

ENVIRONMENTAL STATEMENT (VOLUME III)

Appendix 17.14 Interim Worker Travel Plan

HyNet Carbon Dioxide Pipeline DCO

Planning Act 2008

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 –
Regulations 5(2)(a)

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1. INTRODUCTION

1.1. OVERVIEW

- 1.1.1. This Interim Worker Travel Plan (IWTP) has been prepared to consider measures and initiatives that will encourage the use of sustainable modes of transport by staff involved in the delivery of the Hynet Carbon Dioxide Pipeline Development Consent Order (DCO) ('The DCO Proposed Development'). In particular it identifies sustainable transport measures for staff accessing the Site during the construction stage of the DCO Proposed Development. It is intended that in doing so, the IWTP will support sustainable transport ambitions set out in National and Local policy in England and Wales and minimise the traffic and transport impacts of the DCO Proposed Development during its construction stage.
- 1.1.2. It is intended that this IWTP will be submitted to the appointed Construction Contractor prior to commencement of construction works. The Construction Contractor will be required to adhere to the principles of this document and develop a full worker Travel Plan, including specific measures tailored to their workforce, construction practices, and build programme at that time. The full worker Travel Plan will be submitted to Cheshire West and Chester Council (CWCC) and Flintshire County Council (FCC) for agreement prior to the commencement of construction of the DCO Proposed Development.
- 1.1.3. As is the case for **Chapter 17 – Traffic and Transport (Volume II)** of the Environmental Statement and **Appendix 17.13 Transport Assessment (Volume III)**, the operational and decommissioning stages are not included within the scope of this document.

1.2. SCOPING

- 1.2.1. The proposed approach to the Travel Plan at this stage is set out in the Scoping Note (24 June 2022) submitted to FCC and CWCC. This approach was also discussed with both CWCC and FCC during meetings on the 19 and 30 May 2022 respectively. The **Scoping Note** [is](#) shown in **Appendix 17.12 (Volume III)**.

1.3. DCO PROPOSED DEVELOPMENT

- 1.3.1. The Applicant intends to build and operate a new underground carbon dioxide (CO₂) pipeline from Cheshire, England to Flintshire, Wales with necessary Above Ground Installations (AGIs) and Block Valve Stations (BVSs). It is classed as a Nationally Significant Infrastructure Project (NSIP) and will require a Development Consent Order (DCO) under the Planning Act 2008 ('PA2008') granted by the Secretary of State for [the Department for Energy Security and](#)

[Net Zero \(DESNZ\) Business, Energy and Industrial Strategy \(BEIS\)](#) via the Planning Inspectorate (PINS).

- 1.3.2. The DCO Proposed Development will form part of HyNet North West ('the Project'), which is a hydrogen supply and Carbon Capture and Storage ('CCS') project. The goal of the Project is to reduce carbon dioxide emissions from industry, homes and transport and support economic growth in the North West of England and North Wales. The wider Project is based on the production of low carbon hydrogen from natural gas. It includes the development of a new hydrogen production plant, pipelines, and the creation of CCS infrastructure. CCS prevents CO₂ entering the atmosphere by capturing it, compressing it and transporting it for safe, permanent storage.
- 1.3.3. The DCO Proposed Development is a critical component of HyNet North West which, by facilitating the transportation of carbon, enables the rest of the Project to be low carbon. The hydrogen and CCS elements of the Project do not form part of the DCO Proposed Development and will be delivered under separate consenting processes.
- 1.3.4. The DCO Application will seek consent for the construction, operation and maintenance of the following components which the DCO Proposed Development, namely:
- **Ince Above Ground Installation (AGI) to Stanlow AGI Pipeline** – a section of new underground onshore pipeline (20" in diameter) to transport CO₂;
 - **Stanlow AGI to Flint AGI Pipeline** – a section of new underground onshore pipeline (36" in diameter) to transport CO₂;
 - **Flint AGI to Flint Connection Pipeline** – section of new underground onshore pipeline (24" in diameter) to transport CO₂;
 - **Flint Connection to Point of Ayr Terminal Pipeline** – section of existing Connah's Quay to Point of Ayr (PoA) underground onshore pipeline (24" in diameter) which currently transports natural gas but would be repurposed to transport CO₂ as part of the DCO Proposed Development. No physical works would be required to facilitate the repurposing, with the exception of minor works at each end of the pipeline, and the construction of three new Block Valve Stations (BVSs) along the existing onshore pipeline;
 - **Four AGIs** – Ince AGI, Stanlow AGI, Northop Hall AGI, and Flint AGI.
 - **Six Block Valve Stations (BVSs)** – located along:
 - The new Stanlow AGI to Flint AGI Pipeline (three in total); and
 - the existing Flint Connection to PoA Terminal Pipeline (three in total).
 - **Other above ground infrastructure**, including Cathodic Protection (CP) transformer rectifier cabinets and pipeline marker posts;

- **Utility Connection’s infrastructure**, including power utilities and Fibre Optic Cable (FOC); and
- **Temporary ancillary works** integral to the construction of the Carbon Dioxide Pipeline, including Construction Compounds and temporary access tracks.

1.3.5. Further details of each element of the DCO Proposed Development are set out in **Chapter 3 – Description of the DCO Proposed Development (Volume II)**.

1.3.6. The construction of the DCO Proposed Development is anticipated to commence in 2024, subject to the grant of a DCO. The construction programme is expected to last approximately 18 months.

1.4. TRAVEL PLAN BENEFITS

1.4.1. The objective of this Travel Plan is to encourage staff to consider sustainable transport alternatives over single car occupancy, when travelling to working locations associated with the DCO Proposed Development.

1.4.2. Benefits of the successful delivery of a Travel Plan in the context of the DCO Proposed Development include:

- Reduced travel costs;
- Cleaner environment;
- Increased road safety;
- Improved travel choice; and
- Reduced congestion.

1.5. TRAVEL PLAN OBJECTIVES

1.5.1. The IWTP seeks to reduce the number of trips made to and from the Site by private car during the construction stage. All construction staff would be made aware of the measures included in the Travel Plan, so that benefits can be delivered and the number of car borne trips reduced by promoting car sharing, minibus use and public transport.

1.5.2. The primary objectives which are of most relevance during the construction period of the DCO Proposed Development are as follows:

- Ensure that an appropriate package of measures is employed to:
 - Encourage sustainable travel behaviour;
 - Reduce car usage (particularly single occupancy car journeys);
 - Raise awareness of the sustainable transport measures serving the Site; and
 - Minimise the impact of traffic on sensitive locations.

2. RELEVANT POLICY

2.1. NATIONAL POLICY

2.1.1. This section summarises the policies in both England and Wales that are relevant to, and have been considered, in the development of the IWTP.

ENGLAND

Overarching National Policy Statement for Energy (EN-1) (2011)

2.1.2. The Overarching National Policy Statement for Energy (EN-1) was published in 2011 and states in Paragraph 5.13.4 that *“Where appropriate, the applicant should prepare a travel plan including demand management measures to mitigate transport impacts. The applicant should also provide details of proposed measures to improve access by public transport, walking and cycling, to reduce the need for parking associated with the proposal and to mitigate transport impacts.”*

National Planning Policy Framework (NPPF) (2021)

2.1.3. The National Planning Policy Framework (NPPF) (2021) does not contain specific policies for Nationally Significant Infrastructure Projects (NSIPs) for which particular considerations apply. Paragraph 5 states: *“These are determined in accordance with the decision-making framework set out in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are considered both important and relevant (which may include the National Planning Policy Framework). National policy statements form part of the overall framework of national planning policy and are a material consideration in decisions on planning applications.”*

Guidance on Travel Plans, Transport Assessments, and Statements (2014)

2.1.4. The Planning Practice Guidance provides context and guidance to the NPPF. The Guidance on Travel Plans, Transport Assessments, and Statements (2014) states in Paragraph 5 that *“the primary purpose of a Travel Plan, is to identify opportunities for the effective promotion and delivery of sustainable transport initiatives such as walking, cycling, public transport and tele-commuting, in connection with both proposed and existing developments and through this to thereby reduce the demand for travel by less sustainable modes.”*

WALES

Planning Policy Wales Edition 11 (PPW) (2021)

- 2.1.5. The Planning Policy Wales (PPW) Edition 11 (2021) sets out the land use planning policies of the Welsh Government and its commitment to sustainable development.
- 2.1.6. Chapter 4.1 of the PPW focuses on enabling more sustainable travel choices and reducing dependency on the car for daily travel, which Paragraph 4.1.10 states that *“the planning system has a key role to play in reducing the need to travel, particularly by private car, and supporting sustainable transport.”*

ACTIVE TRAVEL ACTION PLAN FOR WALES (ATAPW) (2016)

- 2.1.7. The Active Travel Action Plan for Wales (ATAPW) (2016) outlines objectives and measures for increasing active travel across Wales. However, given the nature of the Proposed Development, and the important considerations for site security, health and safety, active travel to site Working Areas would not be permitted during the construction stage of the Proposed Development.

2.2. LOCAL POLICY

- 2.2.1. This section summarises the policies of CWCC and FCC that are relevant to, and have been considered, in the development of the IWTP.

CESHIRE WEST AND CHESTER

Cheshire West & Chester Council Travel Planning Guidance (2015)

- 2.2.2. The Cheshire West & Chester Council Travel Planning Guidance sets out the standard requirement for Travel Plans developed and implemented through the planning process. Chapter 1.2 of the Travel Planning Guidance states that *“the overriding aim of the travel plan should be to reduce the proportion of single occupancy car trips to and from site and measures to address this should be explicitly stated.”*

FLINTSHIRE

North Wales Joint Local Transport Plan (2015)

- 2.2.3. The North Wales Joint Local Transport Plan has been jointly prepared by the North Wales Local Authorities in response to the Welsh Government requirement for Local Transport Plans to be submitted in 2015. The Plan is a statutory document for transport in the region. It sets out a range of interventions and schemes for all modes of travel, including one of the recommendations to *“undertake travel planning and travel marketing activities with employees and the business community to increase awareness of and access to sustainable travel opportunities and reducing the need to travel.”*

Flintshire ~~Draft~~ Local Development Plan 2015-2030

2.2.4.

One of the objectives of the ~~draft~~ Local Development Plan is to “Promote a sustainable and safe transport system that reduces reliance on the car.” Policy STR5 (Transport and Accessibility) is as follows.

“Sustainable economic growth and development can only be delivered by the maintenance and enhancement of an integrated, accessible, usable, safe and reliable transport network. The development of Flintshire’s transport infrastructure therefore underpins the Council’s economic ambition and in turn, informs the provision of a sustainable pattern of development. Where appropriate new development and associated transport infrastructure should therefore:

- *Facilitate accessibility to employment, homes, services, and facilities by locating development in places with access to integrated transport infrastructure, thereby reducing the need to travel;*
- *Promote the implementation of an integrated transport solution in Flintshire, involving road, rail, bus, park and ride / share and active travel improvements;*
- *Promote road and rail improvements to support Flintshire’s sub-regional role as a strategic gateway and hub;*
- *Ensure that the local highway network either has, or can be upgraded, to provide capacity to accommodate sustainable levels of development;*
- *Facilitate improvements to the quality, attractiveness and availability of public transport options;*
- *Provide walking and cycling routes, linking in with active travel networks and green infrastructure networks;*
- *Adopt a sustainable approach to the design, function and layout of new development, including providing appropriate levels of parking; and*
- *Support the movement of freight by rail or water.”*

Flintshire Unitary Development Plan 2000-2015

~~2.2.5. The Flintshire County Council Unitary Development Plan 2000-2015. Section STR 2 states that new development will be expected to incorporate, wherever practicable, the following requirements:~~

- ~~• Minimising the number and length of journeys especially by private car;~~
- ~~• Making the best use of existing roads and addressing congestion and safety issues through traffic management and calming measures;~~
- ~~• Enabling the efficient use of and improvements to public transport;~~
- ~~• Enabling alternative means of travel including cycling and walking;~~
- ~~• Facilitating the transfer of freight from road to rail or water; and~~
- ~~• Facilitating the provision and use of telecommunications.~~

~~2.2.6. Section AC4 of the Development Plan asserts that development is required to be accompanied by a Travel Plan to set out measures to reduce the level of car based trips, which the measures will be monitored and reviewed.~~

3. STAFF TRAVEL CHARACTERISTICS

3.1. CONSTRUCTION STAFF

- 3.1.1. The workforce for the DCO Proposed Development will primarily be of a migratory nature; travelling to the region and staying in local accommodation during the working week. Workers will travel from local accommodation to working locations each day.

3.2. WORKING LOCATIONS

- 3.2.1. ~~Six Seven~~ Centralised Compounds will be established along the pipeline Working Width. There would also be one further back-up compound (located at Sealand Road). Staff will travel to Centralised Compounds at the start of each day and subsequently travel to working locations; 'work fronts' along the pipeline Working Width.
- 3.2.2. It is typical for development of this nature that staff will be transported from centralised compounds to work-fronts by minibuses and pick-ups.

3.3. TIMES OF TRAVEL

- ~~3.3.1. A standard working day of 10 hours per day (0800-1800) 5 days per week on Monday to Friday with a 5 hour working day (0800-1300) on Saturday is areis being adopted as the basis of the DCO Proposed Development., however, a~~
- ~~3.3.2. At locations where trenchless crossing techniques are proposed, the working day durations will vary according to the length of the crossing and the technique to be adopted. Trenchless tunnels will be constructed as a continuous operation. As such, extended shifts may be required, including 24-hour operation during tunnelling activities. Core working hours are proposed to be from 0800 to 1800 on weekdays and 0800 to 1300 on Saturdays (excluding bank holidays).~~
- ~~3.3.1.3.3. To maximise productivity within core working hours, the Construction Contractor(s) will require a period of up to one hour before and up to one hour after core working hours for the start-up and close-down of activities. This will include, but not be limited to, deliveries, movement to place of work, unloading, maintenance and general preparation works. It will not include the operation of any plant or machinery likely to cause disturbance to local residents or businesses. These periods will not be considered an extension of core working hours.~~
- ~~3.3.2. In addition to the stated day Monday to Friday, there would also be an allowance for deliveries and worker arrivals between 0700-0800 and 1800-1900. There would however be no physical work activities during these times.~~

~~3.3.3. Saturday working is may also be required between 0800-1300 on. lyThere would also be an allowance for deliveries and worker arrivals between 0700-0800 and 1300-1400 and no although there will be no physical work activities during these times.~~

3.3.4. In order to be available at the start of shift it is anticipated that the overwhelming majority of worker trips would take place outside of the typical peak hours (0800 to 0900 and 1700- to 1800 Monday to Friday and 0700 to 0800 and 1300 to 1400 on Saturday).

3.3.5. Core working hours may vary at locations where trenchless crossings are proposed according to the length of the pipe being installed, ground conditions, and the technique used. In such cases, continual 24-hour working may be required to allow the tunnelling activities to be completed as safely and quickly as possible. The duration of 24 hour working at the majority of trenchless crossings is not likely to exceed a period of days, though the longer crossings in difficult ground conditions are expected to last up to four weeks.

4. TRAVEL PLAN TARGETS

4.1.1. Travel Plan targets should be SMART: Specific, Measurable, Achievable, Realistic and Time-bound. It is proposed that there would be one key objective associated with the Travel Plan for the DCO Proposed Development during the construction stage, as follows:

"To achieve a minimum car occupancy of 2.0 workers per vehicle over the duration of the construction phase of the Proposed Development."

4.1.2. The SMART objective has the following key aims:

1. Reduce the impact associated with the construction stage of the DCO Proposed Development by minimising single occupancy car use amongst construction workers.
2. Increase the proportion of car sharing amongst construction workers to above 2.0 workers per car through the use of a range of incentives with supported marketing activity.
3. Raise awareness of the sustainable transport measures serving the DCO Proposed Development to ensure that they are able to make better informed travel choices.
4. Ensure that an appropriate Travel Plan Coordinator is appointed to encourage sustainable travel behaviour - to be funded by the Construction Contractor - prior to the commencement of the construction stage of the DCO Proposed Development.

4.1.3. **Section 5** presents a range of measures that could be implemented by a Construction Contractor and The Applicant as part of a full Travel Plan for the DCO Proposed Development.

5. TRAVEL PLAN MEASURES

5.1. PROPOSED TRAVEL PLAN MEASURES

5.1.1. The following measures are proposed to deliver the objectives of the IWTP:

- Measure 1: Appointment of Travel Plan Coordinator;
- Measure 2: Travel Plan Marketing and Communications Components;
- Measure 3: Car Parking Management Strategy;
- Measure 4: Car Sharing and Minibus Scheme; and
- Measure 5: Senior Leadership.

5.2. MEASURE 1: TRAVEL PLAN COORDINATOR

5.2.1. The Travel Plan Coordinator (TPC) is an appointed individual who supports and leads the implementation of the Travel Plan.

5.2.2. The TPC assumes overall responsibility for the Travel Plan once adopted, which in this instance would be nominated by the appointed Construction Contractor, and would take on the following roles:

- Coordinating and attending Transport Review Group meetings;
- Prepare and present a monitoring report to the Group;
- Work and liaise with the Traffic Safety and Control Officer (TSCO) in ensuring the objectives of the Outline Construction Traffic Management Plan (OCTMP) are met;
- Manage implementation of the travel plan;
- Providing information of the Travel Plan and ensuring that the information is kept up to date;
- Acting as a key point of contact for issues related to construction worker traffic;
- Reviewing car parking provision on a regular basis;
- Monitoring performance against the targets of the Worker Travel Plan; and
- Implementing additional measures if not delivering on targets set.

5.3. MEASURE 2: MARKETING AND COMMUNICATIONS

5.3.1. All employees are to receive an introductory pack prior to starting work and the objective of these packs are to provide information critical to influencing travel patterns. The contents include but are not limited to:

- Introduction to Travel Plans;
- Website with information on transport to and from the Site;

- Information on the health and environmental benefits of active and public transport choices (where applicable);
- Maps with local transport services;
- Details of public transport timetables and routes; and
- Contact details for the TPC.

5.4. MEASURE 3: CAR PARKING MANAGEMENT STRATEGY

- 5.4.1. The availability of car parking has a major influence on the means of transport people choose for their journeys and is therefore an important Travel Plan measure in promoting sustainable travel to and from the Site. It is proposed that sections of car parking will gradually be introduced as construction develops, with a defined number of construction worker car parking spaces to be provided during construction. Managing the number of parking spaces available on-site would help ensure that the number of vehicles is controlled and car occupancy is maximised. It will be the responsibility of the Travel Plan Co-ordinator working closely with the contractor to determine the amount of spaces to be provided.
- 5.4.2. Car parking at the central compounds will be monitored by the TPC. The Site Manager and the TPC will set the appropriate criteria for construction workers to use parking areas within centralised compounds. Parking at individual work-fronts will be restricted to minibuses and double-cab pick-ups for transport between Centralised Compounds and work-fronts.

5.5. MEASURE 4: CAR SHARING AND MINIBUS SCHEME

- 5.5.1. As above there will be limited parking provision made available to staff who opt to drive to the site by private car alone. Staff are encouraged to 'ride-share' as far as possible. This can either be arranged formally through the TPC or informally among staff themselves. On occasions when car sharers are unable to obtain a lift home with a regular driving partner, the TPC will provide a guaranteed lift home using minibuses or taxis.
- 5.5.2. The Construction Contractor will be required to provide minibuses for transporting workers from the key points of construction worker origin to the Site. This would have the benefit of reducing the number of vehicular trips on the local road network. For example, many of the construction workers would find local accommodation at hotels and bed and breakfasts (B&Bs). They would be keen to minimise their daily travel costs and a minibus service would be an attractive means of transport to them. The locations of accommodation chosen by these workers could provide suitable pick up locations for the minibus.

5.5.3. The Construction Contractor would encourage the use of common hotels and B&Bs by workers that are not from the local area, to encourage the use of shared transport modes. The Construction Contractor would be requested to provide minibuses and to organise where the minibuses will pick up workers and at what times.

5.5.4. A staff registration process will be integrated into the induction process to ensure that all construction staff are registered on a car sharing database and encouraged to car share to site with other staff members.

5.6. MEASURE 5: SENIOR LEADERSHIP

5.6.1. Senior staff members working at, or visiting, the site who are not 'skilled' construction staff should demonstrate a high level of commitment to the IWTP and follow the same rules and policies to lead by example and encourage wider engagement in the programme.

6. MANAGEMENT AND MONITORING

6.1. APPROACH TO MANAGEMENT AND MONITORING

- 6.1.1. Monitoring the Construction Workers' Travel Plan will be central to ensuring its aims are delivered in practice. Monitoring guarantees that failures or changing conditions are identified at the earliest point and that remedial action (i.e. identifying additional measures, providing incentives, marketing campaign to promote the Construction Workers' Travel Plan) can be taken, to ensure that the Travel Plan stays on course to meet its overall objective.
- 6.1.2. The Travel Plan Co-ordinator would be responsible for monitoring the Travel Plan, to ensure an efficient and effective execution of the measures, and to refine the measures, where necessary, to cope with the changes in demand over the construction stage.
- 6.1.3. An important part of the monitoring strategy would be obtaining feedback from construction workers, CWCC, FCC, and local residents regarding any issues with construction worker traffic. The appointment of a TPC will ensure that an appropriate point of contact is available and can react to such feedback.
- 6.1.4. Furthermore, construction workers will be given the chance to offer their suggestions and ideas via a suggestion box/ or an informal discussion with the TPC; while review meetings will be held at regular intervals to ensure any issues are dealt with effectively.

6.2. MONITORING

- 6.2.1. Car occupancy and parking surveys will be undertaken on a quarterly basis once the construction of the DCO Proposed Development commences and then repeated at an agreed periodic interval.
- 6.2.2. The TPC will obtain feedback from construction workers, local council, and local residents regarding any issues with construction worker traffic. The TPC will act as a key point of contact and react to such feedback.
- 6.2.3. The TPC will monitor the total number of construction workers on-site and keep under the number of parking spaces provided to ensure car occupancy target is met.

6.3. REVIEW

- 6.3.1. The TPC will review the results and, if appropriate, revise the target accordingly. The results of the travel survey and revised targets will be included in the subsequent revision of the Travel Plan.

6.4. ACTION PLAN

6.4.1. The programme for the implementation of the Travel Plan measures is set out in **Table 6-1** and sets out tasks and, intended implementation timescales.

Table 6-1 - Action Plan

Action	Target Date	Responsibility
Appointment of TPC	At least three months prior to commencement of construction	Construction Contractor
Development of Full Travel Plan	At least one month prior to commencement of construction	TPC
Car Parking and Management Strategy	At least one month prior to commencement of construction	TPC
Car Sharing and Minibus Scheme	On commencement of construction	TPC
Monitoring – Car Occupancy Surveys	Every 3 months	TPC
Monitoring – Parking Surveys	Every 3 months	TPC

7. SUMMARY AND CONCLUSIONS

- 7.1.1. This IWTP has been prepared to accompany the DCO Proposed Development. It sets out a range of sustainable transport measures that will help workers accessing compounds and working areas during the construction of the DCO Proposed Development in line with sustainable transport ambitions set out in National and Local policy.
- 7.1.2. ~~Six Seven~~ Centralised Compounds will be established along the pipeline Working Width. There would also be one further back-up compound (located at Sealand Road). Staff will travel to Centralised Compounds at the start of each day and subsequently travel to working locations; 'work fronts' along the pipeline Working Width.
- 7.1.3. Given the nature of the DCO Proposed Development, and the important considerations for site security, health and safety, active travel to site Working Areas would not be permitted during the construction stage of the DCO Proposed Development. Travel by other modes, such as bus and rail would not be practical for day to day travel to site given the often rural nature of working locations, lack of infrastructure and for similar considerations of health and safety and site security.
- 7.1.4. Consequently, the focus of the IWTP is to minimise single occupancy car trips to working locations. The main target for the DCO Proposed Development is therefore to achieve a car occupancy rate of at least 2.0 per vehicle. This will be facilitated by the range of measures contained within this IWTP.
- 7.1.5. As above, a range of SMART measures have been presented in this document which, when effectively implemented, are expected to lead to a reduction in the number of commuting trips to and from Centralised Compounds.
- 7.1.6. A critical role in the delivery of the IWTP is the Travel Plan Co-ordinator (TPC). The appointment of a TPC will ensure the effective implementation of the Travel Plan. The TPC will have responsibility for implementing and coordinating Travel Plan measures and monitoring its success. Furthermore, it is recommended that the applicant and TPC should work with the local highway authority throughout the lifespan of the Travel Plan in order to ensure that it is delivered as effectively as possible and is responsive to changing requirements.
- 7.1.7. The Travel Plan is required to be prepared substantially in accordance with this IWTP, and to be approved and implemented by the contractor during construction of the DCO Proposed Development.