

ROVIA

Nutfield Park Developments Limited

Former Laporte Works Site Nutfield Green Park, Nutfield

Rebuttal Proof of Evidence

David Bird BSc CEng MICE

On Transport Matters (CD11.25)

TDC Planning Reference: 2023/1281

Planning Inspectorate Reference: APP/M3645/W/25/3374913

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1 Introduction

- 1.1 This is the rebuttal Proof of Evidence (PoE) of David Bird.
- 1.2 I address a number of issues raised in the PoE of Mr Peter Lee representing Tandridge District Council (TDC) in this rebuttal.
- 1.3 Throughout the rebuttal I have sought to refer to evidence already set out in my main PoE (CD11.12 – Volume I Text) and PoE Appendices (CD11.13 – Volume II Appendices) rather than repeat that evidence in this document.
- 1.4 A signed Transport Statement of Common Ground (SoCG) between both the Appellant and the Council forms part of the Core Documents (CD8.2) which I also make reference to in this document.

2 Points of Factual Disagreement

- 2.1 At paragraph 2.3 of Mr Lee's PoE, reference is made to 9 public footpaths which pass through the site and Mr Lee lists these as "Footpath Nos. 192, 195, 568, 571, 572, 621, 622, 624 and 626". No reference is made to Footpath 616 which does pass through the site but Mr Lee refers to Footpath 626 which does not pass through the site, hence I believe this is an error and FP 626 should be 616. The Transport SoCG (CD8.2) includes a plan at Image 3.1 showing the PROWs which pass through the site.
- 2.2 With regards to Mr Lee's description of the walking route to South Nutfield along Mid Street, at paragraphs 2.5, 8.23, 8.26, 8.27 Mr Lee states that the route is "unlit" or "largely unlit". I disagree with this and I have observed street lighting to be present along most of the route. I would therefore suggest that an accurate description is that: "the majority of the route is lit".
- 2.3 At paragraph 2.4, Mr Lee states:
- "The village has very limited services which do not cater for the day-to-day needs of the community. It has a Veterinary Practice, a flooring shop, car wash, vehicle repair garage and a nursery all clustered around the junction of the High Street and Coopers Hill Road and top end of Church Hill. There are no other services or facilities within the village of Nutfield."*
- 2.4 No reference is made to Nutfield Memorial Hall and its community centre use (I am advised that several classes take place in the hall), the two public houses within 850m of the site or the cricket club and football pitches within walking distance of the site.
- 2.5 Then at paragraph 8.22 Mr Lee states:
- "As I have set out in the OR, Nutfield is a very small village with a population of around 300 people. It has a very limited range of existing services comprising a community centre, a jeweller, a veterinary surgery, a flooring shop, a public house and a garage (mechanic, tyre sales and hand car wash)."*
- 2.6 Table 5.1 of the Transport SoCG (CD8.2) should be referred to for the agreed key services within a walking distance of the site.
- 2.7 I would also note the commitment made by the applicant in the (draft) S106 Agreement to provide buildings for a Use Class F2 (a) Local Shop (a local convenience store up to 280sqm which will be located in the 'Green Park East' area) and Use Class E(e) Medical and Health Services on the site. These will be a significant additional benefit for both new residents of the development and the existing Nutfield community as the facilities will be well connected to existing footways (both within the site and from the A25). The convenience store would cater for everyday needs such as a newspaper, pint of milk / bread.

3 Concerns with Collated Data of Travel Patterns in Surrey and Tandridge

- 3.1 At paragraph 8.42 of his evidence Mr Lee refers to “collated survey evidence” included in his Appendix 5 which is entitled “Travel Patterns – Surrey and Tandridge (although I note that the title erroneously refers to Appendix 6).
- 3.2 I have not commented on any conclusions Mr Lee may seek to draw from this appendix as I consider the analysis he draws on to be flawed.
- 3.3 Under the heading “Borough Level Travel Behaviour”, Mr Lee states that “Car use varies across the boroughs, generally correlating with rail access and urban density”. However, one cannot draw that conclusion from the table of data presented. Indeed it is not known what this data is and what the reference to “Indicative” in the graph title means. However, I assume that the data used is the 2021 Census data on which I comment below. I draw this conclusion partly from the next graph under the heading “Current Travel Behaviour” which shows very significant proportions of working from home.

Census 2021 Travel to Work (TS061)

- 3.4 Under the next heading “Tandridge – Ward Level Travel Intensity by Mode” Mr Lee explains that his analysis is based on Census 2021 Travel to Work (TS061) inputs.
- 3.5 Use of this data is inappropriate for this form of analysis as it was recorded during the Covid-19 pandemic.
- 3.6 This is evidenced in Section 3 and Section 6 of the ‘Travel to work quality information for Census 2021’ document published by Office for National Statistics. I include relevant extracts at **Appendix R1**.
- 3.7 Section 3 ‘Coronavirus (COVID-19) pandemic context’ states that:

“Census 2021 was conducted during a time of unparalleled change because of the coronavirus pandemic. On Census Day, 21 March 2021:

- *a nationwide lockdown was still in place, with government guidance requiring people to work from home wherever possible*
- *those key workers who were working outside of their homes were encouraged to avoid public transport where possible to reduce transmission*
- *non-essential retail and businesses were closed*
- *up to 5.6 million people in England and Wales were supported by a national job support scheme known as furlough*
- *households were not able to meet with others outside of their bubble*

- *the roadmap for moving out of lockdown had just been released, with children and students beginning to return to educational establishments*
- *the Coronavirus Infection Survey (CIS) estimated up to 170,000 people were infected with COVID-19 in England and Wales*
- *approximately 7% of the population of Great Britain (3 million people) were self-isolating with symptoms consistent with COVID-19*

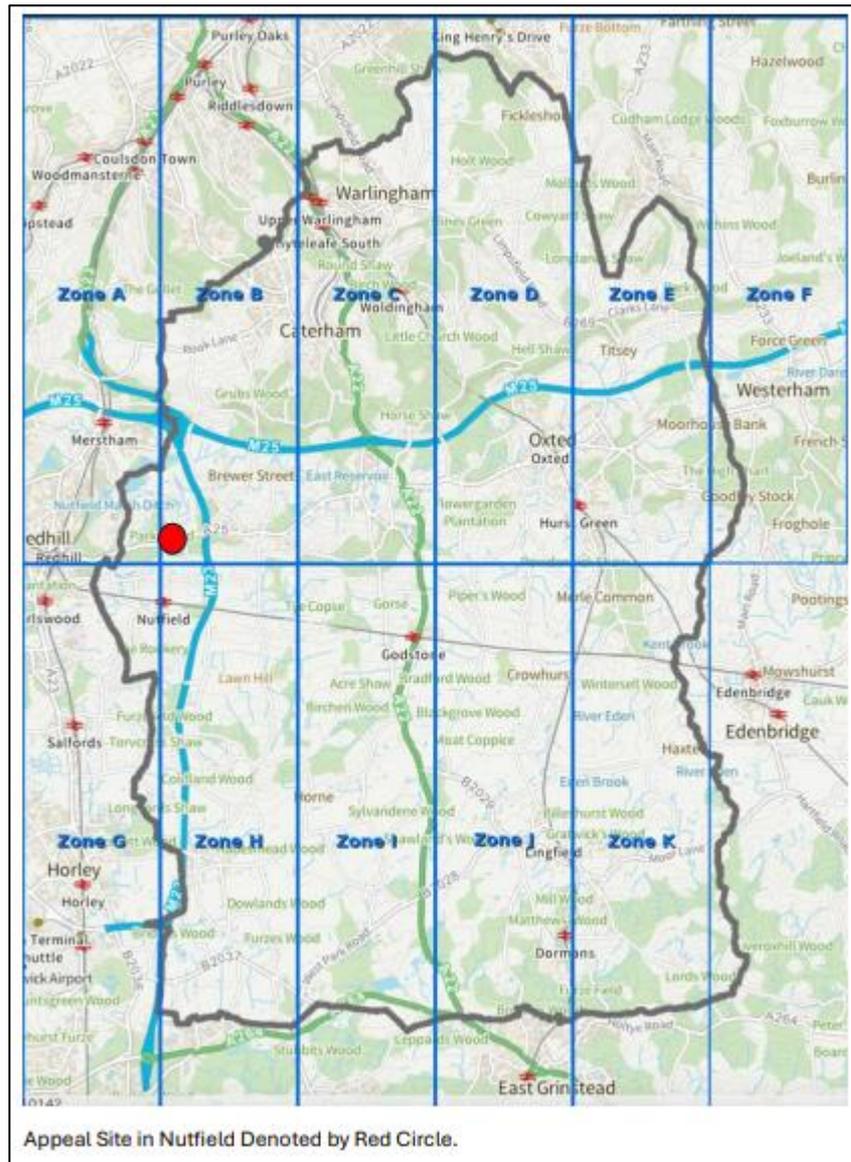
Travel data were expected to be substantially different from past censuses because of the pandemic, with changes in travel mode and increased home working. Behavioural change would vary across geographies, industries and personal characteristics, and responses from people on furlough would add further complexity to the data. Data collected would be a snapshot in time, but with limited utility in measuring pre- or post-pandemic travel patterns.”

- 3.8 The above is evidenced from the data provided in Mr Lee’s Appendix 5 which shows very high proportions of working from home. In addition, and as noted above, those who did need to travel were encouraged to avoid public transport and hence any figures for public transport mode share are likely to be under-stated and car use over-stated.
- 3.9 On the basis of the above, I do not consider it appropriate to use the Census 2021 Travel to Work (TS061) data and indeed I have never done so in similar types of analysis since the 2021 Census was undertaken.
- 3.10 This, in itself, renders the analysis in Appendix 5 inappropriate and inaccurate in assessing travel patterns within the area. However, for completeness I also identify below further issues with the analysis.

Tandridge – Ward-Level Travel Intensity by Mode

- 3.11 The tables on Pages 3 and 4 of Appendix 5 under the heading “Ward-proxy zone summary (weighted by employed residents travelling) relate to Zones A-K in the image on Page 4. These 11 Zones appear to have been arbitrarily created by Mr Lee and do not relate to the data shown in the tables, which is derived from data for Middle Super Output Areas (MSOA). MSOAs are made up of groups of Lower layer Super Output Areas (LSOAs), usually four or five. They comprise between 2,000 and 6,000 households and usually have a resident population of between 5,000 and 15,000 persons.
- 3.12 Mr Lee states that “11 ward-proxy zones (Zone A–K) from MSOA travel profiles and present them as a schematic set of panels”. The 11 Zones Mr Lee presents are shown in **Image 1** below.

Image 1



3.13 The correct makeup of the 11 MSOAs that contain the Census 2021 Travel to Work (TS061) is shown in **Image 2** below, taken from the ONS Nomis website.

Image 2

Select 2021 Super Output Areas - Mid Layer Using List

Tools
Choose a different type of area

List areas within Use maps to select areas

Selection of areas

E02006429 : Tandridge 002

E02006430 : Tandridge 003

E02006431 : Tandridge 004

E02006432 : Tandridge 005

E02006433 : Tandridge 006

E02006434 : Tandridge 007

E02006435 : Tandridge 008

E02006436 : Tandridge 009

E02006437 : Tandridge 010

E02006438 : Tandridge 011

E02006790 : Tandridge 012

- 3.14 As can be seen, the arbitrary gridlines from Image 1 do not correlate with the outlines of the 11 MSOAs shown in **Image 2**. Hence, it is not possible to draw any meaningful conclusions from the data in the tables as one cannot spatially locate them.
- 3.15 On this basis, the 'Tandridge – Ward-Level Travel Intensity by Mode' section of Appendix 5 is inappropriate and inaccurate.

References and Data Sources

- 3.16 On the final page of Appendix 5, five references and data sources are referenced. Only '*Surrey County Council Transport and Local Transport Plan documents*' is listed as a Core Document.

Conclusions on Mr Lee's Appendix 5

- 3.17 Based on the above, I do not consider that any reliable conclusions can be drawn from the analysis contained in Mr Lee's Appendix 5.

4 Comment on Appeal Decisions Referred to in PoE

4.1 In Mr Lee’s PoE, three Appeal Decisions are referenced in relation to locational sustainability and included as appendices to the PoE. These Appeal Decisions are as follows;

TDC PoE Appendix Reference	PINS Reference	Site Name	Proposed Development Description	Decision Date and Outcome
1	APP/C1625/W/25/3365253	Land at Whitminster Lane, Frampton-on-Severn, Gloucestershire GL2 7HP	Outline application for up to 80 dwellings.	8 th December 2025 – Appeal Dismissed
2	APP/T2405/W/25/3369148	Land to the north of Leicester Road, Sharnford LE10 3BD	Outline application for up to 134 dwellings.	19 th January 2026 – Appeal Dismissed
4	APP/J0405/W/25/3363581	Land Adjacent to the Duke of Wellington, Wellington Place, Cooks Wharf, Buckinghamshire LU7 9AD	Outline application for 9 dwellings.	6 th October 2025 – Appeal Dismissed

4.2 Taking each of these in turn.

Land at Whitminster Lane, Frampton-on-Severn

4.3 The Inspector considered one of the main issues to be “*whether the proposed development would be consistent with the scale and function of the settlement of Frampton-on-Severn (Frampton)*”.

4.4 The Inspector concluded that Frampton is not well-served by public transport and future residents of the village will not be able to access strategic facilities and services via public transport. Having reviewed the Transport Statement submitted in support of the Outline planning application, there were just two non-school bus services which serve the village and they operate just once per day for each service.

4.5 The situation at Frampton is in stark contrast with the bus services available to residents of the proposed development at Nutfield. These services are set out in Section 4 of the Statement of Common Ground. In particular as set out in paragraph 4.7, between 7.20 and 9.20 in the morning there are 10 services to Redhill from Nutfield and between 16.30 and 18.36 there are 7 services from Redhill to the site. In addition there are the services provided by the new DDRT scheme that is fully funded by the development.

4.6 Accordingly, I do not consider this Appeal Decision to be applicable when determining the suitability of the proposed development at Nutfield.

Land to the North of Leicester Road, Sharnford

- 4.7 The Inspector considered the main issues to be *“whether or not the appeal site is a suitable location for the development proposed, having regard to the sustainability of the location.”*
- 4.8 Mr Lee states at 8.37 of his PoE that *“Not dissimilar to Nutfield, Sharnford has ‘extremely limited services and facilities,’ comprising a school, public house, play areas and a car garage. The Inspector noted in paragraph 10 that “facilities for day-to-day living and convenience are not available within the village itself, with residents instead needing to travel to other nearby settlements”.*
- 4.9 It is the links to these other nearby settlements that caused the Inspector concern. For example, at paragraph 13 he refers to a dense network of Public Rights of way and On-Demand bus services but concludes that *“However, whilst they are available, I do not consider that they offer a realistic alternative to the private car”.*
- 4.10 Paragraph 14 describes the nature of the PROW and Bridleways of being more leisure orientated and para 15, when referring to bus services states: *“However, looking at the timetable posted in the bus shelter closest to the site, and in evidence before me, I do not consider that this offers a realistic alternative route to such locations. By way of example, using the scheduled bus service, one could not access Enderby Park and Ride or Fosse Park before 10am”.*
- 4.11 This led the Inspector to conclude at paragraph 16 *“None of these non-car modes of transport really offer, in my opinion, and on the evidence before me a sensible, context-appropriate real choice to the private car.”*
- 4.12 Again, this is in stark contrast to the appeal site where high quality walking/cycling routes will be provided to link with National Cycle Route 21, which will be enhanced to provide a practical and useable cycling route into Redhill. The bus services that I have previously described will also be available providing a practical and realistic alternative to the private car.
- 4.13 Accordingly, I do not consider this Appeal Decision to be applicable when determining the suitability of the proposed development at Nutfield.

Land Adjacent to the Duke of Wellington, Cooks Wharf

- 4.14 In this case no facilities would be available in Cooks Wharf and hence residents would need to travel elsewhere to access such facilities. The Inspector considers the significant shortcomings in the pedestrian and public transport routes in paragraphs 7-15 before concluding at paragraph 16 as follows *“As such, the combination of safety concerns, the limited bus service, and the distance to daily facilities, would create a very high dependence on the use of private cars by new residents. Residents would be unable to safely access any facilities on foot, and those with mobility issues would be significantly disadvantaged. Overall, I find the appeal site is not in a sustainable or suitable location for housing, having regard to the spatial strategy.”*

- 4.15 In contrast to Cooks Wharf, Nutfield provides safe walking routes to local facilities and these routes will be enhanced by the agreed highways improvement package as set out in the SoCG which includes new signalised pedestrian crossings on the A25. Improvements to NCR21 and the existing and proposed bus service improvements I have previously mentioned provide realistic alternatives to the private car.
- 4.16 Therefore, again, I do not consider this Appeal Decision to be applicable when determining the suitability of the proposed development at Nutfield.

Appendix R1

Travel to work quality information for Census 2021

Known quality information affecting travel to work data from Census 2021 in England and Wales to help users correctly interpret the statistics.

Contact:
Census customer services
census.customerservices@ons.
gov.uk
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Release date:
8 December 2022

Next release:
To be announced

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1 . Main points

- The Office for National Statistics (ONS) collected Census 2021 responses during the coronavirus (COVID-19) pandemic, a period of unparalleled and rapid change; the national lockdown, associated guidance and furlough measures will have affected the travel to work topic.
- We provided extra guidance to respondents affected by the pandemic on how to respond to travel to work questions, but it is not clear how this guidance was followed.
- There was an increase in home working from 10.3% in 2011 to 31.2% in 2021, but the government advised people to stay at home and only attend work if you had no alternative; there are also several other aspects to consider when interpreting results for this topic.
- As designed, we did not collect any workplace address information for those working at home, including those following government guidance to do so.
- Large numbers of people were still being supported by government furlough schemes, and it is not clear how the question guidance provided was followed; some people may have provided travel information for the last time they worked, or they may have answered based on their behaviours on Census Day.
- Restrictions on travel ended later in 2021, and while there will have been a shift back towards some behaviours from before COVID-19, hybrid and home working remain commonplace.
- We are researching the potential of using alternative data sources and modelling methods to produce travel to work statistics on a more frequent and timely basis, including workday populations and hybrid working patterns.

Tell us what you think about this publication by [answering a few questions](#).

2 . About the travel to work topic

Census 2021 in England and Wales collected information about the resident population's places of work, their workplace addresses and their method of transport to the workplace. At the Office for National Statistics (ONS), we use this information together with people's address data to estimate a distance travelled to work variable.

Policymakers and planners use these data to understand the flows of people around the country to their workplaces. This informs:

- planning of public transport
- understanding of how people with different characteristics access the job market
- planning about how net zero and levelling-up targets can be achieved

The data also underlie Travel to Work Areas and Workplace Zones, which are geographies that represent principally self-contained areas of the country where the population live and work.

Travel to work data are closely connected to labour market data. Read about [labour market quality information for Census 2021](#).

3 . Coronavirus (COVID-19) pandemic context

Census 2021 was conducted during a time of unparalleled change because of the coronavirus pandemic. On Census Day, 21 March 2021:

- a nationwide lockdown was still in place, with government guidance requiring people to work from home wherever possible
- those key workers who were working outside of their homes were encouraged to avoid public transport where possible to reduce transmission
- non-essential retail and businesses were closed
- up to 5.6 million people in England and Wales were supported by a national job support scheme known as furlough
- households were not able to meet with others outside of their bubble
- the roadmap for moving out of lockdown had just been released, with children and students beginning to return to educational establishments
- the [Coronavirus Infection Survey \(CIS\)](#) estimated up to 170,000 people were infected with COVID-19 in England and Wales
- approximately 7% of the population of Great Britain (3 million people) were self-isolating with symptoms consistent with COVID-19

Travel data were expected to be substantially different from past censuses because of the pandemic, with changes in travel mode and increased home working. Behavioural change would vary across geographies, industries and personal characteristics, and responses from people on furlough would add further complexity to the data. Data collected would be a snapshot in time, but with limited utility in measuring pre- or post-pandemic travel patterns.

4 . Coronavirus (COVID-19 pandemic impacts on the quality of travel to work data

As Census 2021 was taken in a period of rapid change, there is uncertainty as to how people responded to the travel to work question. At the Office for National Statistics (ONS), we provided supporting documents to give extra guidance on questions. However, our analysis suggests that this guidance may not have been followed in all instances.

We issued specific guidance for the labour market and travel to work questions, as the question routing for labour market directly influences the travel to work topic. For the labour market question (number 33 on the paper questionnaire) that asked “In the last seven days, were you doing any of the following”, people on furlough were guided on-screen to choose “temporarily away from work”. This meant that they would remain within the economically active population because, while not working on Census Day, they remained employed.

All economically active people were then shown the travel to work question “How do you usually travel to work”. On-screen text stated: “answer for the longest part, by distance, of your current journey to work. If the coronavirus pandemic has affected your journey to work, please select the answer that best describes your current circumstances”. The specific guidance document for this question included the instruction: “if you are away from work on furlough, in isolation or in quarantine, answer about how you used to travel to work before your circumstances changed”.

We instructed people to look at the guidance if they were unsure how to respond to any questions. However, we cannot be sure how the questions for travel to work were interpreted by those on furlough. They may have read the guidance, or they may have felt that they should respond based on their travel behaviour on Census Day, potentially selecting any method of travel that they used or “working from home” if they remained at home. Part of our quality assurance indicated inconsistencies between the “temporarily away from work” group and data from other administrative sources.

So, census travel to work data are a mixture of pandemic and pre-pandemic travel behaviours. The data will also include a substantial number of responses from those who were furloughed, and it is not clear how these furloughed responses were intended.

5 . Coronavirus (COVID-19) pandemic-related behavioural changes in travel to work data

All censuses are carried out during periods of change. However, the pandemic was an unprecedented situation, with rapid shifts in government guidance and legislation over a very short period of time. This will have influenced many people's travel behaviours.

The guidance to work from home where possible will have increased the number of people selecting the "Work from home" box for their place of work and method of transport. The shift from other methods of transport to "working from home" may not represent longer-term trends pre- and post-pandemic. In line with our previously tested question design, people working from home were not asked their workplace address, as this is assumed to be the same as their home address. The increase in the proportion of home workers during the lockdown means that a smaller proportion of the population have provided their "usual" workplace address. This could result in decreases in average distance travelled in some occupations and industries that would ordinarily have longer commutes but now have high levels of home working.

Guidance for furloughed workers requested that they provide their "usual" travel behaviours, so they may have provided workplace type and address. This could lead to increased average distance travelled in industries or occupations with concentrations of people on furlough. For those occupations and industries where there are both furloughed and home workers, these changes may cancel each other out. Distance travelled may also have been affected by behavioural changes for those who were travelling into work – for example, travelling shorter distances to local workplaces rather than city centres. This may correlate with industries that were more likely to commute longer distances, such as workers in the financial sector in London.

Government guidance was to avoid public transport, if possible, to reduce transmission. For those who continued to travel to work, there may have been substantial changes in travel behaviours. For example, someone who regularly took a train into work may have swapped to driving to reduce their risk of contracting COVID-19. This may also be correlated with other characteristics, including:

- age
- health
- industry
- occupation

We do not have information on the "business as usual" behaviours of these people, so we are unable to reconstruct their pre-pandemic travel patterns. As this guidance is no longer in effect, it is also unclear how representative the method of travel information is for the present day with the rise of hybrid working.

6 . Using the data

Take care not to overinterpret the data from the travel to work topic. We are unsure whether people on furlough followed guidance as intended. Because of this and complications resulting from some inconsistency in the guidance, it is unclear how representative the method of travel, distance travelled, and derived variables are of Census Day.

This is further complicated by the substantial shifts in behaviour because of the coronavirus (COVID-19) pandemic. This makes it difficult to know whether patterns detected are concentrations of:

- furloughed populations
- pandemic-related changes in behaviour
- longer-term trends

The issue is likely to be concentrated in populations with high rates of furlough. We expect this to be closely connected with characteristics variables such as:

- health and age
- employment variables including industry and occupation
- geographical concentrations of these variables

For this reason, take extra care when interpreting multivariate travel data or data for geographies below “Region”.

Census 2021 travel to work data use the 2001 travel to work specification, which is a method consistent with variables from the 2001 and 2011 Censuses. Compared with the 2011 specification, Census 2021 data do not include figures for people who work from home but use other transport for their employment. As a result, home-working figures may be higher than the 2011 variable because of definitional differences.

7 . Processing furlough responses

At the Office for National Statistics (ONS), we published extra guidance to help people on furlough to answer the census questions about work and travel to work. This guidance said that they should identify themselves as “temporarily away from work”. This would ensure they were still included in the economically active population. It would also provide travel to work information for the last time that they went to work before their behaviours changed.

We are unable to determine how furloughed people followed guidance. However, our research suggests that there are inconsistencies between the number of people answering “Temporarily away from work” in Census 2021 and the equivalent in other administrative data sources. This may result in scattering of furloughed responses through other labour market categories. Our [An overview of workers who were furloughed in the UK: October 2021](#) article suggests that furlough is associated with other characteristics, including:

- age
- health
- location
- industry
- occupation

It is possible that the interaction of furloughed responses with technical aspects of census processing, such as edit and imputation, could increase values in the observed census data. There is no specific flag for furloughed people within the data, and we are unable to quantify the effect that they may have had on the travel data. Neither are we able to make any adjustment. We recommend caution when using the travel to work data, as multivariate and small geographies are more likely to contain concentrations of this effect.

Travel to work data also underlie the Travel to Work Area geographies, which are used in economic analysis to understand access to jobs and the labour market. These geographies may be less representative of where people are living and working. At the moment, we advise users to continue to make use of the 2011 Travel to Work Areas for analytical and statistical work, and we will continue to update users on future developments.

8 . Future plans

We recognise that travel to work data, including origin-destination matrices, and method and distance of travel, are used by a wide range of stakeholders. They use these data sources to understand travel behaviours, plan service provision, and as the basis for economic geographies such as Travel to Work areas.

At the Office for National Statistics (ONS), we are researching the use of alternative administrative data sources and survey data combined with modelling approaches to produce more frequent and timely measures of travel to work statistics. This may also provide the opportunity to measure:

- hybrid working
- workday populations
- non-work-related travel behaviours
- travel outside of standard working hours
- seasonal changes

We are investigating potential alternative sources of these data as part of our ambitious Census and Data Collection Transformation Programme. There will be a user consultation in 2023 about the future transformed system for population and social statistics. We will be publishing further information on our plans in the near future.

9 . Related links

[Labour market quality information for Census 2021](#)

Methodology | Released 8 December 2022

Known quality information affecting labour market data from Census 2021 in England and Wales to help users correctly interpret the statistics.

[Quality and methodology information \(QMI\) for Census 2021](#)

QMI | Last revised 28 November

Details the data strengths, limitations, uses, users and methods used for Census 2021, England and Wales.

[How we assured the quality of Census 2021 estimates](#)

Methodology | Last revised 7 November 2022

Methodology for the validation of Census 2021 population estimates for England and Wales, including the assurance of processes, assessment of estimates, and involvement of local authorities.

[Travel to work variables Census 2021](#)

Supporting information | Released 5 December 2022

Lists variables and classifications used in Census 2021 data about travel to work.

[Labour market variables Census 2021](#)

Supporting information | Released 5 December 2022

Lists variables and classifications used in Census 2021 data about the labour market.

10 . Cite this methodology

Office for National Statistics (ONS), released 8 December 2022, ONS website, methodology, [Travel to work quality information for Census 2021](#)