Luton LAF Feedback on the Draft Local Transport Plan (LTP5)

1. Overview

We support the Vision and Objectives of the plan. We are pleased to see that the Strategic principles put people, accessibility and sustainability first. It's good to see that the plan recognises the importance of community engagement in shaping the action plan.

The Local Access Forum have worked closely with the Deni Krevesic and provided formal feedback on two occasions. We are pleased to see that our suggestions have been built into this version of the plan.

It's vital that this plan is implemented successfully, given the transport challenges faced by the town over the next 15 years (2026 to 2041):

- Growth in population (approx. 15%)
- Growth at the airport (passenger numbers to double from 16 to 32 million passengers per annum by 2043)
- Car dependency and little take-up of ZEVs
- Ageing population (over 65s increases from 13% to 18%)
- Sizeable developments at the border of the Borough (North, East of Luton), more within 15 miles.
- Luton already suffers from the worst delays from congestion in this area and there are no road plans which will reduce that congestion (M1-A6 link will at best balance the increased traffic from the "Land North of Luton" development).

The LTP includes a total of 225 policy measures, all of which would make a difference. Unfortunately, as the plan makes clear, Luton is only able to deliver a few these measures – just 16 are being worked on now (p48: Short-term delivery plan – Luton Council led measures). For the rest, we rely on government funding and "partners".

It's not clear from the document, what the priority actions are. The wide range of improvement measures means that the plan can easily be adapted to whatever funding is available. The drawback of this approach is that it can lead to fragmented changes which reduce their effectiveness.

STRONG LEADERSHIP FOR CHANGE IS VITAL. THE PLAN SHOULD HIGHLIGHT THE KEY INITIATIVES THAT LBC WILL FOCUS ON. HOW WILL THE PLAN CHANGE LUTON IN THE NEXT FIVE YEARS?

2. Luton LAF's LTP Priorities

2.1 Make the Sustainable User Transport Hierarchy a reality

This is explained in *Principle 1 – Planning for People*. To make this a reality we need to actively educate people about it and promote it.

2.2 A better environment for Walking/Wheeling/Cycling

Pavements and cycling facilities need to be safe and pleasant to use:

- We need to tackle pavement/cycle lane parking. It is likely that Councils will be given new powers to fine obstructive parking. We need to use these powers.

- We need to improve surfaces, tackle overgrowth and overhanging trees and ensure paths are well lit.
- Where possible we need to provide segregated cycling/pedestrian routes in line with LTN1/20

The "*Healthy Streets Approach*" described in Principle 2 should be mandatory in new developments. We can also apply the approach to improve key routes.

2.3 Green/Blue environment protected from development and made more accessible

Policy 3: *Access to parks, green spaces and the River Lea* supports this. This is a virtuous circle: walking/cycling around and to a local park can be a first step to walking and cycling for other reasons.

2.4 Ensure that the emerging Luton Local Plan reflects LTP5

In "*Policy 15: Planning principles*" the "Ongoing Policy Measures" should already be built into the draft local plan. The "By 2030" principles should also be included in the version of the Local Plan being developed now. 15L: *"Ensure all new developments follow the Healthy Streets Framework and other Active Travel England guidance to prioritise sustainable transport options"* is a priority!

The LAF needs to check that new Planning Applications (Power Court, Stage, Luton Airport etc) meet the principles in Policy 15.

2.5 Collaboration and Engagement are vital

Objective 6 is absolutely critical: "*Embrace diversity across Luton through meaningful collaboration on transport plans, policies, and schemes*".

Many of the changes in the LTP will require individuals to change their behaviour. True collaboration needs to be supported by continuous dialogue and education. A survey-based consultation on a planned change is not true collaboration.

Luton Council need to work on bridging the communication gap with specific groups of people, particularly those from racially/culturally diverse communities and socially deprived/working class so that we can better educate and inform about the issues raised in LTP5.

3. LAF comments on specific details of LTP5

3.1 Examples of good practise

LTP5 refers to a couple of design principles

- The "Healthy Street Framework": about creating fairer, sustainable and attractive urban spaces.
- "Department for Transport Circular LTN 1/20" on Cycle Infrastructure Design.

Having some live examples would help in understanding these principles. Are there any good examples in Luton of a "Healthy Street" and a "LTN 1/20" cycleway?

3.2 Monitoring and Evaluation Plan

In section 7: *Making Change happen,* Table 4: (7.2?) gives the *"Monitoring framework for LTP objectives and indicators"* – listing the KPIs and measures for each objective.

The LTP proposes that the first full monitoring report will be published two years after the plan is adopted. We believe that there should be an initial report immediately after adoption to publicise the baseline for the KPIs. This can also be used to sense-check the proposed KPIs.

After the first full report at two years, the proposal is that reports will be produced every five years thereafter. We believe that the monitoring results are public information and the raw results should be freely accessible. Where the data is collected continually, it should be shared annually at least. Some data – for example "Government" data - will be collected to a different timetable to the 5-yearly reports. It should be shared when it is produced.

Objective 1: One of the KPIs is *"Noise pollution levels (if available)"*. Should publish noise monitoring from the airport.

Objective 3: focuses on residents. Should add a KPI on "Number/percent of trips to/from the airport by walking, wheeling, cycling / bus / DART". The number of DART passengers should be published annually. It will be easy to compare to the number of airport passengers to see whether modal shift to/from the airport is happening.

Objective 4: One of the KPIs is *"Length of additional high quality, segregated cycling infrastructure"*. This may encourage the wrong behaviour: small lengths of improvement to non-segregated cycle facilities at key pinch/danger points can make a bigger difference.

Objective 4*: "Percentage of new homes within 400m…"*. Not sure this is the right measure. We need to improve sustainable travel throughout the town. Should be "Percentage of all homes within 400m…".

3.3 Comments on individual policies

"*02O: Work with neighbouring authorities and other delivery partners to improve active travel connectivity to neighbouring communities on the edge of Luton*" and "*07J: Work with neighbouring authorities to ensure that new settlements on the edge of the town are provided with adequate public transport. This includes involving bus operators at the early stages of planning.*"

These are both a bit weak: it should be: "..ensure that new communities or settlements are provided with safe routes for walking and cycling to key destinations within Luton…." NB: this is not being done adequately at present!

The network of cycle routes defined in the LCWIP needs to be augmented because of the new developments outside the borough (see figure 8 of the LTP). Specifically:

1. A cycle route from "Land North of Luton" to Leagrave Station.
2. An E-W cycle route along the boundary between Luton and "Land North of Luton". This will facilitate travel between the two areas and proved access to the new employment areas in the West of the new development.
3. A cycle route along the boundary between Luton and "Land East of Luton". This will facilitate travel between the new estate and Luton and ease access to employment at the airport and Butterfield.

3.3.1 "*02G: Promote and license a cycle and e-cycle hire scheme (and an e-scooter scheme pending legislation….*". Personal mobility devices like e-cycles and scooters will play an important part in the shift away from cars. The legal framework needs to be finalised and enforced, but the sooner we start, the sooner we can make progress.

3.3.2 "*17A: Continue to enforce illegal parking in bus and cycle lanes to support public transport, and act accordingly on the outcome of government's footway parking ban review.*" Enforcement of parking restrictions in cycle lanes is poor at present. It would be more honest to say "Improve the enforcement of parking rules in …..".

3.3.3 "*19B: Work with bus service operators to assess potential use of hydrogen/biofuels for buses and coaches.*" and "*22C: Assess potential use of hydrogen/ biofuels for buses and coaches and consider new propulsion technologies as they become available.*" We have concerns about biofuels: they are not zero-emissions and there are doubts whether they are net-zero at the scale needed to make a significant contribution. Green hydrogen production will only be in the preliminary stages by 2030. We are concerned that these policies could be a distraction – other policies will provide bigger contributions to "Net-Zero".

What is the Luton Local Access Forum (LAF)?

The Countryside and Rights of Way Act 2000 places a duty on Highway Authorities for any area to establish a LAF for that area.

The main purpose of Luton LAF is to give advice on the improvement of public access in Luton for open-air recreation, responsible enjoyment and other related matters. The Luton LAF provides advice on access within the Luton Borough boundary and land outside Luton that is owned, managed or controlled by Luton.

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