



CABINET – 17 SEPTEMBER 2021

LEICESTER CITY COUNCIL DRAFT LOCAL TRANSPORT PLAN 4 AND WORK PLACE PARKING LEVY CONSULTATIONS

REPORT OF THE DIRECTOR OF ENVIRONMENT AND TRANSPORT

PART A

Purpose of the Report

1. The purpose of this report is to advise the Cabinet of the consultation on Leicester City Council's draft Local Transport Plan (LTP4) and Workplace Parking Levy (WPL) and set out a proposed response for submission to Leicester City Council as the views of the County Council.

Recommendations

2. It is recommended that the comments set out in this report in response to Leicester City Council's consultation on its draft Local Transport Plan 4 and Workplace Parking Levy proposals (paragraphs 23 to 36 and paragraphs 45 to 48 respectively) be submitted to Leicester City Council as the views of the County Council.

Reason for Recommendations

3. The draft Leicester LTP4 and WPL will inform the next stage of local transport plan making in the City up to 2036. As the City of Leicester is important to residents of Leicestershire, e.g. for access to jobs and services, so then too is the need for good transport connectivity to and through the City. Proposals within the City's boundaries have the potential to interact with and affect county highways, transport networks and local communities. The content of the Leicester City draft LTP4 and WPL are thus important to the County Council.
4. The proposed responses set out key comments for consideration by Leicester City Council in preparing its new LTP4 and WPL proposals. These comments seek to ensure alignment with key strategic documents (including the Leicester and Leicestershire Strategic Growth Plan (SGP), the Leicester and Leicestershire Strategic Transport Priorities document and the County Council's Strategic Plan) and ensure that Leicester City Council's draft LTP4 and WPL do not have a negative effect on County highways or residents.

Timetable for Decisions (including Scrutiny)

5. Consultation responses are required to be submitted to Leicester City Council by 17 September 2021.

Policy Framework and Previous Decisions

6. The Council's Strategic Plan (2018 to 2022) "Working together for the benefit of everyone" was approved by the County Council in July 2020 (having been revised in light of the Council's declaration on climate change). It has five strategic outcomes, with the delivery of 'Affordable and Quality Homes' and 'Strong Economy' most directly impacted by the City Council's emerging LTP4 and WPL.
7. The SGP for Leicester and Leicestershire was approved by the County Council and the other nine partners, including Leicester City Council, in late 2018. It provides the long-term vision for planned growth of the area to 2050. It recognises the pivotal role of the city of Leicester in the area and its 'central city' role, supporting the market towns and rural area around it through more jobs, leisure, arts, culture and entertainment. The SGP recognises that Leicester needs to grow in such a way that enables full use to be made of its existing services and infrastructure and notes that by providing more homes close to jobs in the city centre and other employment centres this will help relieve development pressures in the County.
8. In November 2020 the Cabinet approved the Leicester and Leicestershire Strategic Transport Priorities document (2020-2050), which highlights where Leicestershire County Council and Leicester City Council will work together to deliver common transport aims and objectives and ensuring that long-term development needs and associated transportation requirements are co-ordinated.

Resource Implications

9. There are no immediate resource implications for the Council arising from the recommendations in this report. However, where proposals put forward by Leicester City Council have cross-boundary implications, officer resources will be required to work with City Council colleagues to understand the nature of any potential impacts and to identify any possible complimentary/mitigating measures that might be required in the county area that should be funded by the City Council.
10. The Traffic Management Act 2004 (network management duty) states that:

"It is the duty of a local traffic authority to manage their road network with a view to achieving, so far as is reasonably practicable and having regard to their other obligations, policies and objectives, the following objectives:

 - securing the expeditious movement of traffic on the authority's road network; and
 - facilitating the expeditious movement of traffic on road networks for which another authority is the traffic authority".

11. Close working between the County Council and City Councils is of paramount importance in the delivery of transport infrastructure and related proposals. Early evidence-based identification of cross-boundary issues, such as impact on neighbouring authority's road networks, are vital to delivering the network management duty and achieving wider benefits for Leicester and Leicestershire.
12. The Director of Corporate Resources and the Director of Law and Governance have been consulted on this report.

Circulation under the Local Issues Alert Procedure

None.

Officers to Contact

Ann Carruthers
Director, Environment and Transport
Tel: (0116) 305 7000
Email: Ann.Carruthers@leics.gov.uk

Janna Walker
Acting Assistant Director, Development and Growth
Tel: (0116) 305 0785
Email: Janna.Walker@leics.gov.uk

PART B

Background

13. The Leicester and Leicestershire Strategic Transport Priorities (LLSTP) document, which was approved by the Cabinet in November 2020, sets out how the County Council and Leicester City Council will work together to deliver common transport aims and objectives, including those in support of the SGP.
14. The report to the Cabinet in November 2020 noted that that the two councils would continue to prepare their own specific detailed plans and strategies, including their respective Local Transport Plans. It also noted that Leicester City Council's infrastructure requirements, because of local growth and development, would continue to be included within its Local Plan, ensuring that the right infrastructure and transport interventions are identified to support Local Plan growth.
15. Leicester City Council held informal discussions with key stakeholders (e.g. businesses, environmental groups, other organisations in the city and the County Council) in late 2020 / early 2021, as to what transport improvements they wanted to see in Leicester and sought initial views on the concept of a Workplace Parking Levy (WPL) for Leicester. At the time the County Council expressed its concern about the implementation of a WPL and its potential impact on Leicestershire residents.

Consultation

16. On 25 June 2021 Leicester City Council launched a formal consultation on its draft Local Transport Plan (LTP4) and draft WPL (<https://consultations.leicester.gov.uk/communications/ltp4/>). The 12-week consultation seeks the views of people who live/work in the city or who visit. This consultation closes on 17 September.
17. The City Council's consultation exercise was highlighted with all County Council members in late June and again in early July, highlighting the implications for County residents and businesses and advising members that the Cabinet would be asked to agree the County Council's formal response at its meeting on 17 September.
18. Comments from members (one response received) and officers have informed the County Council's formal response to the City Council's LTP4 and WPL proposals and these are set out in paragraphs 23 to 48 below.

Leicester City Council's draft LTP4 overview

19. Leicester City Council's draft LTP4 sets out the transport strategy framework for the City to 2036.
20. The proposed Plan sets out a programme of transport improvements, including delivery of an electric express bus network across the city,

establishment of a city-wide network of cycleways and paths and a major transformation of Leicester Railway Station to create a new gateway into the city.

21. Supplementing its emerging Local Plan, the draft LTP4 proposals are a step forward for public transport, cycling and walking in the city, focussing on three main areas:
 - Developing connected main transport corridors and stations,
 - Improving transport within local neighbourhoods,
 - Managing demand for car use.

Proposed response to Leicester City Council's draft LTP4 consultation

22. The proposed response below sets out key comments for consideration by Leicester City Council.

General comments

23. The City of Leicester has a significant role to play in meeting the economic and social needs of people across the County. Thus, the County Council recognises the importance of a well-functioning transport system in Leicester in achieving accessibility to such economic and social needs.
24. The County Council thus welcomes the opportunity to formally comment on the draft LTP4 and is supportive in principle of many things that are being sought to achieve through it. The County Council recognises that as a unitary authority facing its own particular range of challenges and opportunities, Leicester City Council must prepare a transport plan that is fit for its needs and aspirations and has no intention to comment on the LTP4 in this respect.
25. However, given the wider importance of the City of Leicester for Leicestershire residents and businesses, the County Council does wish to comment in respect of seeking to ensure the draft LTP4's alignment with key strategic documents and seeks to ensure that its proposals do not have a negative effect on County highways. Whilst acknowledging the potential benefits for County residents of some of the proposals such as the improvements to the rail station and connecting cycle routes.

Note: The following headings relate to sections of the draft LTP4.

Policy Overview

26. The County Council notes that the ongoing/planned transport assessments that are required to support the development of the City Council's own Local Plan could identify a requirement for additional transport improvements within Leicester, over and above the proposals currently identified within the draft Leicester LTP4. It will be important for the LTP4 to be updated at the appropriate time to reflect any such additional requirements.

Challenges and Opportunities

27. In recognition of the City's central role as the main focal point for jobs and services for the County as a whole, as identified in the SGP, the LTP4 should place greater emphasis and recognition on the growth agenda across the wider County area (both in terms of the "edge" of Leicester growth and other urban areas).
28. A "sustainable travel-led" approach to addressing growth pressures is welcomed. However, it should be noted that it will be far more challenging to apply in dealing with growth in demand for orbital travel within the Leicester Urban Area or travel into Leicester from the County and beyond. Even with an ambitious package of sustainable travel and demand management measures, the approach may still need to be accompanied by *targeted* highway works to deal with residual traffic impacts, which is something that the LTP4 should acknowledge.
29. The LTP4 should also do more to acknowledge the transport connectivity challenges that will arise from meeting a considerable volume of the City's housing needs in areas beyond its boundaries (unmet need).

Transport Vision

30. Leicester's role in the wider County should be further emphasised. Notwithstanding any specific initiatives within the City, for people travelling from across the Leicestershire area car travel is likely to continue to play a predominant role in accessing jobs and services across in Leicester. The impacts of this will need to be considered and provided for appropriately.
31. There is little acknowledgement of the "cross-boundary" nature of the Leicester bus network, nor the resulting need for a joint/coordinated approach between the City and County Councils to developing and implementing improvements to the network. Reference to the City and County emerging Bus Service Improvement Plans (BSIPs) would be welcomed as these will need to set out how it is intended that "cross boundary issues" are to be managed in the future.

Key Themes and Proposed Projects

32. As highlighted in paragraph 31, significant parts of the proposed Electric Bus Network extend into the County and this will need to align with the emerging BSIPs for both areas. The LTP does need to emphasise this point and amplify the need for cross-boundary working/agreement.
33. In order to implement an effective strategy for managing demand for car use in and around Leicester, it will need to be devised and implemented collaboratively by the City and County Council on (at least) the basis of a Leicester Urban Area.

Delivery and funding

34. It is welcomed that the draft LTP highlights the funding constraints that all Local Highway Authorities work under. Under the auspices of the SGP delivery, it will be important for both the City and County Councils to continue to work together with district council partners to secure the funding to deliver the transport infrastructure and measures that will be required to enable Leicester and Leicestershire' future growth. Where relevant and appropriate, it will also be important for the two authorities to continue to provide mutual support for funding bids to Government.
35. Both authorities also face the common challenge of seeking to ensure that their respective highway assets remain in good standard and fit for use; this will become an ever increasing challenge to support increasing levels of cycling, walking and passenger transport and with the potential wider use of micro-mobility (e.g. e-scooters). Where suitable opportunities arise, the County Council would welcome the opportunity to cooperate with the City Council to ensure that maintenance funding from Government is used to best advantage for existing and future assets.
36. In respect of securing funding from developers, it will also be important for the two authorities to continue to work jointly on the development of area strategies (e.g. for the north of Leicester) to provide an evidenced-based platform on which to seek to secure such. It would be helpful if the LTP4 could make greater reference to this.

Leicester City Council's Workplace Parking Levy (WPL) overview

37. The City Council is considering the concept of a WPL scheme for Leicester, to encourage more people to switch from using private cars to sustainable transport and to help deliver the funding for transport improvements identified within the City Council's LTP4. Potential investment from WPL in radial bus routes and services, new park and ride sites and an improved rail station would have the potential to benefit travellers from the County.
38. A WPL is a charge on employers (businesses, public sector, and education organisations) that provide parking places for those that commute by car. Liable employers can choose to pass on the charge to their employees or pay it themselves.
39. Key points to note on the City Council's WPL initial consultation proposals:
 - The scheme would only operate within the City Council's administrative area.
 - It would require Secretary of State approval to implement and the earliest it could be introduced is 2023, ahead of the next mayoral election.
 - It would be broadly based on Nottingham City Council's WPL (currently the only WPL operational in the UK).
 - The levy / charge is yet to be determined but is likely to be around £550 per parking space per year for employers with eligible parking spaces.
 - Possible exemptions or discounts are still under consideration and are yet to be determined. These include:

- Public sector bodies (including the City Council and the University Hospitals),
 - Staff and students at educational establishments (universities, colleges and schools),
 - Parking spaces used by customers and blue badge holders,
 - Emergency services and those employers with a small number of workplace parking spaces (in Nottingham this is 10 spaces)
- All funds raised from the WPL must be ring-fenced for investment in transport schemes outlined in the City Council's transport plan.
40. To help to provide evidence to understand the potential impact of the WPL proposals on traffic levels, congestion, air quality, road safety, carbon emissions and on parking, the City Council intends to utilise the Leicester and Leicestershire Transport Model.
41. Drawing on evidence and experience from the Nottingham City Council, the City Council will also be carrying out local assessments to help determine any knock-on effects, for example, for parking in county residential areas, including county roads, and possible action to safeguard residents' parking.
42. The County Council will be reviewing the City Council's WPL proposals and associated evidence as they develop, particularly with regard to the risk of displaced parking in all County areas adjoining the City administrative boundary such as Anstey, Glenfield, and Braunstone. Consideration will also be given to communities further afield which may become a focus for displaced parking should commuters operate informal liftshare arrangements with others to reduce car trips into the City and consequent WPL charges.
43. It should be noted that the consultation document does not, at this time, contain any confirmed detail regarding the operation of the proposed WPL scheme or evidence to show what effect it might have on the County.
44. The City Council intends to prepare a detailed business case for formal consultation later in 2021. This will include further details of the scheme, supporting evidence and take account of responses received from this current consultation exercise.

Proposed response to Leicester City Council's draft WPL consultation

45. The County Council welcomes the opportunity to formally comment on the proposals at this stage. The proposed response below sets out key comments for consideration by Leicester City Council.
46. These comments seek to ensure alignment with key strategic documents and, given the connectivity, interaction and possible impact on County highways and communities, of proposals, they also seek to ensure that proposals will not have a negative effect on Leicestershire highways or residents.
47. As such, the County Council has the following comments:

- i. The County Council is opposed to the concept of a WPL and has no plans to introduce its own WPL.
 - ii. The County Council is not supportive of the introduction of a WPL in Leicester City.
 - iii. If Leicester City Council remains committed to pursuing a WPL the County Council would insist that the boundary for such a scheme was within the extents of Leicester City Council's administrative boundary.
 - iv. If the WPL proposal is taken forward, the County Council will expect a fully researched and evidence-based study of the likely levels and geographic extents of workplace parking displacement from the City into the County. This should draw on evidence from, at a minimum, Nottingham City Council and Nottinghamshire County Council.
 - v. Should the project be implemented, it should include funding from the City Council for the introduction of appropriate mitigation measures across the County.
48. Should Leicester City Council not agree with points iii to v above, it should be noted that the County Council will continue to voice its opposition to the WPL proposal more widely, in order to seek to safeguard the interests of its residents.

Equality and Human Rights Implications

49. There are no equality and human rights implications arising from the recommendations in this report.
50. The City Council's draft LTP4 and WPL document indicates that significant further work will be undertaken to progress the proposals. The County Council will continue to work with the City Council where appropriate to minimise any negative impact on the County.

Partnership Working and Associated Issues

51. Leicestershire County Council and Leicester City Council have a strong track record of partnership working to develop and deliver strategies and programmes, such as Park and Ride, bus priority corridors, Leicester and Leicestershire Rail Strategy and the Leicester and Leicestershire Integrated Transport Model.
52. The County Council will continue to work closely with Leicester City Council during the development of its LTP4 and WPL, in order to maximise the benefits and minimise disbenefits of any proposals.

Background Papers

Report to the Cabinet on 20 November 2020 'Leicester and Leicestershire Strategic Transport Priorities':

<http://politics.leics.gov.uk/ieListDocuments.aspx?CIId=135&MIId=5999&Ver=4>

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