

Harbour Avenue, Camel's Head  
Plymouth

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SAS Harbour Avenue Limited

Transport Statement





# Harbour Avenue, Camel's Head

## Transport Statement

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## Contents

1	Introduction .....	1
2	Background & Policy .....	3
3	Existing Conditions .....	17
4	Site Accessibility .....	21
5	Development Proposals .....	26
6	Trip Generation and Traffic Impact .....	30
7	Framework Workplace Travel Plan (Measures Only) .....	36
8	Summary and Conclusions .....	42

## Appendices

**Appendix A** Drawings and Figures

**Appendix B** Masterplan

**Appendix C** Plymouth Cycle & Walking Map

**Appendix D** PIA Data

**Appendix E** Bus Timetables

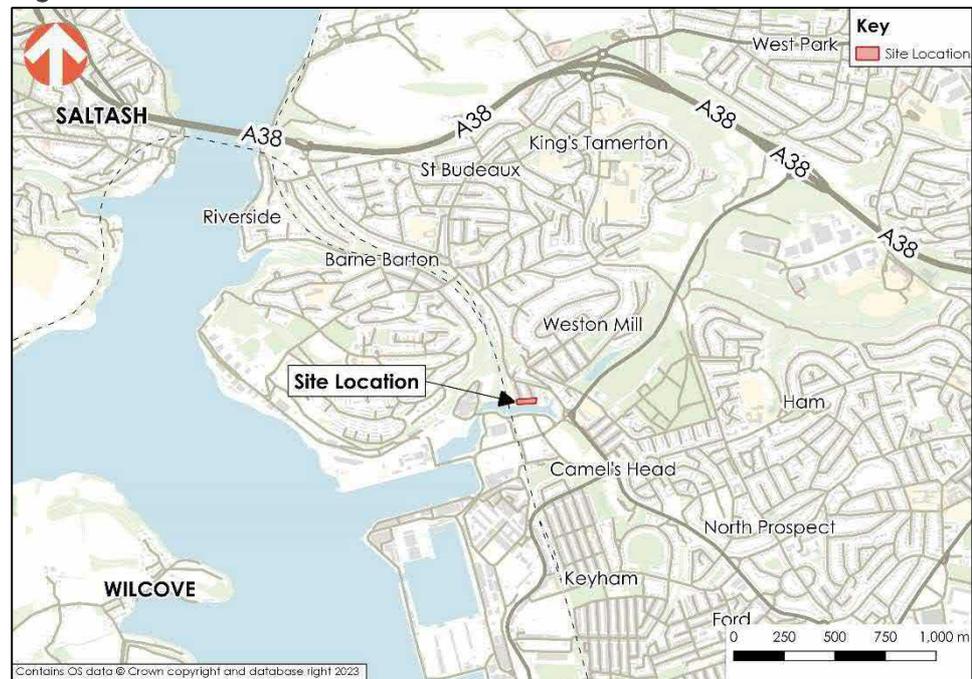
**Appendix F** TRICS Data

**Appendix G** Travel Plan Implementation Strategy

# 1 Introduction

- 1.1. Awcock Ward Partnership (AWP) have been commissioned by SAS Harbour Avenue Limited to prepare a Transport Statement (TS) in support of a Full planning application for a change of use of buildings and land at Harbour Avenue, Camel’s Head, Plymouth. The change of use is for self-storage, commercial storage, indoor vehicle storage, commercial distribution, a recreational sports area, and office use.
- 1.2. The location of the site is shown on Figure 1.1, and the proposed masterplan is attached in Appendix B.

**Figure 1.1: Site Location –Wider Area**



- 1.3. This report has been prepared with reference to the Planning Practice Guidance published in connection with the National Planning Policy Framework.
- 1.4. The structure and content of the report comprises the following:
  - Background and summary of relevant transport policy (local, regional and national) and planning history;
  - Review of existing transport infrastructure and services surrounding the site, including a road safety review;



- Review of the accessibility of the site to local facilities and public transport opportunities;
  - Summary of the development proposals including the site access arrangements;
  - Anticipated vehicular trip generation and distribution for the proposed development, and car parking accumulation;
  - Qualitative consideration of the development traffic impact;
  - Framework Travel Plan Statement; and
  - Summary and Conclusions
- 1.5. The report also includes a Framework Travel Plan Statement, setting out measures only to promote sustainable transport choices for journeys to and from the proposed development.
- 1.6. The final chapter of the Transport Statement presents an overall summary and conclusion which cross refers to the National Planning Policy Framework requirements.

## 2 Background & Policy

### Planning History

- 2.1 The site has been subject to a number of previous planning applications, which have been outlined in Table 2.1 in chronological order:

**Table 2.1: Summary of relevant previous planning application at Harbour Avenue**

Description	Reference no.	Validated year	Decision
Change of Use to a construction skills training centre	90/02477/30	1990	Permitted
Erection of two storey buildings in connection with construction skills training centre	91/00207/30	1991	Permitted
Use of premises for waste disposal	93/00396/C1884	1993	Permitted
Installation of double mobile classroom for construction skills training centre	00/00791/FUL	2000	Permitted
Retention of building and continuation of use as mobile classroom	05/01116/FUL	2005	Permitted
Retention of temporary classroom	11/00128/FUL	2011	Permitted
Change of Use to self-storage and outdoor vehicle storage (Class B8) and ancillary office use (Class E) and associated works	22/02134/FUL	2023	Withdrawn

- 2.2 As shown in Table 2.1, the site was previously granted planning permission for the use as a construction skills training centre and as a waste disposal centre. It is understood that the site was predominantly used by Plymouth City College as a construction skills training centre up until the 2000s. It is also understood that between 2011 until 2019/2020, the site was used as an office furniture and clearance business, although no change of use planning permission was permitted.
- 2.3 As the change of use was not permitted, it is understood that the site, if brought back into operation today, would have consent to operate as an education facility (construction skills centre). It is on

this basis that this document has been prepared, for comparison purposes against the proposed development.

- 2.4 A planning application for a change of use to self-storage, vehicle storage and ancillary office use was validated in 2023, although later withdrawn. This current planning application replaces the withdrawn application and addresses the concerns from the Local Highway Authority.

## National Policy

### *National Planning Policy Framework*

- 2.5 A revised National Planning Policy Framework (NPPF) was published in December 2023. It sets out Central Government's planning policies for England and how they are expected to be applied. Amongst others, the revised Framework replaces the original NPPF that superseded PPG13 Transport and provides the single national transport planning policy.
- 2.6 Paragraph 10 states that "*at the heart of the Framework is a presumption in favour of sustainable development*". Paragraph 11 of the NPPF expands on this point and declares that "*plans and decisions should apply a presumption in favour of sustainable development*", in relation to decision making the Framework states that this means:

- *Approving development proposals that accord with an up-to-date development plan without delay; or*
- *Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
  - *The application of policies in this Framework that protect areas of assets of particular importance provides a clear reason for refusing the development proposed; or*
  - *Any adverse impact of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

- 2.7 Paragraph 92 states that planning policies, and decisions should "*aim to achieve healthy, inclusive and safe places*". The Framework provides a guidance and examples on the creation of places which:

- *Promote social interaction, including opportunities for meeting between people who might not otherwise come into contact with each other –for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;*
- *Are safe and accessible, so that crime and disorder, and fear of crime, do not undermine that quality of life or community cohesion –for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas; and*
- *Enable and support healthy lifestyles, especially where this would address identified local health and well-being needs –for example through the provision of safe and accessible green infrastructure, sport facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.*

2.8 Section 9 of the document specifically focuses on promoting sustainable transport. The Framework acknowledges that “*Transport issues should be considered from the earliest stages of plan-making and development proposals*”.

2.9 It is stated within Paragraph 114 that plans and decisions should take account of:

- *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;*
- *the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code<sup>1</sup>, 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.*

<sup>1</sup> *Policies and decisions should not make use of or reflect the former Design Bulletin 32, which was withdrawn in 2007.*

2.10 The Framework states in Paragraph 115 that a ‘*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.'*

2.11 In relation to design and layout, Paragraph 116 of the NPPF requires that developments should:

- *Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*
- *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 – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
- *Allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
- *Be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.*

2.12 Paragraph 117 requires that all developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment, and a Travel Plan.

2.13 The NPPF states in Paragraph 111 that in setting local parking standards for residential and non-residential development, local planning authorities should take into account the following:

- *The accessibility of the development;*
- *The type, mix and use of development;*
- *The availability of and opportunities for public transport;*
- *Local car ownership levels; and*
- *The need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.*

2.14 Paragraph 112 of the Framework states that “*Maximum parking standards for residential and non-residential development should*



*only be set where there is a clear and compelling justification that they are necessary for managing the local network, or for optimising the density of development in city and town centres and other location that are well served by public transport”.*

***National Planning Practice Guidance (NPPG)***

2.15 On 6 March 2014 the Department for Communities and Local Government (DCLG) launched a suite of planning practice guidance to bring together relevant material for England in an accessible and usable way. As well as other planning matters, the new resource contains specific guidance on “*Travel Plans, Transport Assessments and Statements in decision-making.*”

2.16 The NPPG states that these documents should:

*“primarily focus on evaluating the potential transport impacts of a development proposal” and that they “can be used to establish whether the residual transport impacts of a proposed development are likely to be “severe”, which may be a reason for refusal, in accordance with the National Planning Policy Framework.”*

2.17 The NPPG also states that:

*“The Transport Assessment or Transport Statement may propose mitigation measures where these are necessary to avoid unacceptable or “severe” impacts. Travel Plans can play an effective role in taking forward those mitigation measures which relate to on-going occupation and operation of the development.”*

2.18 The key principles that should be taken into account when preparing a Travel Plan, Transport Assessment or Statement are also defined in the NPPG. This states that Travel Plans, Transport Assessments and Statements should be:

- *proportionate to the size and scope of the proposed development to which they relate and build on existing information wherever possible;*
- *established at the earliest practicable possible stage of a development proposal;*
- *be tailored to particular local circumstances (other locally-determined factors and information beyond those which are set out in this guidance may need to be considered in these studies provided there is robust evidence for doing so locally);*
- *be brought forward through collaborative ongoing working between the Local Planning Authority/ Transport Authority, transport operators, Rail Network Operators, Highways Agency where there may be implications for the strategic road network and other relevant bodies. Engaging communities and local businesses in Travel Plans, Transport Assessments and Statements can be beneficial in positively supporting higher levels of walking and cycling (which in turn can encourage greater social inclusion, community cohesion and healthier communities).*

### ***National Design Guidance***

2.19 The National Design Guide was published by the Ministry for Housing, Community and Local Government in October 2019.

2.20 This document forms part of the Government’s Planning Practice Guidance and is designed to provide information on well-designed places and how developments can create high quality buildings.

2.21 With regard to Transport and Movement, the document reaffirms the guidance of Manual for Streets (see below) and states:

- *‘Well designed places have accessible local public transport, services and facilities, to ensure sustainable development’;*
- *‘Local facilities are within walk distance, generally considered to be no more than a 10 minute walk (800m radius)’; and*
- *‘In a well-designed place, all modes of transport are positively designed into the built form.’*

2.22 This guidance provides confirmation that the guidelines concerning accessibility as stated within Manual for Streets & Manual for Streets 2 is still relevant and should be applied to current planning applications.



## Regional Policy

### *Adopted Plymouth and South West Devon Joint Local Plan – 2014-2034*

2.23 The Plymouth and South West Devon Joint Local Plan was adopted by Plymouth City Council in March 2019. It sets out the long-term plan to meet the demand for housing, jobs, and services in the region.

2.24 The vision for Plymouth is outlined below:

- *Plymouth's strategic role is fulfilled as a regional city and a major economic driver for the heart of the south west.*
- *Plymouth as a healthy city, where our people live in happy, healthy, safe and aspiring communities.*
- *Plymouth as a growing city, where we have used our economic, social, environmental and cultural strengths to deliver quality and sustainable growth.*
- *Plymouth as an international city, renowned as the UK's premier marine city and famous for its waterfront, maritime heritage and culture*

2.25 The plan outlines the following policy in relation to transport planning;

***Policy SPT9: Strategic principles for transport planning and strategy***

*The LPAs and the local highway authorities of Plymouth and Devon, working with key transport stakeholders, will deliver an integrated approach to transport and planning, based upon the following key principles.*

- 1. Sustainable growth as a key driver behind the transport strategy, whilst making sure that transport is delivered in the most health promoting and environmentally responsible manner.*
- 2. Focussing major growth on accessible locations, where high quality sustainable travel can be more effectively promoted, with clear priorities for routes to and from the city's three Growth Areas to balance the competing demands for highway space.*
- 3. Managing the need to travel, by having a balanced distribution of land use within the city and towns.*
- 4. Seeking to reduce the impact of severance caused by transport networks, enabling more journeys by walking, cycling and public transport and providing genuine alternative ways to travel from home to work and other facilities*

5. *Providing realistic sustainable transport choices and increasing the integration of transport modes so that people have genuine alternative ways to travel.*

6. *Getting the most out of existing transport networks, through measures that improve network efficiency and encourage behavioural change, with major infrastructure projects only where there are no better alternatives.*

7. *Supporting economic and housing growth with major transport infrastructure projects where there are proven benefits, so that transport links are not a barrier to planned development and pinch points on the network are alleviated.*

8. *Adopting a hierarchy of transport modes and routes based upon different spatial settings.*

9. *Delivering transport projects which provide a safe and effective transport system, as well as supporting place shaping and healthy community objectives, as guided by the hierarchy.*

10. *Taking local control of our transport future, embracing localism, generating independent resources to transform transport investment, and embracing changes in travel technology.*

11. *Partnership working, with local and regional partners, realising greater benefits over the life of the plan and beyond.*

**Policy SPT10:** *Balanced transport strategy for growth and healthy and sustainable communities*

*The LPAs and the local highway authorities of Plymouth and Devon, working with key transport stakeholders, will deliver a high quality transport system for the Plan Area, supporting the plan's growth strategy and the need for healthy and sustainable communities. A range of transport and planning measures will be delivered according to the hierarchy of modes in Policy SPT9, including (for people and freight where appropriate):*

- *Walking.*
- *Cycling.*
- *Local bus and coach services (including park and ride and Plymouth's High Quality Public Transport Bus Network).*
- *Regional coach services.*
- *Local and international ferry services.*
- *Local rail services.*
- *Community transport.*
- *Private car, taxis and motorcycles.*

*In addition to those measures identified in other policies of the plan, a balanced programme of measures, consistent with the strategic principles for transport and planning, will be set out in the delivery plans of the Plymouth and Devon local highway authorities. This will include measures that will be delivered within the first five years of the plan, as well as identifying potential medium and long term measures that will be developed to manage increased demand for travel.*



*The measures will seek to encourage and facilitate greater modal shift toward sustainable modes of transport, and where infrastructure investment is needed, to support the improvement of sustainable transport choices for local people and businesses.*

**Approved Plymouth Plan 2014-2034**

- 2.26 The Plymouth Plan was approved in January 2021 and provides a development plan for the city, which replaced the Local Development Framework development plan documents for Plymouth and the surrounding area.
- 2.27 The plan sits alongside the Plymouth and South West Devon Joint Local Plan. The applicable policies associated to transport within the approved Plymouth Plan are identified below:

*Policy HEA 6*

*Delivering a safe, accessible, sustainable and health-enabling transport system.*

*The City will deliver a transport system that enables and encourages sustainable and active travel choices, provides good accessibility for the city's population to jobs and services, and supports a healthy environment. This will involve:*

- 1. Using the planning process to:*
  - i. deliver safe and convenient facilities for walking, cycling and public transport;*
  - ii. addressing air quality, carbon emissions and noise pollution;*
  - iii. actively promote and facilitate sustainable travel choices and quiet connected communities.*
- 2. Designing transport infrastructure projects to take full account of the needs of all users, the wider community and place shaping needs of the area, whilst also helping to minimise air quality, carbon emissions and noise pollution.*
- 3. Facilitating and encouraging walking and cycling through protecting the amenity and safety of the public realm, avoiding street clutter and other unnecessary obstructions and structures, making specific provision for people with all disabilities, and maintaining and improving the Public Rights of Way network.*
- 4. 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.*
- 5. Delivering a public transport system that everyone can use, including working with the bus companies to provide easier ticketing, clear journey planning and timetable information, and accessible boarding and alighting across the city.*

- 6. Working with public transport providers to ensure that each neighbourhood is well connected to the city's High Quality Public Transport Network offering good accessibility to key destinations.*
- 7. Investing in and promoting the growth of an electric vehicle charging network encouraging electric vehicle take-up and use and continuing to work with partners to harness the benefits of alternative fuel technologies in both land and marine environments.*
- 8. Delivering a co-ordinated approach, through new development design and retrospective modifications, to reduce road casualties and air and noise pollution, including 20mph limits and zones where appropriate.*
- 9. Working with our partners, including the charitable sector, to provide community transport to enable people who cannot use conventional public transport to access health, leisure, shopping and social opportunities within the city and surrounding area.*
- 10. Working 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.*

2.28 The approved plan also goes onto state on policy GRO4:

***Policy GRO4 - Using transport investment to drive growth***

*The City will deliver targeted integrated transport measures to help support the sustainable growth of Plymouth, in accordance with the vision, objectives and policies of the Joint Local Plan. These include:*

- 1. Continuing to support the High Quality Public Transport Network and improve public and sustainable transport services through, where appropriate, subsidies and new infrastructure.*
- 2. Maintaining, improving and expanding the network of Park & Ride facilities and services, addressing the needs of both Derriford and the City Centre including a new facility at Deep Lane, exploring suitable locations for new facilities and considering the reallocation of space at existing sites.*
- 3. Continuing to support and develop new and existing local passenger ferry services, by working with stakeholders.*
- 4. Working with partners to promote improved and more resilient local rail services, through developing and communicating the Plymouth / Devon Metro concept, reinstating the Tavistock to Plymouth branch line and investigating the need for new rail stations.*
- 5. Improving facilities and services to encourage cycling, including continued delivery of Plymouth's Strategic Cycle Network.*
- 6. Investing in a range of measures to enable and encourage more journeys to be made on foot, including maintaining and expanding the network of Public Rights Of Way and trails.*

- 7. Continuing to support and where feasible expand Community Transport schemes.*
- 8. Supporting and promoting car sharing and the establishment of coordinated car clubs in new developments.*
- 9. Developing our Intelligent Transport Systems to increase the efficiency of the highway network to make best use of its assets.*
- 10. Partnership working with neighbouring authorities and Highways England to ensure effective operation of the local and strategic road network and the interface between the two.*
- 11. Development and implementation of powers to reduce the impact of works being undertaken by statutory providers.*
- 12. Management of demand for travel through the application of accessibility based car parking standards, charging policy for car parks to discourage commuting by car, and targeted fiscal based management strategies in major employment locations.*
- 13. Use of smarter choices and travel planning to provide and promote travel choice, through the planning process.*
- 14. Facilitating efficient freight movements at all spatial scales, with due consideration for the most appropriate mode of travel for the freight being transported, including encouraging and enabling low emission logistics, and working with operators to identify and deliver appropriate facilities.*
- 15. Developing and delivering targeted infrastructure interventions, consistent with the long term vision and objectives for transport set out in the JLP.*

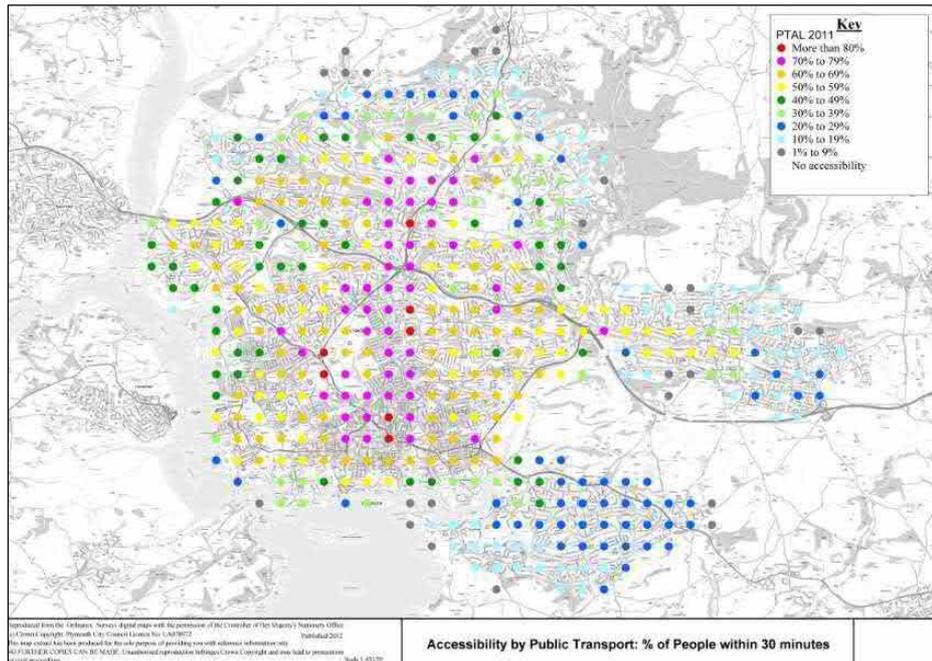
### Adopted Supplementary Planning Document

- 2.29 The Plymouth and South West Devon Supplementary Planning Document (SPD) 2020 was adopted by Plymouth City Council on in July 2020.
- 2.30 The SPD has been prepared to give guidance on the implementation of the policies of the Plymouth and South West Devon Joint Local Plan.
- 2.31 Policy DEV29.4 provided the indicative car parking provision for non-residential development with the associated policy wording advising that '*deviations will be considered on a case-by-case basis*'. These indicative standards are shown in Table 31 as shown below:

Type/size of development	Indicative parking provision
A1 Large food and convenience goods shops more than 999m <sup>2</sup>	1 space per 14 m <sup>2</sup> gross floorspace
A2 Offices providing services mainly to visiting people	1 space per 30m <sup>2</sup> gross floorspace
A3 Restaurants and cafes	1 space per 5.5m <sup>2</sup> used by customers
A4 Drinking establishments	1 space per 2m <sup>2</sup> of floorspace used by customers for drinking. For dining floor space, the same standard will apply.
A5 Hot food take aways	1 space per 5.5m <sup>2</sup> used by customers
B1 General business uses	1 space per 30m <sup>2</sup> used by customers
B2 Manufacturing	1 space per 51m <sup>2</sup> gross floorspace. Lorry parking will be assessed on merits of each case.
B2 Small industrial units less than 235m <sup>2</sup>	1 space per 44m <sup>2</sup> gross floorspace. Small industrial units, particularly of the grouped or court variety will need a separate assessment. Parking provision will normally be communal.
B8 Warehouses less than 2,500m <sup>2</sup>	1 space per 70m <sup>2</sup> gross floorspace. Lorry parking will be assessed on merits of each case
B8 Warehouses larger than 2,500m <sup>2</sup>	1 space per 100m <sup>2</sup> gross floorspace. Lorry parking will be assessed on merits of each case.

- 2.32 The policy then sets out a generic ‘*Methodology for Calculating Accessibility – Plymouth*’ (paragraphs 8.17-8.19). That methodology adjusts parking requirement by a factor taking into account the accessibility of the location judged by a PTAL rating as shown in Figure 2.1 below.
- 2.33 A formula can then be applied adjusting the parking standards set out in policy DEV29.4 to reduce parking reflecting the accessible nature of the site.
- 2.34 However, the policy is also clear that parking provision should be considered on a site by site basis which allows the assessment to take into account the local network risks of providing inadequate parking on any site.
- 2.35 The supporting text in paragraph 8.19 in DEV29.4 states that ‘*it should be noted that the following map is not site specific and a more detailed consideration may be required.*’

Figure 2.1 –Plymouth Accessibility Plan



2.36 The site is located in an area with a PTAL rating of 60-69% (amber).

**Additional Guidance: Manual for Streets**

2.37 Manual for Streets was published by the Department for Transport in 2007 with the purpose of being a “*common reference point for all those involved in the design of residential neighbourhoods*” and represents “*a strong Government commitment to the creation of sustainable and inclusive public spaces*”.

2.38 This latest design guidance demonstrates “*benefits that flow from good design and assigns a higher priority to pedestrians and cyclists, setting out an approach to residential streets that recognises their role in creating places that work for all members of the community*”.

2.39 Manual for Streets sets out the following key objectives of the design of new residential neighbourhoods:

- *Encouragement of low vehicle speeds;*
- *Creation of an environment in which pedestrians can walk, or stop to chat, without feeling intimidated by motor traffic;*
- *Make it easier for people to move around;*
- *Promote social interactio*



- 2.40 Manual for Streets 2 – *“Wider Application of the Principles, a companion guide to Manual for Streets”*, was published by the Chartered Institution of Highways and Transportation in September 2010. Manual for Streets 2 builds on the philosophies originally set out in Manual for Streets, and aims to fill the perceived gap in design advice that lies between Manual for Streets and the Design Manual for Roads and Bridges. The document sets out additional guidance and case studies showing how the Manual for Streets principles can be extended beyond residential streets to encompass both urban and rural situations.

#### **Summary**

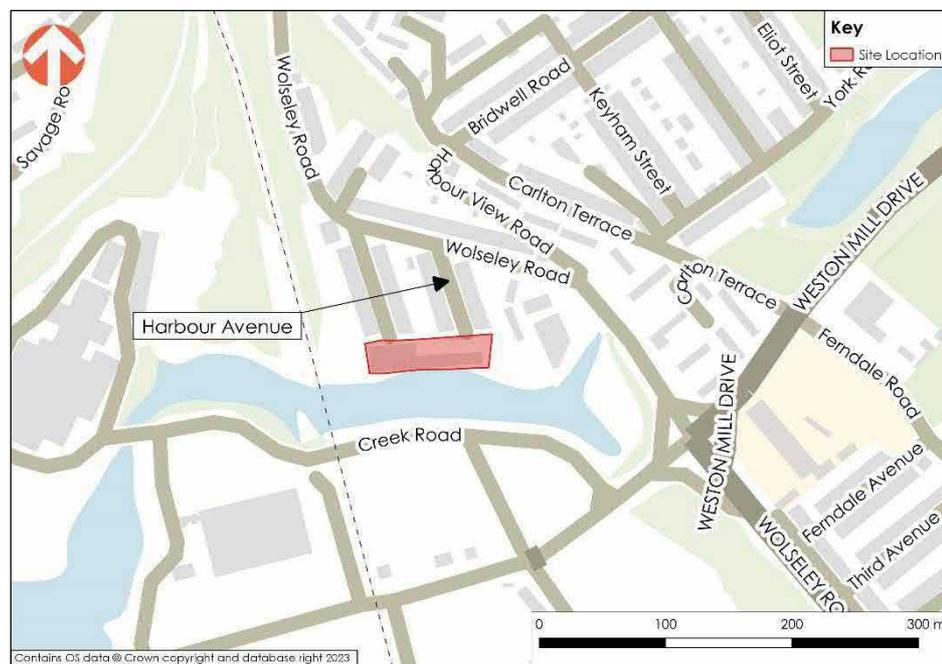
- 2.41 Relevant national, regional and local policies and guidance have been reviewed to identify those which will guide the development design so that transport-related infrastructure associated with the development complies with prevailing policy and guidance. A summary of the planning history of the site has also been outlined.

### 3 Existing Conditions

#### Context

- 3.1 The development site is located in Camel’s Head, Plymouth. The site is bordered by residential properties to the north; commercial development to the east, Weston Mill Lake to the south; and the Cornish Main Railway Line and shrubland to the west.
- 3.2 The location of the site with respect to the local road network is shown on Figure 3.1 below.

Figure 3.1 - Site Location –Local Area



#### Local Road Network

- 3.3 Harbour Avenue routes in a north to south direction, and links the proposed site with Wolsley Road. It provides direct access into the proposed site, and is subject to a 20mph speed limit. Existing residential properties are located on both the eastern and western sides of Harbour Avenue.
- 3.4 Wolsley Road is located to the north of the site and provides access to Harbour Avenue. To the south, it transitions into the A3064 at the A3064 / St Budeaux Bypass signalised junction, approximately 350m south east of the proposed site. Wolsley Road is subject to a 20mph speed limit.

- 3.5 The A3064 provides access to Plymouth city centre via Milehouse, approximately 3.9km south east of the site.
- 3.6 The St Budeaux Bypass provides access to the A38(T) Devon Expressway, approximately 2.1km north east of the site. To the east, the A38(T) provides access to Exeter where the M5 can be reached at Junction 31. The M5 provides access to Bristol and destinations further afield.
- 3.7 The A386 can also be reached via the A38(T) to the east, which provides access to Okehampton, North Devon and Cornwall.
- 3.8 To the west, the A38(T) routes across the Tamar Bridge into Cornwall, providing a connection to the A30(T) and A390.
- 3.9 Wolseley Road to the north routes through St Budeaux, and provides an alternative route to the A38(T) via Victoria Road, approximately 2.2km north of the site.

#### **Pedestrian and Cycle Facilities**

- 3.10 Footways and street lighting are present on both sides of Harbour Avenue and Wolseley Road. These provide access to the local facilities and public transport connections, which are outlined in Section 4 of this report.
- 3.11 An on-street cycle path is located on the southern side of Wolseley Road. This routes between the A3064 / St Budeaux Bypass junction, to the south and St Budeaux to the north.
- 3.12 A shared use path is located on the western side of St Budeaux Bypass. This routes from the A3064 / St Budeaux Bypass junction to the residential area of Honicknowle to the north.
- 3.13 A number of advisory cycle routes are located in the vicinity of the site, as defined on the Plymouth Cycling & Walking Map, which is attached in Appendix C. This includes a route from Carlton Terrace, which is accessible to the north off Wolseley Road. This advisory cycle route goes through nearby residential areas, routing to Kings Tamerton to the north and Weston Mill and Ham to the east. It provides a connection to the shared use path which routes along the western side of the St Budeaux Bypass, in addition to a network of advisory, traffic-free and on-road cycle routes which provide access towards Plymouth city centre.

### Accident History

- 3.14 Personal Injury Accident (PIA) data for the latest five-year period for which data is available has been reviewed, using records obtained using the DCC online accident map, and is attached in Appendix D. The extent of the PIA search area covers Harbour Avenue and along Wolseley Road in the vicinity of the Harbour Avenue junction.
- 3.15 Within the search area and timeframe, three incidents were reported, all of which were categorised as 'slight' in terms of casualty severity of injury. One involved a cyclist and one involved a pedestrian, however these were at different locations, and there is nothing to suggest that there is a particular pattern to NMU incidents recorded in the scope area.
- 3.16 All of the reported accidents were recorded at isolated locations on Wolseley Road, and no accidents were recorded on Harbour Avenue. Given the isolated locations and the low number of recorded incidents, it is therefore concluded that there is no pattern of accidents to suggest a road safety issue.
- 3.17 In conclusion, a review of the DCC accident records, for the most recent five-year period for which data is available, demonstrates that there is no pattern of incidents that might suggest any existing road safety issues on the local road network in the vicinity of the development site.

### Summary

- 3.18 The development site is located in Camel's Head, Plymouth. The site is bordered by residential properties to the north; commercial development to the east, Weston Mill Lake to the south; and the Cornish Main Railway Line and shrubland to the west.
- 3.19 Footways and street lighting are present on both sides of the local road network within the vicinity of the site, including routes to local facilities and residential areas.
- 3.20 There are a number of cycle routes nearby the site, providing access to the range of local residential areas, local facilities and towards Plymouth City Centre. This includes an on-street cycle path along the southern side of Wolseley Road and a shared use path



on the western side of St Budeaux Bypass. There are also a number of advisory cycle routes within close proximity of the site.

- 3.21 A review of the DCC accident records, for the most recent five-year period for which data is available, demonstrates that there is no pattern that might suggest any existing road safety issues on the local road network in the vicinity of the development site.



## 4 Site Accessibility

4.1 This section of the TS considers the accessibility of the site in relation to local facilities and sustainable transport in the local area.

### Local Amenities and Facilities

4.2 The Institution of Highways and Transportation document “Guidelines for Providing for Journeys on Foot” contains suggested acceptable walking distances for pedestrians for some common facilities. This document is intended to advise on planning for and providing for pedestrians, maintaining pedestrian infrastructure and promoting walking and as a result the distances stated in the document may be used for planning and evaluation purposes. Table 4.1 below reproduces Table 3.2 from Guidelines for Providing for Journeys on Foot (GPJF).

**Table 4.1 – ‘GPJF Table 3.2-Suggested Acceptable Walking Distance’**

	Town Centres (m)	Commuting/ School /Sight-seeing (m)	Elsewhere (m)
Desirable	200	500	400
Acceptable	400	1000	800
Preferred maximum	800	2000	1200

4.3 Section 4.4 of Manual for Streets also states that ‘Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes’ walk (up to about 800m). However, it goes on to state that ‘this is not an upper limit and..that walking offers the greatest potential to replace short car trips, particularly those under 2km’.

4.4 Figure 4.1 contained in Appendix A of this report, highlights the location of local facilities and residential areas in the local neighbourhood that would be accessible to the employees and visitors of the site. To provide context, boundaries indicating distances from the site boundary in 400m (or 5-minute walk) increments are also shown.



4.5 As highlighted on Figure 4.1, employees and visitors of the development will be able to access a range of local facilities and residential areas on foot within an approximate 5-, 10-, 15- and 20-minute walk of the development. Table 4.2 sets out the measured walking distance to each amenity from the site following the highway network (which is slightly longer due to the nature of the alignment of the local street pattern).

**Table 4.2 –Accessibility to Local Facilities**

Facility	Approximate Walking Distance (m/mins)							
	0-400m	0-5 mins	400-800m	5-10 mins	800-1200m	10-15 mins	1200-1600m	15-20 mins
Harbour Avenue Bus Stops	1							
Western Mill Residential Area	1							
Camel's Head Residential Area			1					
St Budeaux Residential Area			1					
Premier Convenience Store			1					
Camel's Head Post Office			1					
Lidl Wolseley Road			1					
Co-op Convenience Store			1					
St Budeaux Railway Stations			1					
North Prospect Residential Area			1					
Costcutter Convenience Store							1	

4.1 Table 4.2 above shows a number of residential areas are located within walking distance of the site. With a range of facilities and residential areas within an 800m walk of the site, the site forms part of a walkable neighbourhood, as defined in Manual for Streets guidance.

4.2 There are also a number of schools and health facilities within walking and cycling distance of the school, enabling employees



and visitors of the site the ability to link trips, especially if they live locally.

- 4.3 As outlined in Section 3 of this report, there is a wide range of pedestrian and cycle infrastructure, which allows access from the nearby residential areas, as well as to the nearby facilities. This includes footways and a number of cycle routes to reach the nearby facilities.

**Public Transport –Bus**

- 4.4 The closest bus stops to the site are situated on Wolseley Road, approximately a one-minute (100m) walk from the site, which is well within the 800m ‘walkable neighbourhood’ distance, as defined in Manual for Streets guidance. These bus stops are known as ‘Harbour Avenue’ bus stops. A flag and pole is present at the bus stop, along with relevant bus timetables.

- 4.5 Table 4.3 below summarises the bus services accessible from the bus stops located closest to the site. The corresponding bus timetables are attached in Appendix E.

**Table 4.3 - Existing Bus Services –Harbour Avenue**

Service	Operator	Destinations	Typical Frequency		
			Mon - Fri	Sat	Sun
2/2A	Stagecoach SW	Mount Batten* – Plymouth City Centre –St Budeaux – <b>Harbour Avenue</b> – Saltash	Every 15 mins	Every 15 mins	Every 30 mins
10	Go Cornwall Bus	Plymouth City Centre – <b>Harbour Avenue</b> – Saltash –Tideford –Looe –Polperro	Every 2 hours	Every 2 hours	Every 2 hours
11	Go Cornwall Bus	Plymouth City Centre– <b>Harbour Avenue</b> – Saltash –Liskeard – Bodmin –Wadebridge – Padstow	Every 2 hours	Every 2 hours	Every 2 hours
12	Go Cornwall Bus	Plymouth City Centre – <b>Harbour Avenue</b> – Saltash –Callington – Launceston –Bude – Newport	Hourly	Hourly	Every 2 hours
21/21A	Plymouth Citybus	Plympton –Plymouth City Centre –Devonport – <b>Harbour Avenue</b> –Barne Barton	Every 30 mins	Every 30 mins	Every 30 mins



Service	Operator	Destinations	Typical Frequency		
			Mon - Fri	Sat	Sun
43	Plymouth Citybus	Milehouse -Plymouth City Centre –St Budeaux – <b>Harbour Avenue</b> – Ernesettle –Plymouth City Centre –Milehouse	Every 20 mins	Every 30 mins	Every 30 mins
50/51	Plymouth Citybus	Derriford Hospital – <b>Harbour Avenue</b> –St Budeaux –Plymouth City Centre –Estover – Derriford Hospital	Every 20 mins	Every 30 mins	Every 30 mins
* 2 bus service only					
Sources: travelinesw.com			Date: 29.11.2023		

4.6 Table 4.3 above demonstrates that there is a wide range of frequent bus services available within a minutes’ walk of the site. On average, there are approximately 13 bus services per hour that operate between the Harbour Avenue bus stops and Plymouth City Centre, Monday to Friday. This offers a high level of public transport connectivity, including during the peak hours, enabling employees and visitors of the site a viable alternative to commuting via private car. The bus services also provide access to a range of local residential areas, including Milehouse, Barne Barton, and Saltash.

**Public Transport –Rail**

4.7 The closest railway stations are St Budeaux Ferry Road Railway Station and St Budeaux Victoria Road Station, both located approximately a 10-minute walk or a three-minute cycle (800km) north from the site.

4.8 Services operate every two hours from St Budeaux Ferry Road Railway Station to Plymouth, including in the peak hours. Direct services also operate from a number of local railway stations, including Saltash and Liskeard, as well as destinations further afield such as Bristol and Exeter.

4.9 From St Budeaux Victoria Road, a service operates every two hours on the Tamar Valley Line between Plymouth and Gunnislake. Together the stations provide a combined frequency of approximately one train per hour towards Plymouth City Centre.



- 4.10 These rail services could offer a viable alternative to commuting via private car to destinations further afield.
- 4.11 Cycle storage covered by CCTV is provided at both stations, providing the opportunity for employees and visitors to cycle between the railway station, reducing reliance on private car use.

### Summary

- 4.12 There are a range of local facilities and residential areas located within a 10-minute (800m) walk of the site. These include convenience stores, a supermarket, bus stops, and a railway station. The site is therefore considered to be located in a 'walkable neighbourhood', as defined in Manual for Streets guidance.
- 4.13 There are also a number of schools and health facilities within walking and cycling distance of the school, enabling employees and visitors of the site the ability to link trips, especially if they live locally.
- 4.14 The site is well located with respect to existing bus services, with frequent bus services available within a minutes' walk of the site. On average, there are approximately 13 bus services per hour that operate between the Harbour Avenue bus stops and Plymouth city centre Monday to Friday. This offers a high level of public transport connectivity, including during the peak hours, enabling employees and visitors of the site a viable alternative to commuting via private car.
- 4.15 In conclusion, it is considered that the site is located in a highly accessible location, and it is therefore considered to provide the opportunity for journeys from the site to be made by sustainable modes of travel as required by the NPPF.

## 5 Development Proposals

### Introduction

- 5.1 The development proposals consist of a change of use of buildings and land at Harbour Avenue, Camel's Head, Plymouth. The proposed development consists of 1,389sqm of self-storage, commercial storage, indoor vehicle storage, commercial distribution, a recreational sports area, and office use. A copy of the masterplan is included in Appendix B.
- 5.2 The proposed access arrangements are set out below.

### Access Arrangements

- 5.3 The existing access arrangements will be retained, with access being taken from Harbour Avenue into the site. The current arrangements consist of a gated access which can be secured, with Harbour Avenue providing direct access into the site. No changes to the access arrangements are proposed.
- 5.4 The site access will lead directly into the existing car park and circulation area within the site, which has historically created a shared space environment, and will continue to do so.
- 5.5 Whilst the majority of vehicles accessing the site will be light vehicles (as outlined in Section 6 of this report), the largest vehicle expected to use the site is a 3.5t van. Swept path analysis has been undertaken to demonstrate that a 3.5t panel van can enter the site, turn around, and exit in a forward gear. This is shown on Drawing 1597-ATR-101, contained within Appendix A.

### Servicing

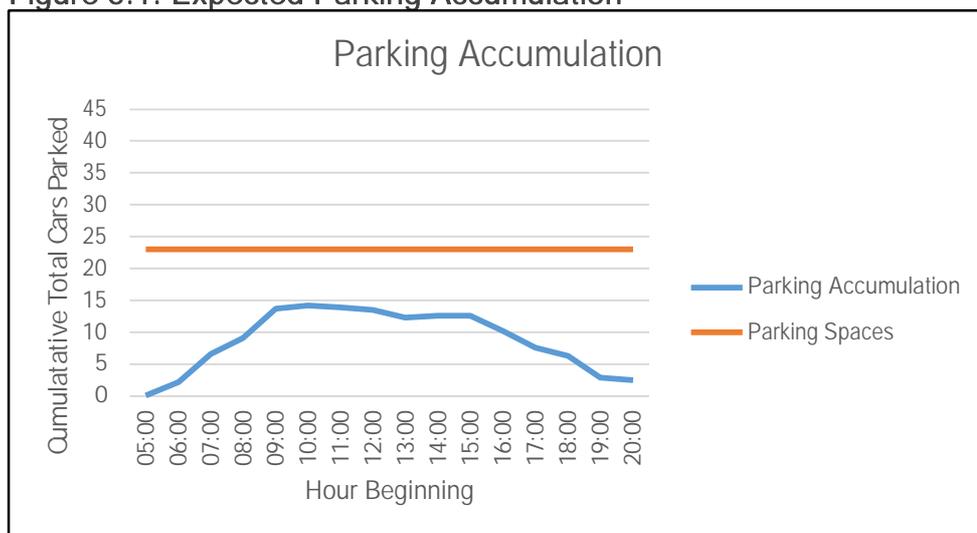
- 5.6 A bin store is proposed to be located in front of Unit C, located approximately 12m south of the site entrance and Harbour Avenue. Refuse lorries will not enter the site and instead operators will access the bin store on foot from Harbour Avenue, as is the case with the existing site. The existing access arrangements for refuse lorries accessing Harbour Avenue and turning around will remain unchanged.

## Parking

- 5.7 A total of 23 car parking spaces are proposed for the change of use. This includes 21 standard car parking spaces, one disabled parking space, and one Electric Vehicle (EV) parking space. Electric cabling will be installed along the northern side of the car park, enabling the future provision of electric charge points for an additional seven parking spaces.
- 5.8 Compared to the existing car park, approximately seven additional parking spaces are proposed.
- 5.9 The amount of car parking is considered to be broadly in line with the standards set out within the adopted *Plymouth and South West Devon SPD*, which is outlined in Section 2 of this report.
- 5.10 The parking standards set out in the SPD for '*General Business Use*' have been used for the storage, distribution and office aspects of the site, given the final mix is still to be determined. A public transport accessibility rating of 65% has been used, based on the accessibility index map supplied within the SPD.
- 5.11 With the accessibility index calculation applied, the general business use aspect of the site has an indicative parking requirement of 18 spaces.
- 5.12 For the recreational sports area, the gym use class parking standard in the SPD has been used, which states that the parking standard will be '*assessed on the merits of each case*'. For the proposed sports area, an additional five parking spaces is considered to be appropriate. It is expected that the majority of use will take place in the evenings, when the parking spaces associated with the general business use will be vacant.
- 5.13 A parking accumulation assessment has been undertaken for the proposed change of use site, based on the parking spaces set out above and the expected trip generation outlined Section 6 of this report.
- 5.14 Figure 5.1 below sets out the resulting parking accumulation for the site.



**Figure 5.1: Expected Parking Accumulation**



- 5.15 Figure 5.1 shows that the maximum parking accumulation for the site peaks at 14 vehicles, between 9am-1pm. The parking accumulation demonstrates that there will be sufficient parking spaces available, with spare capacity if required.
- 5.16 The proximity of the site to the adjacent residential area means that the proposed level of parking will, so far as possible, mitigate overspill onto the residential parking provision. This is considered to resolve the concern from the highway officer regarding potential overspill on the local residential streets raised in the withdrawn planning application for the site.
- 5.17 The Plymouth and South West Devon SPD (2020) sets out requirements for cycle parking, which states that for uses other than residential, cycle parking should be based on 25% of the proposed car parking provision. For 23 spaces, this would equate to a minimum of 6 cycle spaces. It is proposed to provide a covered cycle rack on the western side of the car park, to be used by both site employees and visitors. This will provide cycle parking spaces for 10 bicycles, which is in accordance with the Plymouth City Council standards.

**Summary**

- 5.18 The development proposals consist of a change of use of buildings and land at Harbour Avenue, Camel’s Head, Plymouth. The proposed development consists of 1,389sqm of self-storage, commercial storage, indoor vehicle storage, commercial distribution, a recreational sports area, and office use.



- 5.19 The existing access arrangements will be retained, with access being taken from Harbour Avenue into the site. No changes to the access arrangements are proposed.
- 5.20 The site access will lead directly into the existing car park and circulation area within the site, which has historically created a shared space environment, and will continue to do so under the proposed changes of use.
- 5.21 Swept path analysis has been undertaken, demonstrating that a 3.5t panel van can access the site, turn around and exit in a forward gear. A bin store is to be located within 12m of the site entrance. This will be accessed on foot from Harbour Avenue, with refuse lorries not entering the site itself, which is unchanged from the existing arrangements.
- 5.22 A total of 23 car parking spaces are proposed for the change of use site. This includes 21 standard car parking spaces, one disabled parking space, and one Electric Vehicle (EV) parking space. Electric cabling will be installed along the northern side of the car park, enabling the future provision of electric charge points for an additional seven parking spaces. The amount of car parking is considered to be broadly in line with the standards set out within the adopted *Plymouth and South West Devon SPD*.
- 5.23 A parking accumulation assessment has been undertaken, which demonstrates that there will be sufficient parking spaces available, with spare capacity to mitigate the risk of overspill parking on local residential streets.
- 5.24 A covered cycle rack will be installed on the western side of the car park, to be used by both site staff and visitors. This will provide cycle parking spaces for 10 bicycles, which is in accordance with the Plymouth City Council minimum provision.



## 6 Trip Generation and Traffic Impact

### Introduction

- 6.1 This section of the TS considers the vehicular trip generation that might be expected to arise as a result of the proposed change of use. It also demonstrates how the trips are likely to be distributed across the road network and considers what the resulting traffic impact will be.
- 6.2 The potential trip generation for the existing site use has also been calculated, and a comparison has been made with the proposed use.

### Existing Vehicular Trip Generation

- 6.3 In order to estimate the existing vehicular trip generation for the extant site (construction training centre), reference has been made to the TRICS v7.10.3 database. The search criteria included college sites located in ‘Suburban’ and ‘Edge of Town’ locations, and surveys in Greater London and The Republic of Ireland were excluded from the query. Surveys undertaken during Covid-19 were also excluded due to the impact on travel behaviours, notably the significant increase in online learning and lack of physical attendance at college establishments.
- 6.4 Table 6.1 shows the TRICS weekday network peak hour trip rates and resulting trip generation. The full TRICS report is included as Appendix F. The standard network peak hours of 08:00-09:00 and 17:00-18:00 on a weekday have been assumed.

**Table 6.1: TRICS Vehicular Trip Rates and Trip Generation –Existing Use (Construction Training Centre)**

	Weekday AM Peak (0800-0900)			Weekday PM Peak (1700-1800)		
	Arr.	Dep.	Total	Arr.	Dep.	Total
Trip rate per 100sqm	2.219	0.941	3.16	0.562	0.736	1.298
Trip generation (1389sqm)	31	13	44	8	10	18

- 6.5 As shown in Table 6.1, the existing site might be expected to generate around 44 and 18 two-way vehicular movements in the weekday AM and PM peaks respectively. This equates to



approximately one vehicular movement every one to two minutes during the AM peak hours and one vehicular movement every three minutes during the PM peak hours.

### Proposed Vehicular Trip Generation

- 6.6 In order to estimate the vehicular trip generation for the proposed uses at the site, reference has been made to the TRICS v7.10.3 database. Again, the search criteria included sites located in ‘Suburban’ and ‘Edge of Town’ locations, and surveys in Greater London and The Republic of Ireland were excluded from the query. Surveys undertaken during Covid-19 were also excluded due to the impact on travel behaviours.
- 6.7 For the storage, distribution and office use aspects of the site, trip rates have been obtained from “industrial estate” sites, which best reflect the overall mixed industrial use of the proposed development. These are typically higher than those for storage sites, which is expected to be the predominant use for the site, therefore creating a robust assessment. For the recreational sports area, trip rates have been obtained from “fitness club - private” sites.
- 6.8 Table 6.2 shows the TRICS weekday network peak hour trip rates. The full TRICS report is included as Appendix F. The standard network peak hours of 08:00-09:00 and 17:00-18:00 on a weekday have been assumed.

**Table 6.2: TRICS Vehicular Trip Rates –Proposed Change of Use**

	Weekday AM Peak (0800-0900)			Weekday PM Peak (1700-1800)		
	Arr.	Dep.	Total	Arr.	Dep.	Total
Industrial Estate (Trip rate per 100sqm)	0.717	0.375	1.092	0.259	0.593	0.852
Fitness Club (Trip rate per 100sqm)	0.587	0.807	1.394	1.052	0.881	1.933

- 6.9 The resulting trip generation for the proposed change of use is shown below in Table 6.3.



**Table 6.3: Trip Generation –Proposed Change of Use**

	Weekday AM Peak (0800-0900)			Weekday PM Peak (1700-1800)		
	Arr.	Dep.	Total	Arr.	Dep.	Total
Industrial Estate Trip Generation (996sqm)	7	4	11	3	6	9
Fitness Club Trip Generation (393sqm)	2	3	5	4	4	8
<b>Total Trip Generation</b>	<b>9</b>	<b>7</b>	<b>16</b>	<b>7</b>	<b>10</b>	<b>17</b>

6.10 As shown in Table 6.3, the proposed development is expected to generate approximately 16 and 17 two-way vehicular movements in the weekday AM and PM peaks respectively. This equates to approximately one vehicular movement every three to four minutes during both the AM and PM peak hours.

**Vehicular Trip Generation Comparison**

6.11 A comparison has been made between the potential trip generation for the existing site usage and the proposed change of use. This is shown in Table 6.4 below.

**Table 6.4: Vehicular Trip Generation Comparison**

	Weekday AM Peak (0800-0900)			Weekday PM Peak (1700-1800)		
	Arr.	Dep.	Total	Arr.	Dep.	Total
Trip Generation –Existing	31	13	44	8	10	18
Trip Generation –Proposed	9	7	16	7	10	17
<i>Net Change</i>	<i>-22</i>	<i>-6</i>	<i>-28</i>	<i>-1</i>	<i>0</i>	<i>-1</i>

6.12 Table 6.4 demonstrates that the proposed change of use is expected to generate approximately 28 fewer vehicular movements in the AM peak hours and one fewer vehicular movement in the PM peak hours.

6.13 With fewer expected vehicular movements in both the AM and PM peak hours, it is therefore considered that the proposed change of use will not have a significant negative impact on the local road



network, or one which could be considered ‘severe’ in terms of severity. Instead, the proposed change of use would be expected to generate a net benefit arising from the reduced trip generation.

**Expected Vehicular Mix**

- 6.14 It is expected that all vehicular traffic generated by the site will be in cars and light goods vehicles. The largest vehicle expected to access the site is a 3.5t van.

**Trip Distribution & Assignment**

- 6.15 In order to forecast the distribution of the site vehicular trips onto the local road network, the ‘*Location of usual residence and place of work by method of travel to work*’ dataset’ (WU03EW) from the 2011 Census has been used. The routes from local residential areas (based on local Middle Super Output Area data for Plymouth and Local Authority Areas for the wider south west region) have been assigned, based on typical travel times, distance and route attractiveness using GIS based routeing software.
- 6.16 Whilst the corresponding dataset relating to the more recent 2021 Census could have been used as an alternative, travel patterns could be impacted by the Covid-19 pandemic, as acknowledged by the ONS and NOMIS database, and therefore 2011 Census data has been used in this instance.
- 6.17 Table 6.5 below outlines the expected distribution of the trips from the proposed change of use site.

**Table 6.5 – Trip Distribution**

	Wolseley Road – East	Wolseley Road – West
Trip Distribution	65%	35%

- 6.18 Table 6.6 outlines the expected trip assignment of development vehicular trips, based on the distribution shown in Table 6.5.

**Table 6.6 – Trip Assignment**

	Wolseley Road – East	Wolseley Road – West
AM Peak (08:00-09:00) – Trip Assignment	10	6
PM Peak (17:00-18:00) – Trip Assignment	11	6



- 6.19 Tables 6.5 and 6.6 demonstrate that the majority of vehicular trips will arrive and depart along Wolseley Road to the east, due to the close proximity of the site to the St Budeaux Bypass. The remaining 35% of vehicular trips are expected to arrive and depart along Wolseley Road to the west.

#### **Traffic Impact**

- 6.20 The proposed use is expected to generate approximately one vehicular movement every three to four minutes on average in the weekday peak hours. This is considered to be a low level of trip generation which would represent no more than might be expected by day-to-day variation in traffic flows in the area. In addition, the traffic impact of the site is expected to be less when compared with the existing planning permission in both the AM and PM peak hours.
- 6.21 It is therefore considered that the site will not have a significant negative impact on the local road network and cannot be considered to be 'severe', which complies with the requirements of the NPPF.

#### **Summary**

- 6.22 The proposed development is expected to generate approximately 16 and 17 two-way vehicular movements in the weekday AM and PM peaks respectively. This equates to approximately one vehicular movement every three to four minutes during both the AM and PM peak hours.
- 6.23 A comparison has been made between the extant use and the proposed change of use for the site, which demonstrates that the proposed change of use site is expected to generate approximately 28 fewer vehicular movements in the AM peak hours and one fewer vehicular movement in the PM peak hours.
- 6.24 It is expected that all vehicular traffic generated by the site will be in cars and light goods vehicles. The largest vehicle expected to access the site is a 3.5t van.
- 6.25 It is therefore considered that the site will not have a significant negative impact on the local road network and cannot be considered to be 'severe', which complies with the requirements of the NPPF. Instead, the proposed change of use would be



expected to generate a net benefit arising from the reduced trip generation.

## 7 Framework Workplace Travel Plan (Measures Only)

### Introduction & Background

- 7.1 The NPPF highlights that a key tool to achieve its stated objectives on sustainable transport will be a Travel Plan, and the Framework requires that all developments which generate significant amounts of traffic should be requested to provide a Travel Plan. Whilst the proposed change of use is not expected to generate significant amounts of traffic, nevertheless a Measures Only Framework Workplace Travel Plan is presented in line with best practice.
- 7.2 This section of the Transport Statement sets out a proposed framework for a Travel Plan that will ultimately provide a strategy for the introduction of a package of measures aimed at encouraging the uptake of sustainable modes of transport over the private car, wherever possible.
- 7.3 Paragraph 111 of the NPPF sets out that all developments which generate significant amounts of transport movement should be required to provide a Travel Plan. The NPPG states that in determining whether a Travel Plan will be needed for a proposed development, local planning authorities should take into account the following considerations:

- *the Travel Plan policies (if any) of the Local Plan;*
- *the scale of the proposed development and its potential for additional trip generation (smaller applications with limited impacts may not need a Travel Plan);*
- *existing intensity of transport use and the availability of public transport;*
- *proximity to nearby environmental designations or sensitive areas;*
- *impact on other priorities/ strategies (such as promoting walking and cycling);*
- *the cumulative impacts of multiple developments within a particular area;*
- *whether there are particular types of impacts around which to focus the Travel Plan (e.g. minimising traffic generated at peak times); and*
- *relevant national policies, including the decision to abolish maximum parking standards for both residential and non-residential development*



7.4 The NPPG defines the primary purpose of Travel Plans as:

*“to identify opportunities for the effective promotion and delivery of sustainable transport initiatives e.g. walking, cycling, public transport and tele-commuting, in connection with both proposed and existing developments and through this to thereby reduce the demand for travel by less sustainable modes..they should not be used as way of unfairly penalising drivers.”*

7.5 In relation to its contents, the guidance goes on to explain that:

*“Travel Plans should identify the specific required outcomes, targets and measures, and set out clear future monitoring and management arrangements all of which should be proportionate. They should also consider what additional measures may be required to offset unacceptable impacts if the targets should not be met. Travel Plans should set explicit outcomes rather than just identify processes to be followed ...They should address all journeys resulting from a proposed development by anyone who may need to visit or stay and they should seek to fit in with wider strategies for transport in the area.”*

7.6 The guidance also recommends that:

*“It is often best to retain the ability to establish certain elements of the Travel Plan or review outcomes after the development has started operating so that it can be based upon the occupational and operational characteristics of the developme. ”*

### Travel Plan Objectives

7.7 The overarching objectives of the Travel Plan for the Harbour Avenue development will be as follows:

- Raise awareness of the Travel Plan and its objectives;
- Reduce the traffic generated by the development to a lower level of car trips than would be predicted for the site without the implementation of the Travel Plan; and
- Promote the development of a healthy, sustainable and vibrant local community.

### Location & Accessibility

7.8 The Travel Plan for this development will need to consider the location of the site together with its accessibility to local facilities and residential areas, and the opportunities available for sustainable travel in the local area. Therefore, information and analysis contained within this Transport Statement will have a key role in informing the development of the Travel Plan.

7.9 As detailed previously in this report, key issues relating to the site's accessibility include the following:

- Nearest bus stops are located within 100m of the development site with a high level of service, with approximately 13 bus services per hour to Plymouth city centre and frequent services to the surrounding residential areas. St Budeaux Ferry Road Railway Station is also located within 800m of the site, offering services to Plymouth and destinations further afield;
- A range of residential areas located within 800m walking distance of the site;
- Multiple local facilities are located within 800m walking distance of the site, including a supermarket, convenience stores, a pharmacy, a bank, and a post office;
- Multiple walking routes and footways, both to local facilities and nearby residential areas; and
- A number of cycle routes nearby the site, providing access to the range of local residential areas, local facilities and towards Plymouth city centre. This includes an on-carriageway cycle path along the southern side of Wolseley Road and a shared use path on the western side of St Budeaux Bypass. There are also a number of advisory cycle routes within close proximity of the site.

7.10 The measures set out in the following sections of this framework will aim to take advantage of these opportunities for employees and visitors to travel to/from the site via sustainable modes of transport.

### Physical Measures

7.11 The Travel Plan will appreciate the physical or “hard” measures built into the on-site and off-site infrastructure to facilitate the use



of sustainable modes of travel. For the Harbour Avenue, this includes the following:

- Secure cycle parking will be provided for staff and visitors;
- An Electric Vehicle (EV) charge point is to be provided, with electric cabling to be installed along the northern side of the car park, enabling the future provision of an additional seven electric charge points; and
- Good highways design practices will be incorporated to reduce vehicle dominance within the site and encourage lower speeds.

### Travel Plan Co-ordinator

7.12 The developer will be responsible for ensuring a Travel Plan Co-ordinator (TPC) is in place for the development at first occupation. As well as having specific duties to lead on the delivery of the Travel Plan and the implementation of associated services and promotional strategy.

7.13 The TPC will also be responsible for developing the measures accordingly to ensure they respond to changes in local sustainable transport infrastructure and services and therefore continue to meet the needs of employees and visitors.

### Services & Facilities

7.14 One of the TPC’s duties will be to lead on the delivery of any additional services in connection with the Travel Plan. These “soft measures” will be complementary to the physical infrastructure or “hard measures” set out above. For Harbour Avenue, it is proposed that this would include the following:

- Set up a staff travel website or social media page; providing an outlet for the promotional strategy set out below;
- Include sustainable travel options in staff induction;
- Ensure a copy of the Travel Plan is available for each employee to view upon request;
- Create and distribute Travel Information Packs amongst employees;

- Provide details and travel information on safe pedestrian and cycle routes in the area;
  - Provide advice on cycle safety; encourage the development of a bicycle user group;
  - Liaise with Travel Plan Coordinators at local developments and employers to facilitate cross-promotion of relevant measures;
  - Provide information on cycle to work scheme if available; and
  - Act as a point of contact for all staff required information.
- 7.15 The TPC will also engage with local cycle shops with a view of securing discounts for staff. The closest bike shop is located 3.7km to the south of the site, in Devonport:
- Bikespace –7 Riverside Business Park, New Passage Hill, Plymouth, PL1 4SN

### Promotion

- 7.16 The promotional strategy will be implemented by the TPC. This will aim to raise awareness of the aims and objectives of the Travel Plan, promote sustainable travel options and engage employees in the future development of the Travel Plan. As part of this strategy, travel information will be distributed to the employees, via a staff travel website or social media page. This could include the following travel information as appropriate:
- A brief explanation of the Travel Plan and its objectives;
  - Pedestrian, cycling and public transport maps;
  - Bus and rail timetables for the local services;
  - Public transport information website addresses and contact numbers;
  - Promotional material highlighting health and environmental benefits of walking and cycling;
  - Details of local car share databases (e.g. [devon.liftshare.com](http://devon.liftshare.com)); and
  - Contact details for TPC.



- 7.17 In addition to the staff travel website or social media page, a Travel Information Pack will be issued to all employees. This will provide information on the cycle to work scheme and car sharing as well as details of relevant websites for up to date travel information.

### **Implementation Strategy**

- 7.18 The responsibilities and timescales for implementation the progress of the measures included within the Travel Plan are set out in an Implementation Strategy table, a copy of which is included in Appendix G. At this stage, the responsibilities and timeframes are indicative. In the majority of cases, the responsibility will rest with the TPC.

## 8 Summary and Conclusions

- 8.1 Awcock Ward Partnership (AWP) have been commissioned by SAS Harbour Avenue Limited to prepare a Transport Statement (TS) in support of a Full application for a change of use of buildings and land at Harbour Avenue, Camel's Head, Plymouth. The change of use is for 1,389sqm of self-storage, commercial storage, indoor vehicle storage, commercial distribution, a recreational sports area, and office use.
- 8.2 Relevant national, regional and local policies and guidance have been reviewed to identify those which will guide the development design so that transport-related infrastructure associated with the development complies with prevailing policy and guidance. A summary of the planning history of the site has also been outlined.
- 8.3 The site is bordered by residential properties to the north; commercial development to the east, Weston Mill Lake to the south; and the Cornish Main Railway Line and shrubland to the west.
- 8.4 Footways and street lighting are present on both sides of the local road network within the vicinity of the site, including routes to local facilities and residential areas.
- 8.5 There are a number of cycle routes nearby the site, providing access to the range of local residential areas, local facilities and towards Plymouth City Centre. This includes an on-street cycle path along the southern side of Wolseley Road and a shared use path on the western side of St Budeaux Bypass. There are also a number of advisory cycle routes within close proximity of the site.
- 8.6 A review of the DCC accident records, for the most recent five-year period for which data is available, demonstrates that there is no pattern that might suggest any existing road safety issues on the local road network in the vicinity of the development site.
- 8.7 There are a range of local facilities and residential areas located within a 10-minute (800m) walk of the site. These include convenience stores, a supermarket, a post office, a bank, a pharmacy, bus stops, and a railway station. The site is therefore considered to be located in a 'walkable neighbourhood', as defined in Manual for Streets guidance.



- 8.8 There are also a number of schools and health facilities within walking and cycling distance of the school, enabling employees and visitors of the site the ability to link trips, especially if they live locally.
- 8.9 The site is extremely well located with respect to existing bus services, with frequent bus services available within a minutes' walk of the site. On average, there are approximately 13 bus services per hour that operate between the Harbour Avenue bus stops and Plymouth city centre Monday to Friday. This offers a high level of public transport connectivity, including during the peak hours, enabling employees and visitors of the site a viable alternative to commuting via private car.
- 8.10 The existing access arrangements will be retained, with access being gained directly off Harbour Avenue into the site. No changes to the access arrangements are proposed.
- 8.11 The site access will lead directly into the existing car park and circulation area within the site, which has historically created a shared space environment, and will continue to do so under the proposed changes of use.
- 8.12 Swept path analysis has been undertaken, demonstrating that a 3.5t panel van can access the site, turn around and exit in a forward gear. A bin store is to be located within 12m of the site entrance. This will be accessed on foot from Harbour Avenue, with refuse lorries not entering the site itself.
- 8.13 A total of 23 car parking spaces are proposed for the change of use site. This includes 21 standard car parking spaces, one disabled parking space, and one Electric Vehicle (EV) parking space. Electric cabling will be installed along the northern side of the car park, enabling the future provision of electric charge points for an additional seven parking spaces. The amount of car parking is considered to be broadly in line with the standards set out within the adopted Plymouth and South West Devon SPD.
- 8.14 A parking accumulation assessment has been undertaken, which demonstrates that there will be sufficient parking spaces available, with spare capacity to mitigate the risk of overspill parking on local residential streets.

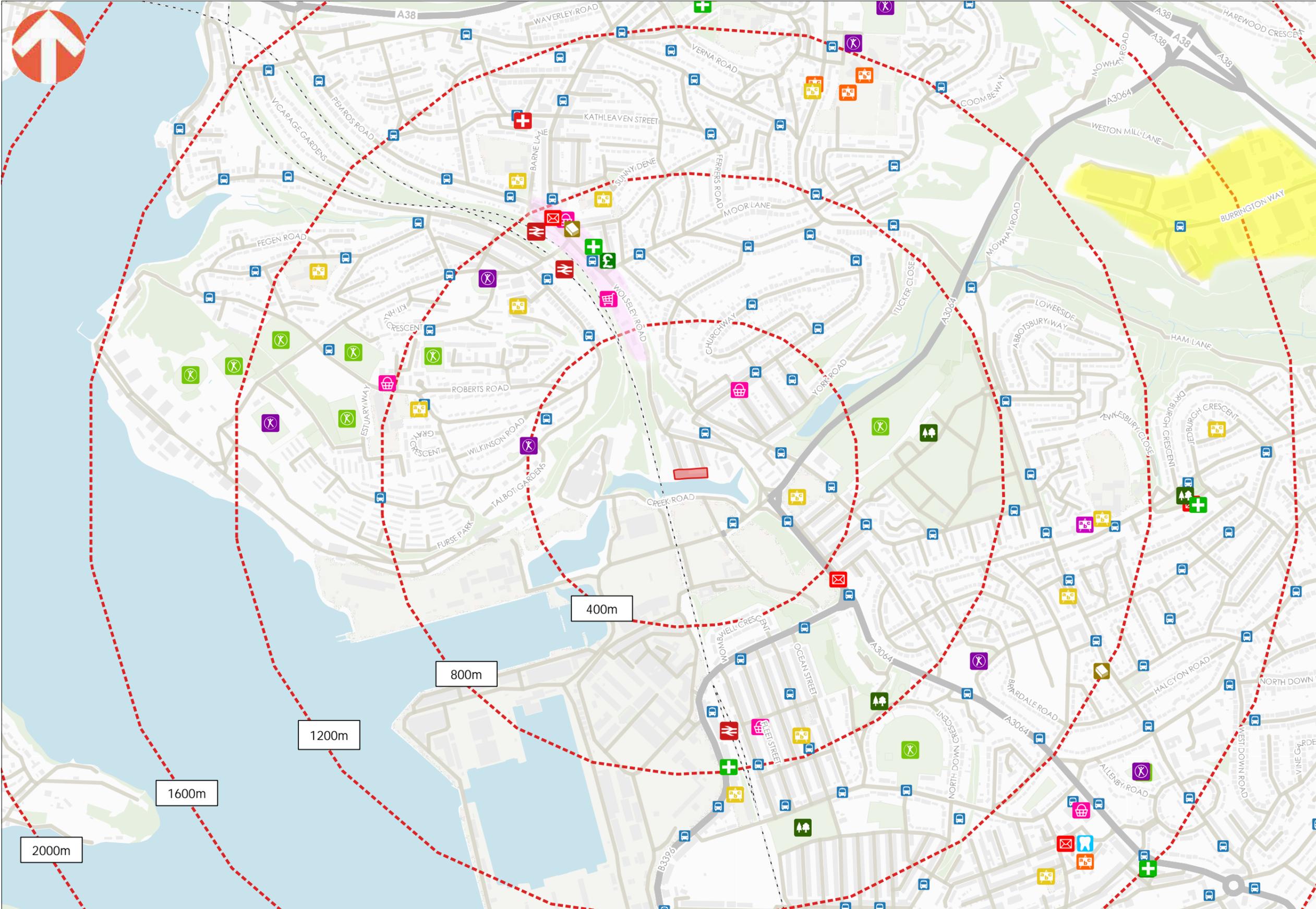


- 8.15 A covered cycle rack will be installed on the western side of the car park, to be used by both site staff and visitors. This will provide cycle parking spaces for 10 bicycles, which is in accordance with the Plymouth City Council requirements.
- 8.16 The proposed development is expected to generate approximately 16 and 17 two-way vehicular movements in the weekday AM and PM peaks respectively. This equates to approximately one vehicular movement every three to four minutes during both the AM and PM peak hours.
- 8.17 A comparison has been made between the extant use and the proposed change of use for the site, which demonstrates that the proposed change of use site is expected to generate approximately 28 fewer vehicular movements in the AM peak hours and one fewer vehicular movement in the PM peak hours.
- 8.18 It is concluded that the site will not have a significant impact on the local road network and cannot be considered to be 'severe', and therefore complies with the requirements of the NPPF. In addition, the proposed change of use would be expected to generate a net benefit arising from the reduced trip generation.
- 8.19 A Measures Only Framework Travel Plan has been provided, setting out a package of measures to encourage the uptake of sustainable modes of transport over the private car, wherever possible.
- 8.20 In overall conclusion, it is considered that the site provides a highly sustainable location for development, a safe and suitable access can be provided, there are opportunities to travel by sustainable modes of transport, and there would be no severe impacts on the local road network. The proposed development is therefore considered to satisfy the transport elements of the NPPF and so there is no highway reason to prevent planning permission from being granted.



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## Appendix A Drawings and Figures



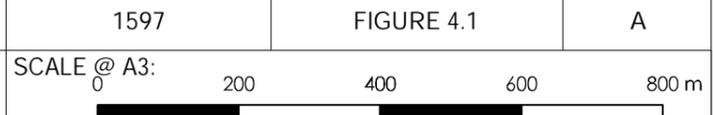
KEY	
<b>Education</b>	
Nursery	
Primary	
Secondary	
<b>Retail</b>	
Local Centre	
Convenience Foodstore	
Supermarket	
<b>Health</b>	
Pharmacy	
GP Surgeries	
Dentist	
<b>Leisure</b>	
Other Sports Facility	
Playing Field	
Public Park Or Garden	
<b>Other Facilities</b>	
Employment Area	
Post Office	
Library	
Bank	
<b>Transport</b>	
Bus Stop	
Railway Station	

400m = 5 mins walk = 1-2 mins cycle  
 800m = 10 mins walk = 2-3 mins cycle  
 1200m = 15 mins walk = 3-4 mins cycle  
 1600m = 20 mins walk = 5-6 mins cycle  
 2000m = 25 mins walk = 6-7 mins cycle

REV	DATE	DESCRIPTION	BY	CHK	APD
A	21.12.2023	INITIAL ISSUE	AC	CAM	DOPA

PROJECT: HARBOUR AVENUE, CAMEL'S HEAD		
TITLE: SITE ACCESSIBILITY PLAN		
PROJECT No: 1597	DRAWING No: FIGURE 4.1	REV: A

CLIENT: SAS HARBOUR AVENUE LIMITED





Unit A

Weston Mill Quay

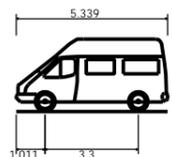
BINS

Unit C

Unit D

SM

Unit B



3.5t Panel Van  
 Overall Length 5.339m  
 Overall Width 1.986m  
 Overall Body Height 2.565m  
 Min Body Ground Clearance 0.338m  
 Track Width 1.986m  
 Lock to lock time 4.00s  
 Kerb to Kerb Turning Radius 6.400m

PROJECT: HARBOUR AVENUE, CAMEL'S HEAD					
TITLE: SWEPT PATH ANALYSIS - PANEL VAN					
CLIENT: SAS HARBOUR AVENUE LIMITED			PROJECT No: 1597	DRAWING No: 01-A TR-101	REV: A
DRAWING STATUS: FOR INFORMATION ONLY			SCALE @ 1:250		
			12.5 metres		
A	21.12.2023	INITIAL ISSUE	AC	CAM	AJW
REV	DATE	DESCRIPTION	BY	CHK	APD



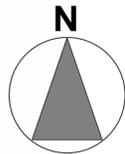
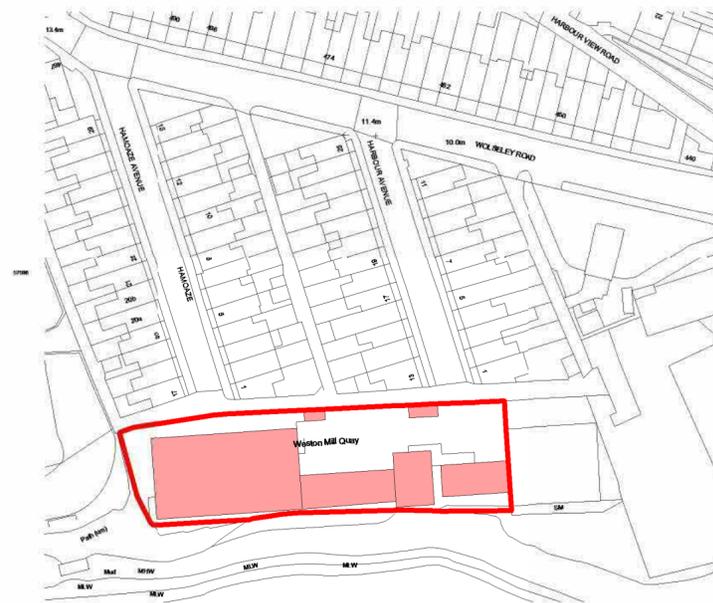
Awcock Ward Partnership, Ada House, Pynes Hill, Exeter, EX2 5TU  
 Tel: 01392 409007 Web: [www.awpexeter.com](http://www.awpexeter.com)



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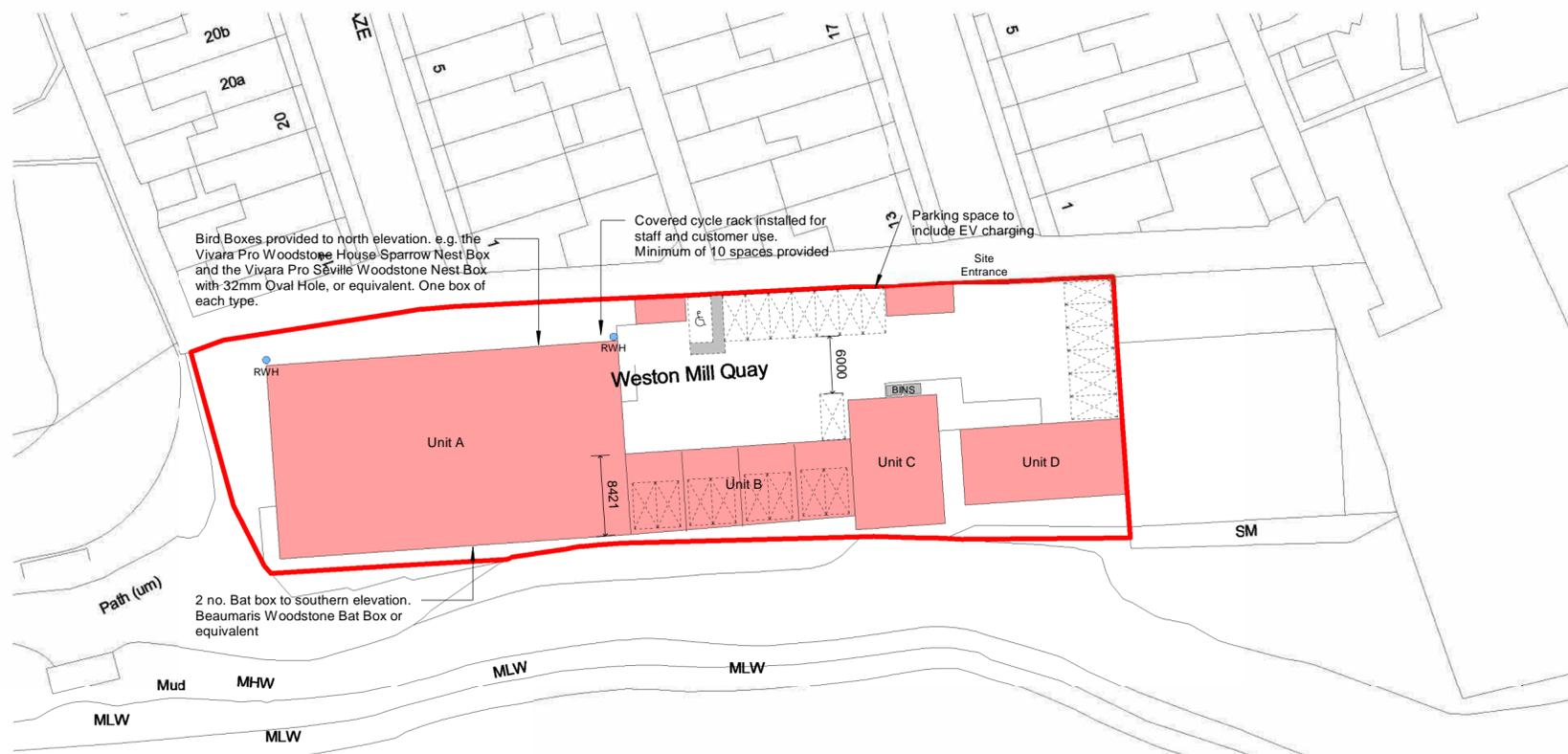
## Appendix B Masterplan

1:50	0	1m
1:100	1m	1m
1:200	2m	1m
1:250	2m	1m
1:500	5m	10m
1:1250	10m	
1:2500	20m	



Location Plan  
 1 : 1250

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Block Plan  
 1 : 500

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C -18.12.23 -Parking provision  
 B -13.12.23 -EV charging position  
 Revision: A -30.05.23 -Validation Updates



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Change of use from F1 to B8 Plus E

at  
 Harbour Avenue  
 Plymouth  
 Devon  
 PL5 1BH

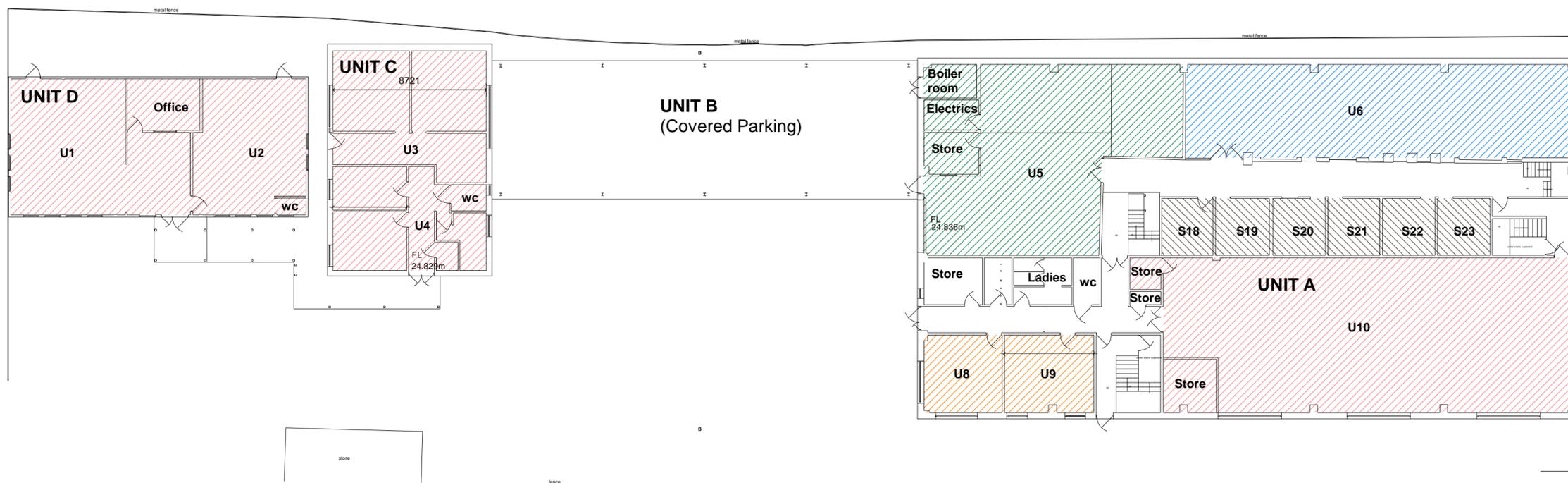
for  
 Mr R Spriggs

Title  
 Location and Block Plans

Scale, As indicated A2 L sheet size.

Org No. 1274 01 rev: C

1:50	0	1m
1:100	0	1m
1:200	0	1m
1:250	0	1m
1:500	0	10m
1:1250	0	10m
1:2500	0	20m



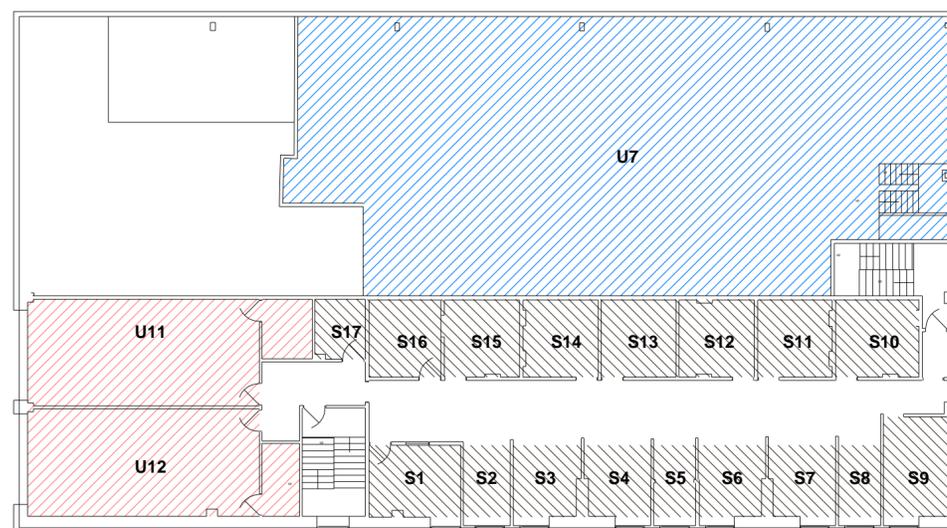
### Ground Floor Plan

1 : 200

- U1 -Business storage, distribution and office
- U2 -Business storage, distribution and office
- U3 -Business storage, distribution and office
- U4 -Business storage, distribution and office
- U10 -Business storage, distribution and office
- U11 -Business storage, distribution and office
- U12 -Business storage, distribution and office
  
- U5 -Indoor vehicle storage
  
- U6 -Recreational sports
- U7 -Recreational sports
  
- U8 -Office and storage
- U9 -Office and storage
  
- S1 -S24 -Self Storage

### Building Uses Key

1 : 20



### First Floor Plan

1 : 200

Revision:



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Change of use from F1 to B8 Plus E

at  
 Harbour Avenue  
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 Devon  
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for  
 Mr R Spriggs

Title  
**Building Uses Plan**

Scale, As indicated A2 L sheet size.

Org No. 1274 02 rev: