;
 - Plymouth City Council aspirations for the site allocation;
 - Client expectations and necessary operational requirements; and,
 - Servicing requirements.

Figure 4-1: Site layout



4.11 The construction of the CDC will require the removal of 20 existing parking spaces and the creation of 5.5m wide service road to the rear of the accessible parking and drop off bays, as shown in **Figure 4-2**.

Figure 4-2: Parking Rearrangement and pedestrian routes

Site Access

- 4.12 The site is extremely permeable for pedestrians and cyclists, with a new access provided from Western Approach to the northern end of the premises, as well as a new footway at the current entrance from Western Approach. Pedestrians can also enter the facility from Market Avenue, with an improvement being made to allow safe passage.
- 4.13 As shown on Figure 4-2 (Appendix B) pedestrian routes will be incorporated across the car park to allow safe access.
- By road, the premises will be accessed from Western Approach by way of an updated all movement access 4.14 junction and from Market Avenue, through the northern part of the car park. Vehicles will be able to travel both ways through the car park.
- 4.15 A raised table crossing will be provided at the junction of Western Approach.

Vehicle Parking

- Five parking spaces will be provided on-site for those with accessibility needs along with a drop off area. It is anticipated that those travelling to the premises who wish to park, will do so either within the remainder of the car park, the Western Approach Pay and Display car park or using the existing short stay parking at Market Way / New George Street which is located in close proximity.
- 4.17 Approximately 25 parking spaces will be removed from the Colin Campbell car park as set out in Figure 3-

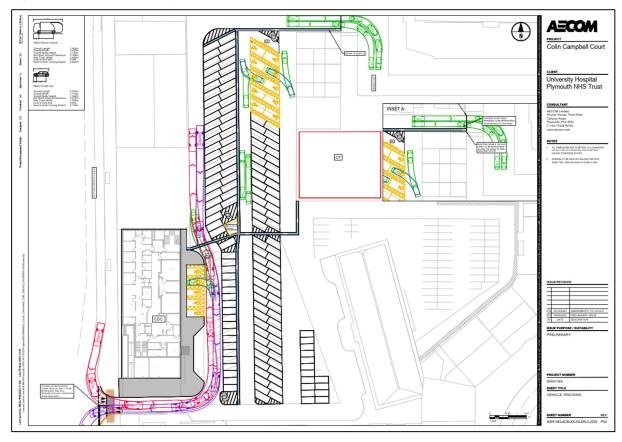
Cycle Parking

18 dedicated secure and covered cycle parking will be provided on site for staff in accordance with the relevant local standards. Two Sheffield type stands (four spaces) will be available for members of the public to use. In addition, storage and changing facilities will be built into the scheme proposals.

Servicing

4.19 The design of the facility has taken into account the requirement to allow servicing to the current business at Colin Campbell Court. Figure 4-3 (Appendix C) shows a swept path analysis of a standard waste vehicle.

Figure 4-3: Swept Path Analysis



- 4.20 Waste will be removed from the facility utilising the route through the site, as shown in Figure 4-3.
- 4.21 Deliveries will utilise the drop off point at the rear of the building and will be timed to occur outside business hours, wherever possible.
- 4.22 Parking spaces have also been tested for their accessibility.

Sustainable Travel Facilities

- 4.23 It is anticipated that this development will be close to the location for one of Plymouth City Council's 'Mobility Hubs,' which is planned nearby to Colin Campbell House. Their website defines a Mobility Hub as being, "designed to offer a variety of transport modes and provide connectivity to public transport networks. They are being designed to reduce private car use, improve the surrounding area, meet local needs and to be recognizable across the city"².
- 4.24 Dedicated cycle parking will be included on site for staff and visitors in accordance with standards set out in the Plymouth Development DPD. In addition, storage and changing facilities will be provided within the premises.

Summary

4.25 This section has presented anticipated staff and visitor numbers, expected to use the proposed facility using information provided by the Trust.

 $^{^2\} https://www.plymouth.gov.uk/parkingandtravel/transportplansandprojects/transportplans/transformingcitiesfund/mobility hubs$

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4.26 The proposed development is largely car free. Five parking spaces will be provided for disabled users and a drop off layby for deliveries and taxis. It is anticipated that other users will utilise the extensive sustainable travel infrastructure in close proximity to the site. If users wish to drive, they will use underutilised city centre car parks such as Colin Campbell Court or Western Approach.

5. Trip Generation

Introduction

- 5.1 A key component of a TS is to provide an outline as to the number of trips that will be generated by a given development.
- 5.2 A common method of trip generation is using the TRICs trip generation data base. This database uses a number of surveys of the same land use classes to determine a trip rate per person or by different modes. TRICs provides a list of land use sub-category definitions for Healthcare, it does not however include a category similar enough to a Community Diagnostics Centre to enable the use of the database with any accuracy. A first principles approach to the trip generation has therefore been undertaken, using data supplied by the Trust.

Person Trip Generation

Employee

- 5.3 As stated in the previous section, approximately 128 WTE staff will be employed at the facility, these staff are likely to work a mixture of shift patterns depending on the department and will not all be at the facility at any one time.
- 5.4 **Table 5-1** provides details of the potential shift patterns.

Table 5-1: Likely Shift Patterns

Availability	Department	Total WTE	Shift Time	Percentage of staff
7 Days	MRI	22.3	07.00 - 19.00	50%
			07.00 - 13.00	25%
			13.00 - 19.00	25%
7 Days	СТ	19.36	07.00 - 19.00	50%
			07.00 - 13.00	25%
			13.00 - 19.00	25%
7 Days	X ray	5.81	07.00 - 19.00	50%
			07.00 - 13.00	25%
			13.00 - 19.00	25%
7 Days	Ultrasound	27.4	07.00 - 19.00	50%
			07.00 - 13.00	25%
			13.00 - 19.00	25%
7 Days	Admin and Clerical	18.64	09.00 - 17.00	100%
7 Days	Phlebotomy	2.24	08.00 - 18.00	100%
7 Days	Advanced Practitioner	2.24	08.00 - 18.00	100%
5 Days	Physiological Measurement Staff	30	08.00 - 18.00	50%
			10.00- 16.00	50%
Total		128		

Total 128 (Rounded)

5.5 **Table 5-2** presents a person trip generation, based on the shift times presented in **Table 5-1**.

Table 5-2: Person Arrivals and Departures (Employees)

Time	Arrivals	Departures
06:00-07:00	56	0
07:00-08:00	19	0
08:00-09:00	19	0
09:00-10:00	15	0
10:00-11:00	0	0
11:00-12:00	0	0
12:00-13:00	19	0
13:00-14:00	0	19
14:00-15:00	0	0
15:00-16:00	0	0
16:00-17:00	0	15
17:00-18:00	0	19
18:00-19:00	0	19
19:00-20:00	0	56
	128	128

Staff Mode Share

5.6 The Census 2011 dataset includes origin-destination data including 'Location of usual residence and place of work by method of travel to work'. This dataset is not yet available for the 2021 Census. These mode share statistics from the Census 2011 database have been investigated in order to understand the mode share of staff travelling to the facility for work. The site is located within both the Plymouth 027 and Plymouth 029 super output areas, these are presented in **Table 5-3** alongside an average of the two.

Table 5-3: Employee Mode Share

Mode	Plymouth 027	Plymouth 029	Average
Walk	30%	16%	23%
Cycle	3%	5%	4%
Car	38%	68%	53%
Public Transport	28%	10%	19%
Taxi	0%	1%	1%
Other	0%	0%	0%

Source: Census 2011 'Method of Travel to Work'

5.7 As the site is car-free, the mode share for motor vehicles has been pro-rated onto the other modes, with the anticipated trip generation by mode presented in **Table 5-4**.

Table 5-4: Employee Trip Generation by Mode

Mode	Average	(One Way trips)
Walk	49%	63
Cycle	10%	13
Public Transport	39%	49
Taxi	1%	2
Other	1%	1
Total		128

5.8 **Table 5-4** indicates that up to 49% of staff could be expected to walk to work, with 39% using public transport. It is acknowledged that some staff may still choose to drive to work, however with the exception

of disability spaces, they will be required to park at other locations within Plymouth City Centre due to the car-free nature of the development.

5.9 **Table 5-5** presents the forecast number of staff daily and peak hour trips by mode.

Table 5-5: Employee Trip Generation by mode (Two Way)

Trip Generation

Mode	Average	AM Peak 08.00 – 09.00 (Two Way)	PM Peak 17.00 – 18.00 (Two Way)	Per Day (Two Way)
Walk	49%	9	9	125
Cycle	10%	2	2	26
Public Transport	39%	7	7	100
Taxi	1%	0	0	3
Other	1%	0	0	3
Total	100%	19	19	256

Patients

5.10 Estimates of the number of patients accessing the facility on a daily basis have been generated using average month (per year) presented in the Trust's business case for funding, as set out in **Table 5-6**.

Table 5-6: Predicted number of patients

Average	Month	(bv vear)
Average		IDV VEGIT

Availability Days	Facility	2023/2024	2024/2025	2025/2026
7	MRI			750
7	СТ	1,012	1,012	2,833
7	X ray			750
7	Ultrasound	1,179	1,179	3,300
7	Plain X Ray			750
7	Echocardiography			750
7	Electrocardiogram			750
5	Blood pressure monitoring			17
5	Spirometry			175
5	Simple Field Tests			35
5	Audiology Assessments			166
5	Electroencephalography			146
5	Some sleep investigations			105
5	Pacemaker clinic			333
7	Phlebotomy			417
5	FeNo and Lung Function Tests	175	175	175
5	Point of care testing	5,677	5,677	7,948
	Total	8,043	8,043	19,400

5.11 **Table 5-7** shows the estimated daily patient numbers using the monthly average divided by 30 for services that are open seven days a week and 20 for services that are open five days a week. This shows an estimated daily total of 378 patients by 2025/2026.

Table 5-7: Estimated Daily Patients

			Ave	rage M	onth	Esti	mated	daily
(Average Days in Month)	Availability days	Facility	2023/ 2024	2024/ 2025	2025/ 2026	2023/ 2024	2024/ 2025	2025/ 2026
30	7	MRI			750			25
30	7	СТ	1,012	1,012	2,833	34	34	94
30	7	X ray			750			25
30	7	Ultrasound	1,179	1,179	3,300	39	39	110
30	7	Plain X Ray			750			25
30	7	Echocardiography			750			25
30	7	Electrocardiogram			750			25
20	5	Blood pressure monitoring			17			1
20	5	Spirometry			175			9
20	5	Simple Field Tests			35			2
20	5	Audiology Assessments			166			8
20	5	Electroencephalography			146			7
20	5	Some sleep investigations			105			5
20	5	Pacemaker clinic			333			17
Total			2,191	2,191	10,860	73	73	378

- 5.12 The site is car-free, with those wishing to travel by car to the proposed development required to pay for parking within the city centre.
- 5.13 At this time, the profile of when patients may attend the CDC is not known. If it assumed that patients will be able to access the facility between 08.00hrs and 19.00hrs then on average 29 patients an hour could require access. This equates to approximately 58 two way person trips per hour.
- 5.14 The site is located in a highly accessible area and also an area with low car ownership. **Table 5-5-8** presents the results of the National Travel Survey (2020) which shows 54% of households within the St Peter and the Waterfront ward do not have access to a car. The neighbouring wards of Stoke and Drake also have lower levels of car ownership with 31% and 45% of households, respectively, not having access to a car. This may suggest that locally people will be less likely to drive to the facility.

Table 5-5-8: Car Ownership (National Travel Survey 2020)

Ward	% of total households with No cars or vans
E05002078 : Budshead	26
E05002079 : Compton	22
E05002080 : Devonport	42
E05002081 : Drake	45
E05002082 : Efford and Lipson	30
E05002083 : Eggbuckland	19
E05002084 : Ham	33
E05002085 : Honicknowle	32
E05002086 : Moor View	20
E05002087 : Peverell	18
E05002088 : Plympton Chaddlewood	10
E05002089 : Plympton Erle	18

E05002090 : Plympton St Mary	13
E05002091 : Plymstock Dunstone	14
E05002092 : Plymstock Radford	17
E05002095 : Southway	22
E05002093 : St Budeaux	31
E05002094 : St Peter and the Waterfront	54
E05002096 : Stoke	31
E05002097 : Sutton and Mount Gould	34

Mode Share

5.15 An indicative mode share for patients visiting the site has been derived from 2021 Census 'Method of Travel to Work' for Plymouth. 'Work from Home' has been excluded from this dataset. This is presented in Table

Table 5-9: 2021 Mode Share

Mode	All Plymouth Wards
Walk	13%
Cycle	3%
Car	73%
Public Transport	8%
Taxi	1%
Other	2%

5.16 The mode share for motor vehicles has been pro-rated onto the other modes, with the proposed trip generation by mode presented in Table 5-10.

Table 5-10: Patient Trip Generation by Mode

Mode	Average	(One Way)
Walk	48%	181
Cycle	10%	38
Public Transport	32%	119
Taxi	5%	18
Other	5%	22
Total		378

- 5.17 **Table 5-10** indicates that up to 48% of patients could be expected to walk to the site, with 32% using public transport. It is acknowledged that some patients may still choose to drive to the site, however with the exception of disability spaces, they will be required to park at other locations within Plymouth City Centre due to the car-free nature of the development and will also likely be associated with linked trips to other locations within the City Centre.
- 5.18 **Table 5-11** presents the forecast number of patients daily and peak hour trips by mode.

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Trip Concretion

Table 5-11: Forecast number of patients daily and peak hour trips by mode

Trip Generation

Average %	AM Peak 08.00 – 09.00 (Two Way)	PM Peak 17.00 – 18.00 (Two Way)	Per Day (Two Way)
48%	28	28	363
10%	6	6	76
32%	19	19	242
5%	3	3	38
5%	3	3	38
100%	58	58	378
	48% 10% 32% 5% 5%	Average % 08.00 - 09.00 (Two Way) 48% 28 10% 6 32% 19 5% 3 5% 3	Average % 08.00 - 09.00 (Two Way) 17.00 - 18.00 (Two Way) 48% 28 28 10% 6 6 32% 19 19 5% 3 3 5% 3 3

Total Trip Generation

5.19 **Table 5-12** presents a summary of the total (employee and patient) two way trip generation by mode.

Table 5-12: Total Generation by mode (Two Way)

Mode	AM Peak 08.00 – 09.00 (Two Way)	PM Peak 17.00 – 18.00 (Two Way)	Per Day (Two Way)	
Walk	37	37	488	
Cycle	8	8	101	
Public Transport	26	26	342	
Taxi 3		3	40	
Other	3	3	40	
Total	77	77	634	

Comparison with Consented Scheme

5.20 **Table 5-13** presents a comparison of the person trips generated by the consented and proposed schemes. It can be seen that the proposed scheme generates less movement.

Table 5-13: Comparison with consented scheme (Two-way Person Trips)

	AM Peak 08.00 - 09.00	PM Peak 17.00 – 18.00
	(Two Way)	(Two Way)
Consented	444	385
Proposed	77	77

Summary

- 5.21 This chapter has provided the details of the number of multi-modal trips that could potentially be generated by the proposed development. As the site is located in an area of high accessibility and is essentially carfree, it is anticipated that a large number of trips to the site will be made by sustainable means. Those that do drive to the facility will be required to park at other locations and it is suggested that a high proportion of any car trips will already be on the local network, associated with trips to other City Centre locations.
- 5.22 A comparison of the consented trips associated with the extant planning application for the site has shown that the proposed CDC scheme will generate less movements.

6. Conclusion

- 6.1 AECOM was commissioned by the Universities Hospitals Plymouth NHS Trust to provide for a Transport Statement to accompany a planning application for the development of a Community Diagnostic Centre at Colin Campbell Court, Plymouth.
- 6.2 This TS has considered the development in terms of its location in highway terms alongside an assessment of its sustainability and accessibility credentials.
- 6.3 The site is currently a car park which is owned and managed by PCC. PCC have recently undertaken a number of studies which have indicated that the parking demand for this car park can be accommodated in other City Centre car parks.
- 6.4 It is not anticipated that the proposed CDC, accessed from Western Approach and Market Avenue, will give rise to a noticeable increase in traffic movements, as it is a car free development, with only accessible parking provided. Car free development in this location is deliverable as the premises is located in a very accessible location, as shown by Plymouth's accessibility map (**Figure 2-2**).
- The proposed scheme is located in an accessible location close to existing bus services and good footway / cycleway provisions. It is located near to a range of amenities which will benefit staff and visitors.
- 6.6 A first principles trip generation has been undertaken in order to determine the likely number of multi-modal trips generated by the proposed development. Although it is acknowledged that some staff and visitors will drive, with the exception of disability spaces, the proposed development is car-free and therefore they will be required to park at other locations off-site. As a highly sustainable and accessible location the use of non-car-based trips should be a primary choice of travel mode and it is suggested that a high proportion of any car trips will already be on the local network, associated with trips to other City Centre locations.
- 6.7 This scheme provides a reduction in the number of trips generated by the previously consented West End Health and Wellbeing Centre.
- 6.8 In order to strengthen the sustainable travel attributes of the site, a Framework Travel Plan has been prepared alongside this document, and contained in **Appendix A**.
- 6.9 This TS has provided an analysis of the proposed development and shows that the forecast traffic generation is unlikely to give rise to any issues to the operation of the highway network, certainly not severe in accordance with the NPPF.
- 6.10 It is therefore anticipated that the Local Highway Authority will be able to support the proposal and, subject to conditions, could recommend in favour of the planning application.

Appendix A – Framework Travel Plan



Plymouth Community Diagnostics Centre, Colin Campbell Court

Framework Travel Plan

University Hospitals Plymouth NHS Trust

Project number: 60691383

December 2023

Quality information

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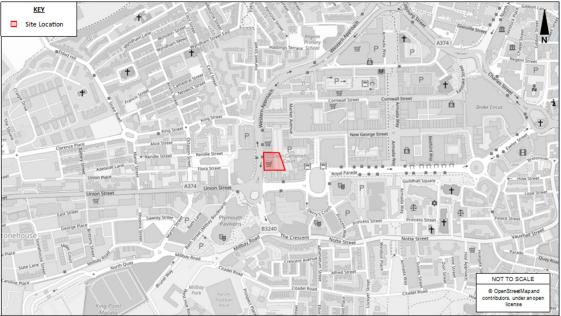
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1. Introduction

Context

1.1 AECOM was commissioned by Universities Hospitals Plymouth NHS Trust ('The Trust') to prepare a Framework Travel Plan (FTP) to accompany the planning application for a new Community Diagnostic Centre (CDC) located at Colin Campbell Court, in Plymouth City Centre. Its location is presented in **Figure 1-1**.





- 1.2 This FTP accompanies a Transport Statement (TS) which has been provided to outline the potential impact of the proposed development on the highway network. The TS concluded that the traffic generation of the development is unlikely to give rise to any issues to the operation of the highway network, certainly not severe in accordance with the NPPF.
- 1.3 This FTP has also been produced to be BREEAM compliant. This means that the Travel Plan has been prepared in line with guidance contained on the BREEAM website, where the aim is "to recognise the consideration given to accommodating a range of travel options for building users, thereby encouraging the reduction of reliance on forms of travel that have the highest environmental impact". Information regarding BREEAM in contained within Appendix A, B and C.

Proposed Development

- 1.4 The proposals comprise development located at Western Approach, at the southwestern half of the Colin Campbell Court car park. The development site encompasses a vacant brownfield site and a small part of the current car park to provide a new Community Diagnostic Centre (CDC) facility.
- 1.5 CDCs are facilities that provide checks, scans and tests in one place, designed to achieve early diagnoses for patients and timely treatment and intervention. They aim to deliver additional diagnostic capacity by providing quicker and more convenient access for patients and reducing pressure on hospitals.
- 1.6 The Plymouth CDC will provide significant diagnostic capacity in terms of imaging, physiological measurement, pathology, and other services. Patients will come from the Plymouth area to utilise the facility. Specifically, the CDC will provide the following services:

Imaging

- Computerised Tomography;
- o Magnetic Resonance Imaging;
- o Ultrasound; and
- o X-ray.

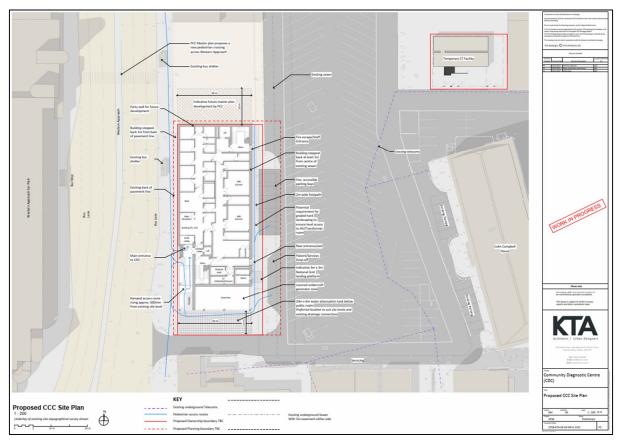
Audiology

- Audiological assessments;
- Fittings; and
- o Follow-ups.

Physiological Measurement

- Echocardiography;
- Vascular Imaging;
- Electrocardiogram (ECG);
- o Ambulatory blood pressure monitoring;
- o Pacemaker clinic;
- FeNo and Lung Function Tests, Spirometry including broncho-dilator response, some sleep investigations, Simple field tests; and
- Neurophysiology.
- 1.7 128 FTE staff will be employed at the facility. It will be open from 07.00 19.00hrs daily and it is expected that when it is fully built out 378 patients will attend the site on an average day.
- 1.8 Five parking spaces will be provided on-site for those with accessibility needs along with a drop off area. It is anticipated that those travelling to the premises who wish to park, will do so either within the remainder of the Colin Campbell Court public car park, the Western Approach Pay and Display car park or using the existing short stay parking at Market Way / New George Street which is in close proximity.
- 1.9 18 dedicated secure and covered cycle parking space will be provided on site for staff and visitors. The proposed scheme layout is presented in **Figure 1-2**.

Figure 1-2: Site Layout



What is a Travel Plan?

- 1.10 A Travel Plan (TP) can be defined as a package of measures which are designed to encourage safe, healthy and sustainable travel options. By reducing car travel, Travel Plans can improve health and wellbeing, free up land designated for parking for other uses, and make a positive contribution to the community and the environment.
- 1.11 This document consists of a Framework Travel Plan (FTP). An FTP is a document submitted when there are likely to be multiple occupying organisations, and end occupiers of the development are unknown. It is prepared in anticipation of a full Workplace Travel Plan, to include staff and visitors.

BREEAM

- 1.12 It is anticipated that the site will be constructed to be BREEAM compliant. As required by the BREEAM scheme, this document therefore provides a site-specific TP that provides a long-term management strategy to encourage more sustainable travel. The FTP includes suggested measures to increase or improve more sustainable modes of transport and movement of people and goods during the building's operation.
- 1.13 The Guidance also recommends that the TP is structured to meet the needs of the particular development and takes into consideration the findings of a site-specific transport survey and assessment that covers the following criteria (as a minimum), as set out in **Table 1-1**.

Table 1-1: BREEAM Criteria

Criteria

- a. Where relevant, travel patterns and attitudes of existing building or site users towards cycling, walking and public transport, to identify relevant constraints and opportunities
- b. Travel patterns and transport impact of future building users
- c. Current local environment for pedestrians and cyclists, accounting for any age-related requirements of occupants and visitors;
- d. Reporting of the number and type of existing accessible amenities, within 500m of the site
- e. Disabled access accounting for varying levels and types of disability, including visual impairment
- f. Calculation of the existing public transport Accessibility Index (AI)
- g. Current facilities for cyclists
- 1.14 The Guidance also states that, "As a minimum, the following measures shall be considered when developing the Travel Plan":
 - Negotiation with local bus, train or tram companies to increase the local service provision for the development;
 - Provision of a public transport information system in a publicly accessible area;
 - Provision of electric recharging stations;
 - Designation of priority parking spaces for car sharers;
 - Consultation with the Local Authority on the state of the local cycling network and on infrastructure improvements;
 - Provision of dedicated and convenient cycle storage;
 - Implementation of cyclists' facilities;
 - Lighting, landscaping and shelter to create pleasant pedestrian and public transport waiting areas;
 - Restrictions or charging for car parking;
 - Pedestrian and cyclist friendly (for all types of user regardless of the level of mobility or visual impairment) with the provision of cycle lanes, safe crossing points, direct routes, appropriate tactile surfaces, good lighting and signposting to other amenities, public transport nodes and adjoining offsite pedestrian and cycle routes;
 - Provision of suitable taxi drop-off or waiting areas; and

• Ensure rural buildings have appropriate access to transport to serve the local community adequately (where procured to do so, for example community centres).

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1.15 It should be acknowledged that not all of the measures will be relevant in each instance.

Report Structure

- 1.16 Following this Introduction, this report sets out:
 - Policy context provides the policy background for Travel Planning in Plymouth;
 - Site Audit sets out sustainable travel opportunities at the site;
 - Aims and Objectives this chapter provides the aims and objectives of the Travel Plan;
 - **Travel Plan Management Strategy** this section informs on potential measures, the monitoring and action plan proposed;
 - BREEAM Compliance a Table is provided in this chapter that sets out BREEAM compliance; and
 - Summary and conclusions.

2. Policy Context

Introduction

2.1 This section provides a policy context for the TP as well as highlighting the best practice guidance used in its development. A full review of policy in relation to transport and the local planning context is contained within the TS accompanying the proposed development.

National Policy

National Planning Policy Framework, NPPF (2021)

- 2.2 The National Planning Policy Framework (NPPF) was first published in 2012 and most recently revised in July 2021. This revised Framework replaces the original document and subsequent revisions, dated July 2018 and February 2019, and sets out the Government's planning policies for England and how these are expected to be applied at a local level. It provides a template within which locally prepared plans for housing and other development can be produced.
- 2.3 The original Framework produced in 2012 brought together around 1,000 pages of planning policy and guidance into a single document. Critically, the document established a 'presumption in favour of sustainable development'.
- 2.4 The revised Framework, 'makes a number of structural changes, in particular dividing the document into clear chapters; incorporates policy proposals on which the Government has previously consulted; and incorporates additional proposals on which this document is consulting'. It is clear that the presumption in favour of sustainable development remains at the heart of the Framework.
- 2.5 The NPPF highlights the importance that transport infrastructure and transport related policies have in facilitating sustainable development and promoting wider health and sustainability objectives. 'Section 9 Promoting sustainable transport' outlines the key transport policy considerations. It states that transport issues should be considered at the earliest opportunities when planning development so that:
 - "The potential impacts of development on transport networks can be addressed;
 - Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage are realised – for example in relation to the scale, location or density of development that can be accommodated;
 - Opportunities to promote walking, cycling and public transport use are identified and pursued;
 - The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken
 into account including appropriate opportunities for avoiding and mitigating any adverse effects, and
 for net environmental gains; and
 - Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places."
- 2.6 It is emphasised that development should "give priority to pedestrian and cycle movements", "address the needs of people with disabilities and reduced mobility in relation to all modes of transport", "create places that are safe, secure and attractive" and "designed to enable charging of plug-in and ultra-low emission vehicles in safe, accessible and convenient locations".
- 2.7 Importantly for assessing transport impacts of proposals now refers to highway safety as well as capacity and congestion. This change was made in order to make it clear that "designs should prioritize pedestrian and cycle movements, followed by access to high quality public transport (so far as possible) as well as to reflect the importance of creating well-designed places".

The NPPF states that, "All developments that will generate significant amounts of movement should be

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- 2.8 required to provide a travel plan, and the application should be supported by a Transport Statement or Transport Assessment so that the likely impacts of the proposal can be assessed'.
- 2.9 In assessing sites that may be allocated for development in plans, or specific applications for development, the document states that:
 - Appropriate opportunities to promote sustainable transport modes can be, or have been, taken up, given the type of development and its location;
 - Safe and suitable access to the site can be achieved for all users; and
 - Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.
- 2.10 Importantly, paragraph 109 states "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."
- Within this context, applications for development should still give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas, facilitate access and the use of highquality public transport, address the needs of people with disabilities and reduced mobility.
- 2.12 It is important that development proposals create places that are safe, secure and attractive, minimising the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards. Developments should also facilitate the efficient delivery of goods, and access by service and emergency vehicles and also designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

Planning Practice Guidance March 2014

On 6th March 2014 the Department for Communities and Local Government (DCLG) launched the planning practice guidance (PPG) web-based resource. This enabled all planning guidance to be provided in a single on-line portal which providing links with NPPF. The PPG contains guidance on Travel Plans, Transport Assessments and Transport Statements in relation to decision taking processes for Local Authorities. The section provides guidance on when a Travel Plan is required, the process for determining the scope of a Travel Plan, what should be included within a Travel Plan and how it should be monitored.

Manual for Streets 2 (MfS)

- The "Manual for Streets" document was launched in March 2007. The document provides guidance on the design of residential streets in England and Wales. A second iteration "Manual for Streets 2: Wider Application of Principles" was subsequently published in October 2010.
- The overarching purpose of MfS is to increase the quality of life through good design which creates peopleorientated streets. It highlights the importance of interactions between all road users. It states that 'Streets should not be designed just to accommodate the movement of motor vehicles. It is important that designers place a high priority on meeting the needs of pedestrians, cyclists and public transport users, so that growth in these modes of travel is encouraged'.

Local Policy

The Plymouth and South West Devon Joint Local Plan 2014 -**2034 (Adopted March 2019)**

2.16 The recently adopted Plymouth and South West Devon Joint Local Plan (JLP) is a joint Plan between Plymouth City Council, South Hams District Council and West Devon Borough Council which looks ahead to 2034. The three councils have joined up to create this plan which will replace all previous development plans in each local council and Plymouth to create one document. It integrates with and completes work that was previously being undertaken separately by these three Local Planning Authorities.

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- 2.17 The JLP has seven sections with section four setting out the Strategy for the Plymouth Policy Area, considering Plymouth's strategic role, area-specific strategies for the City's three growth areas, as well as site allocations.
- 2.18 The Plan also incorporates a range of other longer-term plans and planning processes that have previously been developed separately, including the following:
 - Local Transport Plan;
 - Local Economic Strategy;
 - Waste Strategy;
 - Health and Wellbeing strategies;
 - · Children and Young Peoples Plan;
 - Sustainable Communities Strategy;
 - Visitor Plan: and
 - Vital Spark Cultural Strategy.
- 2.19 The PCC website states that, "this coordinated approach will allow the city to have a single voice on its strategic priorities and help all key partners to pull together in the same direction".
- 2.20 Provision for Colin Campbell Court is included within Plymouth's Joint Local Plan (PLY7). Policy PLY7 states that, "Land at Colin Campbell Court is allocated for high-quality residential led mixed-use development which will transform the western approach to the City Centre and establish a new residential community. Provision is made for in the order of 300 new homes as part of this mix".
- 2.21 "Development should provide for the following;
 - A positive first impression of the city from Western Approach;
 - A more intensive form of development with strong street frontages and a range of active ground floor uses, including retail;
 - Ground floor uses which create activity throughout the day and into the evening;
 - A more urban scale of development with an average building height of between 5 to 6 storeys with accented and landmark buildings on key corners;
 - Alignment of development blocks to the city grid pattern with a network of streets which provide improved connectivity between City Centre and the proposed Millbay Boulevard;
 - The retention and refurbishment of the Art Deco Colin Campbell House, where it is practicable and viable to do so;
 - High quality public realm throughout the site maximising opportunities to create an accessible public open space as a focal point for the community;
 - Improvements to the pedestrian / cycling crossing point across Western Approach;
 - Public parking to support the West End, provided in a way which does not dominate the street scene;
 - Consideration of the potential to open up Frankfort Gate for vehicular access; and
 - Opportunity to better connect the West End of the City Centre with Millbay as part of a scheme to improve the junction of Union Street and Western Approach".
- 2.22 It is acknowledged that this development provides a smaller scheme on part of the car park, however the deviation from the aspiration of the Local Plan should be acknowledged. Elements of the above policy, such as improved connectivity and access or public realm improvements remain relevant and should be considered within the context of this proposed development.

Plymouth City Council - The Plymouth Plan (2014-2034)

2.23 The Plymouth Plan sets a shared direction of travel for the long-term future of Plymouth, bringing together a number of strategic planning processes into one place. This relates to the city's transport needs and the

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- aspiration to be a healthy and prosperous city with a rich arts and cultural environment. The Plan thereby incorporates the Plymouth-specific elements of the Plymouth and South West Devon JLP.
- 2.24 Policy HEA6 of the Plan commits to delivering a safe, efficient, accessible, sustainable and health-enabling transport system. This will include delivering the Strategic Cycle Network and facilities for cyclists which encourage both recreational cycling and the greater and inclusive use of cycling as a primary mode of transport. In addition, Plymouth City Council aim to work with regional partners, agencies and public transport operators to deliver an integrated transport system across all modes covering key locations within and adjoining the Plymouth Travel to Work Area.
- 2.25 Policy HEA9 of the Plan relates to delivering accessible health services and clinical excellence. The city will continue to develop as a location of national and international excellence in clinical and medical science, where everyone has access to the health care they need by:
 - Focusing on integration and joining up services that benefit the people of Plymouth and those who use local services and improving the sustainability of the health and care system.
 - Ensuring that all communities in the city have access to high quality primary care services, with provision of technology-enabled care where appropriate.
 - Supporting the development and emergence of Derriford Hospital as a regional centre of excellence for clinical specialisms that reflect its strengths, aspirations and the health needs of the people of Plymouth and wider population.

Plymouth City Council Development Guidelines SPD July 2020

- 2.26 The Plymouth and South Devon Development Guidelines Supplementary Planning Document (SPD) July 2020 was adopted by Plymouth City Council on 22 June 2020, West Devon Borough Council on 9 June 2020 and South Hams District Council on 16 July 2020.
- 2.27 The SPD has been prepared by the three local authorities to amplify and give guidance on the implementation of the policies of the Plymouth and South West Devon Joint Local Plan (JLP). The document will be a material consideration in the consideration of planning applications pursuant to Part 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended.
- 2.28 The SPD is intended to be used by all members of the community, as well as those directly involved in the development industry and the document is divided into sections which reflect the structure of the JLP for ease of reference.
- 2.29 Chapter 8 is concerned with Transport and Infrastructure and the guidance provided within this chapter supports polices DEV29 to DEV31 of the JLP. The SPD notes that the guidance should be considered alongside;
 - The NPPF, NPPG and the site-specific policies set out in the JLP;
 - Guidance Note: Residential Parking (2012), The Chartered Institution of Highways and Transportation (CIHT) and the Institute of Highway Engineers (IHE)'s;
 - Manual for Streets: Designing and modifying residential streets and Manual for Streets (2007 and 2010);
 and.
 - Designing and modifying non-trunk roads and busy streets; and, Design Manual for Roads and Bridges (DMRB).
- 2.30 This site is located within the PCC unitary authority boundary; therefore, PCC are the Local Highway Authority.
- 2.31 In terms of transport, the document provides detail on how developments should be set out and the number of parking spaces for vehicles (including Electric Vehicle Charging) motorcycles and bicycles. It also provides information on Travel Planning and Transport Assessment.

Plymouth City Council - Plymouth Local Transport Plan (3) (2011-2026)

- 2.32 Plymouth's third Local Transport Plan (LTP3) was produced to cover the period 2011 2026 and replicates the city's growth agenda as detailed in the Local Development Framework. There are two main parts to LTP3 as detailed:
 - Transport Strategy which outlines the local policy and guidance and details the problems and opportunities that exist, and the role transport has in improving peoples' lives.
 - Transport Implementation Plan which outlines the measures that will be developed and potential delivery timeframes and identifies details of the Northern Corridor Whole Route Implementation Plan (WRIP).
- 2.33 The LTP3 states how it will be essential to increase the efficiency of the transport network so that it is environmentally and economically sustainable so as to maximise the benefits of growth. It describes how a more densely populated city with the promotion of sustainable communities and mixed-use development on the main transport corridors provides the opportunity to improve transport infrastructure. It also creates the right environment for increasing the market for public transport and enabling people to choose walking and cycling more often.
- 2.34 One of Plymouth's local transport objectives includes making walking, cycling and public transport the desirable choice by providing more opportunities and encouraging increased uptake of travel by active modes, walking and cycling to promote healthy lifestyles. It also aims to provide an attractive range of travel choices for more people.
- 2.35 Transport considerations and proposals including new infrastructure, improved connectivity, enhancement of public transport provision, provision for walking and cycling, and encouraging the use of sustainable modes have been very important in developing Area Action Plan (AAP) proposals and securing the adoption of AAPs and the Local Development Framework Core Strategy as deliverable.

NHS University Hospitals Plymouth NHS Trust Green Travel Plan (2023 – 2028)

- 2.36 The University Hospitals Plymouth NHS Trust produced an updated Green Travel Plan in November 2023. This 5-year Plan replaces the previous Derriford Hospital Green Travel Plan signed off in 2018 and will be reviewed annually during this time.
- 2.37 In the main the Green Travel Plan, covers the Derriford Hospital site in Plymouth, however offsite locations have also been considered.
- 2.38 The main goals of this Green Travel Plan are to shift travel patterns away from single occupancy car use towards more healthy and sustainable modes of travel and thereby improving the Trust's environmental impact, the health of its employees, and reducing the costs for car park management.

NHS University Hospitals Plymouth NHS Trust Sustainable Development Green Plan 2020-2025

- 2.39 The NHS University Hospitals Plymouth NHS Trust Sustainable Development Green Plan sets out a shared vision for the Trust to work towards 'a greener future'. The plan forms a key part of the Trusts sustainable healthcare strategy to ensure services remain fit for purpose by identifying waste reduction opportunities, financial savings and meeting national priorities such as a reduction in carbon emissions.
- 2.40 The Trusts objectives towards a more sustainable future are to achieve:
 - A reduction in the Trust's carbon footprint by 20% by 2025 (and work towards net carbon zero by 2030);
 - 10% net biodiversity gain by 2025;
 - 85% avoidance of waste going to landfill by 2025;
 - 70% score in NHS Sustainable Development Assessment Tool (SDAT) by 2025; and
 - Embed sustainability into every Trust service and activity by 2025.

- 2.41 Proposals for transport sustainability within the plan cover a broad strategy ranging from material to behavioural changes. One area targeted by the plan is to change existing vehicles fleets to low emission vehicles by targeting a carbon reduction in the existing Trust fleet of 20% by 2025. Another area aims to utilise Trust-wide staff awareness and engagement campaigns to encourage staff to shift to sustainable modes when travelling to work where possible, thereby reducing staff reliance on petrol and diesel cars to travel to work with a target of a minimum 10% reduction by 2025.
- 2.42 The plan further outlines that the delivery of new building projects should be to net zero carbon standards, in addition to BREEAM or similar accreditation standards. This will be supported by the development of the Trusts own sustainability standard for new build schemes, enhancing the BREEAM standard, to improve environments for patients and staff.

Travel Plan Guide for Developments in Plymouth¹

- 2.43 This guide was published in 2019 by Plymouth City Council (PCC). The purpose of this document is to set out clearly how and why Plymouth City Council may require a Travel Plan to be submitted in association with new or expanding developments. This guidance applies primarily to employment and residential developments.
- 2.44 The guide indicates that a Framework Travel Plan is an overarching document or site-wide document. This type of Travel Plan is likely to be requested for large mixed-use developments with multiple occupants. It should establish outcomes, targets and indicators for the whole site.
- 2.45 It should provide a structure to allow for the plan to be managed centrally. It could potentially require individual sites within the overall development to prepare and implement their own individual Travel Plans. The framework Travel Plan should also clarify the outline timeframe for completion and occupation of the development.
- 2.46 The document provides a structure which should be followed in the production of a Travel Plan, as set out below.
 - Introduction with context and development details;
 - Policy statement, including any relevant site-specific policies;
 - Site audit and accessibility review;
 - Objectives and targets;
 - Travel Plan Management strategy including monitoring methodology;
 - Key Measures for all site users which should relate directly to the overall aims of the Travel Plan; and;
 - An Action Plan with implementation timescales and budget. If the end users of some aspects of the site are not known interim content will be acceptable provided timescales are given for when firm details will be provided.

Best Practice Guidance

Working Together to Promote Active Travel: A briefing for local authorities, published in May 2016

- 2.47 This guide was published in May 2016, by Public Health England, it was produced for transport planners, others concerned with the built environment, and public health practitioners. It examines the impact of current transport systems and sets out the many benefits of increasing physical activity through Active Travel. It suggests that while motorised road transport has a role in supporting the economy, a rebalancing of our travel system is needed.
- 2.48 It provides a focus on how Active Travel can be built into everyday life and realise a range of benefits for health, the environment and the economy and suggests a range of practical measures for the promotion of

 $^{^{1}\ \}underline{\text{https://www.plymouth.gov.uk/sites/default/files/Transport\%20Travel\%20Plan\%20Guide\%20for\%20Developments\%20FINAL.pdf}$

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- Active Travel from overall policy to practical implementation. It highlights the importance of community involvement and sets out key steps for transport and public health practitioners.
- 2.49 The document recognises that "Walking and cycling are good for our physical and mental health. Switching more journeys to Active Travel will improve health, quality of life and the environment, and local productivity, while at the same time reducing costs to the public purse".
- 2.50 The document highlights the importance of Travel Plans. It recognises that they are already required for significant new developments such as housing, schools, businesses and healthcare facilities as part of the planning system to demonstrate the impact of such developments on traffic and movement of people. It points to how "Public health and transport planners can work together to ensure that such schemes demonstrate how they support shifts from private cars to forms of active travel, and promote the design of safe and attractive neighbourhoods in which people can move around".

The Essential Guide to Travel Planning (DfT, 2008)

- 2.51 Although it is now thirteen years old the DfT publication, 'The Essential Guide to Travel Planning' brings together experience built up by a range of businesses to detail the requirements in developing and implementing a Workplace Travel Plan and offers a good insight into developing a good Travel Plan.
- 2.52 The strategy proposed focuses on boosting all the possible alternatives to single occupancy car use, in an effort to reduce car miles. This is identified as having both the environmental and business related benefits, given that in the case of the latter it can reduce congestion and improve productivity, saving both the business and the associated employees money and time.
- 2.53 One of the key messages of the Travel Plan guide relates to how some of the biggest gains can come from reducing the need to travel at all. Analysis should therefore focus on employee locations and determining what can be done to influence travel patterns. This includes the implementation of personalised journey planning and offering services on site which negate the need for journeys during the working day.
- 2.54 The guide outlines what it believes is required to deliver a successful travel plan, including the following:
 - Buy-in at the top Senior management support will be important to ensure the necessary resources
 are allocated to your travel plan, and that they are seen to be setting an example / leading the way by
 travelling by sustainable means;
 - Buy-in from the staff Support from a wide spectrum of staff will be crucial in order to ensure the Travel Plan delivers its potential. To achieve this, the plan must be seen to be fair, there must be seen to be a serious support for change, and effective lines of communication must be developed;
 - Resourcing A fixed budget must be set aside to cover the operation and delivery of the Travel Plan;
 - A Long Term Strategic approach A framework must be put in place to ensure that the document is an ongoing strategy, which evolves to meet the changing needs of the business. It is not a one off fix; and
 - Local alliances There is a need to draw on support available from the Local Authority, as well as work with other local networks of businesses to draw down area wide benefits.
- 2.55 The document provides some evidence which promotes the success of Travel Plan initiatives. Importantly the document recognises that "Travel Plans are so effective for small outlays". It states that "travel plans often involve only limited capital expenditure, on items such as new cycle shelters, footpaths, bus stops or car park barriers. Mostly they concentrate on improving existing travel choices whilst giving incentives to use more sustainable travel and disincentives to solo car use. This is backed up by information campaigns to inform staff about travel alternatives that offer them realistic options".
- 2.56 The document reports that, "good Travel Plans have typically succeeded in cutting the number of people driving to work by 15%. This modest sounding percentage translates into a lot of car miles and congestion avoided. For a firm with 2000 staff mainly travelling to work by car this amounts to about one million miles fewer per Year".
- 2.57 As discussed within the document, Travel Plans reduce traffic most during the key periods on the road network the rush hour peaks, the difference to congestion is therefore proportionately more beneficial because the difference between a jammed road and a free-flowing one can be just a small amount of traffic that tips it over capacity.

Summary

2.58 It is clear that the promotion of Travel Planning to promote active and sustainable travel is integral in all levels of policy from national to local government. It is promoted as a way of reducing the impact of traffic on the local environment and also the benefits of physical activity. The benefits of sustainable travel are widely reported in the policy documents and also in the best practice guidance.

3. Site Audit

Introduction

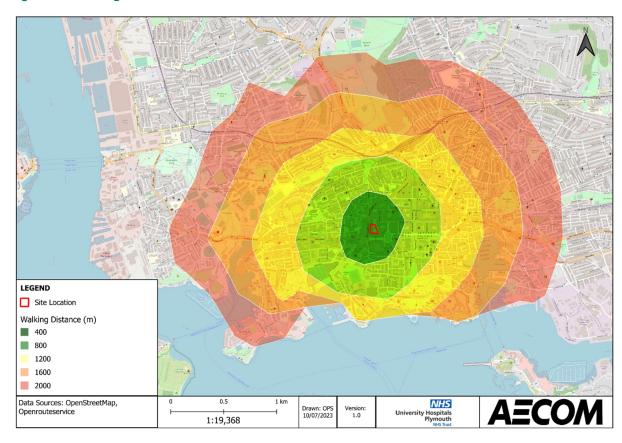
One of the functions of a Travel Plan is to provide details of the sustainable attributes and accessibility of a given location, alongside details including access and parking. This chapter provides details of a site audit undertaken at the site.

Access by Sustainable Modes

Walking and Cycling

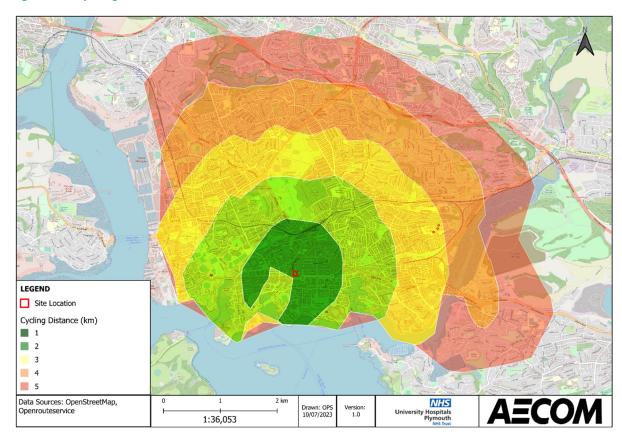
- 3.2 The car park can be accessed on foot via the A373 Western Approach and Market Avenue. However, there are no existing pedestrian facilities in place, such as footpaths or crossing points at either of the accesses or throughout the existing car park. Street lighting is available both within the car park and at the access points.
- 3.3 **Figure 3-1** and **Figure 3-2** present the distance from the proposed site which can be accessed by foot within 2km² and by bike within 5km, representing an approximate 25 minute journey time.





² A 2km distance has been used for walking as this has been based on 5-minute walking time intervals as a proxy for 400 metre intervals. The tool used to produce the intervals did not use measurements of less than 1 km, however further detail was needed for the walking isochrones. Therefore, using an assumed walking speed of 1.4 m per second, time was used instead of distance to differentiate intervals. Based on the above speed assumption, walking 84 metres would take one minute. 400 (referencing 400 metres) / 84 equates to 4.76, therefore, by rounding this figure up, 5 minute intervals were used as a proxy for 400 metre intervals.

Figure 3-2: Cycling Isochrones



- 3.4 This demonstrates that a range of local amenities and public transport services are available near the proposed site, including Drake Circus and Plymouth Railway Station and are within recommended walking or cycling distances.
- 3.5 As the majority of the City Centre is pedestrianised there are multiple routes to and from the premises. Footways route the length of Western Approach with signalised crossings to the north and south of the proposed development site.
- 3.6 Cyclists are able to use the dedicated bus lanes on the A374 Western Approach in order to access the car park, but some cyclists may prefer to reach the car park from Market Avenue as it provides a lower traffic route. However, there are not currently any cycle parking spaces within the car park.
- 3.7 Two National Cycle Network (NCN) Routes run through Plymouth, NCN 27 which runs along Millbay Road approximately 500m to the southwest of the site and NCN 2 which runs along North Road West approximately 700m to the north of the site. NCN 27 connects north eastern Plymouth, along the coast to the west side of Plymouth city centre, while NCN 2 links Ivybridge, Plympton and Plymouth.

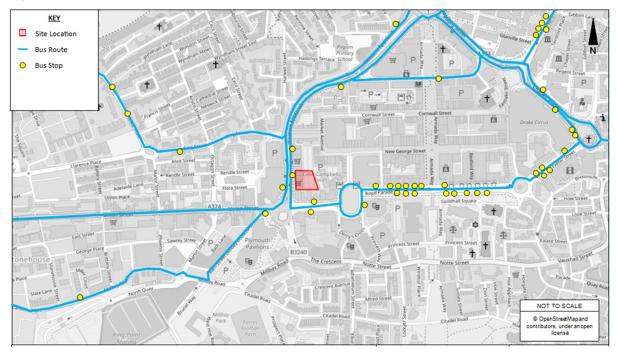
Access by Public Transport

Bus

- 3.8 The site has good access to bus routes with the nearest pair of bus stops (Western Approach Stop 1 and 2) to the premises being situated on the A374 Western Approach approximately 50m and 80m north of the site access (A374 Western Approach) respectively.
- 3.9 Four bus services call at Western Approach Stop 1 and route to destinations including Tavistock, Plympton and Plymouth City Centre. Western Approach Stop 2 provides access to 24 bus services to destinations such as Mount Batten, Derriford and Sherford.
- 3.10 The main bus corridor in Plymouth is situated on Royal Parade and has a total of 16 bus stops that offer a wide range of services across Plymouth and the surrounding areas. The Royal Parade is accessible within 400m east of the site, reached by a 5 10 minute walk, as shown in **Figure 3-1**.

3.11 The nearest bus stops and routes are shown on **Figure 3-3**. **Figure 3-4** is replicated from the PCC website and provides an indication of the number of services that use Western Approach. With a few exceptions, all buses from the north and west of the city, and some from the east, travel along Western Approach.

Figure 3-3: Local bus stops and services



3.12 The nearest bus stops on Western Approach south-bound are on-road, within the bus lane, and therefore any waiting bus will temporarily block the passage of another. However, as these stops serve Royal Parade, which is essentially the terminus for most services operating within the City (as can be seen on **Figure 3-4**), existing stops are more likely to be used for passengers alighting a bus and not waiting to board as they will only be able to travel to two further stops.

Figure 3-4: Bus services in Plymouth



3.13 **Table 3-1** provides a summary of the bus services which are available from bus stops on the A374 Western Approach, which is within walking distance of the proposed site (as presented in **Figure 3-3**).

Table 3-1: Local bus services

Service Number	Bus Route	Weekday Frequency
20 / 20A	Plympton – Lee Mill – lvybridge – Royal Parade	Every 60 minutes
48	City Centre to Wembury via Cattedown, Plymstock	Every 60 minutes
42 / 42A / 42B / 42C	City Centre to Derriford Hospital / Mainstone / Woolwell / Tamerton Foliot via Mutley - Mannamead - Derriford Hospital	Every 10 – 20 minutes
1 / 1A	Plymouth – Tavistock	Every 20 minutes
8/9	City Centre to Efford via Lipson Vale	Every 15 minutes
11	Plymouth – Bodmin Parkway - Padstow	Every 60 minutes
12 / 12A	Plymouth to Bude via Saltash, St Mellion, Callington, Stoke Climsland, Launceston, Whitstone	Every 60 minutes
13	City Centre to Saltash Passage via Weston Mill	Every 60 minutes
16	City Centre to Kings Tamerton via North Prospect, Kings Tamerton, North Prospect, Milehouse	Every 30 minutes
2 / 2A	Saltash to Mountbatten Pier via Plymstock Broadway	Every 15 minutes

Rail

3.14 Plymouth Railway Station is located at North Cross, approximately 1km from Colin Campbell Court. The station is on the cross-country Penzance to Edinburgh line and is managed by Great Western Railway. It offers connections to London Paddington, Penzance, Exeter, the Midlands and Northern England, as well as more local destinations.

Services and Amenities

- 3.15 The site is located in Plymouth City Centre and therefore there are a wide range of services and amenities within close vicinity, including a selection of café's, takeaways and restaurants, as well as retail stores, banks, health facilities and leisure facilities.
- 3.16 **Table 3-2** summarises the range of local facilities within walking and cycling distance of the site.

Table 3-2: Local Amenities

Local Facilities	Approximate from Site (m)	Distance	Walking Time (mins)	Cycling Time (mins)
Premier Convenience Store	180		2	>1 minute
Cornwall Street Fish Bar	240		3	1 minute
Premier Inn Plymouth City Centre	350		4	1 minute
Post Office – in WHSmith	350		4	1 minute
Boots Pharmacy	350		4	1 minute
Theatre Royal Plymouth	450		5 ½	1 ½ minutes
Open POD Electric Charging Point	450		5 ½	1 ½ minutes
St Peter's Primary School	550		6 ½	2 minutes
Nationwide Building Society	550		6 1/2	2 minutes

Notes: 1) Average walking speed of 1.4m/s has been assumed.

- 2) Average cycling speed of 5.5m/s has been assumed.
- 3) Distances measured from the centre of the site along publicly accessible routes

Accessibility Index

- 3.17 BREEAM is a scheme for assessing the sustainability credentials for the built environment. BREEAM guidance states the requirement for the calculation of an Accessibility Index (AI).
- 3.18 This calculation has therefore been undertaken for this site using the Al calculator and associated methodology contained within the BREEAM guidance.
- 3.19 The assessment involves establishing the average number of bus and rail services per hour from the compliant transport nodes during a site's operating hours. A 13-hour operating period (from 07:00hrs to 20:00hrs) has been used for the CDC. Compliant transport nodes are those within 650m of the site, of which there are no rail stations within the vicinity. In the case of bus services, those which are duplicated across compliant bus stops have been considered only once in the calculation. For bi-directional services, average frequency has been calculated for one direction only.
- 3.20 The Al calculations and the bus nodes and services considered as part of the assessment are included in **Appendix B and C**.
- 3.21 The input frequencies of services from compliant nodes results in an Al of 24.81, which according to BREEAM guidance, is sufficient to achieve 5 out of a possible 5 credits (for this building type).

Summary

- 3.22 The site is located on one of the highest frequency bus corridors in the city and there are a number of stops located within walking distance. In terms of cycling, there is a good level of provision of infrastructure within close proximity of, and indeed adjacent to, the premises, highlighting the potential for cycling to replace short car journeys to and from the site.
- 3.23 The premises is located in close proximity to residential areas and a wide range of complementary land uses. In terms of the sustainable transport network, there are good quality pedestrian, cycle and public transport links to and from the area.

4. Aims and Objectives

Introduction

- 4.1 Plymouth City Council's Travel Planning guidance requires that a Travel Plan should include a summary of the key objectives and targets. It states that "development related Travel Plans, targets should initially be set for a five year period unless agreed otherwise, with interim targets where necessary. Such targets should accord with any such trip reductions assumed within the Transport Assessment / Statement submitted for the development".
- 4.2 This section covers the key aims and objectives of the Framework Travel Plan.

Aim

4.3 This Travel Plan aims to influence transport movements made by patients and employees of the development. The aim of this Travel Plan is to ensure that the number of trips undertaken by walking, cycling, car sharing and public transport to and from the facility is maximised, while ensuring that the Travel Plan meets the needs of all users of the site.

Objectives

- In pursuit of these aims it will be important for the Travel Plan to meet the following series of objectives in order to achieve a reduction in car use, and the uptake of cycling, walking and public transport:
 - Encourage opportunities for alternative non-car travel modes;
 - Reduce car dependency;
 - Ensuring that all site users are aware of the travel opportunities available to them;
 - Supporting mobility needs of all users; and
 - Supporting the use of active travel modes.
- 4.5 These aims and objectives will be met through the delivery of the Travel Plan and commitment to the overall process and promotion at the site.

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5. Travel Plan Management Strategy

Introduction

- 5.1 PCC's Travel Planning Guidance requires a clear management and delivery structure, including identifying the Travel Plan Coordinator (TPC). This should also cover the resources allocated for Travel Plan implementation, how the Plan will be managed and the related marketing strategy.
- 5.2 Travel planning measures will be based on influencing the travel behaviour of employees and patients / visitors. A number of measures have been prepared, targeted at the anticipated future users of the development, which aims to support the design and encourage the use of the infrastructure provided in the local area. The actual measures to be implemented at the facility will be confirmed after the completion of a travel survey. This section provides some suggested measures.
- 5.3 The following measures are all aimed at reducing the reliance on the private motor vehicle and meeting the aims and objectives set out in Chapter 4. This chapter outlines the measures, and the supporting marketing and promotion techniques, that will be put forward for this site.

Suggested Measures

- 5.4 Any Framework Travel Plan should set out a range of measures to support and encourage the take up of sustainable travel. Any proposed measures should be appropriate to the type and size of development and must be sufficient to foster successful modal shift in line with the objectives and targets for staff and visitors.
- 5.5 This document presents a Framework Travel Plan, therefore the measures suggested are strategic in nature. Oncea site travel survey has been completed six months after opening and a Full Travel Plan produced, measures will be targeted to the users of the premises.
- This development is effectively car free, with a number of spaces for disabled users and for drop off only. Therefore, people will need to travel to the facility using other modes or pay for parking in local car parks. As such, the range of measures presented reflects this.

Travel Plan Coordinator

- 5.7 A TPC will be appointed to oversee the implementation of the Plan. The key responsibilities of the TPC are as follows:
 - Be the first point of contact for employees wishing to find out more about TP initiatives;
 - Operate or hold responsibility for initiatives, for instance, ensuring that public transport information is disseminated to staff, patients and visitors and is kept updated;
 - Coordinate the monitoring and evaluation process;
 - Update and take ownership of the Action Plan;
 - Identify and develop additional travel initiatives as required;
 - Liaise with the Local Highway Authority and local transport operators to obtain travel information and resources to improve the TP; and
 - Liaise with external groups, including sustainable travel organisations (such as Sustrans) and other Trusts with an active TP, to develop new approaches and share initiatives.

Marketing and Promotion

- 5.8 Often the provision of information can help individuals to try different modes of travel, therefore the TPC will investigate a range of walking and cycling events that can be held on site. This will serve to increase the visibility of the TP for all users of the facility and could encourage temporary or permanent mode shift.
- 5.9 The TPC will be expected to communicate the TP and promote it to all users of the facility through:
 - Raising awareness of sustainable travel options, though providing information to staff and patients;

- · Promoting individual measures and initiatives; and
- Disseminating travel information to users of the site on an ongoing basis
- 5.10 Information will be provided on travel noticeboards in prominent locations across the facility and also online or by email, through steering / working groups and through dedicated events.
- 5.11 It is widely regarded that the best time to influence a person's travel behaviours is at a life change or change in circumstances, for example, starting a new job. By presenting the full range of options regarding travel choices available to that person, they are able to make a well-informed decision prior to previous behaviours or perceptions becoming engrained in their new routine.
- 5.12 Therefore, it is proposed that all new members of staff are provided with travel information prior to their first day. This will contain a range of travel information including public transport timetables, details of walking / cycling facilities provided on-site and maps of the wider network. Patients and visitors will also be given information before visiting the facility.
- 5.13 Travel planning events could also be held at the site to promote sustainable travel. Examples of the types of events that could be held on site include: Walk to Work Day, Bike Week and cycle training workshops. Events which provide incentives for participation are much more likely to be successful; likewise with events that incorporate a 'challenge' or competition element

Measures to promote active travel

- 5.14 Walking and cycling modes provide an opportunity to travel in an active and sustainable way for shorter journeys, typically those less than two kilometres for walking and five kilometres for cycling. The site audit provided in Section 3 identifies a strong level of existing walking and cycling infrastructure in the local area.
- 5.15 Cycle parking will be provided in line with PCCs cycle parking standards, for the proposed development. Secure and covered cycle parking will be provided for staff in visible locations on the site with good natural surveillance. Separate parking will also be provided for visitors close to the entrance of the premises.
- 5.16 In conjunction with appropriate cycle parking, facilities will be provided on-site to the benefit of those who cycle to work. This includes lockers, changing and shower facilities.
- 5.17 Walking and cycling resources including leaflets and links to advice will be provided by the TPC on request and displayed on information boards and online as appropriate. The TPC will also investigate the use of the 'Cycle to Work Scheme'.

Measures to encourage public transport use

- 5.18 This site is located in a very sustainable location in Plymouth city centre, next to a frequently served bus stop. It is therefore well placed to take advantage of public transport travel.
- 5.19 Bus and rail timetables will be provided across the full range of information channels identified in this TP. The TPC will be responsible for obtaining relevant resources and ensuring that they are kept up to date. The TPC can liaise with the PCC Transport Officers for assistance.

Site Management

5.20 Deliveries to the premises will be managed so that they do not impact on the safe operation of the site. Upon making appointments patients will be told that parking is unavailable and links to public transport resources will be provided as appropriate.

Action Plan

- 5.21 An Action Plan should be provided within any TP, summarising the programme of measures, targets, roles and responsibilities, and timescales. The Action Plan should focus on the implementation and delivery of the TP.
- 5.22 This section sets out an Action Plan (laid out in Table 5-1) for the proposed development, following the determination of site occupiers.

Table 5-1: Action Plan

Action Type	Action	Responsibility	Timeframe
Management	Appoint a Travel Plan Coordinator (TPC) and ensure they are fully briefed on the Travel Plan Aims, Objectives and Measures	TPC	Prior to occupation
	Undertake a baseline travel survey (Employees and patients)	TPC	6 months after occupation
Facilities	Ensure shower, changing and locker facilities are available to those who will be allocated to work within the proposed development.	Developer / Site Occupier	Prior to occupation
	Cycle parking to be provided for staff and visitors	Developer / Site Occupier	Prior to occupation
Marketing	Ensure notice boards are provided within the new buildings populated with relevant information and up to date links provided to staff detailing online travel resources. Notice boards could be located within the staff space and at each entrance to the site for visitors.	TPC	Prior to occupation
	Ensure any new staff members are provided with relevant travel information as part of their welcome packs and are given access to any staff travel pages.	TPC / HR	Prior to occupation / on- going
Monitoring and Review	Monitor the progress of the Travel Plan and conduct surveys to assess any changes in travel habits	TPC	On-going

Monitoring and Review

- 5.23 PCCs Travel Plan Guidance recommends that a Travel Plan should include a monitoring and review strategy with related targets that are SMART (Specific, Measurable, Achievable, Realistic, Time bound).
- 5.24 As this is a new development, it is proposed that an online travel survey will be undertaken within six months following occupation for staff, and every two years thereafter for a period of five years in years one, three and five. Targets will be set following the baseline travel survey, to include a Target for Year 5, and interim targets for Years 1 & 3.
- 5.25 A visitor survey will be undertaken at the same time as the staff survey. It is likely that this survey will be paper based.
- 5.26 The content of the survey will be agreed with PCC prior to commencement.

6. Summary and Conclusions

- 6.1 AECOM was commissioned by the Universities Hospitals Plymouth NHS Trust to prepare a Framework Travel Plan (FTP) to accompany the planning application for a new Community Diagnostic Centre (CDC) located at Colin Campbell Court, Plymouth.
- 6.2 The FTP provides a site audit, details of the aims, objectives and measures of the Travel Plan and an Action Plan.
- 6.3 This site is located in an extremely sustainable town centre setting with excellent access to an established network of footpaths and in immediate proximity to a number of bus stops providing access to bus services with high frequencies of service.
- 6.4 No car parking will be provided at the facility for anyone other than for drop off purposes and for disabled users. It can therefore be considered to be car free. This by its very nature makes the development reliant to an extent on sustainable travel modes.
- 6.5 The FTP accompanies a Transport Statement (TS) which was produced to look at the transport impact of the scheme and shows that the anticipated traffic generation is unlikely to give rise to any issues to the operation of the highway network, certainly not severe in accordance with the NPPF.
- The proposed development will be BREEAM compliant and aims to gain credits for sustainable travel for a Travel Plan. The Accessibility Index (AI) calculation has been included in Appendix B and sets out that the proposed development should achieve 5 out of 5 credits.

Appendix A BREEAM Compliance

Context

The development is expected to be BREEAM compliant. The guidance relating to transport in BREEAM is contained the BREEAM Guidance notes³, which outlines the requirement for a 'Travel Plan'. It states that, 'To recognise the consideration given to accommodating a range of travel options for building users, thereby encouraging the reduction of user reliance on forms of travel that have the highest environmental impact'.

It is anticipated that the proposed development will be constructed to be BREEAM compliant. In order for the development to gain credits for transport therefore, it needs to meet criteria as set out in the BREEAM guidance specific to that development. This project is being assessed under the BREEAM UK New Construction (NC) version (v.) 6.1.

Table 1: BREEAM Credits

Credit	Description	Credits Available
TRA 01 – Transport Assessment and Travel Plan	Recognising developments in proximity to good public transport networks, thereby helping to reduce transport related pollution and congestion	2
TRA 02 – Sustainable Transport Measures	Recognising developments in close proximity of, and accessible to, local amenities which are likely to be frequently required and used by building occupants	10

The remainder of this appendix will provide evidence to show compliance with TRA 01 and TRA 02.

Travel Plan

BREEAM Guidance requires that a site-specific TP is produced that provides a long-term management strategy which encourages more sustainable travel. The TP should include measures to improve more sustainable modes of transport and movement of people and goods during the building's operation.

Two credits are available for 'Transport Assessment and Travel Plan. The guidance states that, 'No later than concept design stage, undertake a site-specific transport assessment (or develop a travel statement) and drat travel plan, which can be used to influence the site layout and built form'.

The site-specific travel assessment should cover as a minimum the measures set out in Table 2,

Table 2: BREEAM measures

Measures

a: If relevant, travel patterns and attitudes of existing building or site users towards cycling, walking and public transport, to identify relevant constraints and opportunities.

b: Predicted travel patterns and transport impact of future building or site users.

c: Current local environment for pedestrians and cyclists, accounting for any age-related requirements of occupants and visitors:

d: Reporting of the number and type of existing accessible amenities, within 500m of the site

e: Disabled access accounting for varying levels and types of disability, including visual impairment.

f: Calculation of the existing public transport Accessibility Index (AI)

g: Current facilities for cyclists

³ https://kb.breeam.com/section/3-general-technical/guidance-notes/

The guidance also states that

'Following a Transport Assessment, develop a site specific Travel Plan that can provide a long term management strategy which encourages more sustainable travel the travel plan includes measures to increase or improve more sustainable modes of transport and movement of people and goods during the buildings operation'.

If the occupier is known, involve them in the development of the Travel Plan

Demonstrate that the Travel Plan will be implemented and supported by the building management in operation.

BREEAM Compliance

It is confirmed that this Travel Plan has been developed as part of the feasibility and design stages of the proposed building and considers all types of travel relevant to the building type and users.

Table 3 below provides details of the location of the required information required, to demonstrate compliance with the BREEAM scheme.

Table3: BREEAM Compliance

Criteria	Location of information
a: If relevant, travel patterns and attitudes of existing building or site users towards cycling, walking and public transport, to identify relevant constraints and opportunities.	Staff are unknown
b: Predicted travel patterns and transport impact of future building or site users.	Transport Statement - Chapter 5 – Proposed Development
c: Current local environment for pedestrians and cyclists, accounting for any age-related requirements of occupants and visitors;	Framework Travel Plan - Chapter 3 - Site Audit
d: Reporting of the number and type of existing accessible amenities, within 500m of the site	Framework Travel Plan – Chapter 4 – Site Audit and Appendix B
e: Disabled access accounting for varying levels and types of disability, including visual impairment.	Transport Statement Chapter 5 – Proposed Development
f: Calculation of the existing public transport Accessibility Index (AI)	Framework Travel Plan– Appendix B
g: Current facilities for cyclists	Framework Travel Plan - Chapter 3 - Site Audit
Following a Transport Assessment, develop a site-specific Travel Plan that can provide a long term management strategy which encourages more sustainable travel the travel plan includes measures to increase or improve more sustainable modes of transport and movement of people and goods during the buildings operation'.	This Travel plan is a site-specific document. It has been produced following the production of a Transport Statement, it provides an action plan as a long-term management strategy
If the occupier is known, involve them in the development of the Travel Plan	A draft of this Travel Plan was sent to the project team for review
Demonstrate that the Travel Plan will be implemented and supported by the building management in operation	A travel plan coordinator will be employed to deliver the action plan.

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The BREEAM guidance recommends that the 'Travel Plan includes a package of measures that have been used to steer the design of the development in order to meet the travel plan objectives and minimise car-based travel patterns. **Table 4** provides evidence of where these facilities / measures are available or have been considered.

Table 4: BREEAM Recommendations

BREEAM Recommendations	Evidence
Restrictions or charging for car parking	The proposed development will not provide car parking except for disability spaces
Provision of electric recharging stations	The proposed development will not provide car parking, apart for accessible parking.
Provision of public transport information in a publicly accessible area	Public transport information will be provided on notice boards on-site and online
Consultation with the Local Authority on the state of the local cycling network and on improvements	Not required due to location of development site
Provision of dedicated and convenient cycle storage	Secure cycle parking will be incorporated into the development
Provision of cyclist's facilities	Cycle facilities will be provided
Lighting, landscaping and shelter to create pleasant pedestrian and public transport waiting areas	Landscaped areas will be provided
Pedestrian and cyclist friendly (for all types of user regardless of the level of mobility or visual impairment) with the provision of cycle lanes, safe crossing points, direct routes, appropriate tactile surfaces, good lighting and signposting to other amenities, public transport nodes and adjoining off-site pedestrian and cycle routes	Site has been designed to be friendly to pedestrians and cyclists
Ensure rural building have appropriate access to transport to serve the local community adequately (where procured to do	••

Ensure rural building have appropriate access to transport to Not applicable serve the local community adequately (where procured to do so, such as a community centre)

Accessibility to Local Facilities

Due to its city centre location, a number of complementary facilities are provided close to the site premises including food, retail, a post office, and a pharmacy.

Suggested recommended walking distances are provided by the Chartered Institute of Highways and Transport (CHIT) within their *Guidelines for Providing Journeys on Foot* (2000) document and replicated in **Table 5** for information.

Table 5: Suggested Acceptable Walking Distances (CIHT, 2000)

	Town Centres (m)	Commuting /School Sight Seeing (m)	Elsewhere (m)
Desirable	200m	500m	400m
Acceptable	400	1,000	800
Preferred Maximum	800	2,000	1,200

Source: Guidelines for Providing Journeys on Foot, CIHT, 2000

Details of facilities close to the proposed CDC are provided in **Table 6**.

Table 6: Accessibility to Local Facilities

Amenity	Evidence	Approximate Distance from Site (m)
Appropriate Food Outlet	McDonald's	250m
	KFC	200m
	Plymouth Pannier Market	200m
	Union Rooms	135m
	Leandra Restaurant	245m
	Pizza Express	309m
	Burger King	203m
	Subway	350m
	Dunya Restaurant	360m
	Premier Store	200m
Access to Cash	Cash Machine (Tesco)	604m
Access an outdoor open space	Millbay Park	480m
	Victoria Park	939m
	Plymouth Hoe	988m
Access to a recreation or leisure facility	McCauleys Gym	250m
Publicly available postal facility	Post Office	350m
Over the counter services associated with a pharmacy	Boots	342m
Public Sector GP surgery or general	Adelaide Street Surgery	750m
medical centre	Armada Surgery	670m
	North Road West Health Centre	932m
Childcare facility or school	Pilgrim Academy Primary	675m
	Tops Day Nursey	750m
	St Andrews CofE Primary School	670m

Accessibility Index

A requirement of the BREEAM process is the calculation of an Accessibility Index (AI) for the proposed development. An assessment of the AI of the site has been undertaken in line with the AI calculator and associated methodology contained within the BREEAM guidance.

The assessment involves establishing the average number of bus and rail services per hour from compliant transport nodes during a site's operating hours. The guidance specifies a five-hour operating period (07:00hrs to 20:00hrs) as the default hours of operation for a typical day for a 'Healthcare' site. Compliant transport nodes are those within 1km of the premises for rail and 650m for bus.

The AI calculations and the bus nodes and services considered as part of the assessment are included in **Appendix C**.

Appendix B BREEAM Calculations

BREEAM® UK BREEAM 2018 Tra01/02 Accessibility Index calculator Using the drop down boxes make the relevant selections and press the 'Select' button Building type Healthcare Hospitals(Acute, Specialist, Teaching, Mental health) No. nodes required 12 $\overline{}$ NODE 1 - Western Approach (Stop 2) Public transport type Distance to node (m) Bus Service 1 Average frequency per hour 3.15 2.92 2.85 2.69 2.08 NODE 2 - Western Approach (Stop 1) Bus Service 2 Service 3 Service 4 Service 5 Service 1 erage frequency per hour 2.38 1.92 1.08 0.62 0.54 NODE 3 - Plymouth Western Approach (North Bound) Public transport type Distance to node (m) 190 Average frequency per hour 2.77 2.69 NODE 4 - Connexions (East Bound) Public transport type Distance to node (m) Bus 120 Service 1 Service 2 Service 3 Service 4 Service 5 Service 6 Service 7 Service 8 Service 9 Service 10 Average frequency per hour 2.77 | 2.62 | 0.92 | 0.54 | 0.08 | 1.9 | NODE 5 - Derry's Cross (NF-bound) Bus Public transport type Distance to node (m) 260 Service 4 Service 5 Service 6 Service 7 Service 8 Service 2 Service 3 Service 10 Average frequency per hour NODE 6 - Derry's Cross South (SW-bound) Public transport type Distance to node (m) 300 Service 1 Service 2 Service 3 Service 4 Service 5 Service 6 Service 7 Service 8 Service 9 Service 10 Average frequency per hour 1.31 NODE 7 - Royal Parade A10 Public transport type Distance to node (m) Bus Service 1 Service 2 Service 3 Service 4 Service 5 Service 6 Service 7 Service 8 Service 9 Service 10 3.54 0.15 NODE 8 - Royal Parade A9 Bus Distance to node (m) Service 2 Service 3 Service 4 Service 5 Service 6 Service 7 Service 8 Service 9 Service 10 Service 1 1.69 NODE 9 - Royal Parade A11 Public transport type Distance to node (m) Bus 450 Service 2 Service 3 Service 4 Service 5 Service 6 Service 7 Service 8 Service 9 Service 10 Average frequency per hour 0.85 0.15 0.23 NODE 10 - Royal Parade A13 Public transport type Distance to node (m) Bus Service 2 Service 3 Service 4 Service 5 Service 6 Service 7 Service 8 Service 9 Service 10 Service 1 1.92 NODE 11 - Royal Parade A21

Service 2 Service 3 Service 4 Service 5 Service 6 Service 7 Service 8 Service 9

Service 10

Accessibility Index	24.81

Bus 650

Service 1 0.62

> Bus 650

0.92

Public transport type Distance to node (m)

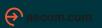
NODE 12 - Plymouth Coach Station

Public transport type

Distance to node (m)

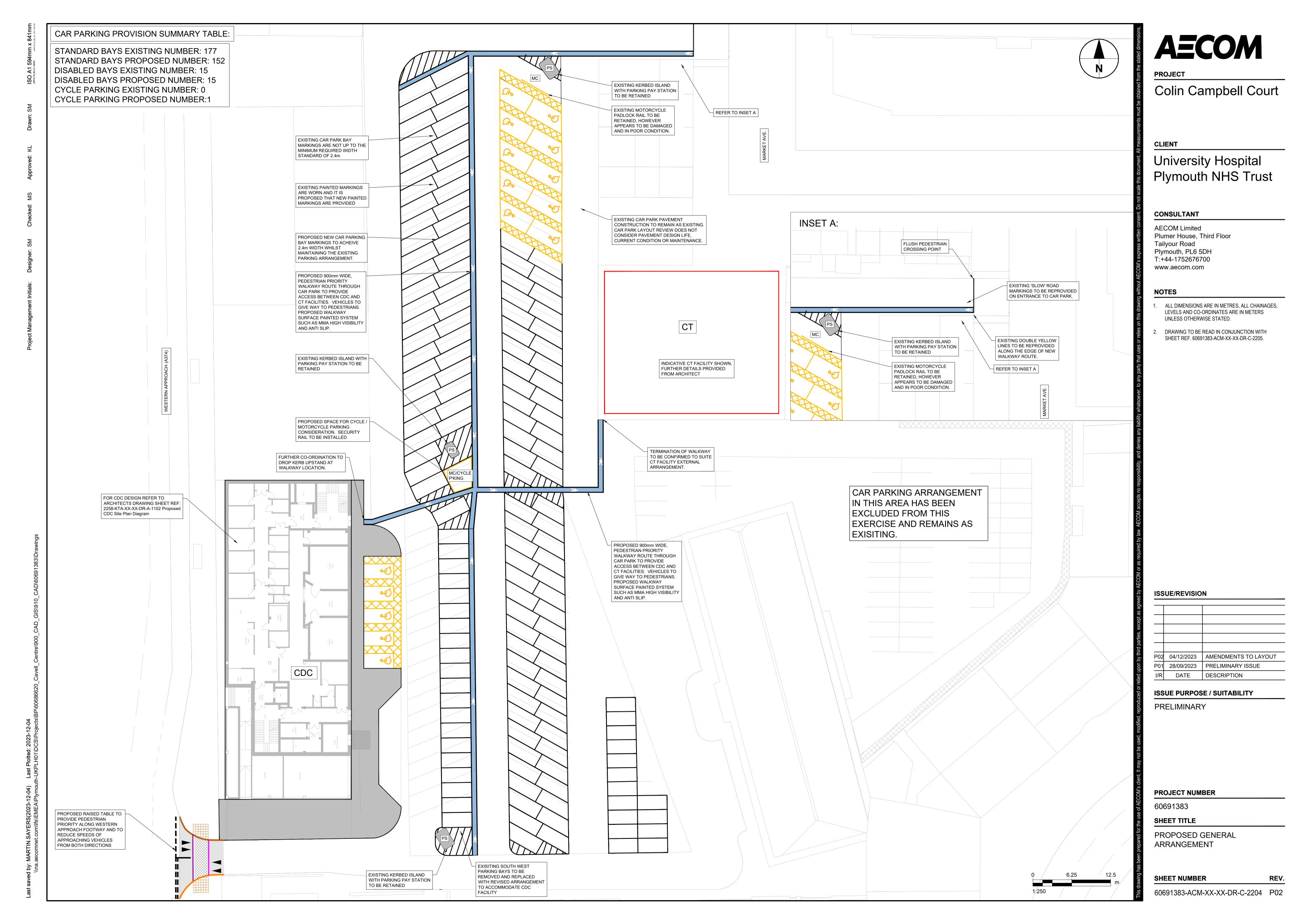
Average frequency per hour

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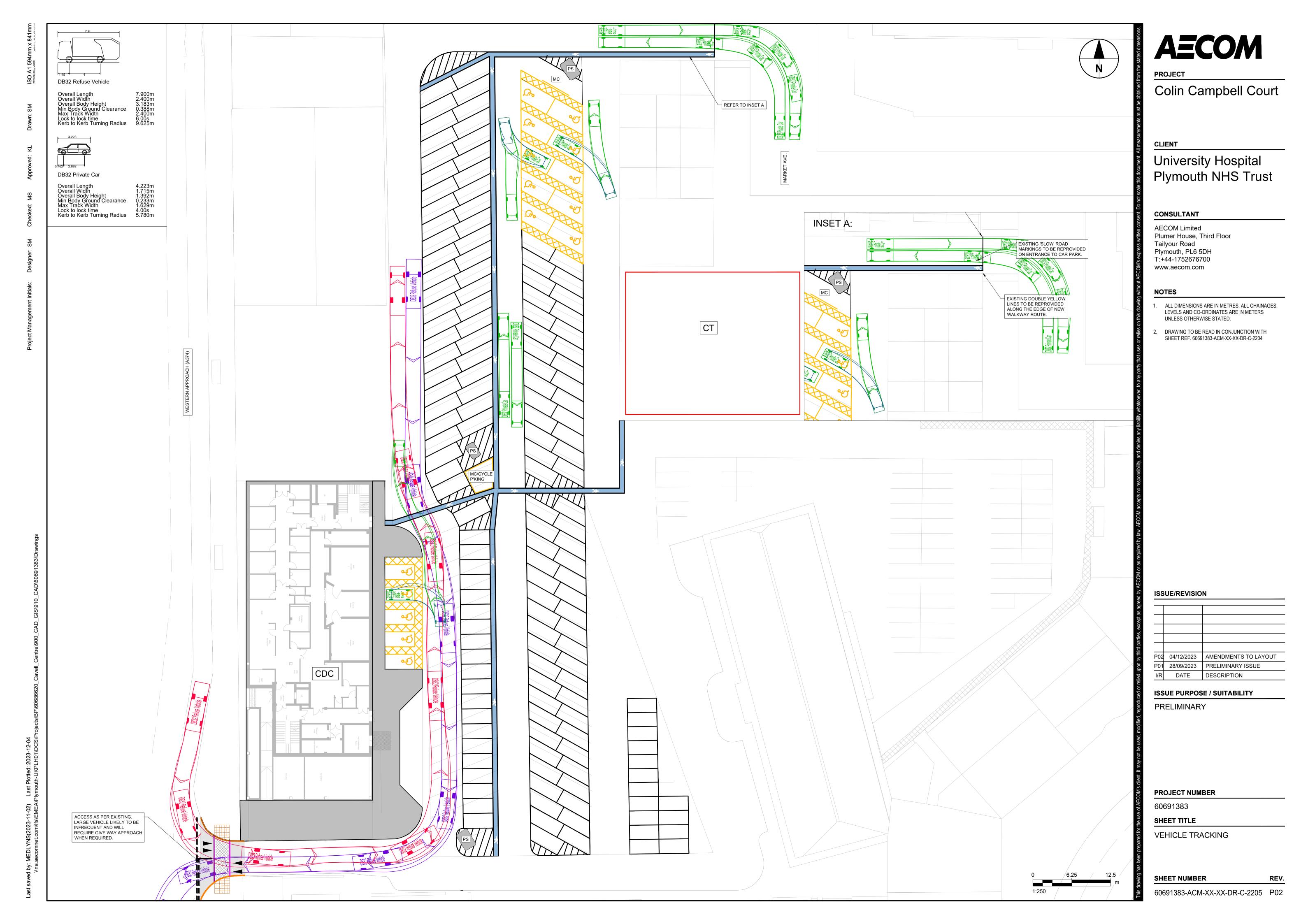


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Appendix B – Site Layout



Appendix C - Swept Path Analysis



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