



ENGLAND'S  
ECONOMIC  
HEARTLAND



Keith Dove  
Strategy and Sustainability Service  
Luton Council  
Town Hall  
Luton  
LU1 2BQ

EEH Business Unit  
c/o Buckinghamshire County Council  
County Hall  
Walton Street  
Aylesbury  
HP20 1UA

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Dear Keith,

### **LUTON LOCAL TRANSPORT PLAN CONSULTATION**

England's Economic Heartland (EEH) is the Sub-national Transport Body (STB) for the Heartland region. Membership of the STB covers the area from Swindon, through Oxfordshire, Milton Keynes and across to Cambridgeshire, and from Northamptonshire across to Luton and Hertfordshire. The Heartland includes the Oxford – Cambridge Arc – a region identified by the Government as being an economic priority for the UK.

England's Economic Heartland welcomes the opportunity to comment on Luton's Draft Local Transport Plan 4. In addition to this response, Officers have provided a series of clarifications to the document, which Luton Borough Council Officers have agreed to incorporate.

As the Sub-national Transport Body, EEH is responsible for setting the strategic vision for the region's transport system. In October 2020 we concluded consultation on the draft Transport Strategy for the Heartland region: the final version of the Strategy will be published in February 2021.

EEH's Transport Strategy will set out a bold framework for achieving the requirement for net-zero carbon in a way that delivers economic and inclusive growth within the Heartland region. It is in this context that England Economic Heartland welcomes and supports the principles underpinning Luton Borough Council's Local Transport Plan and its commitment to embrace the importance of carbon reduction and transport inclusivity at a local level.

In addition, EEH acknowledges and commend the breadth of the strategy in recognising the linkages transport policy has with social and environmental outcomes. The Local Transport Plan rightly sees the deployment of transport policy as an enabler for greater social mobility, improved physical/mental health and helping deliver a high-quality natural and built environment. It seeks to achieve societal, economic and environmental benefits through a policy framework that puts the welfare of people and places front and centre of any change to the transport system. In doing so, aligning closely with the philosophy of the EEH Transport Strategy and the policies that flow from it.

We welcome recognition within the Local Transport Plan of EEH's work as the Sub-national Transport Body. It is encouraging that the development of the region's Transport Strategy has framed the sub-national policy context, within which the Plan has been developed. Equally, it is positive to note that the suite of analytical tools developed by EEH has supported the Council to develop a robust evidence base from which the interventions proposed have been used to develop Luton's draft LTP4.



EEH recognises that by virtue of Luton's success as a major employment centre within the region, the authority must continue to plan for a rising demand of 'in-commuting' into the town. A considerable share of allocated housing growth is planned outside of Luton's administrative boundary, as such the importance of connecting this demand to national and regional public transport networks cannot be over emphasised.

London Luton Airport acts as a major international gateway within the region: generating both business and leisure trips as well as additional freight movements. EEH supports the commitment to work together to realise the role the airport has in supporting the wider regional economy by improving surface access by sustainable modes. This includes the need for continued investment in local connectivity between the airport and the immediate surrounding area. Those measures should be supported by proposals that actively engage airport employees and encourage them to use active travel modes.

In parallel, England's Economic Heartland welcomes the delivery of the Direct Airport to Rail Transport System, an MRT system that will be operational by late 2021. This investment, alongside a wider network of bus and coach services to Luton airport, should provide the preferred transport option for the majority of travellers accessing the airport.

The ambition to increase active travel is supported and Luton's compact, dense urban form is conducive to achieving this. EEH agrees the potential for modal shift from car to walking or cycling for those journeys up to 5km presents a viable alternative, if supported by the appropriate measures. Plans to expand the Council's existing cycle network by adding high quality, direct, coherent routes is an obvious prerequisite to any uplift in trips made by active travel and EEH will continue to share best practice on how active travel infrastructure can be deployed effectively.

Further, the objective to decrease journeys to work by car by 40% by means of a ten-fold increase in cycling, doubling walking and prioritisation of modes aligns with EEH's commitment to ensure proposals brought forward for the development of the transport system reduce reliance on the private car. The growth in the number of young adults and older people in Luton demands the transport system to reflect innovation and choice in its offer to its users. EEH believes Luton's high access to superfast broadband (93%) means it is well placed to benefit from a change in working trends and subsequently more focus on the opportunities for homeworking could be emphasised in Policy 5.

The Plan's priority to promote modal shift by creating an attractive public transport system through lower fares and interchange between modes matches EEH's ambition at a pan-regional scale to improve integration and the need to simplify rail fares. A high quality segregated public transport system will complement any proposed changes to integration and ticketing and proposals for park and ride sites are well received. The delivery of the Luton/Dunstable busway and the segregated cycle path running parallel is considered an exemplar of how harmony between sustainable modes can be achieved. Through its work with the EEH Bus Operators Association, we will continue to identify and promote future opportunities of this nature.

The Midland Main Line is rightly identified as being of strategic significance, particularly in its role to facilitate growth in public transport use for commuting, leisure and business-business journeys. To this end EEH continues to work with East Midlands Railways to reinstate direct inter-city services from Luton north to Leicester and beyond, which will remove the need for interchange at Kettering. These discussions remain ongoing and we will continue to make representation on behalf of our partners.

The Draft Local Transport Plan explores the future role and function of the highway and the potential benefits to health and townscape that can be secured when it is sensitively repurposed. There is a correlation between a high-quality urban environment and people's propensity to engage in active and sustainable transport. The tactical use of EEH's persona data coupled with the Council's proposals for e-scooters in Luton can both contribute to the way people move around more sustainably. It is positive that a case is made in the draft Local Transport Plan to develop mobility hubs to support sustainable urban transport. EEH recommends that the revised Local Transport Plan could include this ambition in Policy 4.

Decarbonising the road fleet presents an opportunity to accelerate environmental obligations



and Luton's record of increasing electric and van use above the national average should be celebrated. The need to plan for the decarbonisation of the road fleet, be that buses, cars or freight, is a regional priority. EEH welcomes opportunities to collaborate with partners and continues to work with policy actors and infrastructure operators to highlight the region's requirements for low-carbon infrastructure to support an overhaul in cleaner forms of traction. Whilst the need to improve energy efficiency is undoubtedly important, careful consideration must be given to how proposals for 'eco-driving' training and/or awareness campaigns can be balanced with investigating proposals to introduce a Workplace Parking Levy, as the two policies may risk creating tension.

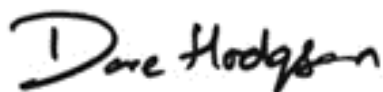
It is clear from the Strategy that land use patterns in Luton have evolved in such way that industrial premises and associated freight activity largely occur in out of town locations. It would be useful to understand Luton Borough Council's views on the proposed Sundon Rail Freight Interchange adjacent to the Midland Main Line and M1.

Finally, the Plan's emphasis on transport inclusivity and improving access to services for those most vulnerable will grow in importance due to the economic downturn caused by the pandemic. EEH also welcomes the Plan's references to safety and concerns for safety as well as accessibility and inclusion. It is our recommendation that these issues be put more clearly at the forefront of the Plan, and its investment priorities. The Plan might also like to more obviously reflect the way design of the built environment and transport crime affects those with a mobility impairment disproportionately when accessing services and amenities. The commitment to work with the rail industry to ensure Luton Station is fully accessible is a key part of these ambitions and as such, it is important that the provision of a train access ramp for wheelchair/scooter use is included in any plans for step-free-access.

We note the Draft Local Transport Plan does not currently have in it a suite of Performance Indicators on which to measure impact and delivery of the Plan's priorities and policies. EEH recommends that Luton should include a suite of Performance Indicators in the final version of the document.

England's Economic Heartland looks forward to continuing to work with Luton in support of its priorities.

Yours sincerely



**Mayor Dave Hodgson**  
**Chair, Strategic Transport Forum**