
TRANSPORT POLICY RESPONSE

To: Niko Grigoropoulos
Team Leader, Development & Planning

Our Ref: 20/01238/OUTMAJ

From: Jenny Graham
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Your Ref: 20/01238/OUTMAJ

Extn: 2623

Date: 16 September 2020

Land at Sandford Park, Newbury – North and Central (Bloor Homes)

Outline planning permission for up to 1,000 new homes; an 80 bed extra care facility as part of the affordable housing provision; a new 2 form entry primary school (D1); expansion land for Park House School; a local centre to comprise flexible commercial floorspace (A1-A5 up to 2,150sq m, B1a up to 200sq m) and D1 use; the formation of new means of access onto Monks Lane; new open space including the laying out of a new country park; drainage infrastructure; walking and cycling infrastructure and other associated infrastructure works. Matters to be considered: Access.

Introduction

1. This note provides comments to date which mainly pick up on changes since the previous and similar application under reference 18/00764/OUTMAJ. The comments below mainly relate to the Travel Plan but some other elements are picked up on initially. Further comments of a more detailed nature on this application may be provided at a future point but these are my comments which are hopefully helpful at this point.

Non Travel Plan elements

2. I have read the latest comments from Highways Development Control and so am aware of the areas that have been covered by the Team Leader's response and will not comment further in this regard.
3. I am pleased to see that the comments I made on the Construction Traffic Management Plan through the previous application 18/00764/OUTMAJ have been taken on board and included in the version submitted with this application.
4. I remain concerned about the site being planned and developed in a disjointed way due to the developers not working together in the way which had been envisaged when the whole site was first allocated. My concern is the impact on travel, within and through the site and the effective linking of this site with the neighbouring Newbury communities and facilities from a transport and travel perspective.

Travel Plan elements

5. It is good to see that many of my detailed comments from application 18/00764/OUTMAJ have been taken on board in the Travel Plan that has been

submitted with this application (included as Appendix M of the Transport Assessment).

6. Some specific comments that have not been taken on board from my last set of comments and some observations of changes I have noted with this new Travel Plan are as follows:
 - a) The mode share used as an indicative baseline for the development considers census data for Super Output Area E01016293. The reason for looking at the 2011 census data is to establish what the existing mode share is for journeys to work in the area and therefore use these as an indication of the likely pattern of mode share that might be adopted by residents of the proposed development (without the intervention of a travel plan). I raised last time that I was not convinced that this was the most appropriate area to choose. It is quite a different area to the Wash Common and St John's areas that are also adjacent to the application site. The picture that the data from the chosen SOA gives is then used as a basis for target setting for the Travel Plan. I would like to see journey to work census data from the residential areas to the west and the north of the application site also considered in the preparation of these indicative mode share figures and the setting of initial targets.
 - b) I also do not consider the indicative targets to be very ambitious given the fact that there is momentum gathering as a result of the Council's declaration of a climate emergency. This should be the very best time to be proposing ambitious plans and aiming to create a development where sustainable travel can be a real option for residents. I think we need to get the baseline (or proxy for a baseline) right first and then look at targets. I do agree however that targets will be changing as the Travel Plan work develops and as the site is built out so they should be kept under constant review. I do not, though, want to start from a position of low ambition and this development will have a key role to play in helping to achieve carbon neutrality by 2030 (when it will still be being built).
 - c) The marketing of the Travel Plan will be key to people engaging and being willing to consider changing travel habits – there is a marketing section in the Travel Plan but there is no mention of social media and I would have thought that this was one of the key tools that can be effective in communicating what is on offer to residents. This can be worked on during the course of the development of the Travel Plan but is an example of how these things need to move on and not just rely on the same methods we were talking about 10 years ago.
 - d) One area of concern is the move away from provision of car club vehicles to serve the development which I have picked up from para 5.25 of the TP. They mention the existing Car Club but not any enhancements / expansion of the scheme to cover the development site. I have not seen an explanation for this change in direction and do not consider this an acceptable position.

- e) Another area of concern is the non-committal language used in para 8.22 of the TP when talking about linking the development with Newbury railway station with a frequent bus service. I consider this to form quite a key part of the public transport strategy for the development but there is no real commitment shown. I recognise that there is more work to be done on the public transport strategy as a whole.
7. My main concern remains the fact that there does not seem to be any progress from the developers towards having one Travel Plan that would cover the whole site. This has been requested before. There are differences between what is currently being proposed by the two Developers in their separate Travel Plans so I can only conclude that there is no progress in this area.
8. My preference is therefore to completely review how travel planning is undertaken for this strategic housing site and to propose that neither of the developers take on the responsibility of implementing travel plan measures for the site and that the Local Authority look to take on this role instead. The developers would each need to contribute to cover the cost of this work for the initial period of the development equivalent to what would be deemed the lifetime of the travel plan if they were implementing it. If it is carried out this way then there can be a consistent approach which is linked into any other Council initiatives and residents will have one place to go for their information, incentives and advice.
9. It is interesting to note in the draft s106 agreement that it is not proposed to append the Travel Plan and have a clause that the agreed travel plan will be implemented but that instead there are two lines under 'other contributions' which refer to a Travel Plan Contribution defined as follows earlier in the agreement:
- Travel Plan Contribution** a contribution in the sum of £[] to the provision of travel plan measures to encourage non-car modes of travel;*
10. It seems therefore that maybe the developer is already considering this approach of funding the local authority to do the work which will overcome the issues of two developers struggling to work together on this aspect and also have a number of other advantages. I do not yet have a figure in mind for this contribution but work is happening to look at a sound methodology for a sum per dwelling in a similar way that other authorities approach residential travel plans (My Journey in Wokingham and Southampton for example).

Jenny Graham
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