

Draft West Sussex Transport Plan 2022-2036. Response from the West Sussex Cycle Forum.

SUMMARY

Cycle forums across West Sussex need to see an unconditional commitment in the LTP to the Government's Gear Change programme, LTN1/20 standards and the plan for Decarbonising Transport.

We find that the draft LTP falls a long way short of the Government's commitments and level of ambition. There are multiple caveats on Active Travel and significant omissions such as the lack of a coherent e-bike strategy. This is not acceptable in a context where environmental issues and public health demand that by 2036 our transport systems and travel behaviour have been radically transformed.

We have recently experienced a growing number of examples where WSCC has been better at finding reasons not to support Active Travel than at showing leadership. Even after the loss of Government funding, cycle forums have been put in the unwanted position of having to call out Active Travel consultations for the lack of conformity to Government standards.

We note that Norfolk CC has recently withdrawn their draft LTP in order to fully take account of the Government's plan Decarbonising Transport. We believe that WSCC should do the same because it would radically alter many priorities including the role of Active Travel.

We find nothing in the draft LTP that would change the current situation on Active Travel. We are looking for a major shift – central Government has had their Gear Change – now WSCC needs its own Gear Change. The WS LTP needs a complete rewrite from a position of strategic clarity and strong leadership. It needs to attract partners, funders, businesses, skills and community involvement from those who have a commitment to building a healthy and sustainable future.

Cycle forums need that commitment to feed into the review of the Walking and Cycling Strategy so that we have a constructive role; otherwise nothing changes.

We offer two strands to support our response. Firstly, high-level comments on the need for WSCC to show the political will to create meaningful change, starting with a single and simple demand for an unambiguous and deliberately worded statement: an unconditional commitment to Gear Change, LTN1/20 and the Decarbonising Transport plan. This is our message to the Cabinet Member for Highways and Transport and her Cabinet colleagues. Secondly, comments relating to the more technical components of a West Sussex Transport Plan; the building blocks of a Plan to see that to fruition.

1 HIGH LEVEL COMMENTS

These comments support our demand for an unconditional commitment to Gear Change, LTN1/20 and the Decarbonising Transport plan.

The LTP lacks clarity on priorities and contains many unresolved contradictions. The plan records that travel behaviour in West Sussex is currently dominated by fossil fuel propelled car travel and acknowledges the benefits of modal shift. However, what emerges is still a business-as-usual fudge with a priority on road transport. Gear Change demands that Active Travel is prioritised in order to change travel behaviour.

Access to Government funding for Active Travel will continue to be compromised. It is becoming increasingly clear that central Government will get tough on local authorities that do not adhere to their message. Going forward, Gear Change makes Government funding for local highways dependent on prioritising high quality Active Travel schemes. The Decarbonising Transport plan makes funding conditional on local authorities delivering ambitious and quantifiable carbon reductions from transport.

The LTP does not set out to position WS to attract partners to deliver Active Travel. Funding for Active Travel does not only come directly through Government. As it stands, the LTP sends a message to potential partners and funders that West Sussex is, at best, equivocal about Active Travel. The plan will appeal to those, in particular developers, who want to fudge the issues in order to continue with business-as-usual. That will reinforce a vicious succession of failures on Active Travel.

The LTP fails to commit to strong support for WS Walking and Cycling Strategy and the implementation of LCWIPs. Without a commitment to Active Travel in the LTP, the review of the Walking and Cycling Strategy begins to look like a cosmetic exercise. There is a growing feeling that constructive, evidence-based responses to consultations are parked in strategies and plans that do not reach implementation. We fear that the work of cycle forums to support local LCWIPs will go to waste, and that the gap between best practice standards for Active Travel and the actual provision in West Sussex will continue to grow.

The LTP does not encourage a constructive role for cycle forums. We are angry about the recent loss of Government funding for Active Travel and dismayed that our county has to be used in the courts as a landmark case to prevent local authorities ignoring Government guidance to promote Active Travel. As community volunteers, we would rather be helping to build community support than calling out plans because they do not conform to Government policy and standards. Some forum members now question their level of involvement unless it starts from an unequivocal commitment from WSCC to Active Travel.

An LTP consistent with the Decarbonising Transport plan would radically alter priorities and reinforce the case for a commitment to Active Travel. We cite the Royal Transport Planning Institute’s Net Zero Transport Study as an example that rises to the challenge of meeting future needs with an integrated and coherent approach. It starts from place-based visions which meet ambitious targets for trip reduction, modal shift and carbon reduction. It requires a decisive break with the approach of meeting predicted changes in travel demand with new road capacity.

2 We have focussed on the Key Issues (2 in Executive Summary) and the Objectives (throughout). That’s because everything flows from them. Our view is that the damage - actually being caused by less than optimum public health and the damage potentially caused by climate change - is paramount.

The Key Issues	WSCF comment
Climate change Local environmental impacts Spatially variable economic performance Development and regeneration pressures Growing and ageing population Public health and well-being Access to services Transport network performance issues	We suggest weighting the significance of these issues in terms of the impact of failing to resolve them. While all of the eight are relevant, the two issues that that must be resolved are climate change and public health and well-being. All the others work on the assumption that life will continue pretty much as now. The well publicised effects of ignoring the reality of climate change could mean that life will not continue as now; diminishing the relevance of some of the issues. Improving quality of life, public health and well-being reduces the burden on the council for health and social services as well as being a good thing in its own right.

	<p>This is not the same as prioritising the issues – prioritising implies a sequence of actions. Weighting means that each objective must support the weighting to create a hierarchy of objectives.</p>
The Objectives	<p>We think that this list of objectives is a sophisticated wish list that might fit neatly with the various strategies but, as with the key issues, is not weighted as to which are the most urgent and/or important. We suggest that they're weighted according to the weighting of the Key Issues.</p> <p>Could each of the objectives begin with 'We will...'? Perhaps currently it is more accurate to say 'We hope to ...'?</p> <p>We have made suggestions as to how the wording might be improved.</p>
Objective 1: Support sustainable economic prosperity across the County by levelling-up underperforming areas and recovering from the COVID-19 pandemic.	
Objective 2: Support development and regeneration plans across the County by enabling local living and through strategic investments at the right time and place to ensure the transport network is fit for the future.	<p>Comment – not being the Planning Authority reduces WSCC's ability to direct how development will happen. WSCC is already supporting development unless there's legislation to do otherwise; but we suggest that WSCC uses its ownership of the public highway to exert its influence to do the right thing.</p> <p>Support only those development and regeneration plans across the County that bring about local living; and through strategic investments create a transport network that is fit for a future that is shown the way by WSCC.</p>

Objective 3: Accommodate the needs of an ageing population that is expected to grow most in existing settlements in the Gatwick Diamond and Coastal West Sussex areas.	
Objective 4: Minimise air, noise and light pollution from use of the transport network to minimise impacts on public health and well-being.	Comment - ?minimise?! Reduce air, noise, and light pollution to the lowest achievable and air pollution to at least statutorily acceptable levels in AQMAs.
Objective 5: Ensure the transport network allows residents to live healthy lifestyles with good access to green and blue spaces, particularly on the West Sussex coast and in the protected South Downs, High Weald and Chichester Harbour.	Comment - this is very weak and does not acknowledge the role that car-oriented transport strategy plays in poor public health (ref PHE) due to inactivity and pollution. 'Good access' could be by car in this objective's definition. Modal shift to Active Travel is a better way to improve public health.
Objective 6: Ensure rural communities can live locally by accessing nearby towns.	'Local living' is not about accessing services at a distance. It is about meeting as many needs as possible locally and providing transport accessible to all for those needs to be met further afield. This is an equalities issue.
Objective 7: Enable the transport network to be on a pathway to net zero carbon by 2050.	Comment – 'enable' – if you mean that you hope merely not be an obstacle (i.e. allow), then you need to change the word. If you mean that you will have policies and actions that will lead to a transport network that will be on a pathway to net zero carbon by 2050, then you should say so. Create a transport network that is on a pathway to net zero carbon by 2050. Set emissions targets for 2036 as a measurement way marker for achieving a pathway to net zero by 2050.
Objective 8: Minimise the impacts of the transport network on areas that are protected for their landscape, ecological or historic characteristics.	
Objective 9: Improve the transport network whilst protecting or enhancing the natural, built and historic environment.	
Objective 10: To monitor and adapt infrastructure to the effects of climate change.	Comment – do you mean that climate change is a given and that you will try to play catch up? Might it be wise to have a proactive rather

	<p>than reactive policy? Adaptation to climate change effects is a key requirement, but it also implies a requirement for not making it worse in the first place by – for example – building major roads.</p> <p>To adapt existing infrastructure to the forecast effects of climate change so that new infrastructure both minimises climate change and resists forecast(able) changes.</p>
Objective 11: Reduce the need to travel by car by enabling local living.	Comment - tell LPAs not to prioritise car travel in new development but to locate development around existing/improved active/shared travel infrastructure.
Objective 12: Improve the efficiency of the County Strategic Road Network, particularly east-west routes including A27, through targeted improvements to address congestion, pollution, rat-running and road safety issues.	Comment – although apparently a laudable objective, in reality this will make the route(s) more attractive and therefore more used – induced demand works against the benefits of the positive steps designed to reduce car use. This dilemma is at the heart of the argument.
Objective 13: Minimise the impacts on the transport network of surface access to Gatwick Airport by passengers and employees and ensure transport network improvements take the needs of other users and communities that share these routes into account.	Comment – this is weak. Should ensure major modal shift to Public Transport of staff and passengers – GAL growth plans increase proportion of sustainable travel access but growth means overall numbers by car will be a lot higher than baseline.
Objective 14: Ensure the rail network is an attractive option for travel between West Sussex towns and to surrounding cities by improving the speed and quality of West Coastway and Arun Valley Line services and capacity on the Brighton Main Line.	
Objective 15: Improve bus network efficiency by reducing the effects of congestion into and within West Sussex towns, particularly where there are gaps in the rail network.	Comment - extend services and adapt infrastructure to prioritise services in urban and congested areas; integrate with rail to optimise Public Transport options.
Objective 16: Ensure the bus network is customer focussed to provide an attractive option for journeys to nearby towns.	Comment – customer focussed? This should be normality not a change. Cost, frequency, availability and journey times are amongst the public’s concerns.
Objective 17: Extend and improve the network of Active Travel facilities, taking account of potential usage and stakeholder support,	Comment – ‘taking account of potential usage and stakeholder support’ is a seemingly sensible phrase – but there’d be no support

<p>so it is coherent and high quality enough to make Active Travel an attractive option for short distance trips.</p>	<p>for something that would have no users and that no one wanted! It is a pointless phrase. As it is written, this is a get out. Build a comprehensive network of coherent Active Travel facilities of sufficient quality (in line with Gear Change and LTN 1/20) to make Active Travel the best choice for local trips.</p>
<p>Active Travel Strategy</p>	
<p>6.3 The relevant transport objectives are:</p>	
<p>Objective 11: Reduce the need to travel by car by enabling local living.</p>	<p>Comment - tell LPAs not to prioritise car travel in new development but to locate development around existing/improved active/shared travel infrastructure.</p>
<p>Objective 17: Extend and improve the network of Active Travel facilities, taking account of potential usage and stakeholder support, so it is coherent and high quality enough to make Active Travel an attractive option for short distance trips.</p>	<p>Build a comprehensive network of coherent Active Travel facilities of sufficient quality to make active Build a comprehensive network of coherent Active Travel facilities of sufficient quality (in line with Gear Change and LTN 1/20) to make Active Travel the best choice for local trips.</p>
<p>6.4 Our Active Travel strategy is intended to address the needs of pedestrians, cyclists, equestrians, persons of reduced mobility and micro-mobility solutions which are emerging and may become more prominent during the life of the Plan. This includes extending and improving the network of Active Travel facilities and working with partners to deliver skills training and promotion initiatives if opportunities arise.</p>	<p>Comment – whilst this seems attractive at first glance, it is still underpinned by the all too common thought that pedestrians, cyclists, equestrians, and persons of reduced mobility have their needs, and the task is to satisfy those needs. This is not an Active Travel policy because it does not understand that the whole idea is to create an environment where not only is it possible to do these things but provide something that is immensely attractive, enjoyable and demonstrably beneficial. That means top quality infrastructure and regular maintenance to keep them that way. If the intention is to have people in significant numbers to travel actively then doing so has to be attractive, enjoyable and demonstrably beneficial – not merely possible for the determined.</p>

	<p>Skills training and promotion initiatives are not in the same league as creating a top class infrastructure. Roadcraft training (to a great extent) is necessary only because the infrastructure is inadequate.</p> <p>Our Active Travel strategy will create a county where everyone has access to an infrastructure that encourages them to travel by foot, cycle or horse*. Micro-mobility solutions are emerging and will become more relevant during the life of the Plan as and when current legislation changes.</p> <p>* Because the purpose of an Active Travel strategy is to encourage people to travel actively in order to increase public and personal health and to reduce climate change effects, perhaps horse riding is significantly less useful. See 4.2 in the draft plan where it is not mentioned.</p>
6.5 Our approach to active travel is to:	
Provide new and improved pedestrian infrastructure, including expanding the utility of existing PROW, where this helps to address barriers and connect routes for short distance trips, taking account of planned development;	
Prioritise and implement new or improved cycle routes, taking account of the potential increase in demand, current conditions for users and the impacts of planned development where these are feasible and deliverable, and there is wide support from local stakeholders;	<p>Comment – ‘taking account of the potential increase in demand’. The demand for cycling infrastructure is already well understood; as in “I would cycle but it’s too dangerous etc”. There is no reliable information as to what their world needs to actually be like for them to regard it as ‘not dangerous’. ‘Attractive, enjoyable and demonstrably beneficial infrastructure’ might be close. The growth in sales of e-bikes indicates that there is a wholly new type of use and user waiting for top class infrastructure. The biggest, and therefore the most individually significant impact on the effort to get a switch from car dependency to a mix of car travel /Active Travel, is e-bikes. All new routes must be designed for e-bikes with</p>

	<p>segregated tracks. Not only will that encourage e-bike use, and be ideal for mobility vehicles, those on foot will be undisturbed thus making the route more attractive for them.</p> <p>Regarding 'wide support from stakeholders' – consultation is not a referendum, nor is it negotiation. The Council should do what is in the best interest of the people – refer to the top two key issues. Gear Change/LTN 1/20 explicitly says not to base designs on stakeholder opposition, but to lead and explain (use pilots).</p> <p>Prioritise and implement new or improved cycle routes, taking account of the potential increase in demand (e.g. from new users on e-bikes), contemporary conditions for users and the impacts of planned development where these are feasible and deliverable, and they are in the best interest of the people. Urgently implement new and improved cycle routes, county-wide and to pure LTN 1/20 standards, in order to drive the necessary increase in Active Travel.</p>
<p>Work with Local Planning Authorities and developers to identify Active Travel improvements that will ensure planned developments are well connected to the Active Travel network;</p>	<p>Comment yes!</p> <p>Work with Local Planning Authorities and developers to identify and implement Active Travel improvements that will ensure planned developments are well connected to the Active Travel network;</p>
<p>Identify priority locations on major roads and railway lines to improve the provision of crossing facilities;</p>	<p>Comment – the A27 is the focus of this point. National Highways has much to offer, but because of its remit, it can be as much of an obstacle as natural phenomena such as hills, rivers and the coastline.</p>
<p>Consult early on active infrastructure proposals in line with our Active Travel fund consultation plan to understand community support and incorporate views on the design of infrastructure;</p>	
<p>Provide good quality Active Travel infrastructure based on latest design guidance wherever possible;</p>	<p>Unless impossible, provide good quality Active Travel infrastructure following the latest design standards and guidance;</p>

Monitor long term usage trends at selected locations and assess scheme benefits for at least 5 years after opening;	
Consider traffic management measures (e.g. expanded pedestrianisation, school streets, filtered streets and low traffic neighbourhoods) in urban areas where these are feasible and deliverable, and there is wide support from local stakeholders; and	
Ensure that the needs of Active Travel modes are considered within the design of all road network improvements.	
Short term (2022-27) Active Travel priorities	
Active Travel Fund schemes - A24 Findon Valley and Shoreham schemes	
West Sussex LCWIP cycle route schemes	
Major road enhancements with Active Travel infrastructure – including A27 Arundel Bypass, A27 Worthing & Lancing, A2300, A259 Littlehampton corridor, A259 Littlehampton-Bognor Regis, A259 Chichester-Bognor Regis corridor, A284 Lyminster Bypass and A29 realignment	These cannot seriously be regarded as Active Travel priorities . All of them are less than wholly desirable attachments to major roads.
Strategic Transport Investment Programme Active Travel infrastructure including Adur cycling corridors, Worthing north – south cycling corridors, Haywards Heath – Burgess Hill cycle route, and Burgess Hill green circle network improvements	
Medium term (2027-32) Active Travel priorities	
A259 Shoreham-Brighton cycle scheme (timing dependent on development)	
Major road enhancements with Active Travel infrastructure – including A24 corridor, A264 corridor and Crawley western link road	

<p>Delivery of a rolling programme of Active Travel infrastructure schemes to be identified through the West Sussex Walking and Cycling Strategy and LCWIP priorities</p> <p>Implementation of new Active Travel crossings of major roads and railways.</p> <p>Longer term (2032-2036) Active Travel priorities</p> <p>Delivery of a rolling programme of Active Travel infrastructure schemes to be identified through the West Sussex Walking and Cycling Strategy and LCWIPs.</p>	
---	--

Additional comments

1 In the revision of the W&C Strategy (now renamed The Active Travel Strategy), we suggest that WSCC develop an e-bike strategy. By making cycling easier/safer/attractive, e-bikes open the doors to travelling further and more frequently by bike. Travel further; travel faster; don't arrive exhausted; go exploring; get fit and healthy; cycle more often; keep on cycling – by making riding just that bit easier, e-bikes make it possible to keep cycling as we get older, so we can keep on enjoying the benefits of cycling.

See also - <https://www.sustrans.org.uk/our-blog/get-active/2019/everyday-walking-and-cycling/9-reasons-to-ride-an-electric-bike>

E-bikes are a game changer. Compared with pedal bikes, they offer a whole new range of uses (and crucially - users). The possibility exists to use e-bikes as a way of speeding up a shift from car dependency to a mix of car and Active Travel where utility travel is concerned. A pedelec/e-bike strategy would recognise the difference between the two bike types – pedal and e-. The implication for infrastructure is that routes would need to be segregated so that those on foot (2-3 mph) and those on an e-bike (up to 15.5 mph) do not become intertwined. There are only 75 kilometres of cycle way in the county; pedal bike usage is not increasing (4.27). These two facts are inseparable. The best way of getting more people on bikes of any sort is to increase the quantity and quality of cycling infrastructure. The growth will come from e-bikes but designing for e-bikes means that there is a pull though for pedal bikes as well as being good for those using mobility scooters. The Plan needs to assess the induced and suppressed demand for e-bikes that will be created by improved infrastructure.

2 In the revision of the W&C Strategy (now renamed The Active Travel Strategy), we suggest a) that WSCC sets its own targets (rather than relying on nationally set targets) for % of journeys done by Active Travel (30% in The Netherlands); b) that the current annual target of 7.5 kms of new cycle routes is uprated to at least 20 kms and that the criteria excludes anything that is not pure LTN 1/20.

3 Although it would be provocative to have a specific strategy to deal with National Highways (NH), it is surprising that the significance of NH for Active Travel is not mentioned anywhere. There are 14 mentions of NH relating to roads for vehicle use.

4 *4.12 The transport network of West Sussex will be expected to cater for increased transport movements as planned development and regeneration initiatives takes place. Sites for over 76,000 new homes are allocated in adopted local plans across West Sussex from the early 2010s through to the early 2030s, with additional sites expected to be allocated as these are reviewed. WSCC has the opportunity to insist on the principles in Gear Change (including Gear Change +1) and the strict guidelines in LTN 1/20, to be fully implemented on the sites for these 76,000 homes.*

5 *Relating to 4.6 Travel behaviour in West Sussex is currently dominated by fossil fuel propelled car travel so we must plan for this while enabling mass electrification and increasing use of sustainable modes of transport. Our approach is to improve the efficiency of the most strategically important local roads and provide facilities for active travel and shared transport services, supported by use of using demand management techniques. Where improvements are proposed to trunk roads that are managed by Highways England, this will be subject to their decision-making and processes. Giving these active travel and shared transport greater priority on local roads that do not form part of the County Strategic Road Network is expected to increase their mode share at a faster rate than traffic growth. If road network improvements are being made, our approach is to ensure they enhance the environment.*

Much of the strategy focuses on improving the main roads, no doubt to accommodate the increasing volumes of cars that are a symptom of people's travel behaviour. The Active Travel strategy slots in neatly when facilities are built alongside these main roads. Because they are fitted in and around the vehicle/road infrastructure, the Active Travel infrastructure is less than ideal in terms of being easy/safe/attractive.

The strategy needs to put changing people's travel behaviour at the forefront. This would be cheaper and more effective than spending £millions on repeatedly upgrading roads. Reading between the lines of paragraphs 4.28 and 4.29 it would seem that WSCC do not believe the challenges of providing Active Travel solutions can be met:

4.28 There is potential to substantially raise the standard of cycling infrastructure in almost all areas of the County, but in most areas this either requires reallocation of existing road space, or acquisition of third party land, which can be challenging and costly issues to overcome.

4.29 ...the costs and affordability of schemes far outweighs the available resources to fund and deliver schemes so an approach to prioritisation is required that takes these factors into account when determining priorities.

There are no comparable instances in the document relating to improving the road network, implying that it might be easier for WSCC to find the monies (or political will) to fund road improvement projects rather than Active Travel projects. Our sense is that Active Travel forms a part of this strategy because it has to, not because WSCC has a real expectation of delivering on more than a fraction of the priorities set out in section 6.5 (essentially a rolling programme of LCWIP schemes with plenty of scope for timelines to be pushed out and schemes deselected because they are difficult).

6 We suggest that WSCC adhere to this statement in the DfT's document 'Decarbonising Transport' (July 2021):

Local Transport Plans (LTPs) are existing statutory requirements that set out holistic place-based strategies for improving transport networks, proposed projects for investment and, ultimately, lay out how key objectives will be achieved. Going forward, LTPs will also need to set out how local areas will deliver ambitious quantifiable carbon reductions in transport, taking into account the differing transport requirements of different areas. This will need to be in line with carbon budgets and net zero.

7 The contradictions that arise are extraordinary. The draft plan can say -

a 'predict and provide' approach (i.e. building road capacity to cater for forecast traffic growth) could have a negative impact and while greenhouse gas emissions from transport are reducing, progress is not currently fast enough to achieve the Government's legally binding target to achieve net zero emissions by 2050 and still prioritise increasing road capacity. Then look at the Snapshot Report – there is a one page summary for each district and borough - it is business-as-usual with some very provisional greenwash.

Compare it to the Royal Town Planning Institute's Net-Zero Transport Report for an example of clarity of vision feeding into a framework that provides a hierarchy of mutually supporting actions:

1. Substitute Trips: Replace the need to travel beyond your community
2. Shift Modes: For longer trips, use active, public and shared forms of transport
3. Switch Fuels: For any trips that must be made by car, ensure the vehicle is zero emission

<https://www.rtpi.org.uk/media/7600/rtpi-net-zero-transport-january-2021.pdf>

.....
Submitted by the West Sussex Cycle Forum, October 4, 2021.