

Appendix 1
Local Transport Plan (LTP4) – Key Themes consultation
Response from Warwick District Council
November 2022



In completing this response, Warwick District Council has tried, as far as possible, to follow the format and questions included in the on-line form on the Warwickshire County Council website. The District Council has, on occasions, provided additional information and comment where this is relevant.

| Proposed Core Strategy |
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| To what extent do you agree that the proposed Core Strategy identifies the key transport themes surrounding the future of transport in Warwickshire |
| Agree |
| To what extent do you agree that the proposed Core Strategy sets out a strategic approach to addressing the key issues surrounding the future of transport in Warwickshire? |
| <p>We support the travel hierarchy set out on page 11.</p> <p>It is good to see that in general the Plan is proposing more urban areas are less suited to increasing motor vehicle capacity and more suited to modes that are higher up the hierarchy.</p> <p>The Travel Choices to reduce carbon must inform all policy choices within the plan and all future decision making about transport infrastructure.</p> |
| To what extent do you agree with the inclusion of each key policy in the proposed Core Strategy? |
| <p>Whilst we support the importance of engaging with communities it is vital that this is done well (e.g., it should not just be a response to the loudest voices on social media) and so there are two key caveats that should be added to this policy</p> <p>a) The community engagement should be genuine, should allow for deep consideration of the issues and should enable fully informed views from communities to be shared.</p> <p>b) To ensure community views are fully informed, WCC and partners will need to invest considerable time in informing communities about the issues and transport choices. Without these caveats this policy could lead to inertia whereby people make the case for improving existing modes rather than thinking differently about other options and opportunities.</p> <p>This policy does not help with prioritisation where there are tensions between outcomes or where there are tough policy choices. As written the policy make no distinction about which element of the vision should take priority. We would like to see the carbon reduction and sustainability themes to be at the forefront of all decisions and through this to deliver options that delivery healthy communities, jobs, education etc.</p> <p>We agree about the inclusion of the policy on decarbonising transport and transport related infrastructure</p> <p>We also support a flexible approach to policy development in response to a changing Warwickshire. However, we would suggest it should be clarified that the approach that is</p> |

taken should always focus on delivering the outcomes set out in other policies and in particular carbon reduction

We agree that data and evidence-led monitoring and evaluation of our transport interventions should be included.

Are there any other issues that you think we should consider in relation to the proposed Core Strategy? Please list these in the box below and explain why you think this.

The LTP4 cannot apply a 'one-size-fits-all' approach and the solutions and management of transport in, for example, Leamington Spa will be very different from in a rural village.

Warwick District Council is currently working with Stratford District Council to prepare a South Warwickshire Local Plan (SWLP). The Plan is expected to replace the strategic policies of the existing Warwick Local Plan which runs to 2029. The South Warwickshire Local Plan will set out a long-term spatial strategy for housing, jobs, infrastructure, and climate change for both Districts. It is anticipated that the next stage of consultation (Issues and Options) will take place in January 2023. The SWLP contains several strategic objectives: Meeting South Warwickshire's Sustainable Development Needs, A resilient and Net Zero Carbon South Warwickshire, A well-designed and beautiful South Warwickshire, A healthy, safe, and inclusive South Warwickshire, A well-connected South Warwickshire and a biodiverse and environmentally resilient South Warwickshire. We consider that for the LTP4 to be meaningful, it needs to deliver the development strategy set out in the SWLP.

It would be useful to refer to the amount of growth Warwickshire will need to accommodate over the next 20-30 years in the overall Core Strategy document as this sets the scene. Given the emerging climate change agenda there are likely to be different approaches to ensuring that new communities are sustainable moving forward. For example, one of the options in the South Warwickshire Local Plan is to look at a possible rail strategy for new growth. There is also the concept of 20-minute neighbourhoods.

In line with the principles of the SWLP, it is suggested that there should be some reference to well-designed places in the aims, and the need for the LTP to acknowledge this in respect of both existing places and new growth.

Proposed Active Travel Strategy

To what extent do you agree that the proposed Active Travel Strategy should be a key strategy within LTP4?

Agree

To what extent do you agree with the inclusion of each policy in the proposed Active Travel Strategy?

Agree

Do you have any comments on the proposed Active Travel Strategy?

The Governments "Active Travel: Local Authority toolkit" references Low traffic neighbourhoods which would support the creation of 20-minute neighbourhoods (Creating places in which most of people's needs can be met within a short walk or cycle.) Reference to that within this active travel section would show a commitment to ensuring that the car is not the only practical way to access services.

AT1: Improving accessibility and attractiveness of active travel options

We feel it needs to define accessibility, AT1 largely prioritises physical accessibility, which is important but needs to cover the issue of inclusivity, so active travel such as cycling is inclusive of background, ethnicity, age, ability, and gender. It is encouraging that the plan

commits to “easier access to affordable rental bikes but other than that, the wording serves the needs of people that are more likely to already cycle and does not mention about the engagement of ethnic minority groups, women, disabled all of which are under presented in the numbers that cycle.

AT2: Better, safer routes for walking and cycling

It is recognised in Local Transport Note 1/20 – Cycle Infrastructure Design that “Cycles must be treated as vehicles and not as pedestrians. On urban streets, cyclists must be physically separated from pedestrians” also “Cyclists must be physically separated and protected from high volume motor traffic, both at junctions and on the stretches of road between them”

It is appreciated that this may not always be achievable, but we feel that it is appropriate that AT2 should reference the standards within LTN 1/20 and aspire to meet them wherever possible.

Reference should be given within this section that any new infrastructure is fully inclusive for non-standard bikes.

Reference should also be made to route proposals having a clear programme of maintenance to ensure that the routes are kept smooth and clear of obstructions/overgrowth.

AT3 - Information and Promotion

It is recognised and the evidence shows that it is more effective to develop behaviour change and infrastructure together. AT3 should state that WCC and the District Councils will promote the benefit of embedding active travel through walking and cycling engagement events, school focussed initiatives etc. The wording within AT3 should recognise the link between building new active travel infrastructure with behavioural change techniques.

To what extent do you agree that the proposed Active Travel Strategy should be a key strategy within LTP4?

Agree

Proposed Public Transport Strategy

To what extent do you agree that the proposed Public Transport Strategy should be a key strategy within LTP4?

Agree

To what extent do you agree with the inclusion of each policy in the proposed Public Transport Strategy?

Agree

Do you have any comments on the proposed Public Transport Strategy?

General Comments

We think there should be stronger emphasis on the contribution that public transport can make to reduce car dependency and congestion, lower carbon emissions and fight climate change, improve air quality and health and tackle social inequalities.

There should be a focus on the delivery of zero emission bus solutions. Switching to clean bus fleets requires the delivery of essential infrastructure and this may involve infrastructure on public or Council owned spaces for chargers for example.

PT1: Working with partner organisations to improve public transport

It is encouraging to note that it is recognised that building strong partnerships is one of the key enablers. Partnership working should be widened out to include the different tiers of government to maximise resources, access funding and collect and analyse data. A wider partnership could look at look local enforcement strategies i.e., parking and could involve the third sector to ensure open dialogue and to work together to face common challenges.

PT2: Improved accessibility and attractiveness of public transport as a travel choice

We agree with the initiatives outlined in this section. Alongside that there should be mention of the integration of the physical network between operators and modes of transport.

PT3: Information and ticketing

This is welcome and it is key to integrate ticketing and payment between operators and modes of transport.

PT5: Community Rail Partnership

It should be an ambition of WCC that all District and Borough Councils contribute and are practically involved in the Heart of England CRP.

Proposed Motor Vehicles Strategy

To what extent do you agree that the proposed Motor Vehicles Strategy should be a key strategy within LTP4?

Agree

To what extent do you agree with the inclusion of each policy in the proposed Motor Vehicles Strategy?

Agree

Do you have any comments on the proposed Motor Vehicles Strategy?

General Comments

The principle of Low Traffic Neighbourhoods (LTN) needs to be mentioned which in essence consists of residential side streets that are closed to through motor vehicles to prevent “rat-running.” With the creation of LTN’s the concept of “20-minute neighbourhoods” can be considered

MV1: Using our influence with partners to provide a modern fit-for-purpose route network

We agree with wording within this section but there needs to be more on the effect that road networks have on climate change issues and the influence that WCC can have on its mitigation. For example, minimising the impact on networks on the quality and quantity of water resources; encouraging the use of recycled materials in construction aggregate; promote opportunities for improving habitat connectivity; the requirement for travel plans to prioritise use of sustainable and low carbon transport which can also reduce costs of transport on air quality and noise.

MV2: Increased use of technology in network monitoring

The details of how this could manifest itself would be useful alongside examples of the benefits of technology. There could be ambitions on how technology could be used, i.e., in the design and construction of networks, the operation of the networks and user engagement i.e., information provision.

MV3 - Maximising funding opportunities

Agree

MV4: Making our towns and villages and the routes that connect them better places to be.

Design guides should promote sustainable transport modes where possible. The LTP should encourage mixed use development at strategic locations to reduce the need to travel and lead to a potential reduction in private car journeys.

Comment needs to be made on the support and promotion of bus services which connects villages and towns and WCC should support the development of transport hubs to facilitate the integration of bus, taxi, rail, and active travel options.

Proposed Managing Space Strategy

To what extent do you agree that the proposed Managing Space Strategy should be a key strategy within LTP4?

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| Agree |
| To what extent do you agree with the inclusion of each policy in the proposed Managing Space Strategy? |
| Agree |
| Do you have any comments on the proposed Managing Space Strategy? |
| <p>We welcome the section on “Managing Space” as this recognises the relationship between transport and place. We agree that transport must remain at the heart of a functioning economy, however, also consider that transport solutions should not be at the expense of good place-making. This is particularly the case in those areas which are subject to the greatest transport pressures (including our town centres) and those areas which are subject to the greatest change through new development.</p> <p>We would therefore ask that the LTP positively considers the following: -</p> <ul style="list-style-type: none"> • Promoting a strong focus on the importance of place-making in all transport-related decisions. This will ensure that transport decisions are always responsive to local circumstances and serve to enhance the creation and maintenance of high quality and distinctive local places. There should be a commitment to work positively with local authorities and all local stakeholders to deliver this. • Promoting the concept of “20-minute neighbourhoods”. For settlements to be sustainable, it is beneficial to maximise any opportunities for people to be able to meet their regular day to day needs within a reasonable walking/cycling distance of their homes. This is referred to as the ‘20-minute neighbourhood’. This is a concept that is being explored as part of the forthcoming South Warwickshire Local Plan. • Improving public spaces, including by supporting more attractive and pedestrian friendly town centres to encourage greater use of active travel which in turn leads to reduced air pollution and congestion. |
| Proposed Safer Travel Strategy |
| To what extent do you agree that the proposed Safer Travel Strategy should be a key strategy within LTP4? |
| Agree |
| To what extent do you agree with the inclusion of each policy in the proposed Safer Travel Strategy? |
| <p>Agree</p> <p>Road engineering design to align with appropriate quality standards Agree, but (notwithstanding Policy ST5) we would like to see this policy specifically mention the need to focus on the safety of active travel. Engineering design can so often be the reason why people don’t walk and cycle and road design (right down to signalisation timing) which is too often focused on car users and congestion rather than convenient and attractive places and routes for people.</p> <p>Promoting safety in all travel choices Agree. This is important. The reference to “feeling safe” is particularly important and needs to be given more weight in decision making</p> |
| Do you have any comments on the proposed Safer Travel Strategy? |
| <p>This is important and it is good to see a strategy on this topic. Residents will want to feel safe using public transport and walking and cycling infrastructure. For example, well-lit footpaths and dedicated cycle lanes. Issues such as poor pavements, poor safety for cyclists, and the lack of connectivity to green outdoor spaces close to housing must be addressed. Safe, good quality cycling connectivity should be designed into new settlements, including the provision of cargo bikes, and associated cycle racks and storage.</p> |

Proposed Freight Strategy

To what extent do you agree that the proposed Freight Strategy should be a key strategy within LTP4

Agree

To what extent do you agree with the inclusion of each policy in the proposed Freight Strategy?

Agree

Promote shift from road to rail and active travel modes

Agree. Would like to see the policy indicate an intention for WCC to play a leading role in delivering this (e.g., proactively promoting low carbon last mile delivery schemes.)

Facilitate the transition to alternative fuels for freight vehicles

Agree. Would like to see WCC play a more leading role in this – e.g., direct investment in low carbon fuels

Support efforts to deliver a better network of lorry parking in the county

Agree

Support and deliver initiatives that improve journey time reliability for freight movements

Whilst we support this policy, it is an example of where the Core Strategy should provide more clarity on priorities where options are conflicting. In our view, priority should be given to Policy F1 rather than this. If that happens congestion should improve with damage to air quality, carbon emissions and at a lower cost.

Reduce the impact of ‘last mile’ deliveries

Agree

Reduce incidents involving freight vehicles

Agree

Encourage freight vehicles to use appropriate routes.

Agree

Do you have any comments on the proposed Freight Strategy?

The LTP4 should aim to cut the carbon emissions of road transport by enabling efficient low carbon transport and the use of electric vehicles, including for freight.

Development Control LTP Policy Framework

LTP4 policy positions ST2; MS6 – road safety audits and assessments

Regarding new roads constructed by developers, the Framework states that the “County Council will carry out or require road safety audits or assessments on all new schemes and alterations to the existing road network proposed by ourselves or others.” The Framework does not specify when these need to be undertaken. Currently, the information to inform these is frequently requested from developers at the planning stage which is unexpected and unusual. In the Council’s experience, this can be a significant factor leading to hold ups in determining major and other planning applications. It is understood that other Highway Authorities request these at a much later stage in the development process, and the Council would ask that this is considered.

LTP4 policy position MS6 – school travel plans

No Comment

LTP4 policy position MS6 – walking to school

No Comment

LTP4 policy position MS6 – Improvements to the pedestrian network

No Comment

LTP4 policy positions MS1; MS6 – Transport assessments and transport statements

No Comment

LTP4 policy position MS5 – New Road adoptions

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| No Comment |
| LTP4 policy position MS6 – Maximising funding opportunities from developer contributions |
| No Comment |
| LTP4 policy position MS6 – Ensuring accessibility for pedestrians, cyclists and to public transport |
| No Comment |
| Key Themes |
| To what extent do you agree that the key themes adopted following the previous consultation have been well integrated into LTP4? |
| Agree |
| Action Plan |
| To what extent do you agree with the approach outlined above? |
| <p>It is not clear from the Action Plan how the schemes have been prioritised in terms of the timescales for delivering some of the schemes. It is not clear what the fall-back position would be for providing some of this infrastructure if the expected funding does not come to fruition, but the projects are clearly priorities.</p> <p>We would make the following comments on specific issues in the Action Plan.</p> <p>2-5 years: -</p> <ul style="list-style-type: none"> • MT003: Emscote road sustainable transport corridor. It would be helpful to have a more specific timescale for the delivery of this project given that it is seeking a significant allocation of CIL funding from WDC. • MT006: (East west cycle track across Leamington town centre). The inclusion of this is welcomed and is correctly identified as being Funded from the future High Streets Fund. This fund needs to be spent by 31 March 2024, so the delivery timescale (column k) needs to be amended to say 2023/24. • There is no reference to the Bath Street improvement scheme for which WCC is currently seeking £3.7m of CIL allocation from WDC. We have understood that this is to be delivered within this period. This also links to the wider Mini Holland study, and it is not clear how any opportunities from this (recognising that these have not, as yet, been agreed) will be included in any Action Plan. |
| Performance Monitoring |
| Please provide your comments or recommendations as to what you consider to be important when monitoring the performance of the LTP and action plan? |
| <p>It is important to find out how well used some of the active travel and public transport provision is and where there is a lack of users, the reasons for this. Further, whether there are improvements that would make a difference to people’s travel and behaviour habits. For some of the longer-term proposals, it is necessary to review and ensure that these projects are still relevant and required given the amount of growth Warwickshire will need to plan for over the coming years. This also links to changes in lifestyle such as more remote working, internet shopping etc.</p> |
| Integrated Sustainability Appraisal |
| To what extent do you agree with the assessment outcomes of the Integrated Sustainability Appraisal Report? |
| Agree |
| Do you think the proposed measures are sufficient to address the outcomes in the Integrated Sustainability Appraisal? |
| Agree |
| Are there any other impacts that we need to take into consideration in the Integrated Sustainability Appraisal or when developing these proposals? |

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| No comment |
| Please share any ideas on how we could enhance the positive impacts and overcome or reduce the negative impacts of these proposals in the space provided below. |
| N/A |
| Awareness of the Local Transport Plan |
| Do you have any suggestions as to how we could raise awareness of LTP4 in Warwickshire? |
| We are currently working on the South Warwickshire Local Plan so there are plenty of opportunities through this and the respective consultation process to raise awareness. |
| Any other thoughts |
| Having now read LTP4, and considering the previous work to develop our Key Themes around transport, how confident are you that the County Council has listened to Warwickshire residents' and other stakeholders' ideas and concerns and produced a plan which reflects them and wider transport issues? |
| No comment |
| Is there anything else you would like to raise regarding the proposed LTP4? |
| <p>One of the aims of the LTP4 is achieving net zero carbon but the individual policies and policy positions are not strongly enough worded to give confidence that this will be delivered. It is suggested that this is embedded more throughout the LTP as a whole and that the carbon reduction is threaded more strongly through each policy so that consistent and clear decisions can be made. The tone for this needs to be set in the Core Strategy. Climate Adaptation does not feature at all in LTP4. However, we know that more storm events, concentrated rainfall, and longer hotter dry periods are predicted for the UK, including Warwickshire. We would like to see more thought given to the risks associated with weather related disruption and measure to manage these risks such as infrastructure design and links to emergency planning.</p> <p>The policies are quite vague in their current format. They should be more focussed and detailed for them to be measurable and can be monitored effectively to make sure they are being implemented accordingly and used for specific interventions.</p> |