Appendix A: Summary of consultation Issues and Leicestershire County Council's Response

Background

The key issues identified highlight the trends across the responses received.

(NB: the numbering and categorisation has been developed by the County Council and not by the responders)

Stakeholder Engagement

Issue	LCC Response
Do not believe themes lend themselves to genuine partnership working	The document has been developed to support the Strategic Growth Plan (SGP). We will continue to work with strategic partners on Strategic Planning Group (SPG) and the Members Advisory Group (MAG) to develop a transport work programme.
Districts should have been engaged earlier Working in collaboration with district councils (outside public consultation) is essential to provide insight into their priorities and policies	A presentation was taken to SPG in October 2019, highlighting the development of the LLSTP. A full public consultation exercise has been undertaken enabling engagement. Like the SGP, the LLSTP acts as a framework for further engagement through the development of local plans and local studies etc which are referenced as priorities in the document.
Further work should be paused "while we work together to identify what [the] priorities should be"	This document represents a point in time, based on the evidence available, including from Local Plans. Further work to prioritise will be undertaken as part of the SGP transport work programme. Updated draft LLSTP revised to make this clearer in Chapter 2
Lack of clear strategy to implement/monitor cross-boundary funding and collaboration.	The ongoing work with Midlands Connect will be the primary forum for collaboration regarding the Strategic Road Network, Major Road Network and rail, but we acknowledge that collaboration with individual planning and transport authorities will be required for smaller, more local, schemes.

	Updated draft LLSTP references this in Chapters 2 and 6.
Expect Local Cycling and Walking Infrastructure Plans (LCWIPS) to be	We will be engaging with local authorities and key
developed in collaboration with local authorities, residents, community	stakeholders as we develop the LCWIPs.
groups (parish councils) etc.	
The list of local stakeholders (paragraph 2.10) should also include	Updated draft LLSTP includes parish and town councils
Parish and Town Councils and Neighbourhood Plan Groups who are	on the list of stakeholders
either in the process of preparing plans for their areas or who have	
adopted neighbourhood plans in place. Many of these plans include	
local transport priorities and policies.	
Reliance on the non-statutory SGP to set priorities is unfair and not	The SGP has been developed by constituent elected local
transparent.	bodies and was subject to public consultation in 2018.
2.11 - How do you agree to align with Midlands Connect when their	We have regular engagement with Midlands Connect as part
policies are not issued and are delayed?	of their Technical Advice Group, as well as the Project Boards
	of several Midlands Connect projects. We are actively
We believe the need for and value of much closer co-operation between	involved in Midlands Connect's Strategy refresh and
Local Transport and Highway Authorities and Midlands Connect should	participating in that process.
be reflected more strongly in the document.	Updated draft LLSTP references this in Chapters 2 and 6.

Covid-19 Impacts

Issue	LCC Response
This document was prepared before Covid-19. As was the Strategic	Given the rapidly changing nature of the landscape post-
Growth Plan. We are already seeing significant behavioural changes to	Covid-19 and the unprecedented situation in which the
travel and work as a result and both documents need to be reviewed	country finds itself, we do not consider that it would be
and reassessed before any precipitous environmental damage.	appropriate to prejudice future efforts which may be required
	as part of the long-term Covid-19 response. We have
Further work should be paused to consider Covid-19 response	developed a separate Covid-19 Transport Recovery Strategy,
	which sets out how we will seek to develop a transport
Whilst the document covers a long time period to 2050, it may well be	response to Covid-19, taking into account our other
worth acknowledging the current Covid-19 pandemic and the potential	obligations and policies including the Network Management
long-term implications of this on transport issues including travel	Duty, LTP etc.
patterns, increase in demand for walking and cycling, homeworking,	Updated LLSTP contains a new section on Covid-19 and
increase in use of the private car and overall behavioural change.	an associated new aim
	The SGP and LLSTP reflect a point in time. Travel conditions

The STP will need to reflect new lifestyles. Covid-19 has already made changes and increased walking and cycling is likely. More home	etc are rapidly changing as more services reopen, people return to work, and as a result of local and national changes to the R-rate. Some form of road infrastructure will be needed to open up land South and East of Leicestershire to accommodate growth
working too. All needs to be reassessed and reliance on a bypass in the SGP which will end up with large-scale detached settlements reliant on the car will prove to be irrelevant and unsustainable.	outlined in the SGP, including freight and delivery traffic. The exact nature and location of this infrastructure will be subject to ongoing investigation and development. This includes measures to support walking, cycling, and explore passenger transport provision. Updated LLSTP as been updated in Chapter 5 to reflect the contents of this response.
Covid-19 will prove to change how we live, and its impact <i>must</i> be assessed and its impact on transport strategy re-evaluated.	As above.

Evidence Base

Issue	LCC Response
Want to see the evidence base that led to identification of themes and aims/challenges/priorities	As the document makes clear, this is not intended to be a replacement for either the City or County's Local Transport Plan. Nor is it intended to be an evidential piece of work or to restate evidence from previous work, which has been referenced in the SGP.
County has consistently failed to assess transport impacts in terms of whether local roads can cope, CO2 emissions etc.	The County Council has invested heavily in some of the most sophisticated modelling tools in the country. We work with district colleagues through the Local Plan process to use
I do not see much evidence in the rest of the Plan that you are actually giving them real weight. This especially applies to issues of low carbon transition, social challenges, and sustainable development maximising social and environmental benefits. Instead there seems to be a strong emphasis on economic development no matter what the cost manifesting in a predict and provide approach to car and HGV use.	these tools to assess the transport and carbon impacts of potential development scenarios, and this evidence is used to underpin the adoption of Local Plans. We also use these tools to examine future conditions on the County's transport network, including in terms of carbon and air quality, and use this evidence to develop our own transport projects to try and minimise the impacts of growth on our transport system. We are constantly looking at ways in which we can improve our

tools to maintain our place at the forefront of modelling for
local authorities in England.

Aims, Challenges, and Priorities

Issue	LCC Response
Lack of meaningful detail re: delivering on key commitments of national, regional, and local plans, policies & strategies	Like the SGP, the LLSTP is not intended to provide a detailed list of investment proposals or transport requirements. The Local Transport Authorities (LTA's) will continue to prepare their own specific detailed plans and strategies, including their respective Local Transport Plans (LTPs). Infrastructure requirements, because of local growth and growth development, will continue to be included within Local Plans (produced by district councils).
Should be a common set of economic, environmental, and social aims and challenges identified at start of document, rather than individual lists at the start of each theme, and shared/agreed with Districts etc	This would have benefits in terms of consistency, but the aims and challenges would have to be made vaguer. Whilst the aims and challenges may fit broad themes, the complexities across the various geographical areas will be different.
Insufficient focus on climate change, health, social mobility etc	The LLSTP is designed to support the SGP, so naturally its focus is primarily oriented towards planning/economic development. Climate change, health and social mobility are embedded within the principal aims of the LLSTP. Both City and County's LTPs currently set out objectives covering these areas as well.
Lack of consideration of transport needs and priorities of County Towns and other Urban Areas	General transport needs are well-understood, including through previous work to develop the transport evidence for local plans. Detailed and specific priorities will be developed through the studies as referenced in the LLSTP, which will lead to development of strategies such as the Market Harborough Transport Strategy 2018 (developed in partnership with Harborough District Council).
Does not consider importance of freight	Agreed – wording on freight developed and strengthened in updated draft LLSTP
Strategic transport infrastructure is essential to the most efficient	

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	operation of the logistics sector. Therefore, the needs of the logistics sector should be explicitly considered in the final LLSTP.	
r	A stronger emphasis should be placed on the importance of rail and the relationship between road and rail for travel and the distribution of goods between cities.	Agreed – wording on rail and freight developed and strengthened in updated draft LLSTP
	Challenges in theme 4 present county towns and urban areas as difficulties in and of themselves, and ignores the fact that they are particularly suited to pilots, MaaS, and other technologies	This is intended to highlight that there will be particular considerations for developing transport solutions for County Towns etc that would not be a concern in city environments – e.g. need for road layout to remain sympathetic to surrounding public realm. Updated draft LLSTP makes this point clearer
		Issue about potential for pilots etc acknowledged. Updated draft LLTSP improves the way futures technologies are referenced
	Priorities relating to passenger transport (bus and rail) need to be significantly strengthened to ensure greater accountability and change.	The LLSTP places passenger transport at the heart of the transport network. It will be implemented in conjunction with our Passenger Transport Policy and Strategy, which gives more detail on the approach we will take to encourage and ensure greater use of passenger transport. It should be noted that the majority of passenger transport services are run by commercial operators, and the local transport authorities have limited control to force change. Therefore, our focus will be on collaborating with and supporting operators to encourage improvements resulting in a greater shift from private car to passenger transport.
8	Consider that just encouraging take-up of electric vehicles is not sufficient. Other priorities around need to improve infrastructure are required. Use Nottingham as a case study?	Updated draft LLSTP clarifies that infrastructure is considered as an essential part of encouraging shift to electric vehicles.
A	Agenda driven by developer interests with little regard for implications.	The rationale and need for new development are set out in the SGP. LCC is aware of the implications of new development in transport and climate terms and the priorities highlighted within the LLSTP are intended to mitigate and manage these as well as resolving existing issues.
F	Focus of document seemingly on second aim, with no consideration for	Purpose of this document is to set a transport strategy to

other aims etc.	support the LLSTP, so naturally the focus of the document is primarily on supporting development. However, other considerations, including public health and the environment are highlighted in the theme priorities.
2.15 - The key factors compete against each other. Economic growth/housing delivery will not lead to good health and wellbeing.	Economic growth and housing delivery are not incompatible with good health and wellbeing and can enhance it. For example, quality housing with easy access to jobs, education, and services can improve mental health, as can the financial security and local prosperity offered by economic growth.
No emphasis on managing parking and how this can help to manage the demand for movement around Leicester, Leicestershire, and the neighbouring areas.	Greater modal shift to sustainable and active travel will reduce the need for parking. The LTA's Network Management Plans provides the detail for how the demand for movement are managed.
The needs of those with mobility impairments and difficulty accessing jobs and services should be fully considered in the detail of further work.	This is included within the priorities, particularly for the more rural areas.
The 'interconnective issues between themes are not really addressed at all. Neither are themes distinctive where considering county and city parts of the Leicester Urban Area.	Updated LLSTP makes clearer that there are interconnectivities between the themes, recognising that they should not be considered as silos into which all journeys will neatly fit and that as a strategic document the LLSTP sets out priority frameworks that might need to be blended together when considering particular transport issues (such as the impacts of strategic growth sites).
	In respect of city and county parts of the Leicester Urban area, the draft LLSTP already highlighted that whilst distinct in nature, the county towns and city and county areas of the Leicester Urban Area face significant common challenges; hence for the purpose of LLSTP they have been grouped together in one section. However, in the updated LLSTP changes have been made to the text of the short term aims in respect of study work to refer also to a particular place's role and character
Transport should be considered at level of functional geography (e.g. Journey to Work areas)	The intention is that journeys between County Towns, and from County Towns to Leicester, will be covered by Theme 3

	(Travel Around Leicestershire). Updated draft LLSTP makes this point clearer
SGP references commitment to define programme of smaller-scale schemes to improve sustainable travel and develop these through Strategic Transport Plan. Current STP does not deliver on this.	The LLSTP is a separate document to the Strategic Transport Plans proposed in the SGP. In reality, it is becoming clearer that, rather than having a single Strategic Transport Plan, a significant programme of work will be required to develop the range of measures which will be necessary to enable growth as envisaged in the SGP.

Regional and Local Growth

Issue	LCC Response
Overlooks the local level - has research been undertaken on local strategies and plans to support the development of the LLSTP?	We are aware of the various local plans which have been and are being developed by district councils and have considered this as part of the development of the LLSTP. These, and other LPA strategies, are acknowledged in 4.9 and 4.11.
Does not encompass full regional growth anticipated, especially within rural districts such as Melton Mowbray. MM Local Plan growth will raise significant transport challenges beyond what is considered in LLSTP.	The LLSTP was developed to support the growth identified in the SGP. We are aware of the various local plans which have been and are being developed by the district councils and have considered this as part of the development of the LLSTP. We appreciate that there are other, smaller, growth areas which are not identified within the SGP, and will continue to work with district councils to identify and resolve transport issues related to these sites.
Links to growth points outside of the County have been overlooked. Very Leicester-centric, but needs to consider travel to Derby, Nottingham, Newark etc.	Travel to Derby, Nottingham, and other cities outside of Leicestershire is covered under Theme 1. We accept that the document doesn't cover travel from the County Towns directly to the cities. Updated draft LLSTP addresses this issue
Paragraph 5.21 includes a list of urban areas surrounding Leicester, this list should also include Anstey	Updated draft LLSTP includes Anstey as Urban Area
Greater emphasis should be placed on the importance of the A46 link road for helping neighbouring local authorities to meet the unmet housing need arising from Leicester City.	In our view, the emphasis is balanced considering the need to ensure that we do not encourage over-reliance on private car for journeys which could be made by passenger or active transport.

A46 expressway and A5 upgrades will encourage increased car dependency and not solve long-term congestion problems. Theme 1: A46 Expressway etc not supported in RIS2; Midlands Connect seemingly reassessing their priorities.	The LTA's analysis indicates that improvements to the A46 will still be required to support strategic and freight movements through the County. The fact that it is not included in RIS2, and Midlands Connect maybe reassessing their priorities across the Midlands region, does not mean that the A46 has become any less important to Leicestershire than previously.
	We acknowledge concerns that roadbuilding, such as an A46 upgrade and A5 upgrade could encourage increased car travel. However, manufacturing and the movement of freight are key parts of the Leicestershire economy, and there is limited opportunity to move this to other modes such as rail. There will also be a need for strategic car travel through the County via the A46 and A5.
	The LLSTP includes a focus on sustainable and active travel, to ensure that the road improvements programme is run in tandem with schemes to encourage greater use of these modes for more local, non-strategic journeys.
2.11 - The A46 Stage 2 report will be 18 months late. How can you commit to it when you don't know what it says?	We are kept fully informed of progress on the A46 Stage 2 Report as members of the A46 Project Board.
2.12 - How will you encourage patterns of development to reduce the need to travel, given the reliance on a S/E bypass around Leicester as set out in the SGP?	We will continue to seek to work with district councils through the development of their Local Plans to ensure that, wherever possible, new housing developments are delivered to a scale and in locations where a range of economic and social facilities and services either are already available or are realistically capable of being provided.
	Through the planning application process, we seek to work with developers and local planning authorities to ensure that appropriate measures can be put in place to support travel alternatives to the private car.
The SGP is likely to lead to unsustainable car reliant development	We will continue to seek to work with district councils through the development of their Local Plans to ensure that, wherever

There are few measurable, and binding targets and stands, consistently demonstrates that the councils' predict and provide for car use, not shape and lead, reduce car use.	riorities are to and in locations where a range of economic and social
The assumption that the major road projects are sus deliver reliable journey times. There is little recogniti transport in reducing road traffic or the increase in roby the road projects.	n of public with developers and local planning authorities to ensure that
It would be worthwhile highlighting the importance o	transport Updated draft LLSTP provides additional reference in the
modelling and other revenue projects and the crucia	
play in supporting local plan preparation and facilitate	ng growth. projects including evidence-gathering.
Paragraph 5.23 refers to the North Thurmaston deve should be the North East of Leicester Sustainable U	
Decentralised growth in SGP is based on exaggerat	d housing The housing and employment needs set out in the SGP have
numbers. Housing and employment land need is expurely speculative in the period beyond 2031.	
Over-emphasis on building along new corridors in the	countryside. The rationale for locations of new development is set out in the SGP.
Growth in the countryside cannot be easily served b transport.	We will continue to seek to work with district councils through the development of their Local Plans to ensure that, wherever possible, new housing developments are delivered to a scale and in locations where a range of economic and social facilities and services are either already available or are realistically capable of being provided.

	Through the planning application process, we seek to work with developers and local planning authorities to ensure that appropriate measures can be put in place to support travel alternatives to the private car.
Theme 4: Exaggerates extent to which people travel long distances.	Our analysis of traffic needs is based on standard methods of forecasting and modelling growth as per Government guidance and industry best practice. LCC is a leading local authority for traffic modelling within England.
Theme 5: Cross-border traffic not significant and requires no specific consideration.	Our analysis of traffic needs is based on standard methods of forecasting and modelling current and future traffic movements as per Government guidance and industry practice. This statement is also contradictory to anecdotal information being provided by individual LPAs, which highlights the need to consider movements not just across boundaries between districts but also across the boundaries between Leicestershire and the adjacent counties.
Loughborough Growth Area Strategy requires more prominence in Theme 4	Updated draft LLSTP enhances prominence of the Strategy.
There is no reference in the document however to the potential for a new Parkway Station accessed from the A5 south of Dodwells Roundabout. This has the potential to be an exemplary mobility hub serving parts of both Warwickshire and Leicestershire, which could also meet latent demand for rail travel due to the constrained nature of both Nuneaton and Hinckley stations.	The LTA's welcome any potential sustainable transport infrastructure that can support the City and County's aspirations. The detail of this development will be considered as part of the Leicester and Leicestershire Rail Strategy Review. Updated draft LLSTP priorities under Travelling Between Cities and Travel Within Leicestershire revised to include supporting rail work being undertaken by other bodies, including other transport authorities
Need to include the M69 and the A42/M42 as part of the SRN in Leicestershire	Updated draft LLSTP addresses this.
Need to refer to final version of RIS2 published April 2020	Updated draft LLSTP addresses this.

Environment and Sustainable Travel

Issue	Response
The document could set out more clearly the role transport has in reducing and mitigating the impact of climate change, for example encouraging the use of more sustainable modes of travel. Fails to recognise the opportunity of bus and cycle and does not provide solid commitment that they will be improved or used to influence other policies.	Updated draft LLSTP provides further clarity on this issue The themes contain numerous priorities to improve bus and cycle infrastructure and encourage modal shift, including development of the Local Cycling and Walking Infrastructure Plans.
It should be considered whether a separate theme on climate change might be appropriate in the document. Little evidence that significant regard has been paid to Paris Agreement, Climate Emergency etc. In view of the Climate Emergency, the City and County should be adjusting their transport policies to move away from encouraging car use by building more roads.	Climate change is considered as part of the Resilient Network theme. Updated draft LLSTP provides further assurance on the importance of climate change. The rationale and need for new development are set out in the SGP. The County Council is aware of the implications of new development in climate terms and the priorities highlighted within the LLSTP are intended to mitigate and manage these. The County Council are developing our Environment Strategy, which will set out the detail of how we intend to manage and reduce climate change and carbon impacts within the County.
Is there potential for plans focused on delivering key bus, walking and cycling enhancements, like the Connected Leicester Hub and Spoke Plan, to be rolled out further to the county towns and large urban areas such as Loughborough and Shepshed, where significant further growth is being proposed? There seems to be priority on road/car use, just at the time that we should be adjusting transport policy away from building more roads. Rather, priority should be given to cycling, walking and in particular, public transport.	The County Council is looking to develop a Cycling and Walking Strategy with the associated delivery of Local Cycling and Walking Infrastructure Plans in appropriate locations, and concepts such as these will be considered as part of that process.
No evidence to show how STP will achieve carbon/climate change improvements	The County Council are developing our Environment Strategy, which will set out the detail of how we intend to manage and reduce climate change and carbon impacts within the County.

	This will include managing and reducing/mitigating the
	impacts of transport.
No powers are being sought to achieve integration of buses and trains.	We do not consider that it is appropriate to speculate
	regarding future powers or set out aspirations relating to
	current or future powers, in light of the ongoing Future of
	Transport Regulatory Review.
Theme 2: Want review of bus network consisting of simple routes,	City Council response required
running at high frequencies, crossing at various points & extending	City Council response required
outside the city	
Doesn't explain how a bus network can be achieved, managed,	The LLSTP is not intended to provide this level of detail.
promoted, and run to meet the aims.	Further detail regarding our proposals for passenger transport
	are set out in our PTPS.
If we are to increase the number of people using public transport in the	The impacts of Covd19 have thrown up many uncertainties
years to come, in order to help tackle climate change I would	about society's future travel habits and our willingness to
particularly like to see an emphasis on better public transport, including	return to the levels of passenger transport (PT) usage as we
improved rail frequency, electrification of the Midland Mainline and the	once did. Through our immediate recovery work, we are
maintenance of rural bus services	complying with Government requirements to provide support
maintenance of rarai bas convises	to passenger transport operators, including financial. We will
	continue to monitor the situation; if necessary we will consider
	a review of our Passenger Transport Policy and Strategy
	should that be necessary, in order to continue to seek do the
	Government for a long term, stable financial approach to the
	support of PT services.
	best we can to support PT services (rural and otherwise), accepting the authority's very challenging financial positic Additionally, we will continue to take opportunities to pres Government for a long term, stable financial approach to

Balance of Resources – City/Urban vs Rural

Issue	Response
Need proportionate distribution of resources to serve City and rural	Resources are distributed using an evidence-based approach,
areas of County.	according to need, demand, and funding availability. By its

Resilient Transport Network theme appears to be too urban-focused. LLSTP needs to acknowledge importance of local roads – all journeys	nature, the LLSTP identifies the importance of County Towns and Urban Areas. Updated draft LLSTP introduces specific challenge in Theme 5 about particular need to maintain local roads, in view of the fact that funding criteria often favours high-trafficked routes. Updated draft LLSTP acknowledges this issue
start and end on these.	opanio and a solution
Imbalance of urban city areas to rural areas creates rural disadvantage in terms of road management, public transport, and new technologies.	Resources are distributed using an evidence-based approach, according to need, demand, and funding availability. By its nature, the LLSTP identifies the importance of County Towns and Urban Areas. County Towns could offer ideal conditions for piloting new technologies, and this is something which we will be considering as opportunities arise.
Rural areas do not appear to have been covered and there are many of our businesses in these areas that contribute a lot to our economy. I would like to see a focus on these areas too.	 Updated draft LLSTP acknowledges this issue by: recognising the importance of rural settlements to local communities and the local economy Continue to support our local communities and business. In the Priorities Short term: Continue to seek to provide support for passenger transport services, including in rural areas Short term: Continue to seek to make funding available to fund local community initiatives Short term: Continue to press Government for stable, long term funding streams, to help us look after our highways assets; better to support passenger transport services, especially in rural areas, and enable the delivery of measures to address local community concerns

Issue	Response
Need for more clarity regarding where priorities for enhancement of the network lie.	The resilient network theme considers the need to maintain and enhance existing infrastructure as appropriate. Detailed priorities and schemes will be developed as part of the further work to implement the LLSTP.
Needs some focus on maintenance - rural roads in disrepair affects cycle use.	Updated draft LLSTP acknowledges this issue in the medium-long term priority section by identifying the need to maintain the existing and new infrastructure and services in the revised draft.

Technology

Issue	Comment
The digital age is disrupting the motor age, resulting in changed travel behaviours such as increased home working and online shopping Rapid technological innovation, including the rise of electric and connected autonomous vehicles will be a challenge.	The impacts of new technology are recognised in the challenges and priorities. The LLSTP will be reviewed as appropriate to account for changes in new technology and emerging opportunities.
Do not feel it sufficiently explores what heading towards zero carbon actually means, nor the real opportunities offered by new and emerging technologies to break away from the single mode to the concept of seamless, integrated transport.	
It will be good to have a joined-up approach for applying for grants and funding, but we need to be forward thinking and looking at new ways of doing things if the strategy is to focus on the next 30 years. It needs to be innovative.	Publication of the LLSTP marks the start of a journey – and the updated LLSTP has been revised to make this clearer. We have a strong track record of adapting and evolving as circumstances affecting us have changed, it is recognised that innovation will be necessary as we continue to need to adapt and evolve over the next 30 years. Part of our successful ability to adapt is grounded in an evidenced-based approach to decision making; in the development of our evidential transport modelling tools we have shown innovation and we plan to continue to innovate further as we develop those tools



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