



York Civic Trust

York's Local Transport Strategy First draft Implementation Plan Comments to Scrutiny Committee meeting of 24th September 2024 20th September 2024

These comments relate principally to Item 6 of the Economy, Place, Access and Transport Scrutiny Committee agenda for 24th September 2024, which provides a first opportunity to comment on the draft Local Transport Strategy Implementation Plan 2024-2026. They have been prepared by York Civic Trust's Transport Advisory Group, which was first invited to advise on a new Local Transport Plan for York in January 2020, and has been working with Council officers and members throughout the subsequent 45 months. We hope to be able to highlight our principal comments on the draft orally at the meeting.

We have also taken the opportunity to add some observations on the Local Cycling and Walking Infrastructure Plan (Item 7), based on our involvement with the Council's LCWIP steering group since its inception two years ago.

The Local Transport Strategy and draft Implementation Plan

We welcomed the Council's new Local Transport Strategy when it was submitted to Executive in July, but expressed concern that it still included no targets for its horizon year of 2040. We also commented critically on the time which the Council had taken to reach that point, and the deferral of the Implementation Plan to late 2024.

The first of these has been resolved in the draft Implementation Plan. We welcome the Council's clear vision for the future of transport in York, its challenging but necessary objectives, the targets set for 2027, 2030 and 2040 for each objective, and the ten policy focus areas on which the Plan is based. However, we have a number of remaining concerns as listed below. **We recommend that the Scrutiny Committee seeks improvements on all of these in the final version to be submitted to Executive in November.**

The timeframe

The final section of the Local Transport Strategy, as approved in July, said: "*Our steps will be set out in Implementation Plans – of five years' duration. Our first will be published at the end of 2024 and will cover the period to 2029.*" In practice the draft Plan is for two years rather than five, ostensibly because government policy and mayoral funding beyond then are uncertain. This reflects a very short-sighted and overly cautious approach on the part of officers. If the Council is serious in its aim to achieve its very demanding carbon reduction

targets for 2030, it needs to set out now what it will need to do over the full five year period. Doing so should also help in influencing mayoral funding plans and government policy in this critical period, and thus help secure the funding and regulatory powers that it needs. **We strongly recommend that Scrutiny Committee seeks proposals for the full five year period to 2029 in the version to be submitted to Executive in November.**

Targets and base data

As noted, we broadly welcome the set of metrics now proposed for each of the ten Council objectives, and the targets set for 2027, 2030 and 2040. However, we are concerned at the lack of base data in the table on page 11. We agree that it is appropriate to use 2019 as the base year, and also to reflect immediate post-pandemic conditions by showing interim data for 2023. **These two years should be adopted consistently in the table.** The document rightly says, on page 43: *“The majority of our targets rely on data that we already gather.”* It should thus be possible to include actual data for 2019 and, in most cases, 2023 in the version to be submitted to Executive. The document offers to do this: *“Before this plan comes to Executive in November we will collate our baseline data (from the period 2019 to 2024) and compare this with the targets set out in this plan.”* **We recommend that Scrutiny Committee seeks an assurance that this data will indeed be included.**

The Packages and Policy Focus Areas

The Local Transport Strategy outlined proposals in ten broad Policy Focus Areas (PFAs), many of which were modally based. The current draft Plan defines ten Packages, which map directly onto the ten PFAs, but then attempts to illustrate how actions in one Package might contribute to other PFAs. It is indeed essential that the Packages reinforce one another. For example, the new parking strategy in Package 7 will directly influence the effectiveness of the enhanced park and ride provision in Package 4; the enhanced provision for enforcement in Package 9 will be essential to the success of the proposal for York to become a 20mph city in Package 3. **The document would be clearer if these dependencies were set out in a new section following the ten Packages, so that the Council and its funders are clear on the importance of action in all ten areas of activity.**

Plans before action

The draft Implementation Plan includes proposals for at least six further plans. Of these, only the bus network review has an early completion date, of March 2025. The three core documents in Package 6: the Movement and Place Plan, the Highway Design Guide and the Transport Supplementary Planning Document (SPD), are not scheduled until December 2025, and only then if funding becomes available. The Movement and Place Plan is presented as key to developments in Packages 1, 2, 3, 5, 7 and 8, so failure to complete it in under 15 months will delay actions throughout the Implementation Plan. The Transport SPD is even more critical, since the Council is currently facing a spate of planning applications for strategic sites which would see them develop as car-based communities. The Parking Review, to which the Council first committed itself in 2017, has no deadline for completion. Yet without direct action on parking, there is no real possibility of the Council achieving its target of a 20% reduction in car use by 2030. Equally the Freight Strategy has no deadline for completion. The Council has already spent four years planning its transport strategy, and it is unacceptable that it should now stretch this to six years. What is needed is action

on the ground. **We strongly recommend that the Scrutiny Committee asks for all of these plans and reviews to be completed, at the very latest, by June 2025.**

The proposed actions

An implementation plan should set out what will be done and when. The current draft makes some attempts to do this, but the wording is all too frequently vague and over-cautious. For example, the section on 20mph zones in Package 3 says (with our emphasis in bold): *“York currently has 20 mph limits in much of its built-up area. **We will look to expand this and will start by engaging with stakeholders and the wider community to explore how York could become a ‘20mph city’ and what that would mean in practice. We will analyse the potential benefits and disadvantages of 20mph limits and will monitor the current 20mph trial in Bishopthorpe with a view to assessing the benefits and applying it in other villages around York imminently.**”* The Local Transport Strategy is much more specific; Policy 6.4 commits the Council to *“make travel safer for pedestrians, wheelers and cyclists, adopt 20mph as the default speed limit for all roads through residential areas (including new developments), within the city centre, near schools, in villages and at retail areas and parks.”* All that is now needed is a statement of which of these will be implemented by 2026 and by 2029. There is ample evidence from elsewhere of the benefits of well-designed low speed areas, without the need for the Council to conduct its own appraisals.

We illustrate below other examples of vague wording and qualified commitments. Given these it is difficult to answer the simple question of what will be in place by December 2025 and by December 2026 with any precision. **We strongly recommend that the Scrutiny Committee asks for much more specific statements, under each Package, of what will be done by each of these dates.**

Plan appraisal

We welcome the commitment on page 43: *“Before this plan comes to Executive in November we will make high level assessments of the costs and benefits of the suggested schemes and their ability to enable us to reach our targets.”* It is essential that this is done before the Plan is approved, so that there is clear evidence that the Plan will be effective in achieving the Council’s demanding 2027 and 2030 targets, and that it represents a cost-effective way of doing so. However, the lack of clarity on what will be done, or on how intensively specific policy measures will be applied, makes it virtually impossible to carry out such an appraisal. **We recommend that the Scrutiny Committee seeks an assurance that the proposed appraisal will be based on the more specific statements of what will be done in each Package which we argue for above. It might well be appropriate for the Committee to ask to see a draft of that appraisal before it is submitted.**

Monitoring and annual reports

We welcome the commitment on pp 43 and 44 to publishing an annual monitoring report. As well as reviewing outputs, in terms of actions taken, and intermediate outcomes, in terms of changes in travel, it will be essential to monitor progress against the principal desired outcomes, as defined by the targets for each objective in the table on p11. However, greater clarity is needed on the timing of such reports. At present there is often a delay of a year or more in the release of Council monitoring data. It should be possible to report on outcomes in a given calendar year by March of the following year, and it will be

essential that this is done so that the Strategy can be adjusted rapidly if targets are unlikely to be met. **We recommend that the Committee seeks a commitment to an annual report each March of progress made against each of the targets in the Plan.**

Finance

We agree that it will be essential to clarify the financial requirements for the Plan. This should be done for the whole period to 2029. In practice, many of the proposed measures are already funded; the main risk is of government funds such as those for BSIP and ATF, being withdrawn given the Council's continued delays in implementation. For the remaining projects, a clear five year Plan with a convincing cost-benefit appraisal should help to secure both mayoral and government funding. **We recommend that the Committee seeks an initial financial assessment for inclusion in the Plan to be submitted in November, and a firm date in early 2025 for a full financial assessment of the first five year Plan.**

Communications and engagement

We welcome the commitment to enhanced engagement on the Plan. The Council has not always been successful in publicising what it has achieved, or in countering misinformation on the impacts of measures which it has implemented. The enhanced communications team should pursue these as key outputs, alongside the planned annual monitoring reports. However, such communication is a one way process, and does not directly engage the public. We suggest that the communications team should also ensure that it is easier for residents and businesses to report problems, building on the success of the consultation in November 2023. We very much welcome the suggestion that the communications team might also "*enable co-development of our schemes*". Such co-creation elsewhere has successfully increased public support for and ownership of cities' urban transport policies.

Comments on specific packages

Our comments below are selective, and designed to highlight some of our concerns above. We would hope that we will have an opportunity to discuss the proposals under each Package in more detail before the Plan is submitted to Executive. **We hope that the Committee will support such further discussion.**

- Package 1: lack of clarity on numbers of blue badge spaces, cycle parking spaces, benches will be provided; reference to a "pavement enhancement programme", but no indication of scale or timing.
- Package 2: lack of clarity on how many cycle priority schemes, school streets, home zones, enhanced crossings will be achieved in 2025 or 2026; several vague statements about activities prior to actual action on the ground:
 - "we will seek funding to develop comprehensive active travel measures along one radial route"
 - "we will also look to implement 'home zone streets'"
 - "we will ... look to pilot a travel hub in a district centre".
- Package 3: there is a commitment to a community audit for each village and district centre, but no reference to any action to be taken as a result; as noted above, the statements on achieving a 20mph city are particularly vague.
- Package 4: there is a clear commitment to implementing the "city centre sustainable transport route", but no date is specified; there is a commitment to upgrading park and ride sites, but no indication of the number or timescale.

- Package 5: there are several vague references, for example:
 - “we will investigate whether it is feasible for the existing bus clean air zone to be extended to other vehicles to improve air quality”
 - “we will look to trial on-street [EV] charging and evaluate its success and scope for further installations in York”
 - “potential interventions ... could include “traffic gating” to maximise efficiency and use of park and ride and improve air quality in the city centre”.
- Package 6: apart from the three Plans in this Package, there is reference to progressing “a study looking at the options for altering traffic movements on the western side of York’s Inner Ring Road”, which suggests that there is little chance of action by 2026. A reference to exploring “how simplifying movements on our network (such as banning certain turns) might reduce traffic congestion or free up road space for cycle facilities, better footways or bus priorities” is similarly vague.
- Package 7: in addition to the undated commitment to a Parking Review, there are references to expanding travel plans and car clubs, with no indication of scale.
- Package 8: in addition to the undated commitment to a Freight Strategy, there are vague references to exploring “mechanisms to eliminate through freight movements from the built-up area of York and its villages” and “options for allowing cargo delivery cycles access to the city centre footstreets”. There is still no firm date for the transshipment centre for which funds were obtained in 2021.
- Package 9: the only commitment on enforcement is to “lobby Government for York to be given powers to enforce moving traffic offences”. Yet the Mayor now has direct control over police activity in this area, which will be essential if actions under Packages 1, 2, 3, 4 and 5 are to be successful.

Local Cycling and Walking Implementation Plan (LCWIP): networks and prioritisation

The government first invited local authorities to submit LCWIPs in 2017. By the time that the Council started work on its LCWIP in autumn 2022, it was already the last local authority in Yorkshire to develop one. It is clear that its failure to do so, and the slow pace at which it has implemented schemes, has adversely affected its access to Active Travel Fund moneys.

Against that background, we were very willing to accept the Council’s invitation to join its LCWIP Steering Group, which was established in November 2022. After a hiatus for the local election, a final draft LCWIP was provided to the Group for comment in November 2023. In the subsequent ten months, the Steering Group has not been approached for further comment. We are very disappointed by the further delay in producing a document to match those which other local authorities are already using to secure government funding. We note the commitment to producing a final LCWIP for approval by Executive in November. **We ask the Scrutiny Committee to seek a firm assurance that the LCWIP will indeed be submitted then, and that the Steering Group will have an opportunity to comment on the significant changes made since it was last involved ten months ago.** The report for Item 7 asks four questions. We have answered these separately for walking, wheelchair use and wheeling (questions a and c), and for cycling (questions b and d).

Walking, wheelchair use and wheeling

The 2023 draft LCWIP did not include proposals for a walking network or an extended set of walking zones, so the proposals in the current report are potentially a useful development.

Instead, the draft LCWIP focused on four key walking zones, each of which was perhaps a quarter the size of the zones proposed in the current report, and was used to illustrate in some detail the types of improvement which could be made. **It is important that this earlier detail is retained, so that immediate action can take place once the LCWIP is approved.**

While we welcome the extended coverage of walking zones across the city, we are concerned on two counts. Firstly there are some surprising omissions from the coverage, both in inner residential areas and in public open space such as the strays, where safety and security will be important. Secondly, the proposed zones are often too large to be suitable for comprehensive treatment. For example, the whole city centre north of the river is covered by two zones, yet the actions required within those zones will differ significantly by location. The earlier four key walking zones were of a more appropriate scale.

The proposed ranking process involves 16 criteria, currently equally weighted. At present none of these considers short car journeys, yet these will offer the main opportunities for attracting transfer from the car to walking. The measurement process for each criterion is not specified, and thus the process is unclear. As an example, we know that lack of priority at crossings is a major concern for pedestrians. Yet it is unclear as to how current provision is measured; there are, for example, some ten relevant crossing points in Zone 1, all with very different levels of provision. Inappropriate scoring, together with the proposed 6.25% weighting, could readily lead to this critical criterion being under-represented.

We do not consider it sensible for the Scrutiny Committee to be debating such detail at this point. **Instead, we recommend that the Committee asks that the Steering Group be reconvened to consider them in detail.**

Cycling

The 2023 draft LCWIP already included a proposed cycle network and a ranking process which was applied to 37 possible cycle routes. We welcome the proposed revised network, which we consider better reflects the strategic and local networks. We are unclear, though, why a new rating and ranking process has been developed, using criteria very similar to those in the 2023 draft. We have quickly compared the top 15 in each of the ranked lists. Of the top 15 in the current list, four schemes did not appear in the 2023 list. And the top four in the 2023 list are now ranked 1st, 4th, 10th and 11th. This illustrates the dangers of using a simple weighting formula without giving careful consideration to the outcome.

Again, we do not consider it sensible for the Scrutiny Committee to be debating such detail at this point. **Instead, we recommend that the Committee asks that the Steering Group be reconvened to consider them in detail.**