

Travel Plans
Supplementary Planning Document
Statement of Consultation
November 2019

Contents

		Page No.
1	Introduction	2
2	Purpose	2
3	When did consultation take place?	2
4	Who was consulted?	2
5	Summary of the main issues raised	2
6	Consultation Review 1: Responses by source	4
7	Consultation Review 2: Responses relating to document sections, with responses from SBC officers	13

1. Introduction

- 1.1 This consultation statement has been prepared in accordance with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The statement sets out who was consulted on the Travel Plans Supplementary Planning Document (SPD).

2. Purpose

- 2.1 The SPD sets out Swindon Borough Council's (SBC's) approach to securing the travel plan measures required by planning obligations as a consequence of development. The approach detailed within the SPD seeks to achieve the effective delivery of residential, workplace and educational travel plans to enable sustainable growth in the Borough.
- 2.2 In accord with the Swindon Borough Local Plan 2026 (Local Plan), the SPD requires a comprehensive approach for dealing with delivery of the transport implications of development, including the provision of travel plans necessary to create a sustainable development as required by the National Planning Policy Framework (NPPF).

3. When did consultation take place?

- 3.1 Public consultation on the draft SPD took place between 2nd September 2019 and 14th October 2019. A total of 26no.consultee responses were received to the draft SPD, resulting in 47no.individual comments being generated.

4. Who was consulted?

- 4.1 In accord with the Town and Country Planning (Local Planning) (England) Regulations, all statutory consultees and interested parties were notified of the consultation.
- 4.2 A formal consultation section was published on the Swindon Borough Council website, and hard copies of documents were made available at the Civic Office reception.
- 4.3 An electronic copy of the document was circulated to consultees and interested parties from planning mailing lists, inviting comment and attendance at drop in sessions.

5. Summary of the Main Issues Raised

- 5.1 All comments have been logged on a 'record of interested parties', and have been responded to by relevant Officers.
- 5.2 A number of themes and issues are highlighted in the consultation responses, including:
- Support for the principles of the SPD

- Discussion around the threshold at which a travel plan is triggered
 - The need to include infrastructure provision
 - The need to recognise the emerging Local Plan 2036
- 5.3 The following consultation review on page 4 records all responses to the online questionnaire, via email and verbally at meetings and drop-in sessions.
- 5.4 The following table on page 13 records responses against the corresponding section of the SPD document, along with officer comments. Cells in green show where the comment is upheld and the SPD will be amended .

TRAVEL PLANS SPD CONSULTATION REVIEW

1 Public Questionnaire

The online Questionnaire went live on 2nd September and closed on 14th October 2019. 13 questionnaires were completed. The comments can be summarised as follows:

Agree	Disagree	No Opinion
Chapter 3 outlines the thresholds at which a travel plan is required. Do you agree with these thresholds?		
6	4	3
<ul style="list-style-type: none"> i. The thresholds seem quite high for some developments. A nurse with 59 children doesn't have to produce a plan - but this is potentially quite a high amount of traffic. The same applies to residential care. I would bring the figure to 50. ii. Could the thresholds please also be linked to the location of the development or location of traffic the development generates? Location of a development that gives rise to more traffic on a route that already has problems should do more to tackle traffic it generates. Please can 'problem' roads or hotspots of 'vulnerable users' be highlighted and this should include road sections of The Ridgeway National Trail (B4192 which is a high casualty road and has a terrible crossroad for non-drivers trying to cross) - more traffic will just increase the problems for pedestrians, cyclists and horse riders. We get complaints year on year about the road stretch of the National Trail from Fox Hill to Liddington hillfort. (Schools and parks are another type of 'vulnerable' location where traffic will have a greater impact.) iii. The proposed residential threshold of 60 is considered unreasonable. National Government's previous threshold of 80 was appropriate in 2007 and remains appropriate now. A mode shift of 10% on a development of 60 dwellings would reduce peak hour trips by only circa 3 trips. Moreover, monitoring results for a 60-dwelling development would be skewed significantly by the travel habits of just one household, making monitoring reports very difficult to draw meaningful conclusions from. iv. The threshold for residential units should be increased to 80, as it previously was. 		
Chapter 5 outlines two options for developers – Option One requires the developer to pay a contribution to SBC to resource the travel plan on behalf of the developer. Do you think this approach will secure more effective travel plans over the long term?		
8	3	2
<ul style="list-style-type: none"> i. Option 2 ensures completion of the travel plan as it has an incentive ii. Private consultancies are just as capable. iii. No, as each site is individual and applying a blanket approach won't work. Swindon Borough Council may want to direct more money to one thing 		

Chapter 5 outlines two options for developers – Option Two requires the developer to pay a bond to SBC, to be retained only if the developer fails to deliver the travel plan in accordance with the agreement. Do you agree that this approach gives Swindon Borough Council the security that travel plans will be delivered to agreed targets?		
9	2	2
<ul style="list-style-type: none"> i. The monitoring and tailored delivery might be subject to delay if the housing delivery is delayed in stages, or phases, and the viability argument could be brought into play. ii. There is no need for bonds. The council can already enforce against non-implementation. Smaller developers will be unable to access bond arrangements. 		
Under Option Two, the developer is also required to pay a contribution towards the monitoring of the travel plan. Do you agree that a financial contribution should be charged for SBC to monitor the travel plan?		
9	2	2
<ul style="list-style-type: none"> i. This should form part of the council's statutory obligations to monitor and enforce the implementation of obligations and conditions 		
Chapters 6 and 7 outline the minimum provision expected of a travel plan. Do you agree the items outlined in tables 3 and 4 will facilitate sustainable transport behaviours?		
9	3	1
<ul style="list-style-type: none"> i. Alternative transport is often available, but the table doesn't address why people need to travel. If you have multiple stops (dropping off children at school before hand for instance) the option to use another sustainable form of transport evaporates. Transport behaviours should be the main focus rather than provision of "walking maps". Additionally, even if walking or cycling maps are provided, many present routes do not have suitable lighting. If the permitted development provides this lighting (or other forms of safety and security) but the rest of the journey does not - then there will be no change in transport modality. A whole systems approach is required for a sustainable shift to reduce congestion and pollution. NB - noting education as Swindon is limited in it school placement provision we do have the situation where pupils are expected to travel many miles to school which somewhat clashes with the aims of the travel plan. ii. Encouraging walking and cycling requires additional measures - KEY MEASURE MISSING FROM YOUR TABLES - signage to help people navigate on foot or on bicycle to various destinations. People worry about getting lost without signs to reassure them. List the National Cycle Network and ensure their signage is refreshed and maintained. KEY INFRASTRUCTURE FOR WALKERS AND CYCLISTS MISSING FROM YOUR TABLES - A key NCN route for The Ridgeway is route 45 linking Swindon and its train station to Coate Water Park and Chiselden, and then beyond via 482 old railway line to the countryside south of Swindon including Barbury Castle Country Park and The Ridgeway. NCN signage should be maintained along these strategically important NCN routes. KEY MEASURE MISSING FROM YOUR TABLES - adding to the off-road cycle and walking route network and introducing pavements to key rural lanes in order to make the network for walkers and cyclists more attractive and better connected - more people will use walking and cycling routes if they are attractive, feel safe from traffic and offer connections to the destinations they want to reach. For example, the hinterland/countryside on the southern edge of Swindon outside the Coate Water Park has terrible footpaths (stiles, missing signage, overgrowth) and rural roads do not have pavements or marked cycle lanes. Just focusing on investing in the immediate margins around Swindon so people can enjoy the hinterland more easily would make a 		

massive difference. Swindon has a great heritage linked to the Richard Jefferies museum - he was a Swindon man who walked in the countryside - the hinterland of Swindon is therefore a cultural landscape so you could do an amazing project to install sculpture and signage along routes to entice people out into the countryside on foot and bicycle, starting out from Coate Water Park. Another example is the lack of a pavement on the road linking The Ridgeway National Trail at Fox Hill with Liddington Hill off the B4192 - we spend money every year cutting the verge to try to help people keep off the roads - there is space to install a pavement for walkers and cyclists (and horse riders perhaps).

KEY MEASURE MISSING - providing better, safer crossing points for walkers and cyclists and horse riders. A good example is near Chiselden when crossing the A346 - people wanting to walk/cycle between the cycle path NCN 45/482 and Badbury and The Ridgeway (tarmac road) have a challenge to cross the A346. Another good example is the crossroad of the B4192 and The Ridgeway just south of Liddington - a nightmare of a huge crossroad for walkers/cyclists/horseriders with a warning road casualties sign in view!

KEY INFRASTRUCTURE MISSING FROM YOUR TABLES - the road to your Barbury Castle Country Park is potholed and the welcome at the country park is poor. It is crying out for investment. You could hold all sorts of walking and cycling events from the country park - there is a huge car park. Providing a bus service at weekends and in school holidays to take people up to the country park would be useful too. Put an education centre up there for local schools.

MISSING INFORMATION FROM YOUR TABLES - Please list Ridgeway National Trail, Barbury Castle Country Park and National Cycle Network in your promotion tables.

- iii. There are 7 provisions relating to events. Promotional events should only be held where a development has more than 1000 units.

Chapter 8 proposes that all new schools develop a travel plan, but we are not seeking contributions or bonds for these. Do you agree with this proposal?		
9	1	3
i. New school should be monitored and enforced to have a STP this will encourage the younger generation to think and make choices about travel		
Appendix A outlines the calculated cost for travel plans. Do you agree that the levels of funding would resource an effective travel plan?		
7	1	5
i. A transparent breakdown should be provided of how the Option 1 contribution sums have been calculated.		

Of those who expressed an opinion, the following summarises the level of support.

Issue	Percentage Agree	Percentage Disagree
Proposed Thresholds	60	40
Contribution option	73	27
Bond option	82	18
Monitoring option	82	18
Minimum provisions	75	25

School travel plans	90	10
Costs of contribution / bonds	87.5	12.5

As an indication of the issues of greatest interest, the following table sets out the percentage of ‘no opinion’ responses. The highlighted issues are those where strong opinions, one way or the other, were recorded.

Issue	Percentage With No Opinion
Proposed Thresholds	23
Contribution option	15
Bond option	15
Monitoring option	15
Minimum provisions	8
School travel plans	23
Costs of contribution / bonds	38

2 E-Mail to Dedicated mailbox

13 mails were sent to the transportplanning@swindon.gov.uk address in the period up to 14th October 2019. The comments contained within those e-mails can be summarised as follows:

- 1 An e-mail by Anne Henshaw on behalf of CPRE (Campaign to Protect Rural England) commends SBC for the excellent approach to travel planning. Further comments are:
 - Travel Plan Statements will only work if the Design and Access and Landscape statements by the developer incorporate all those requirements which you list as being recommended/minimal requirements and the delivery of these is monitored by a SBC officer
 - CPRE do not believe an Interim Travel Plan would achieve anything and it would be better to have clear requirements set out whether an application comes in as Outline or Full.
 - A query as to whether Employment Travel Plans only refer to new employment sites
 - A question as to whether the planning department will ensure infrastructure on site plans and layout are not encouraging car domination
 - How will the costs quoted in Appendix A increase if a development is delayed or spread over a lengthy lifespan of the travel plan.

- 2 An e-mail by Cole Easdon Consultants stating that The Option system is priced such that it will effectively mean that local businesses will lose out on Travel Plan Coordinator consultancy work. Developers will not choose an Option that costs over twice as much (until return of the bond sum years down the line), and are effectively therefore forced to take 'Option' 1. Sadly, this is making it more difficult for local consultancies to thrive, unless of course SBC will sub-contract such work to small local consultancy businesses.
- 3 Swindon Cycle Campaign has submitted its comments by e-mail. These are set out below.
- 4 An email by Network Rail, noting that in the draft SPD that rail use should be encouraged for Employment Travel Plans, it is not noted for Residential or School plans. Network Rail would ask the Council to encourage the use of rail travel throughout the SPD.
- 5 Natural England, by email from Sharon Jenkins, states that Natural England does not consider that this SPD poses any likely risk or opportunity in relation to its statutory purpose, and so does not wish to comment on this consultation.
- 6 Cllr Cathy Martin emailed a response to the consultation. It is set out below.
- 7 Alan Fletcher (resident) makes the following points about infrastructure:
 - Segregated cycle paths should have kerbs to delineate
 - Cycle paths at road level should have tactile segregation from traffic
 - All busses should have audio announcements approaching bus stops
 - All bus stops should have audio alerts, or people could access an app with such a facility to know which bus is approaching
 - Increase the number of bus shelters
- 8 An email from Highways England suggests that in para 3, fourth bullet point, the reference to "local" could be removed to encompass the need for travel planning to address traffic problems on both the local and strategic networks.
They further comment around the policy section - The draft SPD refers to current Local Plan policies TR1 and TR2. This will need to be revised to reflect the emerging policies from the Local Plan review which proposes to remove these policies and replace them with policy DM22. As drafted, this policy will remove the reference to the requirement for planning applications to be supported by a transport statement or assessment and travel plan so as not to duplicate requirements already contained within PPG and NPPF. However, we believe it will nonetheless be important to ensure that the requirement for travel planning remains clearly signposted within local plan policy, to reflect the increasing importance of travel plan measures to contribute to mitigating the traffic impact of development.
- 9 An email from the Council for British Archaeology Wessex saying they have no comment to make.
- 10 An email from Sarah Wright, The Ridgeway National Trail Project Officer, reiterating comments made on the online form.

- 11 An email from Nick Small, Stagecoach Bus Company, stating their concerns that Residential Travel Plan scope and delivery is not actually fit for purpose and can not only deliver mode shift objectives (and not just to bus) but to all sustainable modes and worsen traffic congestion that is slowly strangling bus services. He goes on to advocate the use of the MyPTP tool and its scoping functionality. There are further comments around residential travel planning, but not specific relating to items covered in the SPD.
- 12 An email from Ricard Falconer from Co-wheels car club, pleased that car clubs are being built into travel planning. There is an omission on page 22 – Where it says “Provide space for car club vehicle for developments in excess of 500 dwellings” this should read “Provide one car club vehicle and space for every 500 dwellings”
- 13 An email from Wroughton Parish Council, which is set out below.

3 Ward and Parish Councillors

The draft document was presented to **Planning Committee** on 13th August 2019. The following comments were noted:

- | | |
|-------------------|---|
| Cllr Milner Barry | Targets of 8-10% reduction of car trips – is this ambitious enough in light of climate change? |
| Cllr Pajak | Supportive of bike and bus schemes proposed
Could funding be directed into infrastructure, such as more cycle paths?
Threshold of 60 dwellings may still be too high – 50 might be better |
| Cllr Watts | Bus infrastructure needs consideration – should not have a repeat of areas of North Swindon where buses struggle to get through |
| Cllr Jeffries | How much will the bond be, and how long will it be held for? |

Further presentations were given in the Council Chamber on 3rd September. The invitation was extended to include Swindon Civic Voice and the Taxi Forum, although these groups showed greater interest in the TCMS presentation that was given at the same event.

The following points were made on the draft SPD:

- How can people feed into Travel Plans before the Council approves it?

- Would developer be required to submit Travel Plans if the threshold of the development was to increase after the first planning permission was granted, such as on major phased developments?
- Is 60 units the right threshold? (CF to consider revising the threshold to 40 units)
- What is the difference between this and current approach to Travel Plans?

A representation by email has been made by Councillor Cathy Martyn, dated 7th October 2019 :

“The proposal is to reduce the residential threshold from 80 to 60. I am concerned at whether this would be low enough. There might be sites where less homes would be more than enough to impact travel, where you might want to ensure that there is a long term strategy to support sustainable & active travel & this could be dependent upon the site location as much as the number of homes.

Swindon Borough Council is trying to improve air quality. As such, I believe that all new residents should be encouraged to use sustainable & active forms of travel, regardless of the number of houses on a development or the site location. Any development within an air quality management area should be required to have a travel plan, regardless of the number of homes.

It could be that an area takes a number of small developments in close proximity to one another, which might each fall below the threshold, but together would reach or exceed the threshold for a travel plan. Can something be written into the reviewed policy with reference to the sites identified within the Local Plan as suitable for sustainable development, to ensure that in these circumstances, a location of several smaller sites is looked at as a whole and a travel plan is therefore required from each of the sites to be developed?

This should also encompass 2 or more sites which might have an area of land between them which is capable of being developed but not identified for development within the Local Plan (eg: if the site had not come forward at the time the Local Plan was reviewed).

Finally, if a site starts off with the number of homes falling below the minimum threshold, but there are then piecemeal applications to extend the site, then as soon as the threshold is reached in aggregate, a travel plan should be required for the whole site.”

Wroughton Parish Council submitted an email dated 25th October 2019 setting out its views on the draft document. The points made can be summarised as follows:

- Wroughton Parish Council fails to see how this document would benefit Wroughton in piece meal development.

- They are concerned there are no targets relating to bus travel, and no mention of walking and cycling infrastructure.
- In terms of School travel plans they feel that the onus is on schools to promote and implement travel plans, which is another burden for them.

No further representations have been received from Parish Councils.

4 Swindon Cycling Campaign

A presentation was given to SCC on 9th September and the following written statement was submitted with the same date:

We support:

1. The principle of developing this document as a Supplementary Planning Document;
2. The methods described for securing Travel Plans;
3. A lower threshold for the requirement to produce a Travel Plan for residential developments

We believe it could be improved as follows:

Duration of the travel plan.

In several places, it is mentioned that Travel Plans may have a duration. We could not find anything specifying a duration, although it is also mentioned (eg page 34) that remedial measures may be taken if targets are not met within 5 years.

Car Clubs

Highly accessible club cars are likely to be a key component of changing behaviour and getting people to use other modes most of the time. Car Clubs should be consulted on what they need to ensure club cars are easily accessible for all areas where travel plans would benefit from them. The document refers only to car clubs in the town centre: although from conversations we understand that other areas, for example, Wichelstowe, are likely to have car clubs in the future.

Car sharing should also be promoted.

5 Industry and wider stakeholders

Drop-in sessions were arranged in the Civic Offices on Tuesday 17th September 2019 and Tuesday 1st October 2019. Invitations were sent to over 1600 contacts in industry (land owners, consultants, developers) as well as statutory consultees (disability groups, environmental groups, governmental bodies) and ward and parish councillors. The sessions aimed to explain the SPD and clarify questions ahead of attendees making representations through the consultation process.

There were 3 attendees to the sessions and discussion included;

- Bus information at bus stops – The value of real time information and integrated digital mapping
- The use of apps in encouraging modal shift
- The Local Plan review's removal of policies TR1 and TR2, with Dm22 as a replacement

6 *SBC Local Plan Policy Team*

In a meeting with Angela Clack and Phil Smith from the Local Plan Policy Team, points can be summarised as follows:

- The bulleted list on page 6 will need to be reflected in policy
- Table One – If the DfT document is now withdrawn, the thresholds need to be replicated in LTP / TrfD or similar policy
- Document needs to make more reference to NEV SPD

Responses relating to document sections			
Chapter	Source of Comment	Issue Raised	Officer response
2. Policy Landscape	Highways England	The draft SPD refers to current Local Plan policies TR1 and TR2. This will need to be revised to reflect the emerging policies from the Local Plan review which proposes to remove these policies and replace them with policy DM22	Agreed
		It is important to ensure that the requirement for travel planning remains clearly signposted within local plan policy, to reflect the increasing importance of travel plan measures to contribute to mitigating the traffic impact of development	Matter for Local Plan policy team
	Ward councillor	Can something be written into the reviewed policy with reference to the sites identified within the Local Plan as suitable for sustainable development, to ensure that in these circumstances, a location of several smaller sites is looked at as a whole and a travel plan is therefore required from each of the sites to be developed?	Matter for Local Plan policy team
	Public comment	How can people feed into Travel Plans before the Council approves it?	TPs are published on the online planning portal
3. Thresholds	Public Comment	The thresholds seem high – nursery at 60 children is a lot of traffic – reduce to 50.	Threshold to remain at 60 (Agreed by Cllrs Penny and Sumner)
		Thresholds should be linked to the location of the development	Not agreed
		Current (residential) threshold of 80 is still appropriate – monitoring on fewer dwellings becomes meaningless.	Threshold to remain at 60 (Agreed by Cllrs Penny and Sumner)

		Residential units should be 80 dwellings.	Threshold to remain at 60 (Agreed by Cllrs Penny and Sumner)
	Ward Councillor	Threshold of 60 (residential) dwellings may still be too high – 50 might be better	Threshold to remain at 60 (Agreed by Cllrs Penny and Sumner)
	Highways England	In para 3, fourth bullet point, the reference to “local” could be removed to encompass the need for travel planning to address traffic problems on both the local and strategic networks	Agreed
	Public comment	Would developer be required to submit Travel Plans if the threshold of the development was to increase after the first planning permission was granted, such as on major phased developments?	Total would be identified at Outline
		Is 60 units the right threshold? Consider revising the threshold to 40 units	Threshold to remain at 60 (Agreed by Cllrs Penny and Sumner)
	Ward Councillor	The proposal is to reduce the residential threshold from 80 to 60. I am concerned at whether this would be low enough.	Threshold to remain at 60 (Agreed by Cllrs Penny and Sumner)
		Any development within an air quality management area should be required to have a travel plan, regardless of the number of homes.	Partially agreed (depends on net increase in traffic) - Tweak bullet 1 on page 6
		If a site starts off with the number of homes falling below the minimum threshold, but there are then piecemeal applications to extend the site, then as soon as the threshold is reached in aggregate, a travel plan should be required for the whole site.	Travel plan requirements are currently linked to individual applications / permissions so this is problematic legally.
	Swindon Cycle Campaign	We support a lower threshold for the requirement to produce a Travel Plan for residential developments	Threshold to remain at 60 (Agreed by Cllrs Penny and Sumner)

	Travel Plan Officer	The thresholds that trigger a Travel Plan Statement (rather than a full travel plan) are missing from Table 1	Agreed – Add column to show DfT thresholds
4. Types of plan	CPRE	Interim Travel Plan would achieve anything and it would be better to have clear requirements set out whether an application comes in as Outline or Full.	Interim travel plans will still need to commit to minimum requirements
5. Options for producing travel plans	Public Comments	Option 2 ensures completion of the travel plan as it has an incentive	Both options ensures completion of the travel plan, which is the purpose of the SPD.
		Private consultancies are just as capable.	There is nothing in the SPD to suggest the travel plans won't be implemented by consultancies
		Applying a blanket approach won't work. Swindon Borough Council may want to direct more money to one thing	There will be flexibility within the contribution around where the resource gets focused.
		Delivery might be subject to delay if the housing delivery is delayed in stages, or phases, and the viability argument could be brought into play	Contribution payments will be in instalments at certain trigger points.
		There is no need for bonds. The council can already enforce against non-implementation. Smaller developers will be unable to access bond arrangements.	Enforcement action is time consuming and costly
		Monitoring should form part of the council's statutory obligations to monitor and enforce the implementation of obligations	Statutory obligations arise from the law.
	Consultant	The Option system is priced such that it will effectively mean that local businesses will lose out on Travel Plan Coordinator consultancy work.	SBC may still require consultancy expertise to implement travel plans.
6. Employment and Residential	Public comment	A whole systems approach is required for a sustainable shift to reduce congestion and pollution	The travel plan is one part of the system approach.

travel plan measures		Key Infrastructure missing from your tables	Infrastructure requirements dealt with by S106 outside of travel plan.
		Promotional events should only be held where a development has more than 1000 units	Not supported, although events can be held only after a certain occupation trigger is achieved.
		Segregated cycle paths should have kerbs to delineate Cycle paths at road level should have tactile segregation from traffic All busses should have audio announcements approaching bus stops All bus stops should have audio alerts, or people could access an app with such a facility to know which bus is approaching Increase the number of bus shelters	Infrastructure requirements dealt with outside of travel plan.
	CPRE	Travel Plan Statements will only work if the Design and Access and Landscape statements by the developer incorporate all those requirements which you list as being recommended	Picked up by TDM assessment
		A query as to whether Employment Travel Plans only refer to new employment sites	New, expansion or change of use. This can be made clearer in the document
		A question as to whether the planning department will ensure infrastructure on site plans and layout are not encouraging car domination	Not a matter for the SPD
	Network Rail	Whilst it is noted in the draft SPD that rail use should be encouraged for Employment Travel Plans, it is not noted for Residential or School plans	Agreed
	Stagecoach Bus Company	Residential Travel Plan scope and delivery is not actually fit for purpose	Scope and delivery are based on current good

			practice and will continue to be reviewed if not achieving desired outcomes.
		Use of the MyPTP tool and its scoping functionality	Cannot name commercial products in the SPD but will be considered as part of procurement of delivery mechanisms.
	Co-wheels car club	There is an omission on page 22 – Where it says “Provide space for car club vehicle for developments in excess of 500 dwellings” this should read “Provide one car club vehicle and space for every 500 dwellings”	Agreed
	Ward Councillor	Targets of 8-10% reduction of car trips – is this ambitious enough in light of climate change?	This is benchmarked as a realistic achievement of a travel plan.
	Parish Council	There are no targets relating to bus travel	Targets would be around “sustainable transport” generally and not specific to one mode.
	Ward Councillor (x2)	Could funding be directed into infrastructure, such as more cycle paths / Bus infrastructure?	Infrastructure requirements dealt with outside of travel plan.
	Parish Council	No mention of walking and cycling infrastructure	Infrastructure requirements dealt with outside of travel plan.
	Swindon Cycle Campaign	The document refers only to car clubs in the town centre	Agreed – Page 22 should read “Free membership to the car club (where provided)”
		Car sharing should also be promoted	Already included on p22

8 School travel plans	Public comment	New schools should be monitored and enforced to have a STP	As per proposed
	Parish Council	The onus is on schools to promote and implement travel plans, which is another burden for them	Not supported
9. Appendices	Public comment	A transparent breakdown should be provided of how the Option 1 contribution sums have been calculated	Agreed – Can add to appendix
	CPRE	How will the costs quoted in Appendix A increase if a development is delayed or spread over a lengthy lifespan of the travel plan.	Payment triggers are index linked.
	Ward Councillor	How much will the bond be, and how long will it be held for	Bond amounts cited in appendix. Held until agreed targets met

C Fleming 01/11/2019