



23 September 2021

## **Surrey County Council: Draft Local Transport Plan 2022-2032 Consultation**

Dear Sir/Madam,

Thank you for giving Spelthorne Borough Council the opportunity to comment on the Surrey County Council Local Transport Plan 4 (LTP4). Spelthorne is committed to working with the County and welcome the opportunity to engage in this work.

The document appears to be thorough and robust, and whilst we are generally supportive of the document, we have the following comments to make in relation to the LTP4:

### *General comments*

Overall, the LTP4 sufficiently considers the key challenges facing Surrey in relation to transport and effectively sets out the approach to reduce carbon emissions towards net zero carbon by 2050. The references to evidence base documents throughout the draft plan is welcomed and highlight the detail that has been considered in formulating the LTP4 and the links to wider Surrey Priorities. In terms of the document itself, whilst comprehensive, Spelthorne Borough Council (SBC) feels that it could be simplified and condensed to make it a more concise report that still effectively conveys the key messages of the Plan. Specifically, SBC feels that figures 3.4 to 3.7 are somewhat overly complex/difficult to follow and could be simplified to aid understanding.

Some sections of the plan seem to be slightly repetitive and overlap therefore there may be an opportunity to make it more accessible to the wider community. This would also encourage more interaction on the document from a range of stakeholders.

More generally, there is a need to ensure that as the LTP4 progresses, the list of stakeholders included in figure 5.1 is extended to enable a wider range of parties to participate in its development, such as young people, mobility aid users, etc. SBC would welcome further detail on how specific efforts would be made to reach groups and individuals with protected characteristics. Engagement with these groups and individuals, though it can prove more challenging, could be maximised by pro-actively interacting with public, private and charitable organisations beyond and around the County.

Spelthorne Borough Council is supportive of the vision and objectives of the LTP4. In relation to Objective 2: 'To support Surrey's growth ambitions and enable business and people to prosper sustainably', Spelthorne queries the extent to which airports, in terms of passenger traffic, employee traffic and freight, have been considered in the Plan. An opportunity exists for local authorities to maintain the air quality improvements experienced near airports from a drop in traffic that arose through the pandemic. Joint working between the County and local authority on this matter is advocated.

**Spelthorne Borough Council, Council Offices, Knowle Green, Staines-upon-Thames, TW18 1XB**

[www.spelthorne.gov.uk](http://www.spelthorne.gov.uk) [customer.services@spelthorne.gov.uk](mailto:customer.services@spelthorne.gov.uk) 01784 451499

In relation to Objective 4: 'To create thriving communities with clear air, excellent health, wellbeing and quality of life', waste facilities owned by Surrey County Council at the EcoPark in Spelthorne do not allow access on foot or by bicycle to the community recycling centre, creating accessibility issues and leaving some residents behind. There should be an option for everyone to recycle and access these facilities without creating emissions using a private car.

In terms of the policy areas outlined in figure 3.2, Spelthorne feels that whilst these are suitable in providing an overarching direction for the LTP4 across Surrey, there needs to be a recognition of the various local challenges and priorities facing each borough and district. Specific policy areas and measures to be prioritised in each locality could be set out to maximise gains and to help address those issues most prevalent in each area. For example, figure 1.8 identifies Spelthorne as the only Borough-wide AQMA due to its largely urban character and the presence of several strategic roads, therefore air quality should be prioritised within this locality. There needs to be a recognition within the document of the varying characteristics of each local authority area across Surrey and the need for the prioritisation of certain measures.

Regarding 'Policy Area 9: Supporting Behaviour Change', Spelthorne Borough Council agrees that this is integral to the success of the LTP4. Behaviour change will largely determine the extent to which the other eight policy areas can be achieved successfully, however given the scale of change needed and the associated costs (both in financial and temporal terms), questions remain as to how this will be achieved throughout the lifetime of the plan. Whilst it is important that communities have a choice as to how they wish to travel, a step change in the way we travel is required to address not only local transport issues but to tackle climate change. The importance of modal shift cannot be understated and as the lead highways authority for the area, Surrey County Council must identify an ambitious yet realistic set of measures as to how this will be implemented and achieved over the lifetime of the plan. The extent to which 'stick' or 'carrot' measures are employed in relation to transport will need to be a key factor in decision making.

The Covid-19 pandemic has seen a significant change in behaviours and whilst there is still uncertainty as to the long term impacts, the opportunity must be taken to capitalise on the positive behaviours that have arisen from the pandemic, i.e. more home working and the use of local businesses which have reduced travel, as we move forward.

### *Transport Measures*

Regarding the proposed measures to encourage a shift to more sustainable travel, Spelthorne feels that the development of a sustainable travel network is paramount. In terms of public transport, we support the reference to improved frequency of services and more affordable transport. It is crucial that the delivery plan sets out in detail how these measures will be implemented in a timely manner to enable more people to access reliable, affordable and easy to use public transport. Often it is cheaper for a family to pay to park in a town centre than it is to pay for a bus/train fare, therefore the LTP4 provides a real opportunity to encourage a shift away from the private vehicle and towards cheaper and more accessible public transport. In Spelthorne many bus routes begin/end in London therefore cross boundary working will be paramount to ensure services are improved.

Spelthorne Borough Council supports the prioritisation of an active travel network. It is important that this is joined up across Surrey and also has links with centres and

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employment areas outside of the county. Active travel must be supported by the necessary infrastructure to encourage a wide range of users. Measures to improve safety and boost accessibility should be prioritised such as segregated cycle ways, wide footpaths, well-lit routes and secure cycle parking. Supportive local infrastructure, for example, public toilets, hedge cutbacks to maintain pathways and also areas of shade to shelter from the sun to facilitate walking in good weather or shelter from wet weather, needs to be prioritised if 'avoid' is the first goal of reducing emissions and to encourage a shift to active travel.

In terms of the 'Improve' principle and policy areas 5 and 6, reductions in town centre parking need to be balanced with the need to accommodate EV charging in new developments for not just residents and visitor vehicles, but also commercial vehicles servicing developments that will potentially need to charge in town centres. Residents with work vans will ultimately need secure parking places to charge them overnight as they adopt electric vehicles. E-cargo bikes will also require secure parking to accommodate them.

Also in relation to policy areas 5 and 6, a policy for charging a fee on certain congested roads could potentially have knock on effects and push traffic onto smaller roads in each local authority. Surrey County Council must therefore carefully consider the potential local implications of each measure before taking them forward.

The 20-minute neighbourhood concept is supported by SBC, however, requires further detail as to how this would be achieved in practice. Whilst the 20-minute neighbourhood is likely to be more attainable in sustainable urban locations, rural areas and those settlements that are less compact may be excluded. In Spelthorne for example, in areas such as Charlton Village or Stanwell the implementation of such an approach will not be practical due to their size. There is a risk that aspirations for a more sustainable travel network may generally miss smaller communities, therefore Surrey County Council should consider in more detail how these areas and settlements can be better linked and identify specific measures to support areas of differing character. 20-minute neighbourhoods may also result in additional delivery vehicles to support localised facilities which could in turn lead to additional HGVs on the road network. Cleaner engines must therefore be prioritised to avoid the exacerbation of air quality issues.

### *Delivery*

The LTP4 is a fairly high-level document and currently lacks detail in terms of how the proposed measures will be implemented across the lifetime of the plan. Given the importance of ensuring that the proposed measures are achievable and can be delivered, Spelthorne wish to be consulted on the delivery plan once available and any additional detail that arises moving forward.

In reference to figure 5.2, Spelthorne feels that additional detail is needed on the delivery of each measure and how options may be prioritised. Many of the measures listed are dependent upon external factors and have financial implications therefore it is important to provide more information on how these will be realised across the lifetime of the plan.

### *Challenges and Priorities for Spelthorne*

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Whilst Spelthorne appreciates that the LTP4 is a high-level document that addresses transport issues across Surrey, there are several local considerations SBC feels are relevant to the production of the plan.

As the LTP4 is a live document, SBC considers that it is appropriate for Surrey to update the document to take account of new information as it comes to light, particularly Local Plans. It is important for the LTP4 to consider the impacts of planned growth over its lifetime and to integrate proposed development sites into a network of sustainable travel. The Spelthorne Local Plan is currently under development and will identify allocation sites to deliver over 611 homes each year. It is important that the LTP4 has regard for the planned level of growth and can capitalise on opportunities to provide connected sustainable transport infrastructure for emerging developments.

Public transport use within Spelthorne may be boosted by having faster train services from stations that are below their capacity. For example, some Spelthorne residents in Shepperton and Sunbury, use the congested line from Walton to London as the train is currently twice as fast as that running on the Shepperton/Sunbury route to Waterloo. Extension of the Oyster Zone is not mentioned within LTP4 and it is felt this would facilitate better value public transport use in Spelthorne.

Spelthorne is pleased to see reference to the LCWIP programme at section 3.7.4 to support the delivery of local cycling and walking routes. Moving forward, it will be useful for the Plan to consider how these schemes will be implemented and to also identify opportunities for additional sustainable transport measures. On the whole however, the LTP4 should utilise local evidence base documents wherever possible to enable a more in-depth review of local issues.

Also in relation to 3.7.4, additional reference should be made to the need for improved crossing facilities. Within Spelthorne, there are crossing points where residents making active travel journeys are entirely at the mercy of the traffic stopping to let them across and improving these crossings, linking existing paths and bus stops would support more active travel in the borough, and across to neighbouring authorities, for example at Walton Bridge, Marshalls Roundabout in sites to ton, Fordbridge Roundabout and Laleham Park.

As mentioned previously, air quality is a significant issue for Spelthorne given its borough-wide AQMA designation. The movement of HGVs through the borough exacerbates this therefore there is an opportunity in the LTP4 to implement Low Emission Zones, potentially as an extension to those in London.

I trust the above is clear and our comments will be taken into consideration however should any clarification be sought then please do not hesitate to contact me.

Yours Faithfully



**Spelthorne Borough Council, Council Offices, Knowle Green, Staines-upon-Thames, TW18 1XB**

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Cllr Ian Beardsmore  
Environment and Sustainability Committee Chair  
Spelthorne Borough Council

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1XB**

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