



## Leeds Civic Trust

### COMMENTS ON DRAFT CONNECTING LEEDS TRANSPORT STRATEGY (March 2021)

#### 1 INTRODUCTION

- 1.1 The Leeds Civic Trust (LCT) welcomes the review of the transport policies to be adopted in Leeds and the opportunity to be involved in the formulation of plans for transport in Leeds.
- 1.2 The Trust agrees with the overall thrust of the Strategy and the aspirations which lie behind the proposals set out in the document.
- 1.3 We hope that the comments set out below will be taken in the spirit of a 'critical friend' and be a starting point for an engagement process which will help deliver the transport network which is necessary to underpin the long-term prosperity of Leeds and its city region.

#### 2 GENERAL POINTS

##### **Vision:**

- 2.1 We strongly support the overall vision of a city where you don't need a car and where everyone has an affordable zero carbon choice in how they travel. We agree that we should be "moving away from personal car ownership towards a shared 'go anywhere' low carbon transport network".
- 2.2 However, the objectives are largely expressed in general terms and need to be more clearly linked to policy implications.
- 2.3 The strategy tends to concentrate on journey to work and journey to the city centre, based on the perceived benefits from economic agglomeration. This 'business as usual' model, will not deliver a net zero approach as it requires drawing employees from a larger catchment area (with consequences for carbon generation).
- 2.4 Many of the 'Big Ticket' items rely on national decisions rather than the Leeds strategy. We need to see many more pedestrian, cycle and bus schemes in the pipeline.
- 2.5 The key elements which must be prioritised are:
  - a) re-allocation of road space for pedestrians, cyclists and buses;
  - b) parking management including Workplace Parking Levy and other charging measures;
  - and
  - c) 'different operating models for Public Transport' i.e. public control of bus services and fares.

This is particularly the case in the context of the new National Bus Strategy.

##### **Achievability:**

- 2.6 We do not think that the Transport Strategy is presently ambitious enough to achieve the target of making Leeds Carbon Neutral by 2030. The chart on p25 shows that current policy and the 'Big Moves' may reduce carbon emissions by approximately 25m tonnes but this leaves a further reduction of 35m tonnes still required to meet Zero Carbon by 2030. There need to be further measures in the Strategy to achieve this.



**(In)Consistency:**

- 2.7 The Leeds Strategy and the West Yorkshire Strategy, which is also out for consultation, differ in approach, targets and timescale. Given that 34% of the population of West Yorkshire lives in Leeds and around 120,000 people commute into or out of Leeds each day, it would help public understanding if the West Yorkshire strategies were to dovetail and be consistent:
- the Leeds Strategy is based on being carbon neutral by 2030 and the West Yorkshire one by 2038 - ideally the target date for WYCA should be brought forward;
  - Leeds is looking for a 130% increase in bus usage and WYCA 52% - this represents a huge discrepancy in the ambition for and capacity of the bus system in Leeds;
  - Leeds seeks a 400% increase in cycling, WYCA 2125% - Leeds should be as WYCA!

**Measures:**

- 2.8 The Strategy does not adequately indicate “how” we will achieve the Vision. We think that specific and ambitious policies and programmes need to be put in place quickly. For example, will the over-riding aim of developing “a city where you don’t need a car” underpin all future planning decisions?
- 2.9 For all the ‘Big Moves’, the ‘We May Need to Consider’ section needs to be ‘upgraded’ as many of the measures listed need to be urgently developed and implemented.
- 2.10 The six ‘Big Moves’ and twelve ‘Policy Areas’ should be SMART (specific, measurable, achievable, realistic, timed).
- 2.11 The Connecting Leeds strategy has made good progress with sustainable transport but the city was starting from a very much ‘behind the curve’ position. It needs to drive radical change to deliver its stated objectives.

**Targets:**

- 2.12 The targets for modal split are ambitious but we are not confident that these will be achieved as they are not based on clear and measurable policies and interventions.

**Partnerships and Leadership:**

- 2.13 The emphasis in the Strategy on partnerships and co-operation is both welcome and essential but the City needs to better articulate a practical vision of how its transport and climate change strategies are going to be delivered.
- 2.14 Many of the actions needed to achieve the Strategy are not solely within the Council’s powers. It would be useful to indicate what is needed from each party for each measure to be achieved, including WYCA, national government and Leeds residents. The strategy proposes challenging changes to the way we currently travel and will require a fundamentally different model of engagement with Leeds citizens to ensure its success, demonstrating benefits to individuals as well as the whole community. Particularly important will be a greater willingness to involve communities in designing, developing and implementing local schemes, such as active travel neighbourhoods (ATNS).

**Challenges:**

- 2.15 The Challenges section is not sufficiently explicit about the problems of delivery. It is accepted that many of the obstacles to delivery are presently outside the control of the City Council but clearly identifying this and what is required to overcome the ‘road-blocks’ is essential.



### Planning:

- 2.16 A key to reducing demand for travel (and most specifically use of individual vehicles) is the creation of better links to planning e.g. avoiding extensive out-of-town estates not easy to serve by public transport such as the East Leeds Extension. Linking development to potential mass transit routes is good in the long term but could also help delivery through use funds generated by developers (CIL) - there needs to be greater integration of transport and land use planning. This is a 'must', not a 'may'.

### 3 OTHER KEY POINTS

- 3.1 p6-7. It could be considered that targets would be better based on distance travelled rather than 'trips' as it is distance travelled that is of prime importance re carbon emissions, pollution and congestion (this is used by WYCA). A carbon focus will drive concentration on modal shift from long-commute to long-distance rail, which is admirable, but this would bypass the need to ensure a modal shift from short car journeys onto an improving local bus accessibility policy. The greatest health benefits would emerge from shifting short journeys to an active mode. To some extent, the targets for WYCA and LCC will differ, with WYCA maintaining a focus on encouraging modal shift in long-distance commuting while LCC is also looking to reduce short car journeys and local congestion and movement beyond the 15 minute neighbourhood.
- 3.2 p7. An explanation of how multi-modal trips are counted would be useful as the Strategy envisages more multi-modal trips in future with development of transport 'hubs'.
- 3.3 p7. There is no mention of MRT in the modal share targets. As a key aspect of the justification for MRT is presumably the modal shift that it will enable away from car, this should be represented in the modal shift targets.
- 3.4 p12. "*Walking now accounts for 81% of the shortest journeys made*". This figure, which is based on national data, is inconsistent with the local data on p7 where only 2/3 (67%) of people say they walk or cycle short journeys. We would like to see a much more ambitious target for increasing walking, in line with other key strategies, such as the Health and Wellbeing Strategy.
- 3.5 p15. "*... only changing vehicles to zero emission can deliver the carbon reduction targets*". As this is determined by national policy and individual choice, what has been built into the assumptions for the targets? Do the targets assume that vehicles are zero emission? How can we deliver the levels of investment needed to change behaviours and/or deliver the required modal shift?
- 3.6 p17. There is a lot in this section about travel to work but little on travel to school, leisure, recreation, etc. Policies of the local authority on location of sports facilities will affect travel needs Central government policy on parental choice will clearly impact on school travel patterns but, in the past, everyone just walked to the nearest school. We need reliable data on current school travel patterns to help develop policies to support active travel, such as School Streets.
- 3.7 p19. Accommodating future growth. This is all about the city centre. According to the 2011 census, only 25% of people work in the city centre.
- 3.8 p20. A lot of these growth areas have poor public transport links, which encourages car use e.g. Thorpe Park, LBA business allocation, etc.



- 3.9 p21. The section on air pollution appears to suggest that the problem is solved. This is absolutely not the case. We need to adopt the WHO standards and develop a strategy with a focus on reducing particulate matter as well as NO<sub>2</sub>, especially in inner city areas.
- 3.10 P21. With regard to road safety, 20mph limits will need much better enforcement.
- 3.11 p27. Decarbonising transport – it is public transport that will need to do the ‘heavy lifting’ here. There needs to be a policy shift towards transforming the local centres e.g. Morley, Headingley, etc. This would reduce need to travel and encourage the development of 15 or 20 minute neighbourhoods.
- 3.12 p28. We agree with the aim of reducing the need to travel but ask the question ‘how do agglomeration benefits fit with this?’ Widening the employee market is a key justification for improving inter-urban travel opportunities (e.g. HS2, NPR and regional MRT)? What will the impact of changes in the economy post Covid-19 be on people’s need to travel? How will reducing the need to travel be reconciled with the need to close facilities due to financial pressures? This applies to LA and other public services e.g. doctors' surgeries.
- 3.13 p28. No mention of cycle hire schemes. Employers should be incentivised to provide high quality shower/change facilities and secure bike storage - Leeds is hilly and, even with electric bikes, somewhere to freshen up is essential. No mention here of the airport and its impact on carbon emissions.
- 3.14 p29. With regard to the 20 minute city initiative, other cities are working on a 15 minute neighbourhood. While either would be an advance on the present situation, some consideration could be given to a model which reflects Leeds’ specific geography.
- 3.15 p30. The Outer Ring Road must be the route for through traffic passing Leeds or for those in the urban area leaving Leeds but it is not necessarily sensible for those in Leeds travelling to other locations in the urban area. There is value in other orbitals ‘within’ the urban area to avoid the need to go out and back in again, which would increase travel distances. However the paramount object must be to decrease through traffic in local residential and commercial centres.
- 3.16 p32. We agree with the aspirations. The city centre is vital but we also need to consider the health/enhancement of local centres which have become more important as more people work from home - these do not appear to feature in the Strategy at all (except perhaps in the 15/20 minute neighbourhood concept). There needs to be a section on these important locations and how they can be supported by transport interventions.
- 3.17 p33. Workplace parking – this is not a ‘may’ but should be ‘vital’ to generate funding for public transport improvements.
- 3.18 p34. Enhance public transport. This is key. We need a radical transformation of the public transport offer to achieve the required modal shift from cars. The WY Bus Alliance will not deliver the scale of uplift in bus use which the Leeds Transport Strategy requires, nor will any proposed Statutory Partnership. This fundamental problem needs to be addressed. There has been investment in infrastructure but this is not matched by enhanced services as these are generally private sector led e.g. buses have been reduced in areas where new bus lanes have been installed. A major issue is the structure of the industry, where LAs have limited potential to direct commercial organisations. Bus usage is not declining in locations where there is better planning and greater ability to direct operators e.g. within Nottingham. Key bus corridors should not only link suburbs to the city centre but also enable high levels of accessibility for all between district centres and to



major health, retail and peripheral employment centres - high-frequency circular routes passing through district centres would give people an option to travel between them without going into the city centre (e.g. route 38 was a valuable service for those in North Leeds).

- 3.19 p35. Is the shortage of city centre parking an issue? Surely it can be considered an advantage if alternative travel modes are available? We do not want more city centre parking and closure of those car parks within the Loop should be encouraged. However, while the city centre has to be protected from the ravages of the car, it should not be allowed to become an island.
- 3.20 p35. Develop park & ride offer. In doing this, promoters need to be careful that they are not encouraging people to switch from using public transport from places further out to driving to the P&R instead. The Elland Road P&R is quite close to the city centre – if most people are coming from the M62, a P&R by the M62 junction would be more effective in reducing distance travelled by car. In the long term, use of P&Rs should decline as better end-to-end public transport options become available, supported by last mile walking/cycling.
- 3.21 p35. It is also important to explain how rail services complement bus services to deliver a comprehensive transport network.
- 3.22 p35. Fares reform and integration is not a 'may' but a 'must' if we are deliver the modal shift required.
- 3.23 p37. The comparison of cost of car ownership and public transport seems to significantly overestimate the cost of car ownership by using the first year depreciation cost and a high insurance premium. Of importance for people who own a car is the marginal cost of car usage, which the Inland Revenue put at 25p per mile. As this is much less than typical bus fares there is no incentive for car owners to use their cars less. This also emphasises the need for lower bus fares.
- 3.24 p37. The concept of “mobility as a service” is not very clearly explained.
- 3.25 p38. The growth in taxi and private hire is leading to an increase in congestion. Autonomous vehicles still do not overcome issues of congestion, pollution (mainly particulates if low-carbon technology) and danger.
- 3.26 p38. There should be pressure to de-carbonise last mile services through use of cargo bikes or 'electric milk floats' for home delivery. This is becoming more urgent with the growth in on-line shopping.
- 3.27 p38. We commend the emphasis on transport hubs but these need to work like clockwork with frequent services on all legs if they are not to make cross-city journeys more time consuming.
- 3.28 p44. *“Our targets are based upon trips undertaken by Leeds residents and do not include trips made in Leeds by others living elsewhere. These targets do not include freight travel.”* Given that according to the last census 55,000 people travel into Leeds each day, how does this affect the Strategy? Moving commuters onto rail and bus will help, together with potential for more P&R for rural areas. Targets should be extended to freight as this is a growing issue. This also highlights the importance of linking with the WYCA Strategy.
- 3.29 p44. We are delighted to see that Leeds is adopting Vision Zero. However, this will require a step change in the priority given to this by partners, especially the police, rather than merely “*continuing to work with*”.



- 3.30 p45. Effective monitoring against stated targets is essential. These should also be rolled back for say 10 years to show the way we would be going if there were to be no change in current patterns. A historic view should be honest about failures to encourage real change. The numbers in the mode split table don't seem to be mutually consistent.
- 3.31 p46. Additional information should be provided on the remit and current composition of the Transport Expert Panel.
- 3.32 p48. A key ask of Government should be levelling up, or even reversing, of policy between modes. At present, aviation is most polluting mode and gets big tax breaks, road fuel duty has been deflated while public transport pays more and there is major investment in highways but rail is being cut back - all the wrong signals.