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Environment and Infrastructure  
Hertfordshire County Council  
County Hall, Pegs Lane,  
Hertford, SG13 8DE

Our Ref:

Your Ref:

14<sup>th</sup> April 2021 (by email)

Dear Mr Brennan,

### **Hertfordshire Eastern Area Growth and Transport Plan (GTP)**

CPRE Hertfordshire welcomes the opportunity to comment on the Herts Eastern Area GTP and the measures to encourage sustainable travel. We are concerned however that the document aligns with the objectives of the approved Local Transport Plan 2018 (LTP) when we believe that it should seek more broad ranging objectives relating to climate change and the new policy agenda rather than appearing to believe that we can build our way out of traffic congestion.

The GTP is extensive and difficult for the public to appraise; the format is not user friendly in its details nor in terms of overall costs and sustainability. It does not appear to be informed by public survey work or respond to the new ideas and approaches which are being introduced by a wide range of organisations and institutions in response to wider environmental concerns related to growth and transport.

A RTPi Research Paper<sup>1</sup> recently published in January 2021 has set out a series of ideas on sustainable transport and how to plan for *Net- Zero Transport*. The GTP and the LTP need to be re-appraised with reference to the RTPi paper and the Government's Committee on Climate Change which highlight the critical role of transport and traffic reductions<sup>2</sup> and we raise the following further concerns:

1. The aims of the GTP need to be targeted and ambitious with respect to traffic reduction and the Net Zero climate commitment. Issues to be addressed include:
  - a. transport measures required to achieve a net zero-carbon future by 2050
  - b. required modal shift and traffic reduction
  - c. balance of spending on walking, cycling, public transport and roads.
2. Baseline evidence (County Travel Survey) reveals sustainable travel across Hertfordshire of approx. 40% but there is no current target set for the county. Many cities are looking at 80% share for sustainable trips but the Harlow and Gilston Garden town proposals are

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<sup>1</sup> Net Zero Transport - The role of spatial planning and place-based solutions. RTPi Jan 2021. See <https://www.rtpi.org.uk/media/7600/rtpi-net-zero-transport-january-2021.pdf>

<sup>2</sup> Committee on Climate Change. 2020. Reducing UK emissions: 2020 Progress Report to Parliament. See [theccc.org.uk/publication/reducing-uk-emissions-2020-progress-report-to-parliament](https://theccc.org.uk/publication/reducing-uk-emissions-2020-progress-report-to-parliament)



aiming for 60%. Hertfordshire needs to decide what has to be achieved and by when to meet climate change obligations.

3. By far the largest spending items in the GTP are major road schemes; the Harlow bypass £250m (PK35); the M11 Junction 7a £79m (PK37) and Junction 8 (PK16/17) up to £10M. The sums on active travel are not totalled but are far less. This is inappropriate and there needs to be a major reorientation towards measures to reduce emissions, increase modal split to public transport and traffic reduction.
4. Junction schemes will each generate more traffic and emissions, and this is likely to affect their validity as well as their value for money. We question whether the £5M spent on the Edinburgh Way (PR277) is appropriate, for example.
5. Table 50 shows that 25% of the interventions are for vehicle use, even though this is at the bottom of the transport hierarchy. There is no calculation to show what the relative spending is on projects according to their place in the hierarchy but spending on roads would appear to be the far greater priority. The high costs of new junctions and junction remodelling should be critically appraised against the benefits of investing in sustainable travel infrastructure.
6. As the RTPI report suggests, new growth should only take place when there is integral provision of high-quality public transport. The GTP makes no mention of the need for this at Harlow in the context of the Gilston urban expansion, although we are aware that the County Council is considering some provision within the A414 corridor to Harlow.
7. Funds should be allocated for traffic filters, cycleways and low traffic neighbourhoods to promote walking and cycling improvements. While this requires local consultation, the GTP should at least identify funding provision to respond where they have local support.
8. No reference is made to the potential application of road pricing or parking levies to fund improved sustainable transport.
9. No consideration is given to look at road pricing so that the 'polluter pays' as a way to address long overdue air quality improvements. An example for early consideration could be the Hockerill district of Bishops Stortford which has high levels of air pollution.
10. Integrated bus network provision with regular minimum services is needed for Hertfordshire not least its rural areas, as well as a commitment for zero emission buses. CPRE recommended in 'Transport Deserts' that all new buses should be zero emission by 2025 and all buses zero emission by 2035.
11. High frequency local bus routes should be promoted to connect key nodes. Car ownership is high in the County but it is noted that there was a relative decline in average cars per household from 1.53 to 1.38 per household (2015 – 2017)
12. Active Travel networks are needed – not piecemeal additions. The DoT Guidance for Local Cycling and Walking Infrastructure Plans should be applied with the help of local groups and the use of tools, such as the Propensity to Cycle Tool (PCT), the Route Selection Tool (RST) and the Walking Route Audit Tool (WRAT).
13. As advised in *Manual for Streets* DFT 2007 (Para 6.2) routes should form a coherent network linking trip origins and key destinations, and networks should allow people to go



where they want, unimpeded by street furniture, footway parking and other obstructions or barriers.

### **Conclusion**

An independent multi-disciplinary panel of transport and design professionals is needed for the GTP and all highways proposals. Design Review: The National Housing Audit, January 2020, supported by CPRE and others, highlighted poor design in a lot of new housing schemes and noted that highways works and provisions for walking and cycling were a particular weakness. It sought for *Manual for Streets* to be adopted by all Highways Authorities and that joint design review be applied across the board for highways as well as housing schemes.

Herts County Council should undertake an urgent review of its Local Transport Plan as its nine objectives do not give the necessary priority and urgency to net zero carbon outcomes and are inconsistent with the Government and County's Councils declaration of a Climate Emergency. The Local Transport Plan 2018 has become out of date because of the changes at both national and local level, the UK adoption of a net zero target by 2050 and declarations of a climate emergency.

The County Council is preparing a Climate Change Sustainability Strategy but cannot do so credibly if its transport planning is based on an out-of-date Local Transport Plan which does not take account of legislative requirements for climate change mitigation. The concept of 'growth' is also under wide review and CPRE Hertfordshire would be pleased to be involved in the next stages of planning in these vital areas.

Yours sincerely,

Chris Berry  
Planning Manager