

Failure to Monitor Sustainable Travel Plans

58. Developments that generate significant amounts of traffic are required to submit travel plans; with the objective of minimising impacts of car based travel on the road network by promoting the use of public transport, walking and cycling. These travel plans always include detailed management and monitoring schemes.
59. Travel plans set ambitious targets for reducing vehicle trips by as much as 15% and increasing walking and cycling trips by as much as 25%. This modal shift is expected to be achieved by such measures as ... provision of travel information packs for new residents (to show bus stop locations and bus timetables), provision of secured cycle parking and discounted cycle training schemes, appointment of a travel coordinator to offer personalised journey advice and to conduct surveys into the effectiveness of the sustainability objectives.
60. It is clearly important to know whether these sustainable transport targets are being achieved in East Grinstead, so Infrastructure First submitted Freedom of Information (FOI) requests to both MSDC (ref. R169871) and WSCC (ref. 2228), in March 2021 to find out.
61. We specifically asked about the success of travel plans submitted to support the following large scale developments in East Grinstead ...
- Land West of Imberhorne Lane for 100 dwellings [12/03843/REM]
 - Land South of the Old Convent for 74 dwellings [14/00294/FUL]
 - Land Adjacent to Ashplats House for 117 dwellings [12/00716/REM]
62. In the FOI, we asked ...
- What monitoring has taken place in each case and when was it reported?
 - Where these monitoring statistics and reports can be viewed on the Council's website, or, if not available there, whether electronic copies could be provided?
 - What conclusions has the Council reached as to:
 - i. the effectiveness of these sustainable travel schemes in meeting their targets?
 - ii. how performance of such schemes might be enhanced?
 - iii. what similar schemes might be safely relied upon to deliver modal shifts to reduce the need to travel by car for further housebuilding and what level of modal shift might be expected?

63. MSDC responded to say that they didn't have information on the outcome of any of the travel plans. It seems that simply including them as a condition of the planning consent is the limit of the Council's responsibility. Their FOI response simply said ...

“As the District Council is not responsible for monitoring the sustainable travel plans, the Council does not hold this information. Please contact the travel planner at West Sussex County Council.”

64. Like MSDC, WSCC also responded to say that they couldn't answer any of the questions relating to the required travel plans. However they were at least able to offer an explanation for each of the schemes as to why they couldn't.

65. For the **Land to Western side of Imberhorne Lane** scheme, WSCC responded that they *“had not been consulted in relation to a Travel Plan at this site and are therefore not aware of any formal monitoring.”*

It is not clear from the response whether the onus is on the developer to 'hand in' their monitoring results. If so, they clearly didn't. We cannot understand the logic of imposing a travel plan as a condition of planning if neither authority is interested in knowing whether it was implemented and how effective it has been. A legal agreement was signed by both the Council and Applicant committing to the implementation and recording of the travel plan measures ...

3	Green Travel Plan
3.1	The Owners covenant with the District Council and the County Council
3.1.1	Development shall not be Commenced until such time as the Green Travel Plan has been submitted to and approved by the District Council and the County Council (such approval not to be unreasonably withheld or delayed)
3.1.2	Not to allow Occupation of any of the Units unless any measures scheduled by the Green Travel Plan to be implemented before such Occupation have been so implemented. Those parts of the Green Travel Plan that are identified therein as being capable of implementation after Occupation of any of the Units shall be implemented in accordance with the timetable contained therein and shall continue to be implemented as long as any part of the Development is occupied
3.1.3	The records of implementation shall be made available to the District Council and the County Council

Source: s106 Schedule 2 - Planning Application 10/02071/OUT dated 24th May 2011

66. For the **Land South of the Old Convent, Moat Road** scheme, WSCC responded that *“Given the scale of development is below the threshold for when monitoring is required there is no requirement for formal monitoring at this site.”*

Once again, the WSCC response is difficult to understand given that the Decision Notice for the scheme clearly includes a provision for the applicant to have an approved travel plan in place as a condition of the planning consent ...

21. No part of the development shall be occupied until a Travel Plan has been submitted to and approved in writing by the Local Planning Authority. The Travel Plan once approved shall thereafter be implemented as specified within the approved document. The Travel Plan shall be completed in accordance with the latest guidance and good practice documentation as published by the Department for Transport or as advised by the Highway Authority.

Source: Decision Notice pre-occupation condition for Application 14/00294/FUL dated 25th June 2014

67. For the **Land adjacent to Ashplats House, Holtve Road** scheme, WSCC responded that *“a draft Travel Plan was submitted to WSCC for comments in November 2011. Comments were made although no response was received and so the Travel Plan was not approved. WSCC are not aware of any further monitoring.”*

WSCC made it clear that they expected an approved travel plan to be a condition of the planning consent ...

Travel Plan

The dwellings, hereby approved, shall not be occupied until such time as a Travel Plan has been submitted to and approved in writing by the Local Planning Authority. The Travel Plan shall be completed in accordance with the latest guidance and good practice documentation as published by the Department for Transport or as advised by the Highway Authority.
Reason – To encourage and promote sustainable transport amongst residents in accordance with PPG13.

Source: WSCC Consultation Response for Planning Application 12/00716/REM dated 28th March 2012

Despite the required travel plan being submitted, it's clear that the scheme was allowed without it being approved. It is therefore uncertain whether any of the sustainable travel measures were implemented.

68. The response to our FOI requests appears to show that council officers regard travel plans as no more than a box-ticking exercise, with little inclination to determine whether sustainable travel measures were effective; or even whether they were implemented at all.