

SALISBURY CAMPAIGN FOR BETTER TRANSPORT

Response to Wiltshire Local Transport Plan 2011 – Consultation Issues Paper

Question 1

Are there any key transport trends or unsustainable aspects that haven't been included above? Which key trends and unsustainable aspects need to be addressed first and how would you tackle them?

Trends which have not been included:

- Declining reserves of oil and an inevitable rise in fuel prices as we pass the peak of oil supply.

Unsustainable aspects which have not been included:

- The growth in motorised transport has resulted in a 54% increase in carbon dioxide emissions from domestic transport sources since 1980, which now account for 24% of UK carbon dioxide emissions.¹
- Both train and bus fares are rising in excess of the rate of inflation, whereas motoring costs have fallen in real terms by 13% since 1997².
- Wiltshire's transport aspirations still include major costly road infra-structure projects (e.g. Westbury eastern bypass & further proposed improvements to the A350 corridor). These are hangovers from 1980s/1990s road-based transport policy. The focus should by now have moved on to better and more reliable public transport and measures to increase walking & cycling.
- Walking and cycling for travel purposes have both declined significantly over the past decade.

The unsustainable trends which are identified are in many cases linked, and there is no quick solution to any of them. The County's Local Transport Plan needs to identify these trends, consider how progress to counter them can be measured, and, in conjunction with the overall Regional Spatial Strategy and Local Development Framework, provide solutions which will help to tackle them all.

Question 2

Which of these national transport goals do you consider to be the most and least important in relation to transport in Wiltshire? Are some of these goals more or less important for different parts of Wiltshire (e.g. in large market towns, rural areas, south Wiltshire etc.)?

The primary objective should be to reduce transport's emissions of carbon dioxide and other greenhouse gases with the desired outcome of tackling climate change. Closely linked to this is the promotion of a healthy natural environment – as the emerging South West Regional Spatial Strategy says *“If everyone on the planet consumed such a quantity of natural resources and energy as an average South West resident, three planets would be needed to support life on Earth. Consequently, a shift is needed towards ‘one planet’, lower consumption, with lifestyles which are more resource efficient.”*³ Transport policies will have a key role to play if this shift is to be achieved.

¹ See DfT Transport Trends 2008 edition, summary p.5

² A report in the *The Independent* on 8.5.2009 quoted official figures which show that the cost of motoring has fallen by 13 per cent in real terms since 1997, while bus and coach fares have increased by 17 per cent above inflation. Rail fares have risen by 7 per cent extra above inflation.

<http://www.independent.co.uk/news/uk/politics/britain-driven-on-to-roads-by-falling-cost-of-motoring-1681052.html>

³ See The draft revised Regional Spatial Strategy for the South West incorporating the Secretary of State's proposed changes July 2008 para 1.6.2

Question 3

Which of these regional transport objectives do you consider to be the most and least important in relation to transport in Wiltshire?

We would suggest that the last bullet (reducing the negative impacts of transport on the environment including climate change) is the most important, and would comment that there are other elements of the RSS which are of key relevance – e.g. policy SD1 which includes *“minimising the need to travel and securing a shift to use of more sustainable modes of travel by effective planning of future development, better alignment of jobs, homes and services by improved public transport and effective planning of future development, and a strong demand management regime applied in the region’s Strategically Significant Cities and Towns main centres.”*

Question 4

Are there other ways in which the LTP can help achieve the vision of the Sustainable Community Strategy and support sustainable communities?

The aspiration to *“improve journey time reliability on the A350 corridor including construction of the Westbury bypass”* which forms part of the current Local Agreement for Wiltshire (LAW) is at odds with the aspiration to tackle climate change by reducing carbon emissions from transport and with other sustainability objectives. That particular aspiration needs to be rewritten to encompass improvements to the railway services on the parallel railway line rather than focusing solely on road improvements.

Question 5

Do you support the strategic objectives shown in Table 1? Do they cover all the key aspects that you would like the third Wiltshire LTP to address?

The strategic objectives in general are supported. One key objective which needs to be explicitly spelt out is that of ‘reducing the need to travel’. This is supported in the government’s ‘Delivering a Sustainable Transport System’ document which suggests that a package of measures for an urban area *“may involve public transport investment, demand management, promotion of smarter travel choices and the use of land use planning to reduce the need to travel.”*⁴

Question 6

Which of the approaches do you support and why? If you support the ‘Radical Approach’, how does the Council pay for some of the suggested measures (e.g. significant public transport enhancements) without damaging the local economy (e.g. by having to impose high parking charges)? Have we omitted anything significant from the three approaches?

Salisbury Campaign for Better Transport support the **radical** approach which is proposed because none of the others would have any chance of enabling the county to play its part in reducing carbon emissions.

Regarding how these measures are paid for:

- Charging more for parking, or indeed charging for work-place parking, is not necessarily in conflict with the enhancement of local economies etc. Making town

⁴ DfT “Delivering a Sustainable Transport System” November 2008, para 2.6

centres more attractive places for pedestrians and more easily accessible for those who come by public transport, walking or cycling could counter any increase in charges. Also the move to unitary status gives the opportunity for parking charges to be more standardised across the county (& the reality is that petrol/mileage charges mean that 'saving' money by travelling further for cheaper parking is likely to be a false economy).

- Currently future transport funding planned in Wiltshire is dominated by sums being requested for unsustainable measures which will increase road capacity and lead to increases in greenhouse gas emissions. Thus the agreed LTP programme for transport schemes in **2009-10** totalled some **£4.159 million** which included the following⁵:

£315,000	local safety schemes and road safety
£191,000	key bus route enhancements & public transport
£150,000	school travel plans
£2,013,000	'local transport improvements'
£1,490,000	'advance design fees'

However this sum is dwarfed by the estimated cost of the Westbury bypass proposals whose total capital cost has now risen to **£34.720 million**⁶. This money should be redirected to sustainable transport solutions across the county.

Key omissions from Table 2:

a) Demand & Traffic Management (p.14)

The encouragement of sustainable transport modes surely should be considered as part of the established approach, even in Wiltshire? The Transport White Paper "A New Deal for Transport: Better for Everyone" was published in July 1998, and the current PPG13 was issued in 2001 and both these documents focused on encouraging sustainable transport modes, so these are not new or 'radical' ideas.

It is wrong, under any of the defined approaches, to take the line that it is only in the larger towns that demand and traffic management can apply. There are many cases where even in rural village communities more people would walk or cycle to local amenities, or even to their nearest large town, if they felt the roads were safe for them to do so. And when over 50% of rural addresses are currently within 800m of a bus stop with an hourly or better weekday service⁷ surely the LTP should consider ways to get better use made of these services?

The Council should not explicitly exclude road user charging, nor the implementation of a workplace parking levy (as has been done in para 5.2 on p.12 of the document) since both these measures may be deemed necessary to meet traffic reduction targets which are likely to become increasingly onerous as the LTP period progresses. Even the CBI and the FTA now recognises that congestion charging would have its place ("*Business could benefit from congestion charging in cities so long as strict criteria are met, according to new research for the CBI, the UK's leading business group, and the Freight Transport Association (FTA), the leading voice on freight transport in the UK.*"⁸) Within the period which WC have set for their next LTP there seems little doubt that progress must and will be made in implementing further road user charging schemes.

⁵ See WCC delegated decision ref ETED-009-09

⁶ See Westbury Major Scheme Business Case supplied on <http://www.thewestburybypass.co.uk/> - Table 10.3 funding package (updated January 2009)

⁷ WCC LTP target LTP1h – The 2008 APR shows that in 2007/8 54% of rural households had hourly or better services.

⁸ See CBI press release dated 11.5.2009 on www.cbi.org.uk

b) Public Transport & Accessibility (p.15)

There is no mention under any of the approaches of **support for railway service improvements**.

Wiltshire Council must be aware of the revised policy for funding local and regional rail services promoted by local authorities and PTEs which was announced on 5.2.2009 – see <http://www.dft.gov.uk/pgr/rail/strategyfinance/revisedpolicyfunding>

It is stated in the covering press release that *“To take advantage of the new scheme local authorities must first identify the best way of meeting a local transport need. If a train service offers the best solution and has support from the rail industry, the local authority must then show that the rail scheme has a business case, secure the necessary start-up capital funding, (through sources such as the Regional Funding Allocation), and commit to funding the service for at least three years.”*

There are communities in Wiltshire – such as Melksham – with a totally inadequate train service given the size of their population, and there has been growing support in recent years for a much improved service on the Trans Wilts line from Salisbury through to Swindon. The possibility of providing funding to support such a service should be included in the LTP.

c) Other quality of Life Issues (including climate change) (p.16)

The only proposals suggested here (for all three approaches) are “Seek to address other quality of life issues through the relevant theme/area strategies”. The DfT’s draft Local Transport Plan Guidance attaches great importance to climate change issues, making the point that *“Climate change policy is a fast-developing area and transport will be required to contribute towards achieving the UK’s climate change goals. It will be important for local authorities to consider the impacts of their proposals on greenhouse gas emissions and to seek to reduce (and minimise) such emissions in preparing their LTP”*.⁹

The Guidance also states (section 3.4, para 10) that *“The DfT encourages local authorities to develop strategies and implementation plans that take significant steps towards mitigating climate change, by encouraging the development of sustainable transport systems, facilitating behaviour change and reducing the need to travel through, for example, Smarter Choices measures. Many authorities have already shown their commitment to this agenda by selecting national indicators 185 and 186 relating to climate change as targets for their LAAs. New Local Transport Plans offer local authorities the opportunity to develop transport systems that move towards more sustainable options.”*

Wiltshire Council have failed to take the opportunities which are mentioned – as yet the NIs 185 and 186 have not been selected as targets in the LAA (& indeed the inclusion of the Westbury Bypass in the LAW (see Question 4 above) puts a scheme which will actually increase CO2 emissions compared to the ‘do minimum’ situation at the heart of Wiltshire’s transport aspirations).

d) A presumption against new road building

We note that none of the approaches contains a presumption against the building of new roads. A re-direction of resources from road building towards sustainable transport alternatives will be needed to meet environmental goals, so this presumption should be added.

It is noted that Wiltshire have already submitted 4 ‘Expressions of Interest’ for Major Transport Schemes to the South West region for consideration in the longer term Regional Funding Allocation. These proposals are for Chippenham – including dualling of the A350, for the Yarnbrook/West Ashton A350 ‘Improvement’, and for

⁹ DfT Consultation on Local Transport Plan 3 Guidance, section 2.8, para 23

Salisbury and Trowbridge. These latter two do not contain much detail but do refer to the provision of “low and sympathetically graded embankments and cuttings”¹⁰. It is most concerning that requests for funding for road building packages in the LTP3 period are already being submitted for consideration at the regional level without public consultation and in advance of the ‘LTP3 Strategy’ document which should be helping to define the future transport direction and investment needs of the County.

Question 7

Should any of the three current accessibility priorities (health; education, skills and training; and the Tisbury area) be identified for continuing action? If not, what other, if any, accessibility themes and/or other areas in Wiltshire should be prioritised?

We aren’t provided with the information to enable us to judge whether continuing action on the three current accessibility priorities makes sense. It is not entirely clear why the Tisbury area should be singled out for special treatment.

It is suggested that the current accessibility priorities need to be reviewed as part of the community planning process to be led by the new Area Boards and Partnerships.

However one county-wide theme which would be worth prioritising is that of transport interchanges, particularly focusing on how bus/train interchanges can be improved and also looking at walking/cycling routes to bus/train stations and cycle parking facilities at interchanges.

Question 8

What do you think are the main barriers to accessing essential services and facilities in Wiltshire?

The closure of rural facilities such as shops, pubs & schools.

The provision of leisure, sports and cultural facilities in larger centres, which require rural residents to travel to reach them, coupled with the lack of Sunday and late night bus services to enable people to take advantage of such facilities.

Question 9 Should the maintenance of existing infrastructure take precedence over the building of new infrastructure?

Yes

See also comments under Q6 d above, re ‘presumption against new road building’.

Question 10

Should street lighting be removed or turned off in order to reduce climate change emissions and reduce operating costs?

Yes. Consideration could also be given to more sophisticated systems being trialled elsewhere – e.g. in Germany - whereby lights can be switched on by using a mobile phone.

¹⁰ See for example Regional Funding Allocation 2, Expression of Interest Form, Major Transport Schemes, Salisbury RSS Growth Package, undated document from WCC – para in response to Q1.6

Question 11

What revisions to the existing freight policies should be made? What other policies should be considered (e.g. on satellite navigation systems, on break-bulk interchange facilities, on the promotion of the HGV route network to drivers etc)?

There seems increasing evidence of HGVs using inappropriate routes (e.g. Lower Road through Lower Bemerton in Salisbury) because they are following sat nav guidance. If WC are able to play any part in ensuring that routes which are inappropriate for HGVs could be fed into sat nav systems used by HGVs that would clearly be advantageous.

Question 12

Given the difficulty in progressing rail freight policies and the fact that most freight movements in Wiltshire are by road, should the freight strategy be reoriented to focus more on road freight or should the rail policies be more aggressively pursued?

Rail policies should be more aggressively pursued.

Question 13

Are traffic delays, disruption and congestion a significant problem in Wiltshire? If they are, where and when do these problems occur, and what measures do you favour to tackle them (e.g. more junction capacity, better provision of travel information, better co-ordination of streetworks/events/incidents etc)?

It is often noted in Salisbury that the most significant traffic congestion occurs during school term times. School green travel plans should be pursued more rigorously. The increase in out of town shopping developments also causes congestion – for example in Salisbury the congestion on Southampton Road is almost exclusively due to people going shopping.

Question 14

Should the priority given to users on a road reflect the local setting of the road in question (e.g. in town centres and residential streets, pedestrians and cyclists would be given priority over motor vehicles)?

We support giving priority to pedestrians and cyclists in town centres and residential streets. Consideration should be given to the removal of traffic signs and markings in town centres and a 'shared space' approach, as promoted by Ben Hamilton-Baillie and others¹¹. In rural areas too minor roads with low traffic flows should wherever possible be places which are made as safe as possible for shared use by walkers, cyclists, horse riders and motorised users, with traffic speeds kept low.

Question 15

Given Wiltshire's predominantly rural nature and the need to support local businesses, do you think it is appropriate to increase demand management (e.g. parking standards and charges) and traffic management measures (e.g. onstreet parking) in Chippenham, Salisbury, Trowbridge and other large market towns to help encourage the use of sustainable transport modes?

Wiltshire is in fact becoming an increasingly urban county and presumption that the rural communities must continue to rely on the private car does nothing to support the minority

¹¹ See for example <http://www.hamilton-baillie.co.uk/>

who live in rural areas without having access to the car. See also comments under Q6 (a Demand and Traffic Management) above.

Question 16

Should commuters and/or shoppers be particularly encouraged to use sustainable transport modes by the introduction of higher parking charges?

Yes

In Salisbury there also needs to be a reduction of the parking spaces provided in the City Centre to encourage the use of Park & Ride.

Question 17

With a limited budget to support public transport services, how can the Council best respond to continuing above-inflation cost increases? For instance, should funding for public transport be prioritised over other Council services (with possible adverse impacts on delivery)? Should parking charges be increased to provide financial support for public transport (with possible adverse impacts on retail centres)? Or should we accept that public transport services will have to be reduced further? If you think it should be the latter, where should these reductions be made?

Parking charges should be increased to help support public transport services – on a county- and country-wide basis.

Question 18

How can the Council best deal with the dispersed pattern of passenger demand which makes delivering good public transport access so difficult to achieve? Or should this situation be accepted as inevitable in a predominantly rural area like Wiltshire and resources found to deliver more flexible, specialised, community and/or voluntary transport for those who need access?

Consideration should be given to a range of different community transport options depending on the needs of the local community.

Question 19

Should priority be given to public transport services which provide essential access for people without private transport, or to services which will attract car users so as to help reduce congestion, pollution and climate change emissions? The Council's existing public transport strategy seeks to achieve a balance between these two aims – is the balance right?

A balance is needed between the two aims.

Question 20

Which of the following road users do you consider the most vulnerable? :

- car drivers;
- motorcyclists;
- cyclists; or
- pedestrians.

Which require the highest priority in terms of road safety training and education?

A recent National Audit Office report confirms that the most vulnerable road users are cyclists, pedestrians and motorcyclists. Fatalities per 100 million passenger kilometres, average 1997-2006 for each of the groups identified is¹²:

Motorcyclists	11.144
Pedestrians	4.421
Cyclists	3.404
Car drivers	0.269

There is plenty of advice in the NAO report regarding how safety can be improved particularly for the environmentally friendly modes of walking & cycling. Among them the conclusion (p.7 of report) that *“Research has shown that some measures are effective in reducing the incidence and severity of casualties among pedestrians and cyclists. For example, 20 miles per hour zones in urban areas that are enforced by physical measures such as road humps can reduce accidents involving pedestrians by 63 per cent and cyclists by 29 per cent.”*

Question 21

Should road safety publicity campaigns be based on national campaigns or should they be more Wiltshire focussed? What are the key road safety messages for Wiltshire (e.g. drink driving, speeding etc)?

It is suggested that the cause of road accidents in Wiltshire should be analysed to establish whether there are particular messages which need to be given publicity. There are definitely specific stretches of road in the county with a bad accident record where there should be warnings reminding motorists of the potential fatal consequences of speeding & overtaking without a clear view of the road ahead.

Question 22

Speed enforcement through the use of fixed and mobile cameras is well established in Wiltshire. Do you consider that their use should be extended or complemented with other measures such as variable message type speed warning signs?

Question 23

What ‘smarter choices’ marketing and promotional campaign methods can best inform people about sustainable travel (e.g. fun days, local support of national campaigns, mail drops, roadside boards, radio adverts, car park ticket adverts, etc)? And which messages can best promote ‘smarter choices’ (e.g. cost savings, health benefits, accessibility improvements, reduced social exclusion etc)?

The ‘smarter choices’ message could also include the idea that one is behaving more responsibly by choosing a transport mode which results in lower CO2 emissions. Overall sustainability messages about the level of consumption per head and the notion that we should each be attempting to live within a ‘one planet’ footprint need to be much more widely spread and understood by the public. This is a wider issue than purely transport choices.

¹² National Audit Office/DfT Improving road safety for pedestrians and cyclists in Great Britain, May 2009 Table 1, page 9

Question 24

Would community car clubs where people pay a fee (typically a membership and time fee) to use a car be a viable option in Wiltshire? If you think they would, where should they be introduced?

There already is a successful car share club (hOURCARS) in Salisbury – which has been operating for some years with limited support from the County Council (some start-up assistance from the Travelwise service) and some help from the former District Council (provision of a car-parking space in central car park).

There is clearly scope for the further development of car clubs across the county – not just in the urban areas (where they could be a planning requirement in otherwise car-free housing developments) but also in smaller communities.

Question 25

As it is expensive to implement, should the Council just use personalised travel planning in appropriate new developments? If you think it should also be used in established housing areas, where is the best place to set-up a pilot scheme?

Question 26

Do you think it is right that the Council is proposing to prepare a two-wheeler strategy which sets out policies and objectives for cycles, motorbikes, mopeds and scooters? Or should we develop separate cycle and powered-two wheeler strategies?

We do **not** believe that powered two-wheelers should be dealt with in the same strategy as cycles. Motorcyclists, like cyclists, are vulnerable road users (see accident figures quoted under Q20) and there are a number of issues where the two groups have interests in common. For instance, both groups are concerned about drivers who fail to see them, poorly maintained road surfaces and sudden road narrowings (which create conflict between two and four wheeled vehicles).

However, Salisbury Campaign for Better Transport support the CTC (Cyclists' Touring Club) view there is a distinction between policies to improve motorcyclists' safety (which we feel should be supported) and those which would lead to increased use of motorcycles (which we do not believe can be justified). We quote from the CTC website on the matter¹³:

“We believe that, in addition to the risks which motorcycles and other Powered Two Wheelers (PTWs) pose to their riders, policy decisions in relation to motorcycling also need to reflect the threat which motorcycling poses to other road users and to the environment. PTWs are:

- ***Dangerous to themselves and to others.*** *Motorcyclists place not only themselves at risk, but they are also disproportionately hazardous to pedestrians' and cyclists' safety as well. Per mile travelled, PTWs are about 1.5 as likely as cars to be involved in collisions which cause serious injury to cyclists, twice as likely to be involved in causing them serious injuries and about three times as likely to be involved in killing them.*
- ***Polluting.*** *Compared with cars per vehicle-km travelled, PTWs emit 11.3 times as much methane, 6.3 times as much carbon monoxide, 9 times as much volatile*

¹³ See <http://www.ctc.org.uk/DesktopDefault.aspx?TabID=4790> and http://www.ctc.org.uk/resources/Campaigns/0806_CP_RG-PTWs-v2_brf.doc

organic compounds (VOCs other than methane), 7.2 times as much benzene, 12 times as much 1,3 butadiene and 8.2 times as much particulate matter, according to the latest available Government figures*. They are also a lot noisier. The Royal Commission on Environmental Pollution stated that "Although motorcycles, mopeds and scooters, take up less road space than cars, we have not received any information that would indicate that they would have an environmental advantage over cars in other respects".

- **A threat to pro-cycling policies.** Encouraging more motorcycle use will undermine efforts to promote cycling, not only because those switching to motorcycling might otherwise have switched to a healthier, safer and cleaner alternative (e.g. cycling) but also by adding to the risk faced by those who do cycle or who might be thinking about doing so."

[*the figures in fact date from 2002 and there are improvements in more modern motorcycles, nevertheless it would still be the case that motorcycling should not be seen as a 'green' alternative]

For the above reasons we believe that the issues to be dealt with regarding cyclists and PTW are very largely different, and they should each be dealt with in a separate strategy.

Question 27

What do you think are the best ways of promoting the benefits of two-wheelers? What measures do you think should be implemented to encourage people to make greater use of two-wheelers?

For the safety and environmental reasons given in Q26 above we do not believe that Powered Two Wheelers should be encouraged in the same way as cycling.

As regards encouraging the greater use of cycles, we should suggest:

- Building coherent and complete cycle networks in the county
- Following best practise in cycle infrastructure provision
- Ensuring cycle routes are signed
- Cycle training (Bikeability) in schools across the County, and provided as a holiday activity for those who want it
- Cycle training/refresher courses for adults
- Copious cycle parking, including covered cycle parking
- Routes to schools, colleges, stations etc being properly developed and marked
- Learning from best practise elsewhere, including the six Cycle Demonstration Towns.

We would fully support the thrust of the current Early Day Motion 1431 which "*acknowledges the evidence that cyclists gain from safety in numbers, in other words cycling gets safer the more cyclists there are; welcomes the target in the Government's draft Road Safety Strategy to halve the risks of cycling within 10 years; believes that this target can best be met by also aiming for substantial increases in cycle use in order to maximise the safety in numbers effect, thereby also benefiting health, communities, the economy and the environment; urges that the Road Safety Strategy should tackle the fears which deter people from cycling, such as traffic speeds, irresponsible driving, hostile roads and junctions and lorries; and calls for cycle training to be made available to people of all ages so as to achieve more as well as safer cycling.*"

Question 28

Which of the following walking themes do you consider to be the most and least important?:

- **Improving health through regular physical activity – e.g. by encouraging people to walk to school or work.**

- **Promoting tourism – e.g. by focusing on ‘tourist towns’ and recreational walking routes.**
- **Reducing greenhouse gas emissions – e.g. by maximising occasions where walking can replace private car journeys.**
- **Making walking routes suitable for ‘all weathers’ and improving rest opportunities.**
- **Improving community cohesion and access to local green spaces – e.g. enabling children to have independent access to friends and play areas.**

All the walking themes listed are important, they are all interlinked. Walking should be seen as a form of transport for short journeys to work, school, shops and leisure facilities. Routes to these destinations should be safe, well lit, satisfy ‘desire lines’ with good crossings points on main roads and suitable for use in all weathers. This would have automatic health benefits and improve community cohesion.

Walking routes are as important in small towns and rural villages where residents often have no choice but to use their cars as the narrow roads are dangerous with no pavements.

Wiltshire should raise the standard of its rights of way network to capitalise on the increasing popularity of walking as a recreational pursuit, encourage people to visit their local countryside and promote environmental tourism. This would bring economic benefits to rural communities.

Question 29

Do you think that resources to implement walking measures should be concentrated on selected routes/areas in order to achieve the best value for money? Or should resources be directed to achieving a basic minimum standard of pedestrian links to essential facilities?

There should be a basic minimum standard of pedestrian links but much more could be done if funds were transferred from road building to sustainable and healthy modes of transport such as walking and cycling.

Question 30

Should the highest priority for funding continue to be directed at the area transport strategies of Western Wiltshire (particularly Chippenham and Trowbridge), Salisbury and Devizes? Or should more transport funding be distributed to some of the other areas in Wiltshire (with the implication that the existing high priority areas would receive less funding)?

We do not believe that money directed at the proposed Westbury bypass is well-spent, nor do we support the widening of the A350 at Chippenham which is proposed.

Other Comments

Spatial coverage of the LTP

The draft guidance on LTP3 says that “*Under the Transport Act 2000, as amended by the Local Transport Act 2008, all local transport authorities are required to produce an LTP relating to transport to, from and within their area. In considering this duty authorities should*

bear in mind that patterns of transport use are not necessarily restricted by local authority boundaries."¹⁴

The scope of the LTP needs to cover cross-boundary travel movements and the need to liaise with neighbouring authorities regarding bus and train services, preferred freight routes and other trans-boundary transport links. The LTP & spatial planning for Wiltshire also needs to consider the impacts and consequences of their proposals on neighbouring authorities and protected areas – for example in south east Wiltshire the impact of traffic movements on the New Forest National Park would be a major concern.

Proposed time-span of the LTP

The suggested duration of the LTP – from 2011 to 2026 (para 1.2, page 2) – seems long given the rapidly changing nature of transport policy. The draft LTP Guidance suggests that climate change policy in particular is a fast-developing area – see also the comments under Q6 item c above.

The issues document suggests that '*reviews of the LTP's long term strategy will then be considered every five years*' (para 1.3, page 3) – it is not entirely clear whether this means that a review **will** be undertaken every five years or whether the review will be considered, but may not be undertaken. This needs to be clarified, as does the overall length of the LTP3 period.

Long-term trends

A forward thinking Local Transport Plan strategy will need to consider how long-term issues such as the following might affect transport and local planning:

- Rise in fuel prices as we pass the period of peak oil production
- Alternative power sources such as hybrid and battery-electric cars will be more expensive than fossil fuel to purchase and operate.
- Given that no alternative low carbon fuel sources are presently envisaged for HGVs alternatives to road-based distribution systems may be needed for food and other necessities.
- Rising costs of distribution could have profound effects on transport and land use planning generally. The need for greater self sufficiency in UK food production may change the economics of land use against new road construction and other land-hungry development on green-field sites which are, or could be, used for farming.

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¹⁴ DfT Consultation on Local Transport Plan 3 Guidance Para 4.3