



Local Plan Consultation response from the Transport Action Group (part of Climate Action Leicester and Leicestershire).

“The Local Plan has a key role to play in supporting the rebalancing of transport modes and the promotion of clean low emission transport, in particular by ensuring that other relevant strategies and plans that promote sustainable and clean transport, are embedded within the policies and proposals of the plan. This will help to ensure that new development is well located and integrated with sustainable transport modes, promotes low emission travel and contributes towards achieving efficient and effective sustainable transport networks, as well as being accessible for those that need to use cars.” p175, para 16.6

Transport is, as you say in this Local Plan, an issue which cuts across many areas and we agree with the above statement. At the moment however, the city is designed around car use and prioritises car users over people who cannot, or choose not to, use cars. As it stands this Local Plan will not be very effective in shifting people to sustainable transport modes because while aspects of the policy in this plan are good about encouraging sustainable transport, the planning design conspicuously fails to put in place design to discourage car use. Given that both active and public transport are more affordable for people on lower incomes, more healthy for everyone using them, and reduce the congestion and air pollution in our city, they should clearly be systematically given priority over car use in planning and other policy decisions. Around a third of the households in Leicester do not have access to a car, and the overlap between these households, and the households with poor health, few monetary or other resources and lower than average life expectancy is extremely high. **If Leicester were to start routinely putting active and public transport before car use, it would not only help to reduce the cities carbon footprint and increase our resilience as climate change takes hold, it would also start to reduce the inequalities between rich and poor, and reduce deprivation in this city – which is currently one of the most deprived in the country.**

This Local Plan needs explicit car use reduction targets.

Our aims as Climate Actions Transport Action Group are as follows:

- To reduce car use;
- To improve public transport;
- To encourage active transport (cycling and walking);
- To shift public attitudes away from the car dependence culture; ·

We've also been thinking about freight in the city and county.

We believe that these are extremely important to reduce climate change not only in our City of Leicester but across the County and beyond. The Transport group would like Leicester City council to make these areas stronger and include more detail about discouraging car use within the city and embedding strong policies for this shift to be able to happen within our city.

We strongly support your excellent design policies around encouraging walking and cycling, but as you know, in order to get a large modal shift to active and public transport it is necessary not only to support the sustainable options, but also to actively make the unsustainable driving option less attractive. Where carrots and sticks are used together rather than just carrots there is a far greater percentage shift. **Your own Economic, Transport and Tourism Scrutiny Commission recognised this on 16/10/19 when they agreed to recommend to the City Executive that “the Council systematically puts in place policy and invest in strategies and developments that reduce car use.”**

Leicester needs to start systematically reducing car use through a multitude of measures such as promoting car-sharing, re-regulating bus services, constraining road space and raising the cost of car parking wherever possible. All new development needs to be designed around discouraging car use – not for everyone all the time, but for the majority of people who have choices about how they travel. **This Local Plan should include specific car use reduction targets** for the timeframe of the plan, as well as a commitment to commission and act upon a feasibility and costs study of developing a car-free city centre.

We would like to see a commitment to this kind of prioritisation in this Local Plan, along with specific targets in the reduction of car use, and increase in walking, cycling and bus use. In general, at the moment the draft Local Plan has some good aims and policies regarding transport but they are very vague. Each one needs more specific targets in terms of numbers and dates of proposed implementation. For example, para 16.16 says it’s essential to promote bus use and reduce car use, which is great, aiming to provide fast frequent bus corridors and improved reliability etc, but doesn’t give specific information about **how** they plan to do this. Similarly, in para 16.62 the city centre car parking issue is stated to be poor, and needs improvements, but no specific plans are mentioned. The big problem of pavement parking needs addressing, and it isn’t mentioned.

Sadly, at the moment, the plan continues to support car use, as shown by all the requirements for car parking throughout the plan, for example DQP06, p81, where residential amenity clearly encourages extra space for cars. Given the need we have in the city for more affordable housing, more family homes, more green space, more play areas for children, and above all the capacity to reduce our carbon footprint and reduce the impacts of climate change, the constant allocation of land for cars to park and move around undermines rather than supports our quality of life in the city. Providing an alternative to car travel provides social, environmental and economic benefits. Each £1 invested in concessionary travel, produces £2.87 in benefits, even when we don’t count social inclusion or congestion benefits. See <https://greenerjourneys.com/wp-content/uploads/2014/09/Concessionary-travel-costs-and-benefits-September-2014.pdf>

Create functional Public and Active transport networks.

At the moment there is nothing in this Local Plan about ensuring there are cheap functioning networks of buses and segregated cycle lanes into, around and throughout the city. For example, policy T01 requires development to be integrated into sustainable transport networks but not to contribute to their improvement so they can become functional networks in the first place. These networks do not currently exist. Instead, as you accurately say on

p177, para 16.7 “access by bus into the city centre, is better than orbital services around Leicester which are partial and infrequent. The city centre is very accessible by bus during the daytime, albeit services are delayed by peak hour congestion, but less so during evenings and on Sundays.” In other words, we have a fairly decent radial service some of the time, but very little in the way of orbital services within or around the city and therefore no functional network. **This plan should be creating not just corridors, as shown on p178 in diagram 16, but networks both of bus lanes and segregated cycle routes.**

Buses.

We do strongly support the proposal in this plan to create more bus lanes and increase bus priority. However, this doesn't address many of the factors that explain why bus use in Leicester is low and declining. Bus use is half of that in Nottingham and Nottingham's is very poor in relation to many cities in Europe. Your statement that 93% of Leicester's households are within 400m of a bus stop is a very poor indicator of usage.

Buses services and routes are currently not designed or run to provide a good alternative to cars. Service provision is mainly focussed on the city centre and is typically geared to areas where bus use has been higher than average (along radial routes and some outer estates). Services are run by different operators, who are constrained by the Competition and Markets Authority (a Government body), whose views work against integration. Bus operators even seem to be reluctant to integrate their own routes and ticketing.

Most routes are slow because of the tortuous nature of the routes and the time spent by users waiting at stops. The City Centre is not the centre it was and an increasing proportion of people do not go there to shop or work. This means a bus network is needed which enables people to travel more directly to their destinations without having to go in and out of the city centre, which is simple to use and which is centrally run so that information is easily available.

At the moment services only run where a private operator can make a profit or the council subsidises it and few routes are profitable throughout the week or day, so service hours are variable. For most people the services are not good enough to influence lifestyle choices about where to live or make decisions about where and what to develop. Most parts of the city now have high car ownership and new developments are increasingly car-dependent.

The reason why bus use in Nottingham is far greater than Leicester is partly historic but it has also undoubtedly benefited from the City Council's decision to maintain control of its former municipal operator after de-regulation in 1986. The high bus and public transport use in European cities is because they too have local transport operators and there have been decades of interaction between planning and transport. Cities have therefore been designed to make best use of their public transport systems. Over the same period UK cities have built in more car-dependency, and as it stands this Local Plan could continue to do just that.

We are deeply disappointed by the intention to use a bus alliance (p177, para 16.20), which we feel will not work to genuinely sort out our buses. The Bus Services Act allows Leicester as a city to apply for a Bus Franchise, although we recognise there are more hurdles to overcome as it is not a Combined Authority. Only at the point at which the city can look at and manage all the bus services together and ensure that they develop to interact and support each other rather than competing, do we stand a chance of making buses an attractive option for travel in Leicester. The issues people cite again and again are about buses being too expensive, too infrequent and not running where they are needed when they are needed. This is the kind of thing a bus franchise can be used to improve. **We strongly hope that the next draft of this**

Local Plan will commit to applying for a bus franchise and using it to develop a cheap and attractive network of buses throughout the city and into the County. P177, para 16.18 talks about the need for “quality legible travel information” which could also be much more easily done through a bus franchise.

We also want to see plans to pilot bus passes for specific groups e.g. young people, low income users, families etc. Targeted pilots of free school journeys could be paid for by the WPL and should be set out in this Plan for all children. Their effect should be analysed including reductions in congestion, air pollution and school absenteeism. Additionally, far better partnership work is needed with bus providers, including UHL and University, to ensure timetables work for our school children as well as other users. At the moment this Local Plan conspicuously fails to talk about reducing the cost of bus use, focussing instead on smart ticketing and electrification. These are important but not what make the difference when it comes to getting people to use the buses. Cost and a functioning network are what are essential to get the change in travel behaviour. Electrification is only a climate friendly option if it is accompanied by renewable electricity generation which is why Climate Action is asking that this Local Plan allocate land beyond the city for wind farms and in the city for solar generation.

Park and Ride. The electrification and increase of Park and Ride facilities is good, but in order to make a real difference to carbon emissions, the electric buses need to run on renewable electricity, and this means the city needs to ensure that it supports the development of wind farms beyond the city and serious solar generation within the city. Additionally, they need to be part of the city’s bus network and therefore useable by people wanting to ride but not park. They should also support cycling both by providing secure cycle parking and cheaper tickets for users who have parked bikes rather than cars, but also importantly by having segregated cycle paths leading to them from the surrounding area.

Cycling.

P180, para 16.28 says the City Council “will support development proposals which can provide new or improved cycle routes”, and this is reiterated in the policy T01, but surely it is the City Council who should be making those proposals, and these networks of cycle routes should be included in policy T06? We strongly support the idea of “an infrastructure network of high quality, continuous cycle tracks along main road routes’ (p179, para 16.25) but this target needs to have timescales attached to it. It should also specify that the network can only be achieved by transferring some roads to cycle and pedestrian use only. The canal towpath should be incorporated into this bike network, as it is car-free and is heavily used by cyclists anyway. The towpaths should be resurfaced in many places, and widened wherever possible.

An indication of which roads the council would consider closing to cars in order to form a car free walking and cycling network is again something we would like to see being consulted on as part of this Local Plan.

The action to ‘promote everyday cycling in neighbourhoods’ can only be effective if the above network is delivered. It is good to see the provision of cycle training mentioned, along with an improvement in signage and wayfinding.

Chapter 12 in the Local Plan contains a lot of information about transport plans, programmes and designs. **What is really needed is for all of these to be brought together as one plan to support walking, cycling and bus use while discouraging car use.** The current situation makes it very hard to see how the plans interact and support or undermine each other. It also makes it difficult to assess how effective they are being. We need one clear plan and it should be supported by policy in the Local Plan.

Housing density and new developments on the edge of the city and in the central development area.

This Local Plan is explicitly designed around the Strategic Growth Plan which was seen by the County Council as a key factor in opening up land for development around the south and east of Leicester in locations that would be very car-dependent and for which there is no solution to deal with the generated traffic. Such planning makes no sense when we all recognise (and you have declared) a Climate Emergency. Since the SGP was agreed, Midland Connect has decided not to support the £billion A46 Expressway, but is now suggesting a lower standard road should proceed to allow the development to continue. This misses the point – scattered development across large areas of the County will inevitably result in an increase of car use and increase in carbon emissions, isolation for the people living in the new developments and the exclusion of and discrimination against people who cannot afford cars. **This Local Plan needs to ensure that new development is closely tied to the city and is compact. Not strung out along new roads, and certainly not only 30dph as this Plan currently suggests.**

Council owned greenfield sites on the edge of the city also need to be designed to actively discourage car use. Over many decades there has been talk of Ashton Green being an exemplar in terms of development. Access to the northern part of Beaumont Leys was discussed at the Abbey District Plan inquiry around 1980. Greengate Lane was identified as a specific problem. Opportunities to resolve this problem were proposed and rejected. The first development south of Thurcaston took place around 1990 and it has been spasmodically expanded since then. The road layout has not been designed to facilitate bus use and no bus services exist near the site. There is now one cycleway heading towards Beaumont Centre and one running alongside Ashton Green Road and Beaumont Leys Lane.

The City Council made claims that Ashton Green would be well connected. As the long-standing landowner for the entire area, the council was also in a rare position compared to other greenfield sites. It did not have problems of land assembly or land-value gain being extracted by developers in the process of obtaining planning permission. It had a free hand – and the same will be true of most of the strategic development areas in this Local Plan, and also many of the greenfield sites within the city proposed for development.

The 2011 Census showed that over 75% of households in many parts of both Beaumont Leys and Hamilton owned one or more cars. In the north part of Beaumont Leys (which now includes Ashton Green) it was 92%, the highest in the City, just beating an area in Hamilton with 91%. Given that it was clear that new development in such peripheral areas was highly likely to follow this problematic pattern of encouraging car use, the City Council had a strong incentive to demonstrate that the right combination of development and transport accessibility could make a difference. It failed to take that opportunity. Instead, the developer boasted of the site at Ashton Green being “a short drive away from Leicester city centre” The City Council sought, and was awarded, over £10 million from the Government to fund roads to access further phases of the development, and Ashton Green is now heavily car dependent.

Given this history, we want to see **specific policies in this Local Plan to ensure that new development on the edge of the city does not replicate this problem again.** We are very aware that this housing plan is dependent on 4 very big new housing developments on the edge of the city as well as the central development area. We strongly support putting as much housing as possible inside the city by using every available brownfield site, but we are alarmed by just how low your housing density requirement is both in the central development area and elsewhere. Low housing density such as your requirement in this Plan of 30dpHa creates a big

transport problem because it results in people having to travel longer distances even within new developments to get to shops and other key services. If you are to replace the prevailing culture of car dependency with sustainable travel, then you need to ensure three things in terms of planning, none of which are as yet clearly required in this plan.

- 1. You need to have higher density housing of at least 100dph in the central development area which is by far the most sustainable option from a transport perspective as it gives people the best chance to access good public transport links and services. The more good quality housing which can be put in this area, the less need there is to build beyond Leicester's suburbs where sustainable transport is much more challenging.**
- 2. Where you do build on the edges of Leicester, you need to ensure that each new development has really high quality and affordable public and active transport links.** These must run not only to the city centre, but also via an integrated network to key employment sites around the city and in the County. Not just one bus service, as seems to be the current proposal, but a range of bus services which cost less than parking and are quick and run at the times needed to get to work. This means incorporating shift times. Services should also run throughout evenings and weekends, Unless it is perceived as quick, easy and cheap to cycle or take the bus to work, people who have a choice will continue to drive. This means you have to get all the bus services in the city acting together as a network.
- 3. The big edge development sites also need to have a much higher housing density** than your shockingly low 30dph. We suggest 70dph. 70dph allows for spacious terraced housing with private green space but also uses land efficiently enough that people do not need to walk far to reach the bus stops, shops and other services. It also means less land is used, leaving more space for trees and ponds which reduce the impacts of climate change. The current pattern of low density housing has been shown to increase carbon emissions as people drive. Planning patterns need to change in order to become more sustainable.
- 4. Additionally the big new developments need primary and secondary schools, surgeries, a good range of shops and other services.** In other words, they need to have not just Neighbourhood parades, like the ones those tucked away in Beaumont Leys and Hamilton, but Local Centres. It is not at all apparent from the descriptions of strategic growth sites that this is going to be prioritised. Policy TCR01, p142 says they are only planned in Ashton Green and Waterside. This really isn't sufficient. As Ashton Green and Hamilton have shown, stranding people in low density housing with little access to local services means that only those who can afford a car are able to live there – and the people who do live there become completely car dependent, which is devastating for the climate as well as for residents.

Climate Action is calling for you to ensure that where the city council owns the land, new housing development is made high density and designed to actively discourage car use. You have excellent policies around encouraging walking and cycling in p71, Policy DQP01, but this is not enough. You also need to design to reduce car use.

Train station.

16.36 “Leicester station is a key transport hub for the city, which will play a much greater role in contributing to the growth and prosperity of the city in the future. Currently Leicester Rail Station is poor quality, compared with others of a similar size, especially in terms of transport integration (with bus/cycle/taxi/pedestrian) and acting as a gateway to the City centre. It has

become clear that the station will require substantial enhancement to serve this growth and to significantly improve the efficiency of modal interchange.” We entirely agree with this statement. However, it is not at all clear from the Local Plan or the underlying Townscape Analysis and Design Guidance evidence documents, that the new development will allow this to be improved in the future, while the loss of the outward bus lane on London Rd has undermined rather than supported bus use.

We are concerned by the plans for the train station development because they do not seem to allow for increased use of trains, a substantial all modes transport interchange at the station, or a last mile freight hub in the future. In fact, the almost complete absence of policy designed to start changing how freight is moved about the city is another big criticism we have of this plan. At some point in the future, the main bus and train stations will have to become far more linked, along with substantial cycle parking and possible tram or trolley bus provision. This will require space around the train station. Additionally, as train services increase in quantity and frequency more platform space will be needed. It is very hard to tell from the Townscape Analysis and Design Guidance document if space allowing this kind of transport growth will be possible. Will the tall office blocks be designed in such a way that their ground floors can be replaced by transport related use? Have predictions for necessary space needed in the future for freight and public transport interchanges been made and the relevant space protected? If so, this is not apparent, which leads us to think this kind of essential prediction has not been done.

We are also concerned that this plan does not seem to protect rail track space across the city where it may be needed in the future. This should be planned for and reserved in this local plan so we don't see situations such as in Lutterworth where the old Great Central line which runs down the west side of the M1 has been built on which will make building a trainline for Lutterworth in the future harder.

Railway stations should be transport hubs where buses and other modes can act to distribute passengers to the railway system. Unfortunately the lack of integration between bus and rail and bus de-regulation means that bus access to stations is often poor and this obviously has a bearing on whether people choose to travel by train to work when many work locations are widely dispersed. Analysis of the 2011 Census Journey to Work data shows that 40% of the 2323 passengers who are likely to arrive at Leicester station work in the city centre zone. A further 30% work around the LRI and another 10% in the University / Clarendon Park zone. The remaining 20% are scattered thinly across the city. The creation of segregated cycle routes radiating from the station could make a big difference. Meanwhile, the proposal to build a new multi-storey car park next to the station raises several questions about the City's commitment to tackle congestion, reduce car travel and improve alternative modes.

Freight plan.

We are deeply alarmed by the fact that freight is barely mentioned in this Local Plan. When we talk about road traffic we tend to fixate on cars, but the fastest growing type of road traffic is actually light goods, driven by the accelerating trend for online shopping. Light goods deliveries are also now being made with cars, under the so-called gig economy where self-employed drivers are delivering online shopping parcels, which means we are under estimating the impact of this issue. **This Local Plan should contain a plan and policy - or a commitment to develop a plan and policy - for sustainable freight deliveries.** This plan and these policies should include:

- Ways to concentrate light goods down into fewer vehicles,

- Moving “last mile” deliveries to sustainable transport
- Consolidating HGV deliveries into freight hubs, for onward delivery by sustainable transport.
- Working with the County to together push logistics businesses in the County to move towards rail, ship and shared transport, and away from air and road.
- Pushing national government and transport decision makers to start planning for and working towards this shift away from road and air freight.
- **The Council needs to commission a study on where would be the best places to put freight hubs in and around the city in the future, and the next draft of the Local Plan should protect these sites from development so they are available for use in the future. If the site are beyond the city, then you need to negotiate with the relevant council to ensure they protect the land for this use.**

Long term, as climate change will inevitably start to make itself more apparent and more radical action is needed, freight hubs will need to be served by rail connections, the most sustainable way of moving freight, assuming it is electrically powered. With Leicester occupying a key location in the logistics golden triangle, from where it is said it is possible to reach 90% of the UK population by road in four hours, we have a unique opportunity to be trailblazers for the rest of the UK in how to plan for the future of freight movements. An opportunity not to be missed, so the local plan needs to lay out a strategy for freight movements in the city (and a plan for working with the County and National organisation to start shifting freight away from road and air) not just for today but for the decades to come – this needs truly long term thinking, and the start of it should be in this Local Plan.

Parking.

As we all know, we are now in a climate emergency which Leicester City council announced in February 2019, and yet this plan contains very little in the way of specific parking polices to discourage car use within our city. The council should not be proving cheap parking in our city as it sends out the wrong message to people that it is ok to use your car and encourages people to use their cars to drive into the city centre. We constantly hear from people at the moment that it is cheaper to park in the centre than to take the bus, especially when they travel as a group or have children. The council should be encouraging people out of their cars by supporting sustainable modes of transport, not by undermining them by supporting unsustainable modes such as car use and adding to our already poor air quality.

You make it clear in this Local Plan that you are going to produce a parking standards Supplementary Planning Document. At the moment this Local Plan takes the approach of providing parking and thereby facilitating households to own more than one car and choose to drive most of the time. Instead **we want to see it lay out policy which will help to manage downwards both car use and parking.** We would like to see:

- city wide residential parking permits which can then be charged according to number of vehicles in the household as a form of equitable demand management.
- a reduced number of parking spaces produced in new housing development – 1 per household rather than multiple spaces, and this parking not being in the form of attached garages (which use a great deal of land which should be kept for people and green space).
- new development to be designed in such a way that people have to walk for a couple of minutes to reach their cars in order to make them slightly less convenient.
- Systematic work with private parking providers to ensure that car parking costs more than bus and Park and Ride fares.

- The provision, on every street with parking, of bays reserved for low emission car pool vehicles, these to be provided with operational electric charging facilities.
- The city working with private parking providers to raise the cost of car parking so that it does not undercut buses.

We are very much in favour of the Workplace Parking Levy you are planning. We want to see it cover the whole city, and ideally, if you can get the support of the surrounding councils, also the suburbs. This would not only raise far more money for public transport, but also reduce the cars on the road reducing congestion and making public more reliable, and also prevent the displacement of parking into areas not currently covered by parking permits.

Travel plans.

Although travel plans are mentioned occasionally in this Local plan, we would like to **see travel plans specifically designed to discourage car use made a requirement for all new development**. For example, all the strategic growth areas and the central development area (CDA01, p90) should require developers to provide transport plans committing to both design and actions which will discourage car use as well as supporting the use of active and public transport. Examples of things which could be in such travel plans include limiting and charging for car parking, pushing car access to the edge of developments, providing free bus passes for residents, providing free parking bays for low emission car pool vehicles, organising car sharing etc. Similarly, sport centres, playing pitches, shopping centres, gyms, places of worship and other new development should be required to produce and act on travel plans discouraging car use, for example in policy CT01, p117; CT04, p119, CT05, p120; OSSR05 and OSSR06, p164.

Supporting Low Emission Vehicles

The local plan should encourage and support the expected growth in use of electric cars, and provide the infrastructure to accommodate this. The plan for any city centre car parking development should include adequate provision for the charging of electric vehicles. On-street facilities in the centre and nearby streets should also be provided, where space allows.

Development proposals which include parking facilities or which will be likely to generate vehicle movements or vehicle ownership will be expected to integrate the provision of infrastructure to enable the charging of electric or other ultra-low emission vehicles into the design and layout of the development

For residential development with communal off-street parking provision, at least 20% of car spaces will be expected to include active charging facilities, and passive provision for all remaining spaces with the layout of the car park ensuring that all spaces can be activated for EV charging as demand increases.

In all non-residential developments providing 1 or more car parking spaces, ducting should be installed to enable provision of charging facilities for electric or other ultra-low vehicles. Where 10 or more car parking bays are provided, at least 20% of those bays are required to provide active charging facilities for electric or other ultra-low vehicles, and passive provision is required for all remaining bays.

City-wide 20mph speed limit.

It is very encouraging to see you talking about the importance of walking and cycling within this draft plan, as well as the importance of behavioural changes towards walking and cycling across our city. We support your suggestions on how you plan to achieve this within our city. However, we feel that much more needs to be included in the local plan to make people less car dependent and for them to use more sustainable mobility across our city to make the car less attractive.

One area that we feel that would help support this is to **introduce a 20mph speed limit across the whole of the city including all radial and circular roads**. Wales is currently considering doing this in all built up areas. Over the last few years you have made good progress in making many of our city roads 20mph especially around schools and built up areas. We are assuming you implemented these 20mph limits because you want children to be safe travelling to and from school and for better air quality for our young people. We would like this work to continue on all roads and streets within our city and are disappointed it has not been built into the local plan.

The impact on having a 20mph speed limit across the whole city would have many positive outcomes on making our roads safer for everyone, both encouraging more people to walk and cycle, and reducing both air pollution and congestion as traffic would be moving at a slower and smoother pace. Implementing a 20mph limit across the city would not only make our roads safer, it would have a huge and positive impact on our city's air quality as well as reducing our carbon emissions. The City of Westminster has recently introduced a 20mph limit on all of its roads. We ask that Leicester City Council follow suit and lead the way in both tackling climate change and providing their constituents to the same protection, ensuring that all our roads and streets are made safer to all who live, work and study within the city.

Low traffic neighbourhoods

To get people out of their cars and onto sustainable forms of transport we need to invest in Low Traffic Neighbourhoods (LTN), and we are aware that the council has just received money from National Government to do this. We have to accept that initially there is opposition from car drivers, but this drops over time and as LTNs are being supported by the UK government - see <https://www.independent.co.uk/news/uk/politics/boris-johnson-to-press-ahead-with-more-cyc ling-schemes-b1722059.html> You need to be planning for where they can be implemented them in Leicester. Enticing people onto sustainable forms of transport is often about making them feel safe. Only by separating road traffic from foot and cycle traffic can we make this possible. Therefore we are disappointed to find that this Local plan is not committing to systematically developing low traffic neighbourhoods across the city in already developed areas and in the big new peripheral development areas.

Consult with disabled people over impacts of your policies.

Meaningful public input provides the framework of quality planning and project development. Facilitators of public decision-making processes must ensure equal opportunity for meaningful participation. Councils that seek early and ongoing input from the affected interests are more effective at delivering projects and services to the people they serve. Meaningful engagement ensures accountability, effective communications and consistency. Too often, road street design and building design are implemented without meaningful input from disabled people,

leading to expensive mistakes. The council must commit to listening to and working with disabled people through a formal voluntary group, supported by an Access Officer with the remit to provide quality design and champion the needs of all disabled people.

Monitoring.

The council needs to set up a system to monitor the impacts and shift between transport modes as it brings in new transport policy. The results of this monitoring should then be used to strengthen or change programs to ensure that changes continue apace. We only have a few years left to substantially reduce our carbon footprints if we are to soften and slow climate change and prevent it becoming truly catastrophic. We need to be effective. It would be very encouraging to see strong policy around introducing and using monitoring in this Plan.

Enforcement

Policies without enforcement become sterile documents in a filing cabinet, gathering dust. We need a step increase in enforcement, starting with planning. We recognise that you can only enforce that which is permitted in government legislation. However, where development takes place on council owned land you have control on how that development takes place through the use of covenants – this needs exercising more often. Once development is underway there needs to be more enforcement of the plans submitted to obtain planning permission. Too often the environmental aspects of plans submitted to get planning permission are watered down or ignored at the actual implementation stage, with councils being left to pick up the pieces or accepting developers arguments as to why they can't/won't be implemented.

We ask that you:

- 1/. Make climate related policy a condition of planning permission**
- 2/. Require developers to certify that they have met the planning agreements put in place when planning permission is granted.**
- 3/. Check that such certification is provided**
- 4/. Investigate all suspected planning breaches, always serve enforcement notices where planning has been breached and take legal action where enforcement notices are not complied with.**

We refer you to Climate Action's example policy on this EDC01.

Specific commentary

There are several things mentioned in the Local Plan which we strongly support and others which we are opposed to. These include:

- Objective 9, page 24, while we strongly support improving active and public transport access to jobs and services, this objective should explicitly talk about actively discouraging car use. Many people travel by car because it is more convenient, not because they have no other choice, and while it is essential to improve both public transport and cycling and walking options in and around the city, it is also essential to discourage car use by putting in place policies which make it unattractive, whether these

be congestion charging, variably charged residential parking permits, car free roads, giving pedestrians and cyclists priority at junctions, or a myriad of other options.

- P50, 5.41, “To encourage sustainable travel, new schemes should be located within walking distance of the city centre and at least one of the campuses, or on a major public transport route which accesses these locations”. This is a good idea and the same concepts should be applied not just to student accommodation, but also to the new strategic growth sites. Given that most of them cannot be located within 10 minutes walk of the city centre, they will definitely need to be on major public transport routes.
- P73, DQP01, we are concerned that point 3 of this policy requires the provision, maintenance or improvement of networks of route for all modes of transport, when given the need to shift to active and public transport, it would be far more appropriate to reduce car access, through roads and networks. However, we do strongly support the other parts of this section of this policy which support walking, cycling and public transport.
- P80 DQP05, backland and tandem development of housing without car access to the public highway should be supported as it encourages people to live without cars. Instead it should be required to have safe convenient foot and cycle access.
- P85 DQP11, we strongly support the provision of places where cyclists can shower and change as the lack of such facilities, with the resulting difficulty of turning up at work smart and clean, is frequently cited as reasons why people drive rather than cycling to work.
- P129, para 12.24 We strongly support your suggestion that reduced parking be provided where there are good public transport links – and large new development should be required to have good public transport links so that reduced parking becomes the norm. This would mean that land otherwise wasted on parking could be used for other things such as business development and tree planting. Such development should also contribute towards the necessary public transport links.
- P138 para 13.5, if retail is to be reached by a range of transport options and not just to encourage car use, then it needs to be accessed by both segregated cycle lanes and frequent affordable bus services. Additionally, its parking needs to cost more than the bus fares and it should have secure cycle parking facilities.
- P176, para 16.9. We are concerned that the city’s new Local Transport Plan as described here will continue the city’s old pattern of radial development, rather than increasing orbital cycling and bus routes which are essential to creating a functional network. While the idea of green corridors is great, they can’t just run into the city centre if they are to be useful to connect the city.
- P176, para 16.12. We welcome a supplementary planning document on air quality. However up to this point the City Council’s approach to air quality (as shown by the very small CAZ around the Royal Infirmary) seems to have been to focus on getting areas over the legal limit to just under it. This does not make sense from either an air quality perspective – people are still impacted by poor quality air, which is still dangerous even if it is under the legal limit – or a climate change perspective. Reducing carbon emissions and improving air quality needs a whole city approach based around shifting people from car to active and public transport. Which is why **Climate Action’s Transport Group is calling for a city-wide congestion charging zone**. This would raise substantial funds for improving bus and cycling opportunities. While it would reduce the amount of money made by the Workplace Parking Levy, this would be a sign of them working together effectively to change peoples’ travel choices, and there would still be an overall increase of income. Many cities are not using charging zones because they say they would adversely impact on low income households. We’d like to see Leicester lead the way in showing that due to the use of numberplate recognition, in reality it is possible to put in place lower charges which people on lower incomes

can apply for. And of course, many of our low income households can't afford a car in any case so the additional funding support for buses would improve their transport options.

- P182, para 16.43. We do not support the building of new roads. Road building is massively expensive, with a very high carbon footprint, and it encourages car use. While roads do need to be maintained and improved, the money, time and resources spent on this should be similar to the money, time and resources spent on building new cycle routes and walking corridors. If the council spent more money on active transport than roads for ten years it would transform the cycle and walking networks in Leicester.

Comments on this draft plan's actual transport policies.

Your policy T01, p184, needs to include specific targets about reduction in car use and increase in walking, cycling and bus use. It should be clear that this will be achieved by reallocating road space away from car use in order to create functional active and public transport networks – including the formation of a network of carfree streets enabling people to get around without coming into contact with cars and their dangers and pollution.

Policy T02, p185. We strongly support the commitment to meet carbon reduction and air quality targets – but these targets should be included in the final Local Plan. We also support the widespread use of clean air zones – although citywide congestion charging would be more effective at reducing congestion, raising money and most importantly could be designed to be more supportive of people on low incomes who cannot afford to buy electric cars.

As already stated, we believe you need a bus policy which commits to setting up a functional and affordable bus network via the use of bus franchising. This policy should also ensure that bus hubs have good access from walking corridors and cycle lanes as well as secure cycle storage. See policy T02 Public Transport Network of Climate Action policy proposals.

Policy T03, p186. While we support the basic ideas in this policy it is not nearly strongly worded enough and it completely fails to require developers to produce travel plans to discourage car use, or to minimise the need to travel by car. Again, we suggest policy T04 Accessibility and development from Climate Action's example policies.

Policy T04, p187. Again, we support park and ride in principle but it needs to include the generation of renewable electricity and to be integrated with cycle routes and include secure cycle parking, as well as to be useable by people who have not parked but want to ride.

Policy T05, p187. Your freight policy is completely inadequate and we refer you to Climate Action's example policy T05 Freight. **Specifically, you need to commit to producing a supplementary planning document on freight and a climate friendly freight plan for the city and the county in this Local Plan. As underlying evidence for this Local plan, you should commission a study on where in and around the city you could be planning to develop transport hubs.** It is not necessary for a strategic rail freight hub to be within the city boundaries. As with your strategic development areas, this could be put in one of the surrounding areas and agreed with the relevant councils. Additionally, smaller freight hubs will also be needed to consolidate deliveries onto fewer and clearer vehicles for delivery into the city and these could take up much less space as well as offering local employment.

Policy T06, p188. Again, the basic ideas in this policy are good but not nearly strong enough. We would like to see this policy contain a clear hierarchy to define how road users should be prioritised, a specific and ambitious target to reduce car use in the city, and clarity that you will

not support road building. We refer you to Climate Action's example policy T03 Highways Infrastructure.

Policy T06, p192. We have already commented on parking earlier in this submission, but we want to add that this policy, and particularly the criteria in it, seem very heavily biased in favour of providing unlimited parking rather than using it as a tool for traffic demand management. We strongly disagree with this position - **parking should not be provided on a predict and provide basis. The city should be working on reducing overall levels of car parking while prioritising disabled people and car pool users.** We refer you to Climate Action's example policy T06 Cycle and car parking

Policy T08, p194. Although they improve air quality and have the potential to reduce carbon emissions (depending on their embedded energy and how the electricity they use is generated) and are therefore useful in tackling climate change, electric cars are only a partial solution. This is because they still cause congestion making the roads less available and unsafe for public and active transport options, and because the vehicles themselves emit greenhouse gases as they are manufactured. However, they are definitely part of the solution and should therefore be being supported by the city far more than in this Local Plan. We refer you to Climate Actions example policy T07 supporting low emission vehicles.

Conclusion.

We finish this submission by saying that we know the City Council has the intention of strengthening your climate policies and are looking forward to seeing a next draft which will enable our city to hugely reduce our carbon footprint and be designed in ways which make life tenable as climate change takes hold. In order to facilitate this we ask you to set a specific commitment in the Local Plan for the city to reach carbon zero by the end of the plan period. We refer you to Climate Action's example policy Climate Commitment.

Yours faithfully,
Transport Action Group
(a working group of Climate Action Leicester and Leicestershire)