

Planning & Regulation Committee

Monday, 17 July 2023

ADDENDA

5. Didcot Garden Town HIF 1 Scheme (Pages 1 - 62)

Report by the Director of Planning, Environment and Climate Change

Additional representations received.

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Addendum for Planning & Regulation Committee 17th July 2023

Report by the Director of Planning, Environment and Climate Change (Agenda Item 5 (Didcot Garden Town HIF 1 Scheme))

Further Representations Received

Since the committee report was published, ten further representations in objection have been received. The issues raised in these objections were:

- The proposal would adversely affect the village of Appleford;
- The information submitted does not materially address the very serious negative impacts on the residents of Appleford in respect of noise, vibration, pollution, air pollution and traffic danger;
- The proposal would have a significant adverse effect on residents along Main Road and Chambrai Close in Appleford;
- The development would create permanent noise damage in Appleford at the price of providing a new trunk road from the A34 at Didcot;
- The elevated road over the Appleford Sidings will present particular noise risks. Have these been investigated ?
- There is an increase in air pollution in Appleford due to the elevated road and significant visual intrusion
- Appleford Parish Council has shown that there are alternative routes for the road and the applicant has declined to consider this alternative
- The development would have a devastating effect on the environment
- The development would take place at a prohibitive cost to the taxpayer
- The development would undermine the County Council's net-zero commitments
- Concern over the rationale for the project being to deliver thousands of homes in the local area
- The application undermines the County Council's transport commitments and will result in more traffic
- The development will cause unacceptable damage to the natural environment
- The application is a risky financial gamble with public funds
- The development will not solve rush-hour traffic congestion
- The development will have a detrimental impact on residents in terms of noise and pollution
- The LTCP finds that road schemes generate new demand and are not a sustainable long-term solution for Oxfordshire's transport network. It states that new roads should only be considered in exceptional circumstances
- The road scheme would generate at least 500,000 tonnes of CO₂. The County Council's own operations cause about 13,000 tonnes per year. This will completely undermine the County Council's commitment to reaching net zero.
- The extra traffic generated will add to congestion and pollution
- HIF1 would also lead inevitably to major traffic congestion and disruption for neighbouring villages and towns. OCC's traffic modelling has always been seriously flawed since it was first presented to us by an OCC Planner, as being a road to support local housing rather than a major arterial road

between the A34 and the M40 with hundreds of Heavy Goods Vehicles passing every day. HIF1 conflicts with OCC's own Local Transport and Connectivity Plan, which states "it is NOT a sustainable solution for Oxfordshire's transport network". It also conflicts with the National Planning Policy Framework and the DoT's Transport Analysis Guidance.

- Infrastructure funding should be spent on bus and train services or supporting safer cycling and walking
- There has been no consideration of alternatives including those presented by affected Parish Councils
- The scheme will impact hundreds of Oxfordshire residents at a time when OCC pushes LTNs in Oxford to reduce noise and improve air quality for its residents
- The applicant has not accurately quantified the carbon emissions linked to the development
- There has been no proper consideration of the environmental consequences of the development, the impact on residents from noise and pollution, and the costs of the scheme.
- The application should be refused and alternatives should be looked at which are better for the environment and residents.

Officer Response:

These points are noted although are considered to repeat concerns raised and addressed in the assessments provide in the Officer's report to the Planning & Regulatory Committee.

Further representations from The Neighbouring Parish Councils Joint Committee

The Neighbouring Parish Councils Joint Committee (NPCJC) wrote to your officers on 6th July 2023, stating its view that there is considerable outstanding information required to satisfy the requirements of the EIA Regulations 2017. It stated that some examples of the missing information are as follows:

- Alternatives Options Appraisal as required by the DfT webTAG 2014 and later guidance
- Revised traffic modelling incorporating induced traffic, and management options; and re-scoped to include missing communities e.g. Abingdon and Nuneham Courtenay
- Routing option appraisals assessing environmental, noise, health and air quality impacts on adjacent communities
- Corrected Landscape and Visual Appraisal to meet webTAG 2014 definitions
- Failure to demonstrate bridge design to meet NPPF paragraph 16 and 157
- Corrected noise analyses based on local noise monitoring to meet the requirements of the Noise Policy Statement for England 2010, PPG 2019, and BS 8233:2014; and recognising DEFRA's Noise Action Plan Important Areas along the scheme's proposed route
- Reconciliation of the scheme with OCC's LTCP 2022

- Required full Health Impact Assessment as guidance from Public Health England and guided by the NPPF and PPGs and required by the LTCP 2022
- Full Climate Change Position Statement to meet Policy 27 of the LTCP and the requirements of the EIA Regulations

The NPCJC stated that notwithstanding the exchanges under Regulation 25 requests, considerable information remains outstanding and uncorrected in the Environmental Statement. The Parish Council states that in the absence of a compliant Environmental Statement, the application fails to comply with the EIA Regulations and therefore planning permission cannot lawfully be granted.

The NPCJC wrote to your officers on 12th July 2023 acknowledging the existence of documents provided by the applicant in relation to the Environment Statement. The NPCJC consider that the new documents provided in relation to the Environment Statement should be subject to the EIA Regulations 2017 and be regarded as new environmental information that should be subject to the statutory publicity period

Officer Response:

Officers acknowledge the comments of the NPCJC although concluded that the information provided was clarification to the information previously submitted and subject to the statutory publicity period for EIA planning applications. As the information related to points of clarification and was not considered to be further or additional environmental information, a further statutory publicity period was not required. Officers consider therefore that the EIA Regulations 2017 have been complied with in reporting the application for determination by the Planning & Regulatory Committee on 17 July 2023.

The NPCJC wrote further correspondence to your officers on 12th July 2023 with a review of the published Officer's report. A complete copy of this review is appended to this addendum. The key points raised are as follows:

- The language used in relation to the availability of funding for the HIF1 scheme is not appropriate or impartial, objective or reasoned by bringing attention to an immaterial financial consideration that members are immediately advised to ignore when determining the planning application;
- Paragraph 7 recommends approval subject to referral to the Secretary of State for consideration as to whether the application should be called-in for their own determination. No explanation is given as to why this application requires referral to the Secretary of State;
- The report does not address Green Belt matters until para 275 treating it on par with key issues rather than as a matter of national significance and importance which is the reason for a referral to the Secretary of State in the event of the application being approved;
- The advice to Members on Green Belt is confusing, contradictory and misleading. The NPCJC do not agree with the very special circumstances presented in the report and that they are sufficient to address the application constituting inappropriate development in the Green Belt;
- There is no specific policy support for the HIF1 scheme other than the relevant Local Plans safeguarding land for it. The NPCJC consider that the fact that the

land is safeguarded does not mean that strong support should be afforded to the principle of development as set out in paragraph 94 of the officer's report. The NPCJC considers that the principle of development should be afforded only limited weight in view of publication of the latest iteration of the NPPF and the Council's LTCP that post-dated the adoption of the relevant Local Plans;

- The Officer's Report fails to report the full extent of the District Councils' concerns on the design and layout of parts of the proposal. Despite the views of the District Council's professional officers, the officer's report considers the design of the proposal to be in accordance with relevant design policy;
- The NPCJC concur with the comments raised by Councillor Hicks in relation to the LTCP not being adequately referred to in the report including reference to key targets such as replacing or removing 1 out of every 4 current car trips in Oxfordshire by 2030;
- The officer's report fails to report that the accuracy of the noise assessment has been challenged;
- The assessment of the impact on landscape and biodiversity are not convincing and are downplayed;
- Members do not have the benefit of fully drafted or agreed conditions, which conflicts with the requirements of the NPPF;
- The report fails to report significant findings of the Climate Change Commission (CCC) published in June 2023;
- The assertion that the scheme would lead to an overall carbon saving is wholly unsupported by the evidence;
- A Health Impact Assessment should have submitted;
- Misunderstanding of previous responses referring to a recent CPO Inspector's Report. The point being made is that the application runs the risk of not being fully delivered due to economic uncertainties at a local and national level;
- Concluding section of the report is highly unsatisfactory in terms of how the balance has been applied and the weighting afforded to identified conflicts.

Officer Response:

The comments from the NPCJC are noted. Having reviewed the comments, the points in relation to the LTCP are addressed in further detail in this addendum report in the response to the comments submitted by Councillor Hicks including amendments the Officer's Report.

To confirm why the application would need to be referred to the Secretary of State if approved, this is a requirement of the Town and Country Planning (Consultation) (England) Direction 2021 that under section 10 states that the direction applies where a local planning authority does not propose to refuse an application for planning permission to which this direction applies, the authority shall consult with the Secretary of State as to whether they want to call the application in for their decision. The direction lists the matters to which the Secretary of State should be consulted, which under section 4 includes inappropriate development in the Green Belt that would have a significant impact on the openness of the Green Belt, which is the case in respect of this planning application.

With respect to planning conditions, details of those proposed are included in the report and it is clear what each one is intended to do. The final wording remains to be agreed subject to any requirements stipulated by members of the committee if they resolve to grant planning permission, which is standard practice to delegate to the relevant senior officer. The Committee can also decide to require the final set of conditions to be brought back to another meeting meaning that there are sufficient procedural controls in place for conditions to be imposed that meet the NPPF requirements.

The other points raised are, in the view of officers, a different view on how planning judgments are applied on the various issues in the report. No new issues are raised that require the report to be amended and it will be a matter for members of the committee to apply their own judgements and weighting when making their decision on the application.

Representations from County Councillor

County Councillor Charlie Hicks has commented on the officer's report summarised as follows:

1. the omission of reference to LTCP Policy 36 (Road Schemes), and specifically no reference to the policy to use "decide and provide" traffic modelling policy for new road schemes;
2. the misrepresentation of LTCP's position on the requirement of road schemes (the officer report claims the LTCP makes it clear that road schemes "will" be required, whereas the LTCP only says road schemes "may be required");
3. the omission of reference to headline LTCP targets on car use reduction despite that the transport assessment of this scheme predicts this will take us further away from the target.

1 . Omission of Policy 36 (Road Schemes) "decide and provide" policy

Policy 36 in the LTCP is the only specific policy in the LTCP on road schemes and is not mentioned explicitly anywhere in the officer report. Key in Policy 36 (parts b, d, and e) is that it is the council's policy to use "decide and provide" traffic modelling for new road schemes and to promote the use of "decide and provide" modelling for new developments. There is no mention of "decide and provide" modelling in the HIF1 planning application report. Rather, the traffic modelling that has been used (which is referenced throughout and underpins the case for the project) appears to be the 'predict and provide' modelling approach (i.e. the model predicts future demand based on historic levels of car trips), which the County Council explicitly says in the LTCP is not to be used for new road schemes.

To quote the LTCP: "*To ensure that any road schemes align with our transport vision, we will take a 'decide and provide' approach rather than the traditional 'predict and provide' approach.*" (page 105).

2. Misrepresentation of the LTCP's position on road schemes

I believe there is a factual inaccuracy in the planning application report regarding the strength of language used in how the LTCP's position on road schemes is represented. The planning application report says:

- in Part 4, para 136: "*the LTCP also identifies that there are situations where new road schemes and road capacity enhancements **will** be required*", and
- In Part 4, para 158 (the summary of Impact on Car Travel): "*The LTCP is clear that, despite the objective of reducing car use, there **will** continue to be situations where new road schemes and road capacity enhancements are required*"

On cross-referencing with the LTCP, there is no language that road schemes or road capacity enhancements "will" be required. The strongest language that is used is that "*road schemes **may** be required*" (see LTCP pages 105-107).

Along the same theme, in Part 4 (Assessment and Conclusions), paragraphs 88, 89, and 94 all appear to conflict with LTCP Policy 36, specifically to promote the 'decide and provide' approach to new developments (Policy 36, parts d and e). Put simply, the advice given by officers in these paragraphs is that new developments are assumed to be highly car-dependent, which is the antithesis of the 'decide and provide' approach.

Furthermore, Part 4 paragraphs 149 and 153 demonstrate how the 'decide and provide' approach has not been followed in this application.

3. Omission of assessing the impact of the scheme against headline LTCP targets

Tables on page 61, 62 and 63 in Appendix F show the AM (i.e. morning), Interpeak and PM (i.e. afternoon) peak counts of the traffic model used for HIF1 and show an increase in car traffic flows by around 42% in 2034 compared to 2020.

Officer response to Councillor Hicks's criticisms of the report

Point 1:

Supplementary Information to Paragraph 136:

Paragraph 136 of the committee report advises members that the Local Transport and Connectivity Plan (LTCP), whilst not part of the development plan, is a material planning consideration. The paragraph explains that the LTCP sets a clear vision to deliver a net-zero transport and travel system in Oxfordshire and aims to enable the county to thrive whilst protecting the environment and improving quality of life. The LTCP seeks to achieve this through reducing the need to travel, discouraging private vehicle journeys and making sustainable and active travel the natural first choice. The LTCP includes a number of policies which it is stated are necessary to achieve this, including prioritising active and sustainable modes, improvements to public rights of way and green infrastructure, supporting healthy place-shaping and carbon reduction measures, and bus, rail and digital connectivity strategies.

Supplementary to the advice in the report, members are also advised that the LTCP includes headline targets. The targets are as follows:

By 2030:

- Replace or remove 1 out of every 4 current car trips in Oxfordshire
- Increase the number of cycle trips in Oxfordshire from 600,000 to 1 million cycle trips per week
- Reduce road fatalities or life changing injuries by 50%

By 2040:

- Deliver a net-zero transport network
- Replace or remove an additional 1 out of 3 car trips in Oxfordshire

By 2050:

- Deliver a transport network that contributes to a climate positive future
- Have zero, or as close as possible, road fatalities or life-changing injuries

Members are also advised that Policy 36 of the LTCP specifically refers to new road schemes. Policy 36 of the LTCP states that:

“We will:

- Only consider road capacity schemes after all other options have been explored.*
- Where appropriate, adopt a decide and provide approach to manage and develop the county’s road network.*
- Assess opportunities for traffic reduction as part of any junction or road route improvement schemes.*
- Require transport assessments accompanying planning applications for new development to follow the County Council’s ‘Implementing ‘Decide & Provide’: Requirements for Transport Assessments’ document.*
- Promote the use of the ‘decide and provide’ approach in planning policy development to support site assessment”.*

TDC advises that, as a Highway Authority, OCC must develop its strategies and schemes, as guided by all relevant National, Regional and Local policies at the time. There is a significant amount of time that passes between the inception of a large-scale infrastructure scheme, such as HIF1, through to its completion.

The inception of the HIF1 scheme started prior to the current LTCP, under the LTP4 2015-31. In Part 2 of this plan, the transport priorities for Science Vale were to improve access to the key employment sites and enable their economic growth, to plan ahead to manage the impact of future housing growth on the transport network and to improve connectivity between employment, services and areas of housing growth.

One of the main ways to achieving this was to improve opportunities for sustainable travel, on foot, by bike and using public transport to help to deliver a real step-change in the provision of alternative modes of travel to the car and therefore improving journeys across Science Vale.

Below are the relevant proposals that were identified in the Science Vale Area Strategy under LTP4 Part 2:

SV 2.1: Upgrade the cycle network and undertake maintenance on the existing network;

SV 2.2: Secure new bus services with associated infrastructure and improve existing bus services;

SV 2.6: Deliver the Didcot Science Bridge and widening of A4130 to relieve the already identified pressures on Manor Bridge and support the delivery of the allocated Didcot A and Valley Park Developments;

SV 2.13: Improve access to Culham Science Centre (Clifton Hampden Bypass);

SV 2.14: Promote schemes to provide relief to villages within Science Vale which are affected by high levels of through traffic.

SV 2.16: Deliver the Didcot to Culham river crossing; and

SV 2.21 and SV 2.22: Provide strategic cycle network to encourage the use of sustainable transport

During the drafting of the LTCP, each of these proposals were reviewed to ensure their concurrence with the emerging LTCP policies. In adopting the LTCP, the underlying principles of the LTP4 Science Vale Area Strategy are represented and the HIF1 Scheme is part of a wider strategic strategy, which is required to mitigate the impact of existing allocated growth across the Science Vale Area.

Importantly, the HIF1 Scheme was included in the Infrastructure Delivery Plans (IDPs) for both the SODC LP 2035 and VoWHDC Local Plan 2031 (Parts 1 and 2). The IDPs area wide impacts were modelled through the Evaluation of Transport Impacts to inform the evidence base of these plans, which were found to be sound by the Inspectorate.

As required by Policy 36 a), OCC undertook a stringent Assessment of the Alternatives, which are detailed in Chapter 3 of the ES. DfT guidance was followed throughout the optioneering process and all Options Assessment Reports (OAR) detail the rigorous Early Assessment Sifting that was undertaken for a range of various options. These options were publicly consulted on in November 2018, with a revised OAR taking into account an updated evidence base and options, including the consideration of multi-modal options, being produced.

The HIF1 Scheme is designed to improve access to future housing and employment growth in the local area, including access by walking, cycling and public transport. The Scheme is policy backed and is the cornerstone of mitigation for the planned growth in the area. The Scheme does not aim to provide unlimited highway capacity for cars, or to remove all congestion; it forms part of a balanced transport strategy which also provides high-quality walking and cycling infrastructure, helping to engender modal shift to more sustainable modes.

Whilst the modelling for HIF1 does not explicitly follow the methodology outlined in OCC's *'Implementing Decide and Provide – Requirements for Transport Assessments'*, noting that this was only adopted after the HIF1 planning application was submitted, it does contain 'Decide and Provide' principles within it that Highways Officers have deemed acceptable and in adherence to Policy 36 of the LTCP.

In the 2034 future year, the applicant decided that the model only assumes an 80% demand for all new growth on the network. In justifying this decision, the applicant, in agreement with OCC, assume that:

- Didcot Garden Town principles will continue to be enacted in this area over the next 14 years, increasing the usage of sustainable modes of travel.
- All new developments will benefit from ensuring active travel infrastructure is provided at the earliest stage of a development's build out, thus encouraging a step change towards active travel.
- The largest new development sites follow good spatial strategies and are in more sustainable locations near public transport hubs and / or are located nearer the growing employment areas – Didcot Gateway, Valley Park.
- Recently accepted trip rates as given planning permission at Didcot NE and Valley Park were lower than those used in the modelling and therefore a demand reduction is justified.

This emphasises the fact that the HIF1 planning application has not modelled for 100% of demand at residential development sites. It has planned for growth in active travel modes such as walking and cycling, as well as increased public transport use, to help to reduce the demand on the highway network and therefore traffic levels, by 'deciding' to assume this 20% reduction.

Point 2

Amendment to Paragraph 136

Paragraph 136 of the committee report includes a sentence that reads:

"However, the LTCP also identifies that there are situations where new road schemes and road capacity enhancements will be required, albeit that these will be considered where all other options, including options for traffic reduction, have been explored"

This sentence is replaced with the following text:

"The LTCP also states that alongside managing the existing network, Oxfordshire County Council is also responsible for overseeing the delivery of new highways infrastructure. Whilst the County Council's priority, as set out in the LTCP, is on reducing car use and the need to travel, it is recognised in the LTCP that in some cases new roads, or widening roads and junctions may be necessary, to ensure a reliable and effective transport network. The LTCP notes that road schemes often generate new demand and quickly reach capacity again, and therefore concludes that road schemes are therefore not a sustainable long-term solution for Oxfordshire's transport network. The LTCP therefore outlines a new approach to the development of road schemes to ensure they contribute towards delivery of the LTCP vision and do not reinforce traditional transport planning approaches"

Amendment to Paragraph 158

Paragraph 158 of the committee report states the following:

“Taking all of the above into account, the development is considered to have a positive effect on enabling active and sustainable travel modes through the provision of new infrastructure for walkers and cyclists, and through reduced journey times and new infrastructure for buses. The LTCP is clear that, despite the objective of reducing car use, there will continue to be situations where new road schemes and road capacity enhancements are required. The proposed development is essential in enabling planned housing and employment growth to come forward without creating gridlock on the highway network and is listed in Appendix 1 to the LTCP as a key project being delivered as part of the Science Vale Area Strategy. Furthermore, it is one part of a wider strategy for managing movement by all modes in the Science Vale area and it has the support of TDC”.

Paragraph 158 is amended to read as follows:

“The LTCP acknowledges that, despite the objective of reducing car use, there may continue to be situations where new road schemes and road capacity enhancements may be required and Policy 36 of the LTCP states that new roads schemes will only be considered where all other options have been explored. The proposed development is essential in enabling planned housing and employment growth to come forward without creating gridlock on the highway network and is listed in Appendix 1 to the LTCP as a key project being delivered as part of the Science Vale Area Strategy. Furthermore, it is one part of a wider strategy for managing movement by all modes in the Science Vale area and it has the support of TDC. Therefore, the road scheme is considered to be necessary to ensure a reliable and effect transport network”.

Point 3:

Councillor Hicks states:

‘Tables on page 61, 62 and 63 in Appendix F show the AM (i.e. morning), Interpeak and PM (i.e. afternoon) peak counts of the traffic model used for HIF1 and show an increase in car traffic flows by around 42% in 2034 compared to 2020’.

Firstly, the TDC Officer queries how the figure of 42% was reached and exactly what figures were used. Having looked over the same tables in Appendix F and using the Final Demand Totals in Tables 30 and 32 (which are for the AM and PM peak, noting that it is not standard practice to use the interpeak demands), they have not been able to ascertain how this figure was reached and whether it is the AM or PM peak hour that is referred to.

The TDC officer does not dispute the figures that Councillor Hicks has used, as referred to below:

‘Of note, it says that in 2034, assuming the 15,825 units and 747,446 sqm of commercial floorspace are built out, an additional 19,588 car journeys would be expected on the network in each AM peak period and 21,048 in the PM

peak this is contrasted against a 2020 scenario of around 50,000 car journeys. (N.B. This excludes any HGV/LGV flows)'.

Nevertheless, the TDC officer wishes to clarify that these additional extra trips on the network are not generated by the HIF1 Scheme, however, they are as a result of the Local Plans' allocated sites (some of which already have planning consent and have been implemented). Simply saying that the '*...42% increase in traffic flows...that are enabled by the road*' will make '*...it significantly more difficult to meet our 2030 and 2040 targets on car trip reduction in Oxfordshire*' is misleading.

What the HIF1 Scheme does, is ensure that there is a strategically planned transport network for all modes of transport, whilst taking into account the significant amount of planned growth in the area. The scheme provides very high-quality walking and cycling infrastructure, which helps to engender modal shift.

The TDC officer acknowledges that planning for the future is a challenge and as a Highway Authority the county council has to make decisions that are as robust as possible to a range of different possible futures. They are of the view that the HIF1 infrastructure allows this to happen and will create a transport network that is significantly better for active travel, resilient to adapting to ever changing policies and safe for all road users.

Councillor Hicks also provided and requested by way of e-mail received on 12th July that his formal objection and attached annex be circulated to all members of the committee prior to the meeting on 17th July. These are appended to this addendum.

Withdrawal of an objection

The agent of FCC, owner of the old landfill at Sutton Courtney and other land interests that form part of the land required for the scheme subject to the application, formally withdraw their objection.

FCC can now advise that they support the principle of the application and withdraw their objection contingent to their concerns being addressed through the detailed design stage of the scheme and amendments to proposed conditions. In response, amendments are proposed to conditions as set out as follows:

Amendment to Condition 3:

Condition 3 states that:

"Submission of Construction Environmental Management Plan (CEMP) prior to commencement of each part of the development to be approved in writing by the CPA."

The above wording is deleted and replaced with the following amended Condition 3:

"Submission of Construction Environmental Management Plan (CEMP) prior to commencement of each part of the development to be approved in writing by the CPA. This shall include reference to relevant accesses being maintained during the

construction period as well as details for how any settlement issues relating to restored landfill cells would be mitigated. ”

Amendment to Condition 19:

Condition 19 states that:

“Detailed surface water drainage scheme to be submitted to and approved in writing by the CPA prior to the commencement of each part of the development.”

The above wording is deleted and replaced with the following amended Condition 19:

“Detailed surface water drainage scheme to be submitted to and approved in writing by the CPA prior to the commencement of each part of the development. This will include reference to road drainage not discharging into the site’s surface water infrastructure.”

Amendment to Condition 30:

Condition 30 states that:

“No development to take place within the Didcot to Culham River Crossing section of the development until revised restoration and aftercare schemes have been submitted to and approved in writing by the CPA for Sutton Courtenay Landfill Site”.

The above wording is deleted and replaced with the following amended Condition 30:

“No development to take place within the Didcot to Culham River Crossing section of the development until revised restoration and aftercare schemes including relocation of existing monitoring boreholes have been submitted to and approved in writing by the CPA for Sutton Courtenay Landfill Site”.

Other Amendment to the report

Amendment to Paragraph 230:

Paragraph 230 of the committee report includes a sentence that reads:

“All Oxfordshire Local Authorities have declared a climate emergency in recognition of climate change, adding weight to policies that seek to reduce carbon emissions and protect against the effects of climate change”.

The above sentence in paragraph 230 is deleted and replaced with the following text:

“All Oxfordshire Local Authorities have either declared a climate emergency or acknowledged it in recognition of climate change, adding weight to policies that seek to reduce carbon emissions and protect against the effects of climate change. On 2nd April 2019, the County Council acknowledged a climate emergency and call for action; pledged to make Oxfordshire County Council carbon neutral by 2030, taking

account of both production and consumption emissions; agreed to call on Westminster to provide the powers and resources to make the 2030 target possible; to continue to work with partners across the county and region to deliver this new goal through all relevant strategies; and report to Council within six months with the actions the Council will take to address this emergency”.

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Objection to HIF1 planning application - Cllr Charlie Hicks

The Planning and Regulation committee should reject the HIF1 planning application for the following reasons:

1. The HIF1 application does not align with LTCP Policy 36, specifically parts b, d or e, nor does it align with the sister document to the LTCP called “Implementing ‘Decide & Provide’: Requirements for Transport Assessments” (please see policy document attached with objection).
2. Delivering HIF1 would mean the council is very likely to overshoot our LTCP 2030 targets on 25% car trip reduction.
3. The evidence in the UK government’s Climate Change Committee progress report to parliament suggests that, to get the UK’s surface transport on track to the Paris Agreement, all road schemes should undergo a Net Zero Roads Review, like in Wales (which includes in the criteria that road building should not increase road capacity for cars). Given that this project significantly increases road capacity for cars, it is likely that an independent review would find it is not aligned to Net Zero.

Objection 1. HIF1 does not align with LTCP Policy 36 parts b, d or e, nor the council’s policy on Implementing ‘Decide & Provide’: Requirements for Transport Assessments

Policy 36 of the LTCP says that we will use ‘decide and provide’ for new road schemes and promote the use of ‘decide and provide’ in new developments.

Here is the policy from the LTCP (pages 105 to 107):

Road schemes

As highlighted in the introduction to this chapter, Oxfordshire County Council is also responsible for overseeing the delivery of new highway infrastructure. There are situations where new roads, or widening roads and junctions may be necessary, but this is not a sustainable long term solution because we have found that road schemes often generate new demand and quickly reach capacity again

There is substantial national and international evidence of motor traffic ‘disappearance’, when road capacity is reduced, particularly where there are viable alternatives and in areas of excessive demand on road space.

Traffic ‘disappearance’ research shows that large percentages of motor traffic are not just displaced to other roads, but ‘disappear’ through a range of behavioural changes. These changes achieve the same objectives in ways that do not require car travel, for example changing mode or pooling journeys.

However, there are examples where road schemes may be required and will deliver improvements. This includes where access is needed to new developments or where the existing road is unsafe.

We will always require careful modelling for major schemes to ensure that the likely effects on the wider network are fully understood. To ensure that any road schemes align with our transport vision, we will take a ‘decide and provide’ approach rather than the traditional ‘predict and provide’ approach.

Predict and provide

The predict and provide approach to transport planning uses past or historical traffic and socio-economic trends to determine the future need for infrastructure. Traditionally, transport planning has used this approach to forecast the transport needs of the future.

However, this approach largely replicates and reinforces the status quo. With the changes to transport that are arising due to digital connectivity, new transport modes, the COVID-19 pandemic and the need to achieve a net-zero transport system, there is an increasing risk that infrastructure is provided that does not meet or shape the transport needs of the future⁷⁵.

Decide and provide

The decide and provide approach to transport planning decides on the preferred future and then provides the means to work towards that which can accommodate uncertainty. This offers the opportunity for more positive transport planning and helps implement a transport user hierarchy by considering walking and cycling up-front⁷⁶.

Why is this policy needed?

Ensuring that Oxfordshire's transport network remains reliable and effective is key to supporting the local economy and everyday journeys. Some road capacity enhancements may be required to enable this. In accordance with our transport user hierarchy, road capacity schemes will only be considered after all other options, including opportunities for traffic reduction, have been explored.

It is important that a 'decide and provide' approach is taken during the development of new schemes to ensure that they contribute towards delivery of our vision and do not reinforce traditional transport planning approaches.

What are the benefits for people in Oxfordshire?

Where appropriate, road capacity schemes will help to tackle congestion and pollution providing benefits to health and everyday journeys. It will also support the economy and ensure the county remains an attractive place to work and live.

Adopting a decide and provide approach to planning new infrastructure, including alongside proposed new development will mean that any road capacity enhancements align with our transport user hierarchy, prioritising the most space efficient modes of walking, cycling and public transport. This will help to create attractive environments for residents to walk and cycle in.

The decide and provide approach will also help us to deliver infrastructure that caters for future transport needs.

75. TRICS Decide and Provide Guidance 2021

76. TRICS Decide and Provide Guidance 2021



Policy 36 – We will:

- a. Only consider road capacity schemes after all other options have been explored.
- b. Where appropriate, adopt a decide and provide approach to manage and develop the county's road network.
- c. Assess opportunities for traffic reduction as part of any junction or road route improvement schemes.
- d. Require transport assessments accompanying planning applications for new development to follow the County Council's 'Implementing 'Decide & Provide': Requirements for Transport Assessments' document.
- e. Promote the use of the 'decide and provide' approach in planning policy development to support site assessment.

Policy 36 is the only policy in the LTCP specifically on Road Schemes and it says explicitly that we will use 'decide and provide' for new road schemes rather than 'predict and provide'.

This is fleshed out further in the County Council's policy document, ["Implementing 'Decide & Provide': Requirements for Transport Assessments"](#):

"1.1 'Decide and Provide' instead of 'Predict and Provide'"

1.1.1 As outlined in the LTCP, 'predict and provide' can be broadly described as an approach to transport planning that uses current or historical traffic patterns to determine the future need for infrastructure. However, this approach tends to simply maintain the status quo by perpetuating dependence on the private car through provision of additional highway capacity.

1.1.2 By contrast, the 'decide and provide' approach to transport planning decides on a preferred vision of the future and then provides the means to work towards that whilst also accommodating uncertainty about the future. This offers the opportunity for more positive transport planning and will help to implement the LTCP transport user hierarchy by considering walking, cycling and public transport upfront.

1.1.3 This approach is captured in LTCP Policy 36 (2022a, p.106), which states that:

We will:

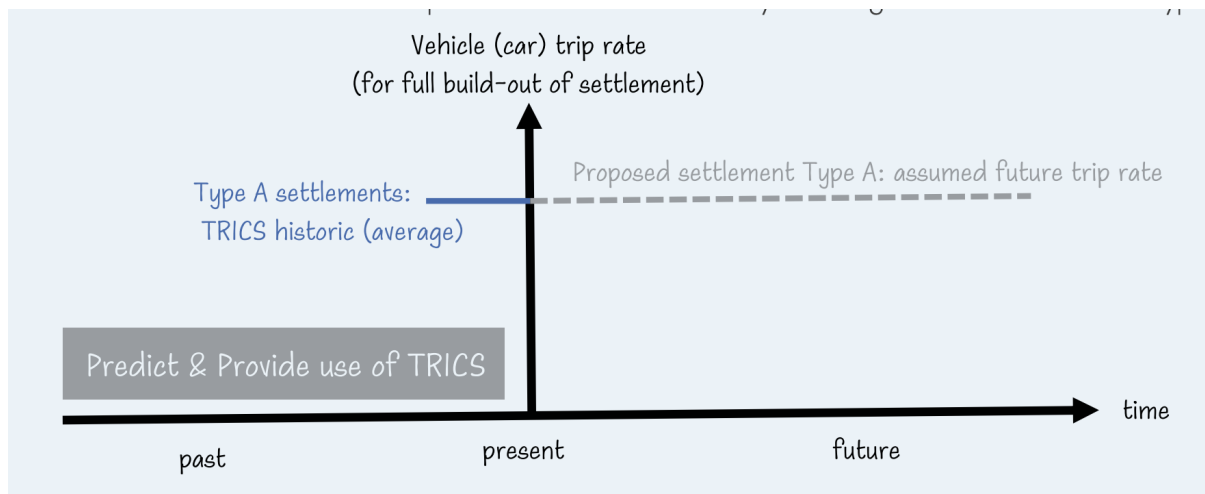
- a. Only consider road capacity schemes after all other options have been explored.*
- b. Where appropriate, adopt a decide and provide approach to manage and develop the county's road network.*
- c. Assess opportunities for traffic reduction as part of any junction or road route improvement schemes.*
- d. Require transport assessments accompanying planning applications for new development to follow the County Council's 'Implementing 'Decide & Provide': Requirements for Transport Assessments' document.*
- e. Promote the use of the 'decide and provide' approach in planning policy development to support site assessment."*

However, the HIF1 application uses 'predict & provide' modelling (predicting the number of journeys according to the historic levels of traffic from additional houses and employment sites), not 'decide and provide', which would be where the mode share that these new developments output is decided and then the developments and infrastructure are designed accordingly.

Predict and provide reinforces the car-dependent model of infrastructure and planning

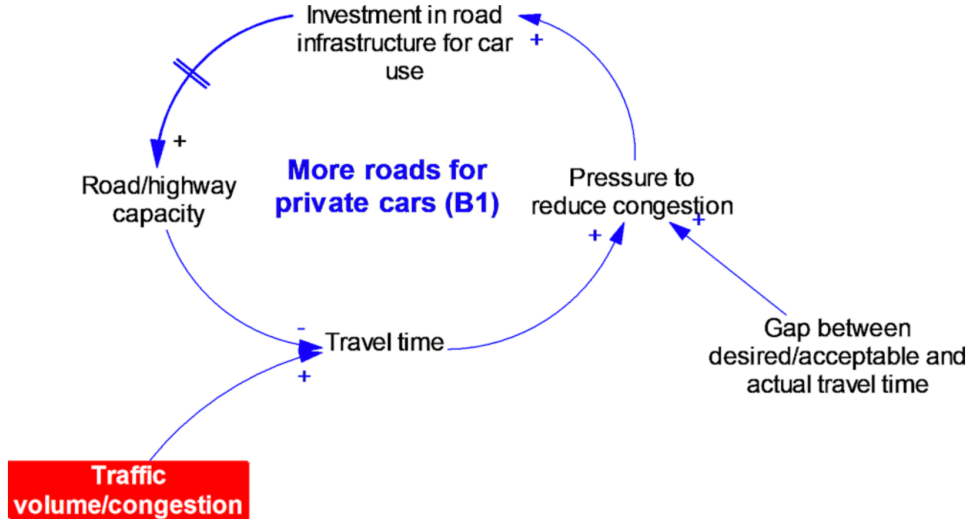
What is the 'predict and provide' approach?

This diagram describes the 'predict and provide' approach, taken from the [TRICS guidance note on this topic](#), which was used to help develop the Oxfordshire County Council policy, *Implementing 'Decide & Provide': Requirements for Transport Assessments*:



The issue with this is that it reinforces the existing car-dependent infrastructure, transport, spatial planning and development system. This is shown below in a diagram from the [OECD's report on Net Zero Transport Systems By Design](#):

Figure 3.1. Road capacity expansion under a "predict and provide" mind-set

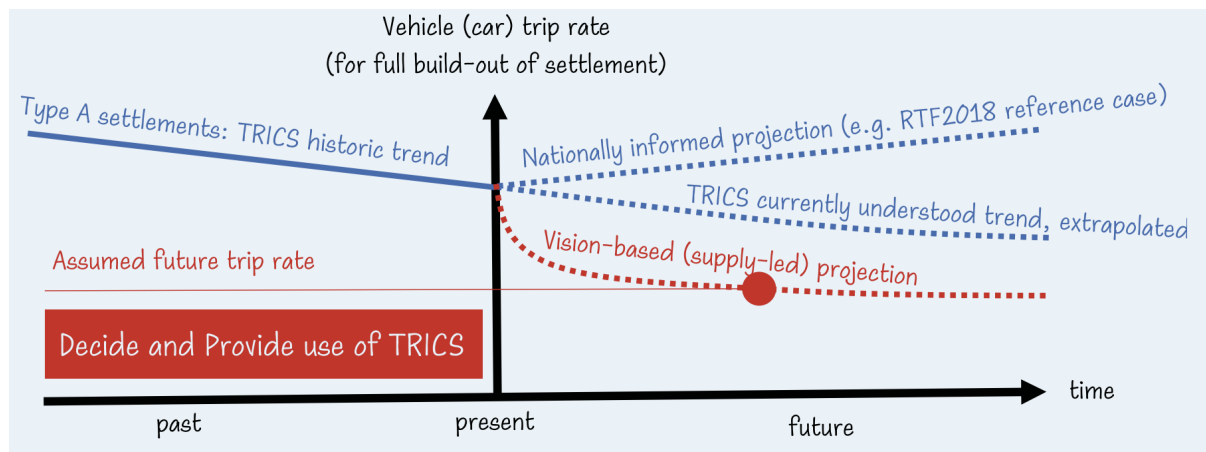


Notes: Arrows with a "+" mean that both variables move in the same direction (when one increases, the other increases and vice versa). Arrows with a "-" mean that the variables move in opposite directions (when one increases, the other decreases and vice versa). The two lines on the arrow denote a delay. The figure can be read as follows: as traffic volume/congestion increases, travel time also increases. As travel time increases, the pressure (e.g. from the population) to reduce congestion increases, which may lead to higher investments in road infrastructure for car use. Such higher investments result in higher road/highway capacity (e.g. more lanes, more roads), which in turn decreases travel time. As travel time decreases and the gap between desirable/acceptable and actual travel time closes, the pressure to reduce congestion also decreases, etc.

Source: Adapted from Sterman (2000[1]).

What is the 'decide and provide' approach?

By contrast, the 'decide and provide' approach starts by asking "What % of all trips arising from the new development can be made by car (and other modes) and be consistent with our LTCP and climate targets?". It then sets this number as the target for which the transport infrastructure and development must meet through how the masterplan of the development is designed, and through the infrastructure that is provided.



Reference: TRICS Guidance note on Decide & Provide
https://www.trics.org/img/trics%20dp%20guidance_web.pdf

Evidence: The HIF1 application uses 'predict and provide' modelling

The traffic model used to underpin the case for and design the HIF1 scheme is primarily the Didcot Paramics model, which uses the Oxfordshire Strategic Model for the wider geography. Both these models use the 'predict and provide' approach, predicting future car trip demand based on existing travel patterns. This can be seen from the Transport Assessments.

In HIF1 Transport assessment (2020) - discussing the Oxfordshire Strategic Model

“2.4.2 Future trip generators”

“The Oxford Strategic Model (OSM) has been developed to predict traffic growth based on travel conditions in 2013. The model consists of an Highway Assignment Model (HAM) representing vehicle-based movements within and across the Oxfordshire County, the Public Transport Assignment Model (PTAM) representing bus and rail-based movements across the same area and for the same periods and a five-stage multi-modal Demand Model (MMDM) that estimates the choice of frequency, mode, period, destination and sub-mode in response to changes in generalised costs of travel.

“These model assignments suggest that in the period 2013-2031 there would be around 25% traffic growth in the Didcot area in the morning and evening peaks, while in the inter-peak periods traffic growth could be 45%. The flow on the A4130 to the A34 is predicted to increase by 30-40% in the peaks and over 50% in the inter-peak periods.”

In HIF1 Transport Assessment (2021) - discussing the Didcot Paramics model

“5.3.8. For the 2034 scenarios the [Paramics] model assumes 100% demand of existing trips present in the 2017 base, and 80% of demand for new growth.”

I.e. the modeller have answered the follow questions and made the following assumptions:

- “What’s the existing car trip demand?” Answer: “XXX”
 - **Assumption: That car trip demand will stay the same in the existing sites**
- “What’s the predicted car trip demand going to be?”
 - **Assumption: For new sites, new car trip demand will be 80% the existing demand for car trips per house or per employment site**

This is using a 'predict and provide' with a small accommodation of demand reduction for future developments. It is not starting with the mode share target that is consistent with our policies and then designing the new infrastructure accordingly.

A 'decide and provide' approach to HIF1 would start with the travel mode share we are aiming for, and then design the transport infrastructure and developments to achieve that mode share

A 'decide and provide' approach to modelling would start by asking: "What car trip demand would be consistent with our LTCP and climate targets?"

The answer would be along the lines of: We need car trips in 2030 to be 25% fewer than 2019 (including new developments). So, we have to significantly reduce the amount of car trips new developments will create compared to existing patterns

The next question would be: "Therefore, what design features would we need for our new developments and what kind of infrastructure would we need to support this?"

The answer would be along the lines of:

- Make the developments walkable, with local amenities and walkable infrastructure. As part of this, make the developments denser so there is higher demand for local shops and amenities that aren't car dependent. This will *internalise* movements.
- With new transport infrastructure, don't increase the road capacity for cars, as this induces new demand for car trips.
- Design more space for walking, cycling and public transport in the infrastructure that's built.
- Join up new developments predominantly with public transport, for example by ensuring good active travel connectivity to existing train stations.

Why does this matter?

We have to break the cycle of car-dependent infrastructure and car-dependent developments if we are to meet the goals set out in the LTCP and match our contribution to the UK meeting the Net Zero goals set out in the Paris Agreement.

The way to do this for carbon emission in surface transport associated with new developments and new infrastructure is to use the 'decide and provide' approach. If councils implement 'decide and provide', then the design of new development master plans will *internalise* movements, by providing local amenities, within walking and cycling distances, high quality walking and cycling infrastructure and connected with high quality public transport. This then means you have a much lower % of car journeys to cater for and you don't then need the car dependent infrastructure. Decide & provide is the key to shift the way we do transport and place planning to fit to decarbonising the transport system. This is why it is so important that we uphold the decide & provide policy.

If we don't do this, we continue to reinforce the cycle of car dependency and will bake-in car-dependency for decades.

Objection 2. This project actively works against us meeting the headline targets of the LTCP

Connected to point 1, the LTCP headline targets include reducing car trips by 1 in 4 (from post-pandemic levels) by 2030.

The Paramics model says that this road and the car-dependent developments it enables will lead to an increase of 42% car traffic flows in the area. This likely underestimates the 2034 traffic flows of building a road because it does not include or LGV/HGV movements nor does it include the 'induced demand' effects of increasing road capacity for cars. The issues of not capturing induced demand have been laid out in the paper written for Place Scrutiny by Professor Phil Goodwin.

To put it simply, if this application is accepted, we bake in car-dependent infrastructure and new developments for decades and we can wave goodbye to meeting our 2030 LTCP targets.

Objection 3. This project goes against the advice laid out in the UK Government Climate Change Committee's in its latest Progress Report to Parliament.

The UK government's Climate Change Committee, in its 2023 Progress Report to Parliament says (**bold** is summary, *italics* is quotes from the report):

a) Measures to reduce car use are important for UK transport decarbonisation

"measures to limit growth in road traffic are also crucial for decarbonising transport"

b) The government is not making good progress in this area

However, *"the Government has made no progress on our recommendations on clarifying the role for car demand reduction and ensuring that key enablers (**road-building decisions** and taxation) are aligned to delivering this"* and *"without policy action to embed a reduction in the need to travel by car or grow the availability and attractiveness of alternative lower carbon modes, traffic is likely to increase beyond the CCC's pathway."*

They go on to say: *"Policy progress in the surface transport sector over the past year has been slower than expected, with credible policies in place to meet only 38% of the required emissions reduction by the Sixth Carbon Budget period"* and *"Further work is needed to develop coherent plans and measurable targets in areas of the sector that were not quantified in the CBDP [Carbon Budget Delivery Plan] – in particular measures to reduce car demand – to make up this shortfall."*

c) Therefore, the UK CCC recommends a series of actions to get the UK back on track for surface transport decarbonisation

The CCC go on to recommend that the government does more to reduce car use with policies on this implemented urgently, saying: *“Measures to reduce car demand – whether through reducing the need to travel, modal shift or shared mobility – present an important opportunity to go beyond the Government’s quantified pathways and reduce the risk of relying solely on rapid ZEV uptake. This can contribute to making up the shortfall on the UK’s NDC and the Sixth Carbon Budget, but only if the development and implementation of a coherent set of policies begins urgently (priority recommendation R2022-119).”*

They also recommend: *“The strategic priority of Net Zero should mean that all scheme appraisals (**including roadbuilding decisions**) must explicitly consider the NRTP decarbonisation scenarios and assess the emissions impacts that they will generate”*

And they recommend that the UK should follow in the footsteps of the Welsh Government in doing a Road Review to align road building to Net Zero, saying: *“At a UK level, various road-building projects have recently been pushed back due to fiscal headwinds. **The Government should launch a more strategic review (similar to the Welsh Roads Review) to assess whether these projects are consistent with its environmental goals (recommendation R2023-148).**”*

The Welsh Roads Review says that to be aligned to Net Zero, new road schemes must meet the following purposes and criteria, including not increasing road capacity for cars

The [Welsh Roads Review](#) sets criteria for which road building is allowed. It must meet the following criteria:

Roadbuilding be limited to four “purposes”:

- *supporting modal shift;*
- *reducing casualties through small changes;*
- *climate change adaptation; and*
- *supporting prosperity through access to development sites which support sustainable transport.*

Roadbuilding should meet the following “conditions”. Schemes should:

- *minimise carbon emissions from construction;*
- *not increase vehicle speeds that increase emissions;*
- ***not increase road capacity for cars; and***
- *not adversely affect ecologically valuable site.*

The summary diagram from the Welsh Roads Review report called “[The Future of Road Investment in Wales](#)”, lays this out:

BASED ON THE SCHEMES WE REVIEWED, WE IDENTIFY THE FOLLOWING PURPOSES & CONDITIONS FOR FUTURE ROAD INVESTMENT:



This '4x4' of purposes and conditions for future road investment should provide a **first stage filter** for sponsors of potential schemes, when considering whether a road scheme is justifiable and appropriate. It does not remove or reduce the requirement for systematic appraisal, but will save significant abortive development work on inappropriate schemes. It will obviate the need for future retrospective exercises repeating the work of the Roads Review Panel.

The Welsh roads review looked at 51 schemes. Of the schemes themselves, 17 were considered consistent with the 4x4 criteria. For a further 17 the panel found a different approach or alternative solution preferable. The panel found no case for the remaining 14.

Therefore, to meet the advice of the UK Government’s Climate Change Committee, the HIF1 application should be rejected until it has been tested on this same 4x4 criteria. **Given that it significantly increases road capacity for cars, it is unlikely to meet the criteria for Net Zero.** It should only be accepted if it is found by an independent panel to meet the 4x4 criteria and if it does not it should be rejected.

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PLANNING APPLICATION REF. NO. R3.0138/21 - HIF1.

NEIGHBOURING PARISH COUNCILS -JOINT COMMITTEE (NPC-JC) COMMENTS ON OFFICER'S REPORT TO PLANNING & REGULATORY COMMITTEE.

Introduction

1. We write to set out a number of serious concerns regarding the Officer's Report (OR) to the P&R Committee which was released to the public on 7th July 2023.
2. ORs are required to provide impartial, objective, reasoned advice to Planning Committees and avoid even the impression of bias. It is even more important that in circumstances where Local Planning Authorities (LPAs) are determining their own applications, as is the case here (see OR paras 3-5), that ORs exhibit these qualities. Regrettably, in this instance, the OR fails to meet these requirements.
3. This note sets out our concerns in summary form, and it is trusted that we will be afforded the opportunity of expanding fully on these matters at the Committee meeting.
4. From the outset the OR is defective. Members' attention is drawn to the fact that the proposed scheme is to be part-funded to the tune of circa £240m by central government (Homes England). (OR para.1)
5. In para 2 of the OR Members are advised that the availability of this funding *"provides a unique opportunity to secure the delivery of strategic infrastructure.....essential to mitigate the impacts of planned housing growth..."*.
6. In the same para however, Members are (quite properly) advised that financial considerations are not material considerations to be taken into account in the

determination of planning applications, and that Members should not take account of the availability of funds in their decision making.

7. The use of such terms as “unique opportunity” and “essential” are hardly appropriate to an OR, and cannot be remotely characterised as impartial, objective or reasoned. Furthermore, having drawn Members’ attention to an immaterial financial consideration they are then immediately advised to ignore such a fact.
8. Due to time constraints it has not been possible to fully address all of the key issues identified in the OR. It should not be inferred from that that we agree with the OR in respect of those key issues.

Referral to Secretary of State

9. Para 7 of the OR recommends approval of the scheme, subject to referral to the Secretary of State for consideration as to whether the application should be called-in for his own determination, without any explanation at all as to why this application requires referral to the Secretary of State. Members should have been advised at this stage that, from the time of the application being lodged it was regarded as a Departure application by the then Case Officer who concluded that it should be advertised as such due to part of the proposed development to the North of the Thames falling within the Oxford Green Belt where development is restricted and regarded as “inappropriate”.
10. The OR does not address Green Belt matters until para 275, treating the Green Belt on a par with other “key issues”, rather than as a matter of national significance and importance, which is the reason for a referral to the Secretary of State in the event of the application being approved. As the NPPF states at para 137 – *“The Government attaches great importance to Green Belts”*, so much so as to disapply the presumption in favour of sustainable development in Green Belts (see NPPF para 11 footnote 7)

Green Belt

11. The OR advice to Members on the Green Belt is confusing, contradictory and misleading.
12. The advice in the NPPF on the issue of Green Belts is perfectly clear: -" 147. *Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.*

148. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations."

13. The OR has concluded that the HIF1 application proposal constitutes inappropriate development in the Green Belt (para 284). As stated in para 9 above, the presumption in favour of sustainable development no longer applies and instead the applicant must show that very special circumstances exist which outweigh the harm due to inappropriateness and any other harm which may exist, if there is to be a grant of permission (NPPF para 148).
14. However, the OR in its Part 4 – Assessment and Conclusions section commences at Para 79 by quoting from the NPPF on "the presumption in favour of sustainable development" and continues throughout this Part by repeating this presumption. This is quite simply wrong in law. As stated above, the NPPF in fact confirms, at para 11d) i, footnote 7, that, amongst other designated areas, Green Belts are an asset of particular importance where the application of NPPF policies provide a clear reason for refusing development proposals.
15. The OR concedes at paras 293 and 284 that the proposed development constitutes inappropriate development in the Green Belt due to its harm to openness, its failure to assist in safeguarding the countryside from encroachment and its failure to preserve the setting and special character of historic towns. Consequently, it seeks to rely on the "very special circumstances" exemption required by para 147 of the NPPF.
16. These are set out in para 285 of the OR. Firstly, reliance on the "critical" need to address congestion. Although the term "critical" is referred to in inverted commas, there is no reference as to the source of this term.
17. In our submission there is nothing "very special" about congestion in extra-urban areas. It is in fact commonplace, especially during peak periods. As the LTCP points out (see pages 105-107), OCC recognises that new road schemes are not a sustainable long-term solution as evidence shows that they often generate new demand and quickly reach capacity again. As our expert evidence has shown in previous consultation responses, even with the shortcomings of OCC's traffic modelling, and

even with the scheme operational, by 2034 a number of major junctions across the network will be operating at overcapacity (i.e. they will be congested).

18. Further, the LTCP recognises that when road capacity is reduced or congested traffic can also be reduced through a range of behavioural changes, such as trip reassignment and modal shifts to more sustainable modes of transport.
19. The second very special circumstance relied on in the OR is that the land has been safeguarded for development in the SOLP and VOHWLP. We have addressed this point in previous consultation responses, but suffice it to say, there is nothing very special in land being safeguarded in Local Plans. It is commonplace in Local Plans.
20. The third very special circumstance referred to in para 285 covers a range of issues including unlocking the delivery of homes, the encouragement of modal shifts and the reduction of congestion. There is nothing very special about the fact that all LPAs have housing targets to meet set out in Local Plans, and that, as stated above, some local transport networks are congested.
21. The final very special circumstance relied on is that any new river crossing would have to encroach on the Green Belt. i.e. there is no alternative to the proposed scheme. We do not accept that there are no alternatives to the current proposal, and have stated so in previous consultation responses.
22. In summary, the scheme constitutes inappropriate development in the Green Belt, conflicts with the advice in the NPPF, Core Policy 13 of the VOWH P1 and SOLP Policy STRAT6.

The Principle of Development

23. The OR at para 94 states that as the land is safeguarded in both relevant Local Plans “strong support” should be afforded to the proposal as a matter of principle. Whilst the weight to be afforded is a matter of the exercise of planning judgement, that judgement should be exercised objectively, impartially and reasonably. We have already commented on these matters above and they are not repeated here.
24. Suffice to say, that although the land is safeguarded, there is no specific policy support for this particular scheme, given the numerous conflicts with adopted Local Plan Policies and the NPPF (particularly with respect to the Green Belt). Safeguarded land should be regarded and afforded the same weight as land identified for housing or employment uses in up-to-date plans. The VoWHL Part 1 was adopted as long ago as December 2016 and the SOLP although adopted in December 2020, and both are

post-dated by the latest iteration of the NPPF 2021 and the LTCP adopted in July 2022.

25. The proposal does not benefit from the presumption in favour of sustainable development due to the operation of NPPF para 11 d) i. footnote 7 as discussed above.
26. Accordingly, any principle of development should be afforded only very limited weight in consideration of this application.

Design and Layout

27. The section of the OR headed Design and Layout includes consideration of the Didcot Garden Town, the alignment of the Didcot to Culham component, Appleford sidings, the new river crossing, Culham Science Centre, noise barriers and lighting.
28. The OR acknowledges in para 106, in respect of the vision for the Garden Town, the new Science Bridge design is contrary to the NPPF, the Didcot Garden Town Delivery Plan (DGTDP) and Policy 16b of the VoWH Part 2.
29. Notwithstanding the consultation responses of SODC and VoWHDC officers on matters considered in this section of the OR, the OR appears to fail to report to Members the full extent of the District Councils' concerns on these matters. Their consultation responses are to be found in Annex 4 of the OR, commencing at page 125 and we would recommend that Members acquaint themselves with these responses.
30. In addition to that which is set out in the OR, the VoWHDC regards the design of the bridges (both Science Bridge and Thames crossing) as being contrary to paras 126, 130 and 131 of the NPPF, Core Policies 37 and 44 of the VoWHL P1 and the DGTDP (see OR page 125).
31. SODC's Officer describes the design of the bridges variously as "mediocre, uninspiring...disappointing,...incongruous and intrusive" (para 67 page 138 OR)
32. Despite the views of the DCs professional officers however, on design matters the OR concludes that the scheme "is considered to be in accordance with development plan and national policies and guidance that seek to ensure high quality design." (OR para 133).

Access, Travel & Movement

33. We have had sight of Cllr Hicks' comments on the OR, dated 8th July 2023 with which we concur. He has particular concerns that the OR omits any reference to LTCP

Policy 36 (Road Schemes), misrepresents the LTCP's position on the requirement of road schemes and omits any reference to the headline targets of the LTCP to reduce private car trips by 1 in 4 by 2030. These are, in the context of a scheme for a new road, very surprising omissions, and lend further weight to our view that the OR, taken as a whole, fails to meet the requisite standards of objectivity, impartiality and reasonableness.

34. In addition to Cllr Hicks' comments we also set out below the comments of our expert traffic modeller on the OR. He states:

- Re Cycle and Pedestrian access – the design does seek to deliver segregation along the length of the scheme, notwithstanding this as noted in paragraph 102, the scheme notes that pedestrians and cyclists will be required to give way to vehicles. This could be a barrier to encouraging active travel and it is recommended that the scheme considers at junctions etc that priority is reversed.
- Didcot Garden Town has standing principles of delivering a quality environment that reduces car use, improves the environment and promotes green infrastructure. The scheme is not delivering infrastructure that promotes sustainable travel for buses. The County Council believe that the design reduces congestion therefore negates the need for bus priority. That said junctions around the route demonstrate that in 2034, traffic volumes will grow substantially as such the need for bus priority may need to be monitored over time to ensure delays are mitigated.
- Moreover, the Committee may need to consider if the scheme is doing enough to ensure that the principles of the Garden Town are being adhered to in respect of encouraging new sustainable development as noted in paragraph 110.
- The LTCP, as noted in paragraph 136, explains that Oxfordshire is seeking to achieve a net zero transport and travel system in the County. The justification for this scheme is to enable growth to take place. The key scheme objective should be that the options assessment is targeted to ensure all other options have been exhausted first;
- Current car dependence in Didcot sits at 66%, the Officer believes the scheme with mitigation measures could seek to reduce this, however this needs to be balanced against the results of the modelling and criticism of the District Councils and the Parish Councils concerned that the scheme does not facilitate public and active travel;

- It should be referenced around bus service and infrastructure improvements that are potentially delivered as a result of the works as noted in in paragraph 146, but as above, this should be squared against the results of the modelling.
 - The OR does not go into detail for the TDC’s decision as to why they consider that the modelling is robust, and as such it is recommended that the original arguments around induced demand and the network at certain junctions being oversaturated in 2034 remain valid;
 - The OR states that this is one part of wider strategy to mitigate the impact of development. This is not a material consideration as there is no funding or commitments to deliver these improvements;
 - Journey times will worsen in 2034 as a result of increased demand, this is justified in paragraph 153 as a result of facilitating new development;
 - Abingdon has not been modelled and it is noted that limited investment will take place here, save for traffic strategies around signal controls, this will make queuing more of a problem on the approaches to the town.
35. Our traffic expert emphasises that these comments are additional to those previously submitted by him by way of consultation responses by the NPC-JC, to which we would draw Members’ attention.
36. Even without factoring in the phenomenon of induced demand it is clear from the Paramics model that the proposed scheme will result in very substantial increases (approx. 42%) in travel by private car across the network. (See, for example, Appendix F of the Transport Assessment Part 4 page 63 – Tables 30-32).
37. The facilitation and enabling of such increases by the provision of new road capacity is wholly contrary to the NPPF and the newly adopted LTCP.

Air Quality

38. We have responded previously on this matter in consultation responses, We would draw Members’ attention to our submission dated 17th January 2023. Our concerns expressed there remain unaddressed.

Noise and Vibration

39. The OR acknowledges that the proposed development is contrary to Policies ENV11 and ENV12 of the SOLP, together with Policies 23, 24 and 25 of the VoWHLP Part 2. The OR concludes that these harms should be weighed in the planning balance together with any other harms identified and set against any purported benefits of the scheme. However, the OR fails to report that the accuracy of the noise assessment has been challenged, by evidence that the severity and extent of the noise impacts is much larger than the assessment acknowledges. We would draw Members' attention to our submission dated 17th January 2023, on noise and the Environmental Statement.

Landscape and Trees

40. The OR acknowledges that the proposed development would be contrary to Policies ENV1 and ENV2 of the SOLP, Core Policy 44 of the VoWHLP and the County Tree Policy for Oxfordshire in that the development would result in the loss of substantial numbers of trees, hedgerows and tree canopy (OR para 197). Such harm should be afforded very substantial weight in the planning balance.

41. Our landscape consultant has the following comments:

- The OR constantly seeks to downplay large significant impacts at Year 1 to minor/localised impacts in Y15, as tree planting matures. There is no meaningful explanation of why any given impact reduces or the extent to which the impact of tree planting can mitigate a very large engineering structure.
- In its assessment of impact on the Green Belt, the applicant now agrees (OR 282-284) that the landscape impact cannot be adequately mitigated to avoid significant harm to the openness of the Thames corridor and the landscape character around Clifton Hampden. This directly contradicts the assertion that harm reduces from significant to minor/localised, at least for the half of the route within the Green Belt.
- The OR generally lumps the Thames Path National Trail in with a number of other areas of significant adverse impact, when it should be treated individually as a major very large adverse impact on an asset of designated national importance. This puts it in the highest possible category of environmental impact other than 'international importance', which creates a very high bar against which to assess the balance of benefit versus harm.
- The OR makes very little mention of the impact of the squat viaduct over the gravel lakes just south of the Thames crossing. The impact was not considered in assessments

prior to 2018 as the gravel extraction was still operating. The retrospective assessments are totally unconvincing, since there was inevitable pressure to avoid contradicting previous assessments. The main lake has considerable value as a tranquil haven for biodiversity and quiet recreation in a wider area under considerable development pressure, the loss of which would be very regrettable and anything but visionary planning.

- The Appleford Sidings route and design are flatly unacceptable for their impact on local residents, and could have been avoidable with better route planning. Whilst the scheme has to be judged on its merits rather than the availability of preferable alternatives, the question has to be asked whether this was the only practicable option, since only then might it be concluded that it is unavoidable in spite of its high level of harm, because the road had to be where it is. The scheme is not acceptable on its merits because one of its greatest areas of impact was avoidable.

42. Additionally, significant weight should be afforded to the consultation responses of the Landscape Officers of SODC and the VoWHDC.(OR pages 126-127 para 11) It is reported:

“The submitted response to landscape comments shows a lack of willingness to include even otherwise unusable areas of land for planting to help with mitigation. This approach to landscape mitigation is reflected throughout the proposals, resulting in a scheme where the extent of mitigation appears to have been predominantly limited to the operational land take, rather than defined by an assessment of landscape and visual mitigation requirements.”

43. As stated, the OR seeks to downplay the various harms identified by suggesting that the development “would protect and enhance the landscape as far as is reasonably practicable” (OR para 204). Members are not advised that the greatest loss of trees and harm to landscape occurs within the Green Belt between Culham and Clifton Hampden.

44. Neither ENV1, ENV2 of the SOLP nor Core Policy 44 of the VoWHLP make any reference whatsoever to a “reasonably practicable” qualification of harm. It is perfectly clear that the proposal would fail to protect or enhance the landscape. This is a further example of the OR failing to advise Members fully on very important matters of policy and is highly misleading.

Biodiversity

45. As with its treatment of Landscape and Trees, the OR seeks to downplay the adverse impacts that the scheme will have on biodiversity. OCC produced in November 2022 an Oxfordshire Climate and Natural Environment Policy Statement, which seeks to achieve a 20% Biodiversity Net Gain (BNG) in respect of development proposals. (OR para 208). This should be regarded as a material consideration in consideration of this proposal.
46. Further, when the Environment Act 2021 comes into force a minimum 10% BNG will be required. Para 174 of the NPPF requires measurable BNG. The Wildlife Trust continues to maintain an objection to this scheme.
47. The OR recognises “some impacts on biodiversity” (OR para218), without advising that these impacts will be adverse, but suggests that these could (not would) be avoided or reduced or mitigated by way of planning conditions. Whilst the use of planning conditions are a perfectly acceptable means of mitigating adverse impacts, in this instance Members do not have the benefit of being able to consider draft conditions, as none have been submitted in the OR for consideration.
48. The OR further advises that prior to the first operational use of the new road that an updated BNG Assessment be submitted demonstrating a minimum 10% BNG. (OR para 218). This is wholly unacceptable. It is quite inconceivable that in circumstances where a new road has been built out, that its use would be effectively stopped in the event of a 10% BNG not having been achieved.
49. Para 56 of the NPPF advises that planning conditions should be enforceable and precise, and that where they are to be used they should be agreed early in the planning process. Pre-commencement conditions should be avoided without clear justification. Annex 1 to the OR sets out proposed conditions, the greater part of which appear to be pre-commencement conditions.
50. Members do not have the benefit of fully drafted or agreed conditions, simply an outline of conditions proposed. The OR’s treatment and approach to planning conditions represents a further conflict with the requirements of the NPPF.

Climate Change

51. In respect of concerns in relation to Climate Change Members are referred to our previous consultation responses, together with those of Oxford FoE.

52. The OR (paras 231-232) makes reference to the Climate Change Commission (CCC) Report which was published in June 2023 which was after our last consultation response and this Report warrants comment.
53. The OR fails to report to Members significant findings of the CCC which are highly relevant to this proposal. The CCC Report notes “Surface transport remains the UK’s highest emitting sector, contributing 23% (105MtCO₂e) of total emissions in the UK. It expresses concerns that carbon savings from plug-in hybrid vehicles (PHEVs) are three to five times lower in the real world than previously assumed and also questions the commitment to achieving modal shifts (page 108). It further states that road transport demand in 2022 is around 5% below pre-pandemic levels and could represent a new “steady state” (page 113). This new base level has, of course, not been taken into account in the traffic model.
54. The CCC also states that “measures to limit growth in road traffic are also crucial for decarbonising transport (page 113), and that “without policy action to embed a reduction in the need to travel by car or grow the availability and attractiveness of alternative lower-carbon modes, traffic is likely to increase beyond the CCC’s pathway.” (page 113) In stark terms, carbon reduction targets will not be achieved unless travel by private car is significantly reduced.
55. The analysis in the OR is severely flawed for the following reasons.
- i. The most important flaw, which invalidates the OR’s conclusions on climate change, is that the OR’s assessment assumes that there will be as much traffic if the HIF1 scheme was built compared to if it was not built. This flaw has been confirmed by Professor Phil Goodwin, emeritus Professor of Transport Policy at UCL. If, instead of assuming, without evidence, (as the OR does) that no additional traffic would be generated, and that carbon emissions for HIF1 would be comparable to actual emissions from historically delivered road schemes, operational emissions for the HIF1 would be much higher than admitted at around 359ktCO₂e.
 - ii. The OR fails to report CCCs conclusion that the passive provision of active travel infrastructure is insufficient to encourage a reduction in car travel and a shift towards active travel. Research shows that the most effective interventions include congestion charges, limiting access by car to certain areas, and parking control, i.e. measures that increase the cost and reduce the convenience of car travel. The Climate Change Committee recognises this, and recommends measures to reduce

car demand. Instead of these, the HIF1 scheme makes it more convenient to get around by car.

56. The OR fails to advise Members on specific policies in the LTCP to which significant weight should be afforded. These include the headline target of replacing or removing 1 out of every 4 current car trips in Oxfordshire by 2030 and delivering a net-zero transport network with 1 out of every 3 car trips reduced or removed by 2040. LTCP Policy 36 is of particular relevance, and as Cllr Hicks has pointed out, the OR fails to refer to it, misrepresents LTCP policy and omits any reference to car reduction targets.
57. The OR summary on Climate Change (para 243) makes no mention of the LTCP whatsoever, and the assertion that this scheme would lead to an overall carbon saving is wholly unsupported by the evidence. As such, this proposal conflicts with the LTCP, the NPPF, DES7 and DES8 of the SOLP and Core Policies 37, 40 and 43 of the VoWHLP Part 1.

Water Quality & Pollution

58. The proposed scheme can only be made policy compliant through the adoption of a tranche of planning conditions. Our comments on the OR's suggested use of conditions are set out above, and not repeated here.

Historic Environment

59. The OR acknowledges that the scheme will cause harm to a number of cultural heritage assets, and advises that these harms need to be balanced against any public benefits that flow from the proposed development. These assets include a Scheduled Monument, Grade I Nuneham Courtenay Registered Park and Garden and Conservation Area and Clifton Hampden's Conservation Area.

Impact on Agricultural Land

60. There is a general policy requirement to avoid the loss of Best and Most Versatile (BMV) agricultural land, reflected in the NPPF, Policy DES7 of the SOLP and Core Policy 43 of the VoWHLP Part 1. The OR (para 302) states that this development will

result in the permanent loss of 39.4ha of BMV land, and that this loss is both “significant and harmful” (OR para 304).

61. Significant weight should be applied to this loss, yet the OR advises that it would be acceptable due to the fact that OCC has sought to avoid such loss, albeit unsuccessfully, and that there are no alternative options available. (OR para 305)

Other Matters

62. The OR paras 323 and 324 addresses our previous response that no Health Impact Assessment (HIA) has been submitted by OCC as explicitly required by LTCP Policy 9, stating that the ES provides sufficient information for such an assessment to be made.
63. Policy 9 of the LTCP refers to the requirement for an HIA to be submitted for “larger-scale infrastructure proposals”. Given that most, if not all, larger scale infrastructure proposals will be regarded as EIA development, an ES would need to be submitted in any event. The only reasonable interpretation of Policy 9 is that an HIA is required in addition to an ES, and that an ES cannot be regarded as a substitute for an HIA. The policy requirement of Policy 9 of the LTCP remains unmet.
64. The OR at para 325, misunderstands our previous response referring to a recent CPO Inspector’s Report. We are fully aware that the CPO process is separate from the planning process, but the findings of the Inspector in respect of viability and deliverability are equally relevant to the planning process. Our previous comment is not that there is a risk of CPOs not being confirmed (although that is the case), but that the proposed scheme as detailed in this full application runs the risk of not being fully delivered due to economic uncertainties at a local and national level.

Overall Conclusion & Planning Balance

65. The concluding section of the OR is highly unsatisfactory. The only policy conflicts recognised are in respect of noise (see OR para 336), despite the numerous policy conflicts identified by the professional officers of SODC and the VoWHDC, other statutory and non-statutory consultees and those conflicts set out above and in our previous consultation responses.

66. Members are not advised on the weight and significance to be afforded to those conflicts, and mis-advised as to the operation of para 11 of the NPPF. The concluding section makes no mention at all of the recently adopted LTCP.
67. The reasons for refusing this application are overwhelming and for all the reasons set out above and previously submitted this application should be refused.

Submitted on behalf of the NPC-JC

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Planning & Environmental Consultant

12 July 2023



Implementing ‘Decide & Provide’: Requirements for Transport Assessments

Final draft, September 2022

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Executive Summary

Oxfordshire County Council's (OCC) Local Transport and Connectivity Plan (LTCP), adopted July 2022, outlines a clear vision to deliver a net-zero Oxfordshire transport and travel system by 2040, improving health and wellbeing, tackling the climate emergency, reducing private vehicle use, and prioritising walking, cycling, and public transport.

As detailed in the LTCP, in order to achieve this, fundamental changes to the way the county's transport and travel system functions will need to be made. Such a substantial undertaking will necessarily entail a multi-pronged approach to reshaping the way places are connected.

Stemming from the framework set out in the LTCP there will be numerous strategies which will contribute to setting out how the transport and travel system is upgraded and reconfigured in order to achieve these aspirations. Amongst these, the forthcoming area transport strategies and transport corridor strategies will be key, as will OCC's new Parking Standards for New Developments (2022) document and the Street Design Guide (2021), which will help to ensure sites are master-planned to give primacy to high-quality walking, cycling, and public transport provision.

As set out in Policy 36 of the LTCP, another significant element of realising these aims will be to make the shift from an approach to transport planning characterised as 'predict and provide' towards adopting a 'decide and provide' approach instead.

This document details how the 'decide and provide' approach is to be implemented through the transport assessments (or transport statements) and infrastructure delivery mechanisms which accompany planning applications for proposed development.

Whilst the document focuses on how the transport assessment process needs to be adapted to help facilitate the 'decide and provide' approach, this forms only one part of working towards adopting this new approach to transport planning. Such an endeavour needs to stem from a comprehensive rethinking of spatial and transport planning, beginning at a strategic level and continuing throughout all stages of planning.

This document is primarily intended for use by developers and their consultants, transport officers at the county, and planning officers at the district and city councils. It applies to all developments but will be particularly pertinent to large residential and employment sites that are expected to generate significant travel demand. More detailed information on how different developments will need to follow this document is provided under the section, 'Stage 2: Scenario testing' (see section 3.4, pp.15-17).

The document is based on guidance that TRICS (2021) has produced, called the 'Guidance Note on the Practical Implementation of the Decide & Provide Approach' with further detail and requirements provided relevant to the LTCP.

It is set out in three main parts: the first outlines the guiding principles that underpin this approach; the second discusses how potential traffic impacts are to be modelled and how trip rates should be appropriately evidenced; and the final part details the process (summarised in the flow-diagram at Appendix 1) for implementing the approach through transport assessments by modelling a range of plausible scenarios and monitoring and managing outcomes.

PART ONE | Guiding Principles

This first part of the document explains the principles underpinning the 'decide and provide' approach; how transport assessments have been undertaken in the past; how the new approach will be based on the TRICS guidance; the role that this document plays as part of a wider set of strategies to decarbonise the transport network; and how this document relates to the National Planning Policy Framework (Ministry of Housing, Communities and Local Government, 2021) and the policies of the county's five local plans.

1.1 'Decide and Provide' instead of 'Predict and Provide'

1.1.1 As outlined in the LTCP, 'predict and provide' can be broadly described as an approach to transport planning that uses current or historical traffic patterns to determine the future need for infrastructure. However, this approach tends to simply maintain the status quo by perpetuating dependence on the private car through provision of additional highway capacity.

1.1.2 By contrast, the 'decide and provide' approach to transport planning decides on a preferred vision of the future and then provides the means to work towards that whilst also accommodating uncertainty about the future. This offers the opportunity for more positive transport planning and will help to implement the LTCP transport user hierarchy by considering walking, cycling and public transport upfront.

1.1.3 This approach is captured in LTCP Policy 36 (2022a, p.106), which states that:

We will:

- a. Only consider road capacity schemes after all other options have been explored.
- b. Where appropriate, adopt a decide and provide approach to manage and develop the county's road network.
- c. Assess opportunities for traffic reduction as part of any junction or road route improvement schemes.
- d. Require transport assessments accompanying planning applications for new development to follow the County Council's 'Implementing 'Decide & Provide': Requirements for Transport Assessments' document.
- e. Promote the use of the 'decide and provide' approach in planning policy development to support site assessment.

1.2 Transport Assessments and the TRICS database

1.2.1 Traditionally, standard practice has been for transport assessments for large residential and employment sites to use data from the TRICS database to determine the anticipated vehicular trip generation (or trip rates) of a proposed development based on recent traffic survey data for comparable sites across the country.

1.2.2 Combined with census data from the Office for National Statistics (ONS) to determine geographical distribution patterns, trip rates have then been used to identify the potential traffic impact on the highway network, and in combination with the identification of connectivity needs for active and sustainable modes, transport modelling has then been used to identify where capacity on the network is exceeded.

1.2.3 Typically, developers have been required to improve junctions that have been forecast to be over capacity in future years where issues arise as a direct result of impacts

attributable to their development proposal. Alternatively, in locations where more comprehensive intervention has been identified as necessary, they have made financial contributions towards strategic schemes to be delivered by OCC. This tends to be in cases where third-party land is required, or where significant problems arise from the impact of multiple development sites and therefore not the responsibility of any individual development to resolve.

1.3 The new approach and the TRICS guidance

1.3.1 The new approach to undertaking transport assessments that OCC requires developers to follow is based on guidance that TRICS (2021) has produced, called the 'Guidance Note on the Practical Implementation of The Decide & Provide Approach'. OCC's document builds on the TRICS advice adding further detail where necessary and ensuring that it relates appropriately to the LTCP and Oxfordshire.

1.3.2 Essentially, this new approach still entails the need for proposed developments to assess their potential transport impact on the highway network, but instead of basing this solely on previous travel patterns as before, transport assessments will be required to model a range of plausible scenarios. As such transport modelling will still be necessary.

1.3.3 These plausible scenarios will be based on the characteristics of the proposed development site's location, its existing connectivity, the mitigation or connectivity improvements that will be either delivered directly by the site developers or through financial contributions towards OCC schemes, and the extrapolation of trends in travel behaviour.

1.3.4 The document also sets out how, through S106 legal agreements and travel plans, the impacts of developments will need to be monitored and managed over time.

1.3.5 Further to this, rather than identifying junctions that are forecast to be over capacity and then providing schemes to increase capacity for private vehicles, developers will instead be expected to first consider the extent to which they could address these issues by making provision for sustainable and active modes. These provisions should be of a sufficiently high quality to achieve the requisite modal shift to address the identified capacity issues. It should also be ensured that the provisions comply with policies requiring the promotion of sustainable and active modes, including due consideration of the transport user hierarchy identified in policies 1 and 2 in the LTCP (see further discussion of policy in sections 1.5-1.7).

1.3.6 Additionally, as before, in many cases development proposals will still be expected to make contributions towards strategic improvements to be delivered by OCC in addition to direct delivery of schemes by site developers as appropriate.

1.3.7 Whilst planning obligations will still be required to meet the tests set out in paragraph 57, p.16 of the National Planning Policy Framework (NPPF) and Regulation 122(2) of the Community Infrastructure Levy Regulations 2010, it is essential to note that following the requirements of this document will not afford developers an opportunity to reduce expenditure on appropriately justified infrastructure requirements or other planning obligations, such as contributions to public transport service enhancements or 'soft' measures such as car clubs, etc. As the TRICS guidance notes (2021a, paragraph 7.17, p.22):

It is important to state that the use of scenarios should not be carried out as a mechanism to minimise investment in the transport infrastructure. Using D&P [decide and provide] does not reduce the overall investment, rather it redistributes it to other travel modes.

1.4 The role of this document as part of other planning processes

1.4.1 It is important to note that individual sites will make a valuable contribution to decarbonising the transport network and are required to have demonstrated that they have mitigated their transport impact through policy-compliant means. However, decarbonising the transport network will not be most effectively achieved by only addressing transport needs on a site-by-site basis. Referring back to the necessarily multi-pronged approach to reshaping the transport network, this document, and the practices it requires are embedded through transport assessments (and transport statements), will form only one part of the means necessary to achieving the key aims of the LTCP.

1.4.2 Of fundamental importance will be ensuring that, through the forthcoming local plans for each of the district and city councils, development is allocated in locations where there are the best opportunities for reducing the need to travel by co-locating residential and employment uses, or where exists the best opportunities for providing high-quality active and sustainable transport infrastructure improvements.

1.4.3 These opportunities will need to be thoroughly explored and identified through the associated plan-making processes, as well as in more detail at the planning application stage. It is also important to acknowledge that this document and its requirements apply equally to allocated and non-allocated development sites.

1.4.4 Further to this, it will be important to ensure that these new practices promoted by OCC – including the forthcoming LTCP corridor and area strategies (and any resultant strategic schemes identified by OCC), this document, and the new Parking Standards for New Developments document – are appropriately referenced within the core policies of the forthcoming local plans, as these carry greater weight in planning decisions than the LTCP does by itself.

1.5 National and local policy context

1.5.1 Although this document sets out a new way of undertaking transport assessments and puts a greater emphasis on giving primacy to ensuring high-quality walking, cycling, and public transport provision across the county than has previously been the case, there is a significant body of existing policy that is supportive of this new approach. Provided below is a summary of the relevant national and local policy that lends weight to moving towards the ‘decide and provide’ approach.

1.6 NPPF and the DfT’s Decarbonising Transport plan

1.6.1 Section nine of the NPPF discusses the promotion of sustainable transport, which supports the aims of this document. Paragraph 104 (p.30) states that:

Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- a) the potential impacts of development on transport networks can be addressed;
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;
- c) opportunities to promote walking, cycling and public transport use are identified and pursued;

d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and

e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

1.6.2 Additionally, paragraphs 110 to 113 (pp.31-32) stipulate how development proposals should be considered. Of particular note, it states that it should be ensured that (p.32), “appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location”.

1.6.3 Further to this, a key consideration when considering the sufficiency of connectivity provision for a development proposal is the requirement for it to be ensured that (p.32), “safe and suitable access to the site can be achieved for all users”. Bearing this in mind in the context of the subsequent paragraph, which states (paragraph 111, p.32):

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.

...if a proposed development has not provided for safe and suitable connections to the site for walking and cycling, this should be considered to be an unacceptable impact on highway safety.

1.6.4 Finally, the Department for Transport (DfT) has produced a plan which sets out the government’s commitments and the actions needed to decarbonise the entire transport system in the UK, this is called, ‘Decarbonising transport: a better, greener Britain’ (DfT, 2021a), and states (p.158):

We recognise that the government has a role in helping Local Planning and Highways Authorities to better plan for sustainable transport and develop innovative policies to reduce car dependency. We need to move away from transport planning based on predicting future demand to provide capacity (‘predict and provide’) to planning that sets an outcome communities want to achieve and provides the transport solutions to deliver those outcomes (sometimes referred to as ‘vision and validate’). We will continue to work with MHCLG to identify how we can best support local authorities to develop innovative sustainable transport policies as part of the planning process, how this can be used to better assess planning applications, and better monitor local transport outcomes to deliver on our ambitions for sustainable transport use.

1.7 Local Plan policies

1.7.1 The four district councils and the city council all have policies in their respective local plans strongly supporting the promotion of sustainable and active transport modes and seeking to reduce the need to travel, key extracts from these policies are listed below.

1.7.2 Cherwell Local Plan 2011-2031: Part One, Policy SLE 4: Improved Transport and Connections (p.55):

All development where reasonable to do so, should facilitate the use of sustainable modes of transport to make the fullest possible use of public transport, walking and cycling. Encouragement will be given to solutions which support reductions in greenhouse gas emissions and reduce congestion.

1.7.3 Oxford Local Plan 2036, Policy M1: Prioritising walking, cycling, and public transport (pp.104-106):

Planning permission will only be granted for development that minimises the need to travel and is laid out and designed in a way that prioritises access by walking, cycling and public transport.

1.7.4 South Oxfordshire Local Plan 2011-2035, Policy TRANS2: Promoting Sustainable Transport and Accessibility (pp.149-150):

The Council will work with Oxfordshire County Council and others to...

- iii) ensure new development is designed to encourage walking and cycling, not only within the development, but also to nearby facilities, employment and public transport hubs;
- iv) support provision of measures which improve public transport (including Park & Ride), cycling and walking networks within and between towns and villages in the district;

and Policy TRANS4: Transport Assessments, Transport Statements and Travel Plans (p.153):

Proposals for new developments which have significant transport implications that either arise from the development proposed or cumulatively with other proposals will need to submit a Transport Assessment or a Transport Statement, and where relevant a Travel Plan. These documents will need to take into account Oxfordshire County Council guidance and Planning Practice Guidance and where appropriate, the scope should be agreed with Highways England.

1.7.5 Vale of White Horse Local Plan 2031: Part One, Core Policy 33: Promoting Sustainable Transport and Accessibility (p.124):

The Council will work with Oxfordshire County Council and others to...

- ii. ensure that developments are designed in a way to promote sustainable transport access both within new sites, and linking with surrounding facilities and employment

and Core Policy 35: Promoting Public Transport, Cycling and Walking (p.126):

- iii. ensure that new development is designed to encourage walking as the preferred means of transport, not only within the development, but also to nearby facilities and transport hubs

1.7.6 West Oxfordshire Local Plan 2031, Policy T1: Sustainable transport (p.90):

Priority will be given to locating new development in areas with convenient access to a good range of services and facilities and where the need to travel by private car can be minimised, due to opportunities for walking, cycling and the use of public transport, particularly where this would help to reduce traffic congestion on the routes around Oxford and the Air Quality Management Areas at Witney and Chipping Norton.

and Policy T3: Public transport, walking and cycling (p.101):

All new development will be located and designed to maximise opportunities for walking, cycling and the use of public transport.

PART TWO | Transport Modelling, Evidencing Trip Rates, and Document Updates

This part of the document sets out the assumptions that should be made for permitted, committed and planned growth; the suitability of various evidentiary sources; the consideration of the long-term effects of Covid-related transport impacts; the relationship between car parking provision and trip rates; the applicability of the car trip reduction targets in the LTCP; how this document should inform the evidence base for local plans; and the requirement for periodic updates to the document.

2.1 Assumptions for permitted, committed, and planned growth

2.1.1 As before, a scoping exercise will need to be undertaken to ensure that transport assessments (and transport statements) take appropriate account of permitted, committed, and planned growth which will generate traffic impacts on the area of the highway network also impacted by the proposed development.

2.1.2 Amongst other matters, this will need to be considered in the context of whether it is intended for TEMPro (using DfT data to forecast the growth in trip origin-destinations over time) to be used and the appropriate inclusion of growth allocated in an emerging or adopted local plan.

2.1.3 As with proposed development itself, different scenarios accounting for permitted, committed, and planned growth may be required based on various plausible trip generation scenarios. This may include scenarios that assume that background growth will generate trips derived from current travel behaviours or that reductions in private car dependence will be achieved, which can be attributed to suitable rationale and evidence.

2.1.4 When considering the scenarios to be tested to account for background growth reference should be made as appropriate to the scenarios and assumptions identified in Table 1 (p.29, 2018) of the DfT's Road Traffic Forecasts 2018: Moving Britain Ahead.

2.1.5 Further to this, future year scenarios will need to be tested appropriate to the specific development proposal (taking into account its scale, build-out programme, etc.) and will need to be agreed with OCC transport officers. Where relevant, future year scenarios will also need to be agreed with National Highways.

2.1.6 In this way, the transport assessment can ensure that the residual cumulative impacts on the transport network can be adequately identified and addressed as required in the NPPF (paragraphs 111 and 113, p.32).

2.2 Sources of evidence for justifying trip rates

2.2.1 As importantly noted in the TRICS guidance (2021a, p.24):

A clear evidence-based approach to D&P should be taken and reported upon in the TA (or TS) accordingly. A robust evidentiary base, transparently and accurately sourced, remains as important as ever. Up-to-date and relevant evidence should be cited wherever possible.

2.2.2 The starting point for determining existing and forecast multi-modal trip rates for all scenarios will be using the TRICS database. However, should supplementary evidence be considered useful or necessary, the inclusion of other evidentiary sources could be considered.

2.2.3 One such potential source may be to utilise travel to work data from the ONS census in 2011. Census data from 2021 is not suitable as it was undertaken in the midst of the Covid pandemic so is not representative of typical travel patterns due to a number of influencing factors. How TRICS and census data can be utilised is discussed in more detail in Part Three (pp.12-21).

2.2.4 Other potential sources may include existing survey data from other sites, survey data of other locations commissioned by the applicants of the proposed development, or empirical studies from academic sources as long as they are from an appropriate timescale (typically no older than 3-5 years) and are sufficiently comparable in respect of location, proximity to key services, connectivity characteristics (i.e. walking, cycling, and public transport provision), and other significant variables.

2.2.5 The use of all evidentiary sources will need to be appropriately justified and their acceptability must be agreed with OCC transport officers. Where relevant, evidentiary sources will also need to be agreed with National Highways.

2.2.6 Use of DfT National Travel Survey (NTS) data to forecast multi-modal trip rates is not considered acceptable unless it can be justified that it is directly relatable to the specific characteristics of the proposed development. Typically, referencing national trends will be unacceptable as these are not directly relevant to any specific location. The NTS acknowledges the limitations of its findings in its Quality Report (DfT, 2020a, p.3), stating:

The NTS is not designed to produce robust data below regional level. Whilst it is possible to analyse data for smaller geographies than regions, for example local authorities, often many years of data need to be combined to obtain a suitable sample size. Even then this is not ideal as weightings are applied to the sample to be representative of England. This is likely to skew analyses as demographics at sub-national level can vary significantly from the national level.

2.2.7 Furthermore, while the NTS identifies a trend in the reduction of annual trips (DfT, 2020b, p.1) at the national level, analysis of ONS census data from 2001 and 2011 (Marsden, 2018) shows that this reduction has fallen more sharply in urban areas than in rural areas. Additionally, while the commuting mode share for private cars in London and regional centres has decreased over the same period, the mode share for private cars has instead increased in smaller towns and rural areas.

2.3 Accounting for Covid-related transport impacts

2.3.1 As noted in the LTCP (2022a, p.12), the long-term effects on travel behaviour resulting from the ongoing Covid-19 pandemic are still not yet known. Although much speculation has taken place about the potential shift towards more homeworking for office-based jobs, it remains too early to make any meaningful or quantifiable judgements about how shifts in travel behaviour are likely to be impacted in the mid to long-term.

2.3.2 Indeed, as of April 2022, traffic count data recorded across Oxfordshire by OCC shows that there is an uneven impact on peak time traffic levels and five-day average flows, with some areas seeing a return to pre-pandemic levels, while other locations are above or below pre-pandemic levels. Meanwhile, bus patronage typically remains significantly lower than pre-pandemic levels.

2.3.3 Accordingly, it may only be appropriate to include any predictions about Covid-related impacts on mode share or trip generation in future year scenarios as sensitivity tests at this juncture. However, should new travel patterns begin to emerge over the

course of the coming years and there is suitable supporting data to evidence these new behaviours, these could be considered in transport assessments in the mid to long-term as a separate scenario to be tested alongside other scenarios. Any suppositions made would also need to be carefully monitored to record whether these in fact materialise.

2.3.4 Collecting this data through monitoring will make an important contribution to understanding these emerging travel behaviour patterns, as recognised by the International Transport Forum in their Travel Transitions research report (2021).

2.4 Car parking provision and trip rates

2.4.1 Parking provision must be proposed in line with OCC's new Parking Standards for New Developments (2022). Studies have shown that the availability and convenience of car parking can have an effect on car usage, both at journey origin from residential developments (Transport for London, 2012 and Guo, 2013) and, in the context of commuting, at journey destination (Dalton, *et al*, 2013 and Christiansen, *et al*, 2017), with parking costs also an important factor.

2.4.2 However, these studies also show that there are a number of other factors that also influence car usage, including public transport availability and travel time or distance to work. Accordingly, when setting trip rate assumptions in transport assessments (or transport statements), the proposed car parking provision can be considered as an influencing factor but should not be identified in isolation as a means of reducing anticipated car trips.

2.4.3 Providing car parking in line with the latest OCC standards (alongside cycle parking) will need to form part of a wider strategy to encourage modal shift by providing improvements to sustainable and active modes, demand management measures, and master planning (in accordance with OCC's Street Design Guide, 2021).

2.5 Use of LTCP car trip reduction targets

2.5.1 The LTCP includes the following targets for replacing or removing car trips across the County (2022a, p.6):

By 2030 our targets are to:

- Replace or remove 1 out of every 4 current car trips in Oxfordshire
- Increase the number of cycle trips from 600,000 to 1 million cycle trips per week
- Reduce road fatalities or life changing injuries by 50%

By 2040 our targets are to:

- Deliver a net-zero transport network
- Replace or remove an additional 1 out of 3 car trips in Oxfordshire

By 2050 our targets are to:

- Deliver a transport network that contributes to a climate positive future
- Have zero, or as close as possible, road fatalities or life-changing injuries

2.5.2 At the time of writing, the means of achieving these targets have yet to be comprehensively identified. The forthcoming area transport strategies and transport corridor strategies, OCC's new Parking Standards for New Developments (2022) document and the Street Design Guide (2021) will all play important roles in working towards these targets, as will the emerging local plans, and individual development sites.

2.5.3 Therefore, it may be challenging to substantiate how these targets will be achieved to a sufficient degree of certainty for the purposes of modelling a core scenario. However,

with respect to traffic generated by a development site or background and committed growth, it may be appropriate for transport assessments to include additional sensitivity scenarios with these target reductions as a basis for trip rate assumptions. For further discussion of how uncertainty should inform the choice of core and alternative scenarios, see paragraphs 1.3 and 3.50 of the DfT's Uncertainty Toolkit (2021b) and sections 3 to 5 of the DfT's TAG Unit M4: Forecasting and Uncertainty (2019).

2.5.4 Furthermore, as the means of achieving these targets will not solely be within the control of any particular development proposal – rather they will be contributing towards these aims – it would be inappropriate for an accompanying transport assessment (or transport statement) to assume the delivery of strategic improvements is sufficiently certain, notably in the potential absence of funding or planning permission.

2.5.5 Some exceptions may be made for a specific scheme if a particular impact on site traffic or background growth is directly attributable to said scheme and if it has sufficient certainty of delivery (e.g. is fully funded and has planning permission).

2.6 Transport modelling for Local Plans

2.6.1 It is anticipated that the evidence base produced for the local plans of the respective districts and the city will be supported by modelling undertaken using the Oxfordshire Mobility Model.

2.6.2 To ensure a consistent approach with transport assessments for individual development proposals, the evidence bases for local plan development should also adopt a similar methodology as required in this document by modelling a range of plausible scenarios, which incorporate different assumptions about trip generation.

2.6.3 In this way, the plan-making process (as described in section 1.4) can anticipate potential issues with various spatial strategies that may be under consideration. It will enable the more successful identification of opportunities to ensure suitably high-quality sustainable and active mode connectivity, and opportunities to reduce the need to travel.

2.6.4 Accordingly, as with the process for identifying impacts at the planning application stage, the transport evidence for plan-making must also consider multiple plausible scenarios for trip generation (see Stage 2: Scenario testing, pp.15-17) associated with the spatial strategy identified in the local plan. This will help to ensure that connectivity for sustainable and active modes can be provided for sufficiently and instances where failing to do so results in locations on the highway network that are over capacity are understood.

2.7 Future updates to this document

2.7.1 In order to keep aligned to changes in local and national policy and legislation, this document will be periodically reviewed and updated. For example, the Planning for the Future White Paper (MHCLG, 2020, p.62) proposed significant reforms to the combined system of S106 contributions and the Community Infrastructure Levy by consolidating them into a single levy at a nationally-set rate. If such changes were to take place, this would prompt the requirement for this document to be amended accordingly.

2.7.2 It is recognised that the approach in this document represents a significant change in how transport assessments are undertaken, how the resultant connectivity improvements are identified, and how impacts are monitored over time. As the TRICS guidance acknowledges (para 11.7, p.29):

As transport professionals, we are directly experiencing the paradigm shift to a new D&P approach. It can be uncomfortable moving on from familiar and ingrained ways of working and we can only learn by doing.

2.7.3 Considering this represents a new way of working it is also possible that changes will need to be made to refine how the document works in practice. It is anticipated that a review of the OCC document will take place every 12-18 months, in line with the timescales identified in the TRICS guidance (paragraph 1.8, p.8).

DRAFT

PART THREE | Implementing ‘Decide and Provide’ within Transport Assessments

This third and final part of the document details the process for implementing the ‘decide and provide’ approach through the transport assessment (or transport statement) accompanying a planning application. This is set out in three main stages: identifying accessibility characteristics; scenario testing; and monitoring and managing outcomes. A flow-diagram summarising the three stages of the process is provided at Appendix 1 (see p.23). A supplementary step-by-step guide has also been produced, which

It is critical that the process described below is undertaken thoroughly, all parameters are appropriately scoped and agreed with OCC, all assumptions are robustly evidenced, and that this is comprehensively and clearly reported in the resulting transport assessment (or transport statement). To this end, it is strongly recommended that pre-application highways advice is sought early in the application process to determine and agree the appropriate parameters (OCC, 2022b).

3.1 Stage 1: Identifying accessibility characteristics

3.1.1 The TRICS guidance advises that a visioning exercise should be undertaken to identify what kind of place is intended to be made through the proposed development. It states that three key questions should be answered (paragraph 6.5, p.17):

- What sort of place are we creating?
- What kind of activities do we need or desire to travel for?
- How will we provide for mobility?

3.1.2 These are very important questions to consider as part of a master-planning exercise and will help to identify and inform key elements of a proposed development such as its mix of uses and their relative locations to ensure that the optimal connectivity is achieved in accordance with the LTCP transport user hierarchy.

3.1.3 For the purposes of informing transport assessments, this high-level vision needs to be translated into suitably defined elements, which in turn can inform the necessary provision of on and off-site provision for all modes, parking levels, and public transport improvements.

3.1.4 This document considers accessibility as a combination of the influences of proximity and connectivity. Identifying the characteristics of a site inherent to its location, such as its proximity to key services, whether schools, leisure and healthcare centres are to be provided within the development, and those characteristics that can be changed through connectivity improvements, is fundamental to establish anticipated trip rates for the various scenarios to be tested by identifying comparable sites in the TRICS database.

3.2 Proximity and connectivity metrics for new developments

3.2.1 The comparable sites used in the TRICS database should be identified by following the general principles set out in the TRICS Good Practice Guide (2021b, see Section 4, pp.7-10). However, to ensure a sufficiently robust process has been undertaken in determining this comparability, in addition to this, the first activity for proposed residential development (for employment developments, see paragraphs 3.2.13-3.2.14) that should be undertaken is to determine which services are accessible within a 20-minute walk (i.e. 10 minutes each way) and whether the sites to be used as comparisons share similar accessibility characteristics.

3.2.2 The LTCP contains policies on promoting 20-minute neighbourhoods, including Policy 13 (2022a, p.61), which states that we will:

Work with our District and City Councils to ensure that regeneration schemes and new developments support application of the 20-minute neighbourhood model to create walkable, vibrant neighbourhoods.

As such, undertaking this assessment will also help to determine the extent to which a proposed development succeeds in meeting this policy objective. Furthermore, by identifying services that are beyond a 20-minute return walk, it will help to identify destinations to which improvements to cycling and public transport connectivity will need to be made. The 20-minute neighbourhood assessment is not intended as a comprehensive means of identifying all improvements for sustainable and active modes. Therefore, it should be noted that such improvements may also be required to destinations within a shorter distance and to other locations not identified through this process.

3.2.3 In line with the LTCP (2022a, see pp.56-61) and with the Town and Country Planning Association's (TCPA, 2021) guidance on 20-Minute Neighbourhoods, a 20-minute return walk should be based on an 800-metre walking distance, i.e. ten minutes there and ten minutes back. For the purposes of this document, this is taken to be within an 800-metre distance from the centre of the site. This must be based on available walking routes as opposed to a radius to better reflect actual, rather than theoretical, distances. The services to be identified as being within a 20-minute walk are:

- Primary school
- Secondary school
- Supermarket or local grocery shop (selling fresh food)
- GP surgery
- Employment (such as a town centre, science park, business park, industrial estate, or other employment sites of a similar scale, e.g. major hospital, university, etc.)

3.2.4 If the provision of any of these five key services forms an intrinsic part of the proposed development, then the distance to these new locations can be used.

3.2.5 The acceptability of these five services should be agreed as part of the transport assessment (or transport statement) scoping exercise. For example, the schools identified should have sufficient capacity (or can be expanded) to accommodate new pupils.

3.2.6 This assessment must also take appropriate account of severance issues caused by railways, roads (particularly dual-carriageways and motorways), waterways, or any other obstacle that would impact on walking and cycling routes. It must also take account of the comparable quality of the provision for walking and cycling. For example: whether the routes have street lighting; controlled crossings; footways of a suitable width, etc.

3.2.7 In addition to comparison sites being of a similar proximity to the five key services identified above, they should also have similar provision in terms of cycling connections (in terms of both destinations served and quality) and access to similar levels of bus and rail services in terms of both frequency, journey times (i.e. directness of service), and number of key destinations served.

3.2.8 The rationale for including these five services is based on the importance attributed to walkable access to education, healthcare, and jobs in the TCPA's guidance (see Section 2, pp.16-32).

3.2.9 Additionally, access to primary schools, supermarkets, and GP surgeries is identified in the Ministry for Housing, Communities, and Local Government's (MHCLG) English Indices of Deprivation 2019 Technical Report (p.51) as, "...important for people's day-to-day life and to which people need to have good geographical access". Proximity to these services is used as one of the indicators of deprivation.

3.2.10 Finally, the Department for Transport's National Travel Survey (DfT, 2020b, p.2) identifies the three most common trip purposes in 2019 (the most recent year for which data is available prior to the impacts of the Covid-19 pandemic) as being: leisure (26%); shopping trips (19%); and commuting (15%), which lends further weight to the identification of the proximity of the services listed above. Some geographical variations in trip purpose proportions may exist, but it is likely that these three general trip purposes are common to all locations.

3.2.11 Although leisure trips are identified as the most common trip purpose, these are derived from the combination of six different journey purposes (as defined in the NTS): 'Visiting friends at private home'; 'Visiting friends elsewhere'; 'Entertainment / public activity'; 'Sport: participate'; 'Holiday: base'; and 'Day trip'. Consequently, given the diffuse nature of these destinations and their specificity to an individual, it is not possible to capture this trip purpose in the accessibility characteristics metrics.

3.2.12 Not all development proposals will be within a 20-minute walk of all of these key services but identifying the distances to these destinations will provide a sufficient understanding of whether a site's proximity to these locations is of appropriate comparability with sites in the TRICS database.

3.2.13 For proposed employment developments, the first step will be to identify existing employment sites of a similar scale to the proposed development and assess the proximity and scale of nearby settlements to establish the pool of potential employees for the site and the travel options available to them.

3.2.14 Instead of using the 20-minute neighbourhood metrics to establish the comparability of sites, an assessment should be undertaken to establish the relative quality of existing connectivity for walking and cycling, the frequency, journey times (i.e. directness of service), and number of key destinations served by bus and rail. In doing so, this will provide an indication of the potential for prospective employees to reach the site and the opportunities they have (or will have following improvements) to access the site by active and sustainable modes.

3.2.15 It is acknowledged that there are numerous factors that can influence the travel behaviour of residents and employees and therefore the accessibility characteristics identified above are an unavoidably imperfect means of determining the potential trip generation of a proposed development. Nevertheless, this remains an important exercise, especially in the context of considering a site's compliance with the LTCP Policy 13. When choosing suitable sites to be used as comparisons, it may be preferable (and more robust) to use the average trip generation of multiple sites that are broadly similar instead of using only one site that is more directly comparable.

3.3 Mixed-use development: internalisation and localisation

3.3.1 In addition to the assessment described above, where a proposed development includes a mix of uses, the resultant internal and external trips will need to be identified

and included in the modelling. These anticipated trip rates must be appropriately evidenced, and consideration will also need to be given as to how these trips can be provided for in respect of sustainable and active mode provision.

3.3.2 When considering the suitability of evidentiary sources these must take account of whether the sample data has appropriately comparable characteristics in terms of the ONS Indices of Multiple Deprivation, car ownership levels, rates of employment, and bus and rail connectivity. Additionally, the data sample size should be of a sufficient scale in order that small numbers of those working in that area do not unduly skew the data.

3.3.3 Examples of uses that may result in both internalisation and localisation (i.e. trips attracted from outside the development in the case of the latter) include schools, employment, sports and leisure facilities, and local shops within residential sites. Within large employment sites, examples include sports and leisure facilities and local shops.

3.3.4 The internalisation and localisation rates may vary between different future year scenarios depending on the phasing of facilities that are expected to influence these rates. For example, if there are future year scenarios to be modelled in 2025 and 2030 and a school is required to be provided on-site in 2028, its influence on internalisation and localisation rates should only be considered in the 2030 scenario.

3.4 Stage 2: Scenario testing

3.4.1 The testing of multiple scenarios is a central tenet of the approach advocated for in the TRICS guidance, which advises that (p.19):

Scenario planning covers a broad range of approaches, but in the context of this guidance it refers to the development of a set of plausible and divergent scenarios of the future that help expose uncertainty and, in turn, allow the uncertainty to be accommodated within plan making.

3.4.2 It later goes on to explain that the extent of scenario planning should be considered on a case-by-case basis with three main parameters to be considered to inform its requirement, these are (paragraph 9.5, p.25):

- **Scale** – The need for scenario planning will increase with the project size. All major planning applications relating to 500+ homes or 5,000m² employment/retail floorspace should be supported by scenario planning.
- **Sensitivity** – The need for scenario planning will also increase with increased project sensitivity, for example in less accessible rural areas or, conversely, highly congested, dense urban environments.
- **Complexity** – The need for scenario planning will also increase with project complexity.

3.4.3 As such, these parameters should be applied to the consideration of whether a development proposal requires multiple scenarios to be modelled. It is likely that many sites that would not meet the criteria for scale would still be required to test multiple scenarios due to their sensitive locations. It is strongly recommended that pre-application highways advice is sought early on in the process to agree modelling requirements.

3.4.4 Whilst the requirement for modelling multiple scenarios based on different trip rates may be less likely for smaller sites and minor applications, the principles of reducing dependence on the private car and providing for sustainable and active modes are applicable in all contexts. As noted in the TRICS guidance (2021a, p.25), 'As an approach, a way of thinking or mindset, D&P is relevant to all scales of development and its application can be tailored accordingly.'

3.4.5 For all scales of development, if a proposed development is delivering (or contributing towards) any kind of improvements to active and sustainable modes and intending to base a reduction in vehicular trip rates in a transport assessment on that basis or intending to justify a reduction in vehicular trip rates for any other reason, then at least two modal share assumption scenarios will be required to be modelled.

3.4.6 However, if a development is not able to justify lower trips through the aforementioned means, it is less likely that there will be a requirement for additional scenarios to be tested. This would raise other concerns though, as it would suggest that the development proposal was insufficiently providing for sustainable and active modes, thus potentially suggesting that it is not policy compliant and that it is not a sustainable location for development.

3.4.7 In most cases it is likely that there will be a need to model between two and five scenarios. It is likely that the scenarios will need to incorporate different trip rate assumptions for the development proposal, connectivity improvements, and extrapolated trends in trip rates for the site and background growth assumptions. These are explored in detail in this following section and are summarised as follows:

- 1. Reference cases:** These scenarios are essential to establish the baseline or 'without development' conditions of the transport network. Appropriate scenarios will need to be identified to reflect different trip generation assumptions for permitted, committed, and planned growth.
- 2. Do-minimum:** This will utilise trip rates derived from comparable sites from the TRICS database based on the proposed development's proximity to key services and its current connectivity provision (i.e. without proposed improvements).
- 3. With connectivity improvements:** Once proposed connectivity improvements are identified, a second set of comparable sites from TRICS (or derived from other sources) is identified that resemble more closely the accessibility characteristics of the proposed development when taking into account the associated proposed improvements.
- 4. Requirement and phasing of further improvements:** Should the proposed improvements modelled in the previous scenario prove to be inadequate to address the impacts of the development proposal, further improvements will need to be identified and modelled. This scenario may also be needed to identify the phasing of improvements, particularly for sites with a protracted build-out programme.
- 5. Extrapolated trends:** Trend data from TRICS will be used to extrapolate potential future behaviour resulting in vehicular trip rates increasing or decreasing (or remaining broadly static) over time in order to accommodate the uncertainty of future travel patterns, this reduction or growth in vehicular trips should be applied to the site and the background growth assumptions as appropriate.

3.4.8 The 'do-minimum' will be based on multi-modal trip rates derived from the TRICS database using other comparable sites. Detailed justification must be provided as to why these comparison sites are suitable (see section 3.2) and reflect as closely as possible the characteristics of the proposed development's location in its current state, i.e. without any of the proposed off-site improvements.

3.4.9 This justification must be reported in the transport assessment (or transport statement as applicable) and will include the accessibility characteristics (see Stage One,

pp.12-15) of the comparison sites plus an assessment of the connectivity provision at the comparison sites to ensure that the proposed improvements associated with the development proposal are also of a similar quality.

3.4.10 This means that the comparison sites should be of a similar proximity to the five services identified in stage one but also have similar provision in terms of walking and cycling connections and access to similar levels of bus services (and rail services if applicable) in terms of both frequency, journey times (i.e. directness of service), and number of key destinations served. This latter point is very important as considering proximity in isolation is insufficient, the propensity to walk and cycle will also be influenced by the quality and attractiveness of facilities.

3.4.11 The 'with connectivity improvements' scenario will need to include a list of the proposed off-site connectivity improvements and bus service enhancements, accompanied by supporting evidence of their deliverability and ongoing viability respectively. This should also take account of improvements to be delivered by others if a particular impact on site traffic or background growth is directly attributable to said scheme and if it has sufficient certainty of delivery (e.g. is fully funded and has planning permission).

3.4.12 The identification of connectivity improvements should consider the transport user hierarchy referenced in LTCP policies 1 and 2 (2022a, pp.36-39) and the embodied carbon of infrastructure referenced in Policy 27 (2022a, pp.88-90) in the LTCP. The resultant improvements identified for sustainable and active modes should always be delivered at an early stage of the build-out of a development to ensure that suitable travel choices are available and positive travel behaviours are embedded from the outset.

3.4.13 A separate review of the TRICS database can then be undertaken, this time to consider comparison sites that now more closely reflect a similar level of provision for walking, cycling and bus service levels, when taking into account the proposed connectivity improvement package associated with the proposed development, whilst also remaining comparable in respect of proximity to the five services identified in stage one.

3.4.14 The trip rates derived from this new set of comparison sites can then be used as a basis for modelling this subsequent scenario. If it is not possible to identify appropriately comparable sites in the TRICS database for the 'do-minimum' or 'with connectivity improvements' scenarios, then as discussed in section 2.2, other sources of evidence could be considered instead.

3.4.15 For instance, assuming that they can be demonstrated to have suitably comparable accessibility characteristics – using a similar methodology as described in section 3.2 – then the mode shares for travel to work data from the Lower Super Output Areas in the ONS 2011 census could be utilised. With appropriate justification, it could then be assumed that these modes shares apply to other trip purposes as well.

3.4.16 However, on the basis that TRICS covers the modal share of all trips generated by a site (regardless of purpose) and will likely be more up to date than the 2011 census, this should only be considered as a secondary option if it has already been established that there is no suitable data available from the TRICS database.

3.5 Further rationale for multiple scenario testing

3.5.1 Assuming improvements to active and sustainable transport provision are being proposed as part of a new development, it is critical that at least these two scenarios ('do-minimum' and 'with connectivity improvements') are modelled.

3.5.2 In any modelling exercise there is a reference case or a 'do-minimum' in order to enable the identification of the potential impacts of a proposal (in this case a development) and what the impact of any subsequently proposed mitigation (in this case connectivity improvements) are modelled as being. This is also necessary in order to inform whether any congestion issues arising from the development are satisfactorily addressed by the implementation of connectivity improvements or whether there remain residual impacts, the extent of said impacts, and therefore their acceptability. Without this reference case or 'do-minimum' scenario, the potential impacts of development will not have been adequately assessed as required in paragraphs 104 (p.30) and 113 (p.32) of the NPPF.

3.5.3 For example, if congestion issues are identified it is important that these do not have detrimental impacts on the journey time reliability of bus services or adversely hinder the progress of walking and cycling. In such instances bus priority measures or walking and cycling provision will be required to address these issues (see paragraphs 3.6.2 and 3.6.6 for more on this).

3.5.4 Furthermore, the modelling will form part of the evidence to justify the requirement for the connectivity improvements. By quantifying the potential modal shift achievable through the active and sustainable transport improvements and demonstrating their efficacy in addressing network capacity issues, their compliance with the three tests of the Community Infrastructure Levy Regulations will be demonstrated.

3.5.5 Additionally, testing multiple scenarios will illustrate what could happen if the connectivity improvement proposals do not achieve their desired effect, are later found to be undeliverable due to unforeseen issues, or are omitted from the subsequent S106 and S278 legal agreements, including any potential safety implications. In this way modelling these two scenarios reflects the need to accommodate uncertainty and various plausible outcomes, as is advocated for in section seven of the TRICS guidance (see pp.19-23).

3.5.6 There may also be particular locations where a choice needs to be made between a capacity improvement or a sustainable and active mode improvement. In such instances, the reference case or 'do-minimum' scenario will be necessary to properly inform this decision-making process, see further discussion of this issue in section 3.6.

3.5.7 Finally, the TRICS guidance advises practitioners (paragraph 7.19, p.22) to refer to the DfT's Uncertainty Toolkit to assist with identifying appropriate scenarios. In paragraph 3.31 (2021b, p.25) the toolkit states:

Scenarios can contain both pessimistic and optimistic elements, but objectivity and a balanced approach should be maintained. Optimistic scenarios (or scenarios which are beneficial to the proposal under consideration) should not be considered in isolation.

3.6 Considering further scenario testing and capacity improvements

3.6.1 It may be necessary to model an additional scenario in cases where significant congestion issues remain on the network after the modal shift attributable to the connectivity improvements identified in the second scenario have been taken into account.

3.6.2 For instance, capacity improvements may be justified in situations where congestion results in detrimental impacts on the journey time reliability – and therefore viable operation and attractiveness to passengers – of bus services but where the frequency of services does not warrant bus priority measures, or where the availability of land renders bus lanes (or similar) undeliverable.

3.6.3 Other scenarios that may give rise to the consideration of capacity improvements include where congestion results in highway safety issues, air quality concerns, or the impedance to walking and cycling (where segregated provision is undeliverable). However, the appropriateness of any capacity improvements will need to be considered in the context of potential carbon impacts (both embodied and operational). Furthermore, it is important to reiterate that LTCP Policy 36 (2022a, p.106) states that we will, “only consider road capacity schemes after all other options have been explored.”

3.6.4 In some locations a choice may need to be made between either delivering a capacity improvement or a sustainable and active transport improvement. Assuming that choosing the improvement to sustainable and active modes does not potentially give rise to unacceptable impacts (as noted in paragraphs 3.6.2-3.6.3), there will be a presumption in favour of the improvement that accords with the LTCP transport user hierarchy.

3.6.5 It will also be pertinent to consider the extent of potential congestion; if an improvement to walking and cycling has been facilitated by choosing not to deliver a capacity improvement and this results in queueing traffic for only short periods of the day but allows for an improvement for walking and cycling at all times, this should be considered in the decision-making process.

3.6.6 In other cases, there may be off-site sustainable and active mode improvements to be delivered (or contributed towards) by a development that do not conflict with potential capacity improvements.

3.6.7 Following the outcomes of the site’s monitoring (see section 3.7), if the anticipated mode shares are not achieved and car trips generated by the site are shown to be resulting in unacceptable impacts, it may be necessary for these capacity improvements to be delivered. However, it is important that such situations are given careful consideration: informed by suitable data; only considered once all sustainable and active mode improvements have been delivered; and that the requirement for the capacity improvement is considered as a ‘last resort’. Where relevant, these matters will also need to be agreed with National Highways.

3.6.8 In some instances, it may be appropriate for the monetary equivalent of the capacity scheme to be provided as a contribution towards strategic (i.e. delivered by OCC) improvements instead of the capacity scheme being delivered directly by the developer.

3.6.9 Another scenario will be required to identify whether the identified vehicular impacts based on current behaviour is shown to potentially increase when taking account of trends extrapolated from the TRICS database. If trends extrapolated from the TRICS database indicate an increase in vehicular trips, the potential resulting congestion will also need to be addressed appropriately, i.e. through further connectivity improvements.

3.6.10 Whether these trends actually materialise will need to be carefully monitored (see stage three on monitoring below) and if they do not transpire then the resultant issues will

need to be addressed in the S106 agreement as described above. This approach is supported in the TRICS guidance, which states (paragraph 12.3, p.30):

Should the monitoring and evaluation plan report demonstrate that the forecast trips have exceeded or indeed have not materialised then a revised schedule of transport interventions should be prepared and agreed with the planning and highway authority. In this regard the application of the monitoring regime and commitment in the obligation to follow the findings of the monitoring will be crucial to ensuring that the “decide” element is followed by “provide”.

3.6.11 The process for acquiring and analysing trend data from TRICS is described in section 16 of the TRICS guidance (2021a, p.35) and summarised as follows:

To establish historic trip trends, it is necessary to undertake a separate TRICS analysis for various time slices (initial advice is 5 year periods but this may be amended if considered appropriate) using a consistent set of filtering parameters for each time slice. The attained information can then be combined into a spreadsheet whereby the individual trip rates for each classification can be compared throughout the individual time slices to create a graph showing how trip rates have changed over time.

3.6.12 Further to this, assuming that the potential detrimental impacts of congestion on sustainable and active modes and other environmental and ecological receptors can be suitably and satisfactorily ameliorated (including air quality), it may be acceptable to allow some capacity issues affecting private motor vehicles only as this can act as an incentive to change mode choice (Metz, 2018).

3.6.13 Nevertheless, the acceptability of such instances will need to be carefully considered on a case-by-case basis and will need to be considered in the context of network management matters and OCC’s statutory duty under the Traffic Management Act (2004) to reduce and manage congestion.

3.6.14 Finally, sensitivity scenarios may be required to capture the potential impacts of strategic schemes delivered by OCC, including demand management projects. These will need to be considered appropriately according to the certainty of their delivery. It may also be useful for additional sensitivity scenarios to be tested utilising the LTCP targets of replacing or removing car trips, taking into consideration the discussion of the use of these targets in section 2.5.

3.7 Stage 3: Monitoring and managing outcomes

3.7.1 A fundamental part of implementing the ‘decide and provide’ approach as advocated in the TRICS guidance is the need to monitor the outcomes of its implementation through the travel plans accompanying development proposals. To this end, a Monitoring and Evaluation Plan (MEP) is required where a transport assessment (or transport statement) accompanies a planning application, which will be secured and implemented through the travel plan as part of the S106 agreement where needed.

3.7.2 The costs incurred by OCC having to ensure that the requisite monitoring is carried out by the applicant, plus the resources associated with reviewing the resultant monitoring outputs, will need to be covered by a suitable fee and captured in the S106 agreement.

3.7.3 The MEP will record how the trip generation and mode share of the site evolves over time. The survey specification will need to be agreed with the appropriate OCC officers and should employ the TRICS Standard Assessment Methodology or similar (as outlined in section 22 of the TRICS Good Practice Guide, 2021). The surveys must be

multi-modal, their frequency, and number will depend on the scale of the development and the timing of associated infrastructure delivery.

3.7.4 Survey design will need to take account of multi-modal trips from all access points, including walking and cycling only accesses in addition to main vehicular accesses. Attitudinal surveys should also be considered to collect qualitative data around travel behaviours. Additionally, if there are specific junctions of concern in the vicinity of the site, which may experience problems if the anticipated mode shares are not achieved, then monitoring of these locations should be included in the survey scope.

3.7.5 In the case of strategic housing or employment sites whose construction programmes span many years, monitoring the trip generation and mode shares over time is particularly important. This will facilitate an understanding of whether the expected trip generation rates identified in the various modelled scenarios are occurring in practice. It may be appropriate for the requirement for surveys to be triggered by years passed since implementation and/or levels of dwelling occupations or floorspace.

3.7.6 Further to this, masterplans and design codes should be devised at the outset to allow for sufficient flexibility so that later phases of development can be adapted to influence travel behaviour and make better provision for active and sustainable modes or change layouts and levels of parking to respond to subsequent changes in policy.

3.7.7 If a phased approach to off-site connectivity improvements has been agreed, such as those identified as only being necessary through the fourth scenario, the results of the monitoring may be needed to be used to inform the timing of infrastructure delivery being adapted accordingly. As described in the TRICS guidance (2021a, paragraph 11.6, p.29):

The MEP should reflect the site build out and the timing of the monitoring and evaluation reports agreed with the relevant LPA and the highway authority. If transport outcomes have departed from the trajectories contained within the transport strategy, then the S106 must contain a mechanism to deal with the divergence from the agreed trip scenario.

3.7.8 The requirement for monitoring is particularly important given the need to ascertain whether the anticipated modal change resulting from infrastructure provision, and the trends identified through the extrapolation of historic data, transpire in reality. For instance, in lieu of a more sophisticated (and disproportionately complex) predictive analysis, it is likely to be assumed that the increase (or decrease) in vehicular trip rates will continue at the same rate into the future, when in fact it may become apparent that over time these trends accelerate, decelerate, or plateau.

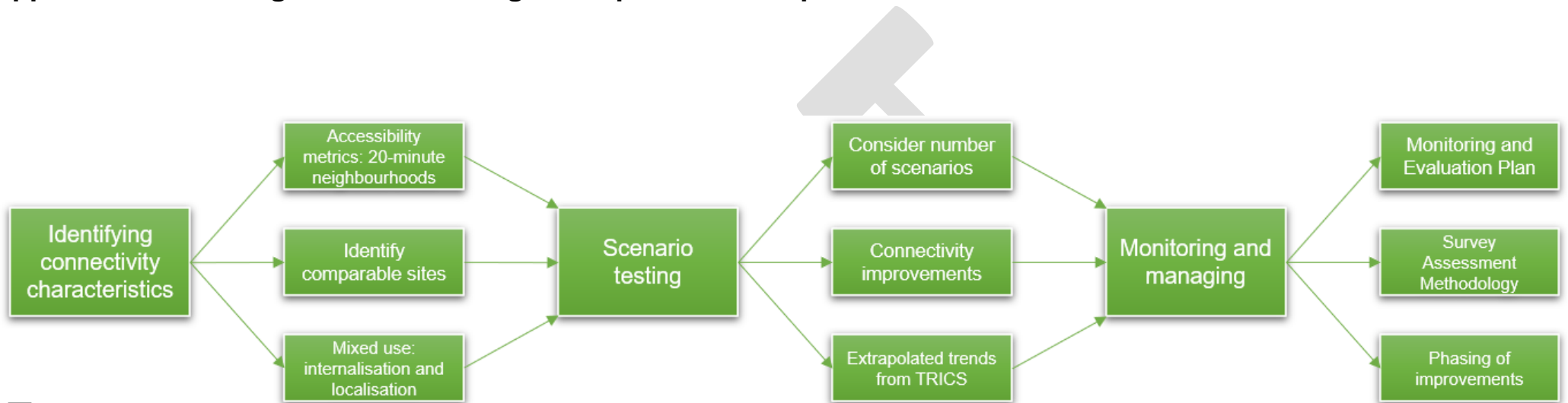
3.7.9 In the case of large-scale housing sites with a protracted build-out, it is important to monitor trip generation and mode share over multiple years as changes in behaviour may only be realised over a long-term period (Song, *et al*, 2017 and DfT, 2022).

3.7.10 Finally, if the proposed development generates traffic that will impact on any Air Quality Management Area in the vicinity, the MEP may also be required to monitor these impacts to ensure that vehicular traffic does not exceed that which is anticipated through any of the scenarios based on a reduction in trip rates. The methodology for any such monitoring and the potential ramifications of any exceedances will need to be agreed with OCC and the relevant Local Planning Authority.

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Appendix 1: flow-diagram summarising the implementation process



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Stage One: identifying connectivity characteristics

1. For residential proposals, taking account of severance issues, measure 800-metre walking routes to five key services to determine if they are within a 20-minute return walk. For employment proposals, identify proximity to nearby settlements.
2. Review TRICS database to identify comparable sites to establish multi-modal trip rates, ensuring characteristics are sufficiently similar to the proposed site.
3. Determine rates of internalisation and localisation for mixed use development, supported by suitable evidence.

Stage Two: scenario testing

1. Consider the number of scenarios that will need to be tested. This will depend on the scale of the proposal and the sensitivity and complexity of its location.
2. Identify the connectivity improvement requirements and whether trip rate reductions can be attributed to them based on other sites from the TRICS database to derive rates for further scenarios.
3. Determine requirements for subsequent scenarios to be tested to identify the phasing of infrastructure or incorporating trends extrapolated from historic TRICS data.

Stage Three: monitoring and managing

1. Produce the Monitoring and Evaluation Plan to be implemented through the travel plan as part of the S106 legal agreement.
2. Agree the survey assessment methodology with OCC, ensuring that it is multi-modal and appropriately covers the build-out programme of the site. Also consider requirements for other impact assessments such as those relating to air quality.
3. Consider the potential requirement for phasing of connectivity improvements and secure this through the S106 and S278 legal agreements.