

End of the Road Campaign,
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End of the Road's submission to the Leicester & Leicestershire Strategic Growth Plan consultation.

We are writing to comment on the Strategic Growth Plan (SGP). We recognise the double constraints of government requirements and population growth which you are dealing with, and support the development of long term planning to provide housing and jobs for people.

However we are deeply concerned that instead of prioritising people and traffic demand management, you are developing a plan which both encourages car use and seems likely to fail to meet the most urgent housing need for the county – that of social housing – at the same time as completely failing to tackle carbon emissions in a time of climate change.

We believe that building on greenfield sites in a huge area of countryside will mean the provision of lots of expensive housing at the same time as making it easy for developers to avoid their social housing responsibilities. Such houses space consuming design and distance from services and jobs will inevitably mean they dramatically increase car use in the county and city. The homes already being built at new developments such as the one at Lubbethorpe demonstrate this - they are being advertised as having links to the M1 with multiple car parking spaces, seemingly have no solar generation capacity, and are not built to a high level of energy efficiency.

Traffic demand management vs predict and provide.

As it currently stands this SGP is clearly designed to predict how much car use it will create and then provide roads to facilitate this. We strongly feel this is the wrong approach. We'd like to see you developing a systematic policy of car use demand management across the county. Instead of encouraging people to drive by building away from friends, services, families and jobs, we'd like to see housing concentrated in the already built up areas.

At the same time we'd like to see people encouraged to use active and public transport by policies such as:

- Reduced and more expensive parking, with an extended blue badge scheme for people with disabilities, permit parking across built up areas, and special parking bays for car pool cars.
- A network of segregated cycle routes for safe cycling – in the cities and towns this could be done by reallocating some roads to pedestrians and cyclists and not cars.
- Not building new roads for car use.
- Making public transport cheaper, more widely available, more frequent, running later at night and at weekends, and more reliable. Reallocating road space specifically to buses would help with this as would more train and tram lines across the county and city.
- 15 or 20mph speed limits in villages, towns and the city.
- A congestion charge in the central areas of Leicester and the larger towns.
- Business parking levies in city, towns and countryside alike to give businesses reason to help their workers not to commute by car.
- Safe and ubiquitous bike parking, combined with public showers for cyclists in key places like the train stations

We do not see this as penalising car users. Instead it would help the people of Leicester and Leicestershire to feel they could get out of their cars. It would make people healthier and happier as they met and talked with each other, got more exercise and benefited from improved air quality and mental health. It also would mean that people without access to cars (this includes over 35% of households in Leicester and generally includes people with the lowest income levels) would

have more opportunities and resources available to them.

Taken from your assessment of transport impacts:

1.1.7 “This assessment takes into account the likely increased travel demand from the number of people expected to live in the area over the plan period.”

4.4.1 “Adding additional houses causes the number of trips in the morning peak hour to increase due to people leaving for work, school etc. As these trips make up a large proportion of the total trips made we would expect to see a strong correlation between growth of new trips that originate in each sector and the number of dwellings. Whilst we would not expect a perfect match due to (for instance) shift working, this work shows a strong relationship between dwelling growth and the number of new trips originating in sectors and provides confidence that new trips are being added to the transport model in the most appropriate places.”

2.1.6 “There is an appreciation that the transport network in Leicester and Leicestershire favours north-south movements with east-west movements being more difficult, especially by public transport. Current structural issues such as this will be exacerbated by forecast growth, with all major transport routes being congested and few having capacity to support growth beyond 2031. It is therefore clear that significant new development cannot be delivered in Leicester and Leicestershire without significant investment in infrastructure and services.”

There is a great deal of evidence that building roads causes additional car trips to be made, due to many mechanisms such as:

- car dependant developments which are difficult or unpleasant to get to without a car
- people choosing to use their cars more when they expect fewer delays, and so they get out of the habit of using active or public transport, and less physically able to walk and cycle
- buses becoming more expensive and being stopped as some of their users switch to cars, thus forcing still more people into cars

The Impact of Road Projects in England study produced in 2017 drew on evidence of short-term impacts from over 80 road schemes, published by Highways England and long-term evidence from four road schemes that were completed 14-21 years ago. It found that new roads induced on average 7% more traffic in the short term (3-7years) and 47% more traffic over 8-20 years. These were increases over-and-above background traffic growth.

Given this evidence, we feel that Leicester and Leicestershire need to take a different approach to traffic than that laid out on this SGP. The quotes above in bold from your transport assessment illustrate your pattern of going with predicting demand and then trying to meet it rather than manage it. We agree that east-west movement is difficult in the city for public transport, and also that infrastructure and services are needed to tackle this, but it can be tackled by dedicating specific lanes and roads to public and active transport and removing the cars from these areas to ensure that congestion doesn't prevent them from functioning. Also, the emphasis of the whole plan could be on services – bus services, cycling hire and maintenance help, car pooling schemes and other community transport – rather than prioritising private car use. Where cars are not prioritised and public and active transport are, people switch from their car – and benefit, along with the rest of the population. Sadly, this SGP heavily prioritises car use, which is one of our main objections to it.

Where and in what form should housing be provided over the coming decades?

Our counter proposal to the SGP choice of greenfield development, is that you support shifts in societal and business patterns of thought and enable housing to be provided by using current buildings and brownfield sites - refurbishing, redeveloping, rehousing and in some cases building new. Also that you support people in under-occupied homes to share their houses by taking lodgers and that you build flats upwards rather than sprawling our urban areas outwards.

Transport assessment 2.1.9 “There is a clear need for Leicester, Leicestershire and regional partners to adopt a planned approach to growth that aligns with national policy such as the government’s Industrial Strategy and stated aspiration for increased housing delivery to ensure long-term success.”

You have choices about what type of housing you plan for and where you plan to put it. We do not agree that Leicester and Leicestershires planning needs to align with the governments aspirations and strategies in every way. Yes, there are things you are legally obliged to do – such as provide housing – but you can choose how you do this, and where your legal requirements are problematic

you can challenge government, as Leicester has recently done around air quality. The government's current housing strategy opens up greenfield sites, and gives property developers more power without reliably increasing rates of provision or housing people who need homes.

We especially feel that given that the need for affordable housing is so concentrated in the towns and city, it doesn't make sense to be building in the countryside where people will need cars to function, housing will be more expensive, and public transport will be both more expensive to get to key services such as hospitals, and less available.

7.2.4 "Strategic transport investment over and above that identified in Midlands Connect and covering all modes of transport will be required to support successful delivery of development as per the proposed SGP scale and spatial distribution. It is deemed unlikely that investment in sustainable transport modes alone will be sufficient to mitigate the scale of growth proposed. This relates in part to the significant sub-regional movements which are less likely to be supported by sustainable modes alone"

Again, we agree that transport investment is needed, but believe that this plan to build outside city and towns on green fields will make it much harder to use traffic demand management and active and public transport. However, building within towns and Leicester diminishes these problems from the start as people can access public transport and are closer to their jobs and services. You can then focus your resources on managing traffic demand as London is starting to do.

7.2.7 "if the level of growth and spatial distribution remains as predicted it is likely that in Central Leicester, the wider urban area and surrounding sectors improved radial connectivity will be required, especially to 2051 to support inward commuting and proposed A46 delivery. The most effective form of this is not clear but is likely to include some elements of Park and Ride and public transport priority routes. Consideration will need to be given to demand or parking management interventions given the large increase in delay forecast in Central Leicester to 2051. More generally there will be a need to continue to support modal switch to more sustainable modes in Central Leicester and countywide given the large increased in intra-sector trips in specific sectors which are more likely to be converted to active and public modes supporting greater highway efficiency."

This strongly supports our position which is that it is the spatial distribution of housing proposed in this Strategic Growth Plan which is a major problem, and that serious traffic demand management is needed instead. The ever-recurring need for radial connectivity could be provided on the current road network if some roads were reallocated away from cars in favour of bus, cycle and walkways. If such public and active transport were able to flow freely along specific roads, then they would be connected radially. For example, dedicating Braunstone Lane East and Middleton Street to buses and bicycles without cars would provide connectivity for buses across the River Soar as well as reducing pollution in that area. However, building tens of thousands of houses in areas which encourage car use would massively increase congestion within Leicester and make it much harder to use traffic demand management in a positive way.

7.2.1 "The spatial distribution of proposed growth as modelled in this work....is dependent upon the delivery of strategic transport infrastructure as proposed by Midlands Connect."

7.2.6 "It is therefore clear that the A46 proposals will be central to supporting delivery of the scale of growth proposed in the current spatial distribution utilising strategic sites and will require additional highway and other transport investment to mitigate specific areas of network stress."

This is a classic case of roads causing out of town development which then causes more car use and then more roads. Again we want to point out that you don't have to keep to this vicious cycle. Now is your chance to plan for traffic demand management and housing which supports community and people.

P16 Midlands Connect "By leading growth in technology from the Midlands, including driverless cars or piloting platooning of freight vehicles, the UK can become a global centre of excellence for application of these technologies in a sustainable environment where defined standards and legal and regulatory boundaries can be established. This will enable manufacturers to produce globally-accepted products driving accelerated market demand and economic growth."

These kinds of things push activity from more sustainable options like bus and rail towards private vehicles, both cars and heavy goods vehicles. Platoons of freight are surely better done by rail freight trains, and driverless cars could be replaced by public transport with facilities for moving things like on trains. "accelerated market demand" for manufactured items may be good for investors, but the belief that we "need" more possessions does not make people happier and does damage the environment and accelerate climate change as they consume precious resources and pollute during manufacture, transport and disposal. The typical pay for someone working in a

logistics warehouse in this county is £13,000 per year – this is not a living wage and does not support sustainable lives. Not all economic growth is positive, and we'd like to see an understanding of this in this SGP.

Summary

We are concerned and opposed to this SGP:

1. which seems very unlikely to provide even a fraction of the social housing which is needed
2. which increases inequity in Leicestershire both through rural housing provision, the promotion of poorly paid jobs and a transport system which favours the well off
3. which is based on a pattern of predict and provide at a time when planners across the UK need to be acting to promote low carbon living, transport and business.
4. which will exacerbate air quality and add to carbon emissions across the county at a time when we need to address climate change.

We sincerely hope that you will re-examine your approach and priorities as we feel a long term plan for the county which is sustainable for all the people who live there as well as the environment is very important.

Yours faithfully,

Working group of End of the Road Campaign: Melissa Foxon, Kim Burley Jones, Felicity Larson, Tom Mee, James Peel, Christina Wigmore, Zina Zelter

End of the Road is an action group in the West of Leicester formed of about 250 people who are opposed to building more roads in the city and wanting to see better traffic demand management introduced.

P.S. Finally we feel we need to comment on the wording of the HEDNA, flood risk, utilities and much of the other underlying evidence for this Strategic Growth Plan. This documentation was very hard to understand, sometimes contradictory, as well as there being vast amounts of it, and some of it was only made available in the last month. This made it hard for ordinary people to read, understand and comment on this consultation. We feel this undermines the democratic process which the Strategic Growth Plan consultation is supposed to be a part of – how can people engage in the democratic process when the evidence offered them requires expert understanding? – and that as a result you are likely to get very few responses even though many people do care about these issues. In addition to this the wording of the Leicester and Leicestershire 2050: Our vision for growth consultation draft, implied throughout that the environment had been given great value and taken into account. As we read the supporting documentation however, there was little evidence of this.