**From:** White, Joy - E&E [mailto:Joy.White@Oxfordshire.gov.uk]
**Sent:** 19 June 2018 17:05
**To:** Gavin Forrest
**Cc:** Andrew Lewis; DavidFlavin; Travel Plan; Planning; Planning Consultations - E&E
**Subject:** TDC 18-00231-DISC

Please see attached our response to the consultation on the above planning application.

Kind regards

Joy

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**RESPONSE TO CONSULTATION ON THE FOLLOWING DEVELOPMENT PROPOSAL**

**District:** Cherwell

**Application no:**  18/00231/DISC Discharge of Condition 5 (travel plan) of 16/01545/F | 103 & 315 Heyford Park Camp Road Upper Heyford Bicester OX25 5HA

Transport Development Control

**Recommendation:**

Objection

To be acceptable in terms of mitigating the impact of the development by supporting non-car modes of transport, the Travel Plan will need to be revised in line with the comments below.

**Key issues:**

The application states that buildings 103 and 315 would be covered by the site-wide commercial travel plan. The principle of this is acceptable. ‘Full Commercial Travel Plan V5 April 2018’ has been submitted to discharge this condition. This has been checked against our approved guidance and also assessed against earlier comments made by ourselves. The comments from our Travel Plans team are set out below:

We previously spent a considerable amount of time assessing the commercial travel plan for this site looking through these comments again it appears that many of the points raised have not addressed / answered or commented on.

This situation is concerning. I have included our original comments below and would be grateful if they could be checked against the submitted plan and responded to accordingly.

These original comments have been highlighted in blue italics to distinguish them from our more recent comments which are included afterwards.

*Having put this travel plan through our assessment process there are some areas that will require further development, below are some comments which are a general guide to which areas will require further development.*

* *An up to date site plan which shows business locations, routes through the site, both for vehicles and any routes that are suitable for walking and cycling, bus stops, cycle routes, cycle parking, site facilities such as banks shops etc., site shuttle services pick up and drop off points*
* *Details about future development plans for the commercial part of the site*
* *Inclusion of 2011 Census travel to work data for comparison purposes with the baseline survey results*
* *Overall outcomes and targets for the entire site including maximum levels of car trips generated by the development per day*
* *A commitment that each occupier will identify a representative who will liaise with the site Travel Plan Co-ordinator and implement Travel Plan measures specific to their employees  / visitors*
* *Details of how many subsidiary travel plans will be developed for the site, who will be responsible for these, how will the process be achieved, Steps that are proposed to ensure that subsidiary Travel Plans are consistent with the wider targets and requirements of the Framework Commercial Travel Plan*
* *Clarification of the timescales for completion of individual Travel Plans & the implementation of specific measures within them as the development proceeds, including management and review*
* *A commitment that each new occupier will conduct a travel survey for the development within 3 months of occupation and review the travel plan in light of the survey results*
* *A commitment to send the results of all travel surveys to the Travel Plans Team at Oxfordshire County Council within one month of survey completion*
* *As a large part of the commercial element of the site is already occupied how can this commercial travel plan be promoted and taken up by existing site occupiers?*
* *Targets would be easier to monitor if they are set to coincide with each survey year. This will make it easier to see if progress is being made in achieving that target of whether new travel plan actions are required because progress is not being made.*

*Some general travel plan points*

* *Paragraph 1.1.2 It should be made clear that this travel plan will only be concerned with the commercial side of the site. Residential travel plans and commercial travel plans are quite different and should be dealt with separately. So to clarify this travel plan will deal with the commercial part of the site. If there is a desire to deal with the residential element as well this would need to be done in separate sections with their own targets and associated actions.*
* *Paragraph 1.1.5 There is no reason why this should be an interim travel plan. The site already has a number of occupiers and this framework travel plan can deal with businesses that already occupy the site as well as new businesses that will occupy the site in the future. This framework travel plan will set the targets for the site which future occupiers will be expected to adopt as their own. Either through their own travel plans if their organisations are above the travel plan threshold for their specific type of business or by adopting the overall aims and targets of the framework travel plan.*
* *Paragraph 1.2.3 Please supply more details on the current site uses and the companies that occupy the site, is this still the same as is specified in this paragraph? This should include details of the size of their businesses in GFA and the number of employees. An up to date site plan which shows business locations, routes through the site, both for vehicles and any routes that are suitable for walking and cycling, bus stops, cycle routes, cycle parking, site facilities such as banks shops etc., site shuttle services pick up and drop off points. Please also specify if any of the organisation currently occupying the site currently have their own travel plans*
* *Paragraph 1.2.4 We would question this assumption and feel that these organisations are all trip generators. In some cases these trips might be limited to the site itself but with other would form part of another trip such as dropping off children at school or nursey on the way to work.*
* *Paragraph 1.3.3 other advantages to businesses of a commercial travel plan can be managing business travel more effectively, reducing delays caused by congestion, questioning if travel which is part of work is necessary, reducing business costs,*
* *Paragraph 1.4 The reasoning for an interim travel plan is not correct please see paragraph 1.1.5.*
* *Paragraph 2.1 Signage, does the site have good signage highlighting key destinations such as the shops or banks? Ideally signs should also display times to get there by walking or cycling. Are there site plans placed a t strategic locations throughout the site to help site users to find their way around the site?*
* *Paragraph 3.1.4 Has the Paragon Travel Plan adopted the targets of this framework travel plan? Cooperation between the site wide travel plan coordinator and the Paragon travel plan coordinator will be necessary.*
* *Paragraph 3.3 Mode share, please include the 2011 Census travel to work data for this area as it will be useful to compare with the mode share breakdown for the site. It will also help to show if targets are realistic.*
* *Paragraph 3.6 one of the barriers to car sharing was identified as being work patterns, but this was not what was shown in other parts of the survey. Clearly at present car sharing is not viewed as a viable option for travel to and from work the travel plan will need to consider how this attitude could be changed.*
* *Paragraph 3.7.3 A 40 minute walk is quite a substantial walk and persuading employees that it was a good way to travel to and from work could prove difficult*
* *Paragraph 3.8 Perhaps more realistically than walking, cycling could provide an alternative travel mode for a substantial number of employees if they have access to a suitable cycle and they have the confidence and fitness level required and a desire to cycle.*
* *Paragraph 5.2.1 As this is a commercial travel plan it should not be covering trips made by residents as is stated in this paragraph. So the travel plan should focus on reducing SOV vehicle travel by employees and visitors and focus on eliminating any necessary business trips associated with the day to day operations of the organisations involved.*
* *Paragraph 5.3 Indicators are not satisfactory from a travel plan point of view and although observations can be useful surveys should be used to monitor actual level as of traffic being generated by the site.*
* *Paragraph 6.1.4 Travel Information packs should be available either electronically or in a paper format whichever employees prefer. Electronic packs have the advantage of being able to include the most up to date information particularly things like timetables.*
* *Paragraph 6.1.16 As this paragraph states the majority of the site is occupied which further supports this travel plan not being an interim travel plan.*
* *Paragraph 6.1.28 The current dial a ride service does not sound ideal and it could be argued that a timetabled shuttle bus service would allow users to plan their journey more effectively. Demand would be more likely to increase if a regular service was provided and marketed. It is likely that the current provision is unlikely to lead to a more regular service.*
* *Paragraph 6.1.31 It will take a considerable amount of time to set up and maintain a car sharing database and there might be more to be gained from using one that is already established such as Oxfordshire Liftshare* [*https://oxfordshire.liftshare.com/*](https://oxfordshire.liftshare.com/)
* *Action plan actions all need a completion or review date and a person who is responsible for seeing that action is carried out.*
* *Targets associated with the residential element of this development can be included in a separate table. Some may also be of benefit to the commercial element of the site but they are not part of actions for the commercial travel plan.*
* *A greater variety of short, medium and longer term actions should be developed which are directly linked to achieving the wider travel plan objectives. It would be nice to see actions grouped with their objective i.e. measures to increase cycling, measures to increase public transport use, measures to increase car sharing.*
* *Paragraph 8.3.3 It is recommended that any new businesses check with the Travel Plan Team to see if there will be a travel plan requirement. The information in this paragraph is not correct.*
* *Paragraph 9.2.1 Please note; Oxfordshire County Council no longer provide travel survey templates.*
* *Paragraph 9.3 Please specify the remedial measures trigger points for the site*
* *Survey respondents post code plot map would be far more useful if it showed the locations where these employees are travelling from. Please include a more detailed map.*

Our comments on the updated commercial travel plan include questions which we will expect an answer too.

* Section 3.3 Mode Share: Table 3.2: At the moment, it is not possible to relate the survey results to travel plan targets please put them into percentages which can be more easily checked against specified targets.
* Para 3.3.2 A worrying development and in opposition to travel plan targets to reduce SOV travel to and from the site. We will need to see robust measures being introduced to counteract this worrying trend.
* Section 3.4 Using employees home postcodes to imitate a more targeted travel plan approach could be beneficial?
* Para 3.6.1 What is being done to provide employees with accurate information on car sharing and if it would work for them? What is being done to promote car sharing? Have you adopted Oxfordshire Liftshare <https://liftshare.com/uk/community/oxfordshire> as your car share provider of choice? If not why not? Are employees guaranteed a lift home when they are car sharing if there is a problem or there chosen car sharer has had to leave? Are there dedicated car share spaces in advantageous locations on site? These not only offer dedicated parking but also have the dual purpose of advertising car share and reminding others that it might be an option for them.
* Graph 3.9 Is this a true reflection of the travel options available or just a perception amongst employee? Using the main residential cluster areas this should be checked and if it is not correct more accurate information targeted towards specific to residential clusters should be made available to employees.
* Section 4 Please compare our mode share breakdown with 2011 travel to work census data as a sense check. What does this show us? Currently around 96% of surveyed employees are travelling to and from the site by private motor vehicle.
* A SOV reduction target is required of between 5-10% and also a target for all other modes for every year in which a survey will take place in both actual numbers and percentages. It should also be noted that SOV reduction is a key travel plan objective. Please change the travel plan to reflect this.
* Para 5.2.1 Car share is a viable alternative when thinking about car travel to and from the site but is also a car mode please change the travel plan to reflect this.
* Para 5.3.2 Anecdotal evidence can have some value but for the purposes of following and assessing travel plan progress it is of less use. We prefer the use of statistical analysis to provide a fuller picture of whether the travel plan is working well towards achieving its targets.
* Para 6.1.4 Any focus of the proposed TIP (travel information pack) should be tailored to focus on the opportunities that are most accessible to employees currently working at the site, just sending out general information is unlikely to achieve much or do much to change employee travel behaviour. Please specify how are a more targeted approach will be developed and put into practice through this commercial travel plan.
* One of the best times is to catch employees before travel habits are developed. Any recruitment process should offer site related travel advice to all potential employees and where possible focus on local recruitment.
* Are the employees based at the site aware of the TPC existence and their location on the site. How is the personalised travel planning advice that the TPC should be offering disseminated and publicised?
* Para 6.1.8 Oxfordshire County Council recommends Oxfordshire Liftshare <https://liftshare.com/uk/community/oxfordshire> as the car share provider of choice, why reinvent the horse? You can always have a dedicated site group only for Heyford Park, has this been considered? Bearing mind that this appears to be one of the main ways of reducing SOV travel to and from site why is not more being done to promote car sharing to employees? I would expect to see more activity in this area with serious promotion being include within the travel plan. This would be regular activities focusing on signing up employees, such as car share weeks, there may be help available from Liftshare particularly if a dedicated group for the site is set up.
* Para 6.1.19 Home working? Business travel to meetings, video conferencing etc.?
* The Action table must contain a credible set of short, medium and longer term actions which will form a package of measures aimed at helping the travel plan to achieve its aims. These should be grouped under headings such as, measures to reduce single occupancy car trips, measures to increase walking, measures to increase cycling, measures to increase bus use, measures to increase car share etc. Each action must have a completion or review date and a named person who will be responsible for ensuring that it is carried out. The current action table is limited and will need further careful development.
* Targets, a target for all modes is required for each year in which a survey will take place, usually years 1,3 and 5 in both numbers and percentages. There must be a site wide target to reduce Single Occupancy Vehicle (SOV) trips made to and from the site. We will need to see between a 5-10% in SOV trips for the site. Please revise the target for the site. Please also include 2011 travel to work census data as a sense check to your trip rate data.
* Table 7.1 comments this might help but the biggest problem is likely to be the distance that site based employees live from the site?
* Para 7.1.5 Has this now be done?
* Para 8.3.3 The travel plan requirement for any site is based on the type of business and its size, further information on our travel plan thresholds is included in our approved guidance. It is based on the class of business and the GFA in m2 of the enterprise concerned. Please change this paragraph to reflect this.
* The TPC for the site has the overall responsibility for ensuring that any business is informed of their travel plan responsibilities and ensuring that they buy into the overall aims and objectives of the commercial travel plan.
* Para 9.2.4 As the travel plan is not currently meeting its targets this is of matter of urgency and not a nicety. Please change the travel plan to reflect this. We will also expect to see new measures being introduced in the travel plan with the aim of changing this situation.
* A copy of the travel survey that was used should be included in the appendices.

**Officer’s Name:**  Joy White

**Officer’s Title**: PrincipalTransport Planner

**Date:** 19 June 2018