



York Citizens' Transport Forum February 2020 Key findings

York's Citizens' Transport Forum has been established jointly by York Civic Trust, York Bus Forum and York Environment Forum, to enable the public to be directly involved in developing York's next Local Transport Plan. The first round of Forum meetings in February 2020 sought the Forum's views on the problems which York faces, the goals for York's new Local Transport Plan, and the broad strategies which that Plan should adopt. It also addressed possible solutions, which will be discussed fully in the next round of meetings.

In all 100 Forum participants debated these questions in three identical 3 hour sessions. Their findings show remarkable consistency across the Forum as a whole, and hence give a clear signal for the approach which the City of York Council should adopt in developing its new Local Transport Plan. The key findings are listed below, and are explained more fully in the report which follows. A separate report outlines the way in which the Forum was established, and includes suggestions from participants on how it might be developed.

- 1. Congestion, air pollution and the impact of transport on climate change are all serious problems for York, and are in many ways interrelated. The new Local Transport Plan needs to be designed to achieve significant reductions in all three problems (2.1).**
- 2. At the same time the Plan needs to address several other problems, of which the most serious are transport's impact on mental and physical health; danger from traffic; intrusion of vehicles into public space and poor levels of access for some sectors of the population and business (2.1, 2.2).**
- 3. Most of these problems are likely to become significantly worse over the next five to ten years unless significant action is taken; the main threats are new developments too oriented towards car use, and the growing needs of an aging population. The Council needs to provide evidence on the scale of these problems and of underlying trends (2.3, 2.4).**
- 4. The new Local Transport Plan should be designed to meet a number of interconnected goals for the city. Of these, the most important are ensuring that the transport system is efficient, generates substantially less pollution and results in far lower levels of carbon emissions. While the Forum acknowledges that the last of these requires national action it accepts on balance that it is right for the City of York Council to provide leadership in developing its own climate policy (3.1, 3.2).**
- 5. At the same time the Plan must be designed to achieve the goals of ensuring safety, supporting public health, increasing equality of access and increasing liveability, protecting public space and heritage. A Plan which successfully addresses all of these will also help to strengthen the sustainability and economy of the city (3.2).**
- 6. The aims of the 2011 Local Transport Plan provide an appropriate model for a new 2020 Local Transport Plan, but the new Plan needs to give greater emphasis to public health and to equality of access. However, the Forum was unclear as to the achievements resulting from the**

2011 Plan. The City of York Council needs to set out clearly its achievements over the last decade, and how they relate to the 2011 Plan, to provide a context for the new Plan. It also needs to adopt a short term action plan for the period while it is preparing its Local Transport Plan (3.4).

- 7.** The hierarchy of users as adopted in the 2011 Plan remains an appropriate basis for determining priorities. However, it needs to be tailored to the needs of different parts of the transport network, and the role of, and provision for, powered two wheelers and commuters needs further thought. The Forum's principal concern with the hierarchy is that it sees little evidence of it being applied in practice in the decisions which the Council takes. This needs to change (3.4).
- 8.** In meeting the goals outlined in (4) and (5) above, the Plan needs to adopt a holistic, bold and visionary strategy which achieves significant changes in travel behaviour in the immediate future. The Council should set challenging targets for each of the key goals and elements of the strategy, regularly monitor and report on progress, and make the resulting information and data publicly available on a dedicated website. They should be ready to modify the strategy if sufficient progress is not being made (3.4, 4.1, 4.2).
- 9.** The key elements of that strategy will be measures to enhance public transport, walking and cycling and, at the same time, to reduce car use and the need to travel, particularly through the design of sustainable communities. This combination of "carrots" and "sticks" will help make the strategy both more effective and more acceptable to the public and the business community. It should be reinforced by adopting a "hearts and minds" approach, in which incentives are designed to encourage users to change their travel habits (4.1, 4.2, 4.3).
- 10.** To reinforce this core strategy, action is needed to improve the operation of the road network, by reallocating road space and using it more efficiently, improve freight and delivery operations, and make judicious use of new technologies (4.1, 4.3).
- 11.** In developing the detail of that strategy, the Plan needs to ensure that individual measures are cost-effective, that the costs of provision and maintenance are appropriately shared between residents, tourists, the business community and users, that the needs of vulnerable groups are met, that the differing needs of inner and outer York and the wider catchment are addressed, and that private sector operators and developers are engaged positively in the delivery of the strategy (4.4).
- 12.** While these Forum meetings were not designed to address specific solutions, they have already identified a number of priority actions. The largest number of specific proposals related to public transport, and it is clear that Forum members see such enhancements as a priority. Other frequently mentioned measures include the proposed ban on non-essential traffic in the city centre, a more restrictive parking policy, a city-wide car sharing scheme, expansion of the park and ride service, a simplified fare structure for the bus network with targeted lower fares, a more comprehensive and better designed cycle network, and a commitment to ensuring that all new developments are designed for access on foot, by bike and public transport in preference to the car. The Forum stands ready to work with the Council in the development of these proposals (5.1 – 5.9).

1 Introduction

York's Citizens' Transport Forum has been established jointly by York Civic Trust, York Bus Forum and York Environment Forum, to enable the public to be directly involved in developing York's next Local Transport Plan. We have established the Forum independently of the City of York Council, but with their active support, and hope that the Council will work directly with the Forum as work begins on York's new Local Transport Plan later this year.

A Citizens' Forum is a group of residents who broadly represent the characteristics of the population of a city, and who have volunteered to contribute to the development of an aspect of policy for the city. Recent examples in the UK have been the London Borough of Camden's citizens' climate assembly, which focused on ways of tackling climate change, the Greater Cambridge citizens' assembly, which considered ways of reducing congestion and improving air quality, and the 110 volunteers from across the UK invited to discuss national policy on climate change.

Much public involvement in policy only involves informing and consulting, where the city advises the public on what it proposes to do, and perhaps seeks feedback. Citizens' Forums offer a more collaborative approach, in which the public are invited to contribute their experience, advice and ideas. Among the benefits of collaboration are that it:

- builds on individuals' experience
- helps identify and resolve conflicting needs and interests
- generates new proposals
- engenders a sense of ownership of the resulting policy
- reduces the chance of conflict when the policy is implemented
- encourages a continuing commitment to evaluating and enhancing the policy.

We have designed York's Citizens' Transport Forum with these principles in mind.

The three organisations conducted a survey of residents', commuters' and visitors' perceptions of and need for transport in the city in September 2019. A total of 1,388 responses were received from residents, 182 from commuters and 272 from visitors. We invited all residents and employees who responded to our surveys to express interest in joining the Forum, and we were delighted that 440 of the 1,388 residents and 55 of the 182 commuters offered to participate. We approached a sample of the resident respondents which reflects the age, gender, residential location and use of transport of the city's adult population. This resulted in a total of 100 people participating in the first round of meetings of the Forum.

In all, we expect the Forum to be involved at four or five stages in the development of the Local Transport Plan. The first round of Forum meetings was designed to obtain the Forum's views on three key questions:

1. What are the problems for York caused by its transport system, what problems do users experience; where and when are they most serious, and how might they change over time?
2. What goals should we set for York's new Local Transport Plan, which of these goals are the most important, and how well are these reflected in the current Local Transport Plan?
3. What broad strategies should the new Local Transport Plan adopt?

Inevitably, participants also discussed specific solutions, but we envisage the second round of Forum meetings focusing more specifically on these.

The Forum met on three occasions:

- Wednesday 5th February 1830 – 2130: 32 participants
- Friday 7th February 1330 – 1630: 33 participants
- Saturday 8th February 0930 - 1230: 35 participants.

On each occasion the Forum met in five groups, each with an independent facilitator, and held three discussion sessions, one focusing on each question. Each involved:

- a five minute introduction from the lead facilitator
- a set of discussion questions on the screen
- 25 minutes to discuss the questions in groups
- a two minute report back by a volunteer reporter from each group.

The facilitators endeavoured to ensure that all group members were involved, and that differences of view (and context for those views) were identified. In practice there was a high level of consensus both within and between groups. Both the facilitator and the volunteer reporter kept notes in each group, and these form the basis for this report, which endeavours to reflect any differences of view which did arise.

We invited all participants, and the remaining 395 who offered to participate, to comment on a draft of the Forum's findings. This report reflects the comments received from 19 participants (19% of those taking part) and 10 others. A companion report describes the basis for Forum membership, considers the representativeness of the Forum's members, suggests ways in which the views of under-represented groups might be canvassed, and summarises members' comments on the conduct of the Forum.

The remainder of the report considers the answer to each question in turn, followed by a brief summary of specific solutions proposed; a closing summary presents the key findings of the Forum.

2 The problems to be tackled

The first set of discussions focused on current problems and future challenges. After a brief introduction, in which results from the surveys and expectations for the future were outlined, participants were invited to discuss the following four questions

1. Do you agree with the list of problems for York caused by transport, and their relative priority?
2. Do you agree with the list of problems which transport users face in York, and their relative priority?
3. Where and when are these problems most serious?
4. Will some problems become more or less serious over the next 5 – 10 years?

2.1 The problems for York caused by transport

Figure 1 shows the percentages of residents and commuters who considered each of the listed problems serious.

All groups considered that the results in Figure 1 largely reflected their own experience and concerns. Half the groups made the point that the top three concerns - congestion, pollution and impacts on climate change – were linked, and that congestion was to some extent a relative concept. Two groups questioned whether it is possible for York alone to influence climate change. Some groups considered that certain problems were more serious than suggested by Figure 1; in order of frequency of mentions (with numbers of groups in brackets) these were:

- Impacts on public health, including fear and intimidation (6)
- Danger, particularly for pedestrians and cyclists and from large vehicles (5)
- Poor access to work, education and business (4)
- Noise (1)
- Social exclusion (1).

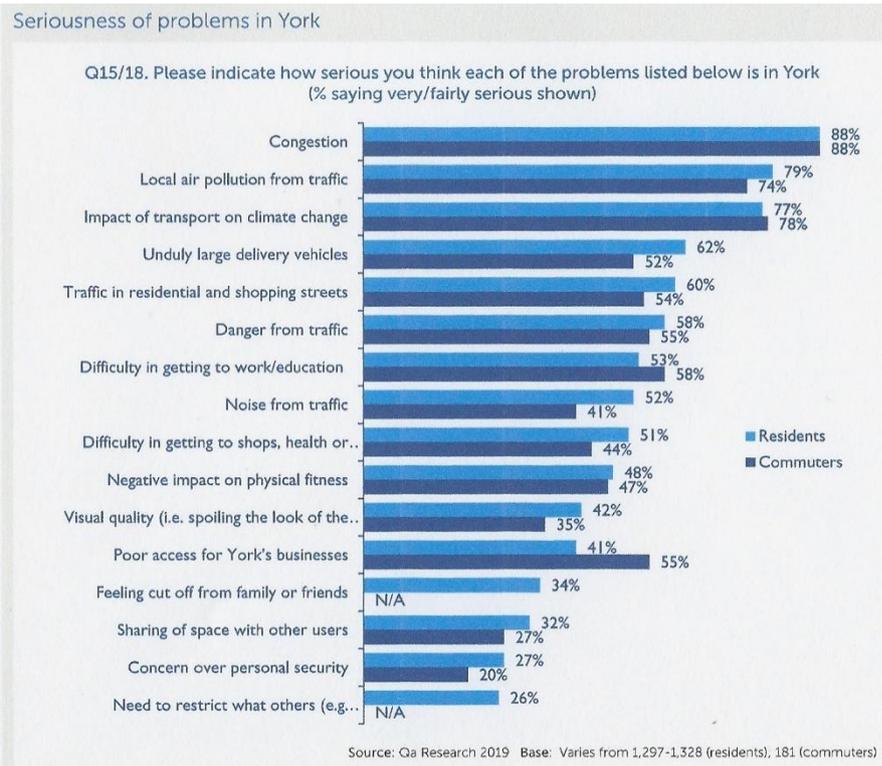


Figure 1: Percentage of respondents considering each problem in York serious

2.2 The problems for users of transport

Figure 2 shows the percentages of residents and commuters who considered each of the listed problems serious.

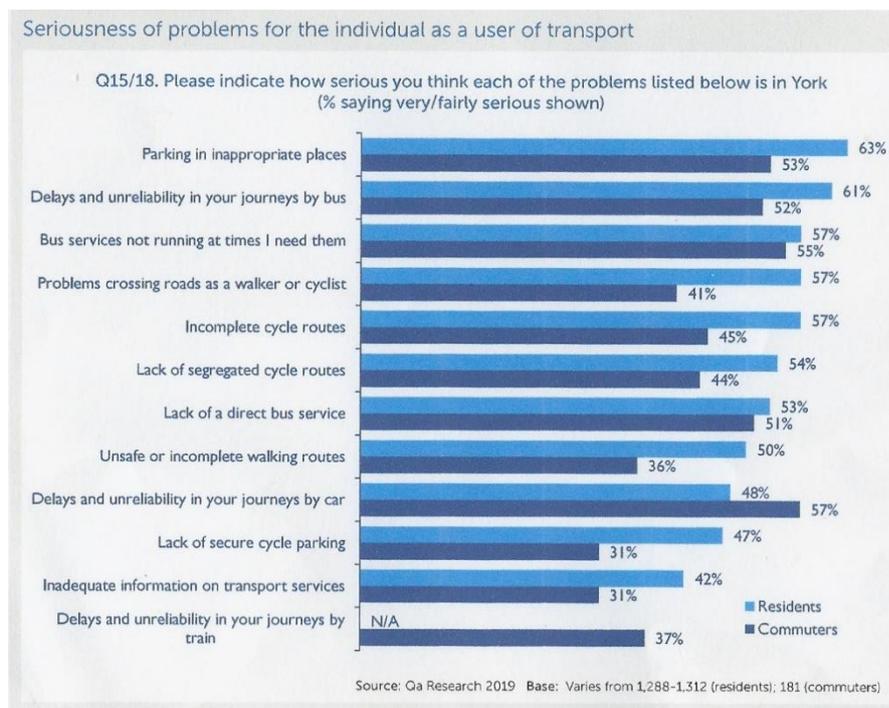


Figure 2: Percentage of respondents considering each problem for users serious

There was a general sense that the results reflected participants' own experience, although only five groups specifically stated this. Several groups commented that the list of problems should have highlighted safety for the user; others mentioned ability to park as another problem missing from the list. In many cases groups considered that certain problems were more serious than suggested by Figure 2; in order of frequency of mentions (with numbers of groups in brackets) these were:

- Cycle routes either not where needed, or incomplete (8)
- Safety for pedestrians and cyclists (8)
- Bus services not serving specific locations, or indirect (7)
- Unreliable bus services (4)
- Costs of travel (4)
- Needs of disabled and encumbered travellers (e.g. with prams) (3)
- Lack of parking for essential needs (e.g. traders) (3)
- Delays in paying bus fares (2)
- Time spent waiting to cross the road (2).

Others mentioned by a single group included lack of information on bus services, inadequate signing of walking and cycling routes, lack of cycle parking, misuse of blue badges and disabled parking bays, and poor road and pavement surfaces.

2.3 The location and timing of problems

Not surprisingly the Outer Ring Road (4 mentions), the Inner Ring Road (4) and the major radials (3) were often mentioned as locations where problems were most serious. One group commented that congestion on the Outer Ring Road was particularly damaging for the city by discouraging access to it. Other specific locations mentioned were the station (4), the city centre (3), the hospital (3), Gillygate (3) and Bootham, Fulford Rd, Hull Rd and river crossings (one each). One commentator made the point that the nature of the problems differs substantially from one area of the city to another, and that care is needed in defining the areas where different solutions might be relevant.

The most frequently mentioned times were school opening and closing times (7), the rush hour (5), hospital visiting times (3), weekends (3), markets, events and race days (3) and the tourist season (3). Other specific mentions included roadworks, poor weather, accidents and, for cyclists, night-time.

There was a general sense that the Forum lacked evidence on the scale of these problems and on underlying patterns of demand for movement in the city. It will be important to base the new Plan on clear evidence of current conditions and likely trends.

2.4 Will these problems be more serious in 5 to 10 years' time?

Almost all groups were convinced that these problems would become more serious; only one group expressed doubts, given the underlying trend to travel less. Four groups mentioned new developments in the Local Plan as a particular cause; one noted that the proposals for York Central and York Station did not send the appropriate signals that York wished to tackle these problems. Several groups noted that there needed to be an iteration between the Local Plan and the Local Transport Plan, to ensure that any new development did not impose unreasonable demands on the transport system. Three groups noted that the aging population of York would add to the transport challenges which the city faces. The majority of groups qualified their responses by stating that problems would get worse unless significant action was taken. This set the context for the two further discussion sessions.

3 The goals for a future Local Transport Plan

In the introduction to this session, the role of a Local Transport Plan, the broad outline of York's most recent (2011) Local Transport Plan, and the hierarchy of users included in that Plan were outlined. The concept of goals as desirable outcomes for York was introduced, and the point made that goals were the mirror image of the problems discussed in the previous session. The following goals, which have been set for Local Transport Plans elsewhere, were offered for discussion:

- A more efficient transport system (less congestion, greater reliability)
- A better environment
- Reduced impact on climate change
- Better public realm and liveability
- Better access for all
- Greater safety
- A stronger economy
- More support for good public health.

On that basis, participants were invited to discuss the following four questions:

1. Given the problems identified in Session 1, what would you like to see in York in 5 – 10 years' time? (Ideally in terms of goals)
2. Which of these goals are the most important?
3. Are any in conflict with one another? If so, how can these conflicts be addressed?
4. How do these goals compare with the current Local Transport Plan?

3.1 Which goals would you like to see for York?

All of the goals listed above were mentioned by several groups; the most frequently mentioned were:

- Environment, with particular emphasis on air quality, but also noise (10)
- Access for all, noting the importance of meeting different needs (8)
- A more efficient transport system (7)
- Support for public health, wellbeing, an active lifestyle and mental health (7)
- Greater safety, with one group arguing for a Vision Zero (6)
- Reduced impact on climate change (5)
- Better liveability and protection of heritage (4)
- Support for the economy (4).

Two dissenting groups argued that climate change was a national issue rather than one to be tackled by York alone; a further two suggested that the economy was not an issue to be addressed by transport policy.

3.2 Which goals are the most important?

Not all groups answered this question directly, so the listing above may provide a better indication of relative importance. But among those goals ranked by more than one group, the most important goals were, in order (with, for each goal, the average of the ranks given by those groups which ranked it):

- Efficiency (average rank 1.0)
- Climate change (1.5)
- Air quality (1.75)
- Safety (2.0)

There was general agreement that, by achieving these goals, the Local Transport Plan would also support the local economy.

3.3 Are any of these goals in conflict?

The general view of the groups was that they were not, and that a balanced approach is needed which pursues them all. The most frequently mentioned conflicts were:

- Meeting the needs of different groups of user (8 mentions, including low income users, disabled travellers, the differing needs of men and women; conflicting needs of residents and tourists, and the requirements of business)
- Conflicting demands on limited finance (3)
- The differing needs of inner and outer York (2).

3.4 The appropriateness of the 2011 Local Transport Plan

Most groups (8) were supportive of the goals and principles of the current Local Transport Plan, though one group criticised it for trying to please everyone, one for not giving enough emphasis to equality of access, and one for a lack of concern over public health. However, five groups questioned whether the Plan had actually been implemented and, if so, what had been achieved. There was a general sense that the Council needed, in starting work on a new Local Transport Plan, to emphasise what had been achieved under the current one.

One commentator queried whether it was appropriate now to devote effort to developing a new Local Transport Plan, given the elapsed time involved. There was a general sense that urgent action is needed, and that at the very least a short term action plan is needed while the Local Transport Plan is being developed.

Most groups discussed the hierarchy of users. Five groups were specifically supportive of it, though two groups noted that it needed to be applied differently in different areas, and one group each noted that the position of powered two wheelers was too high; that more support needed to be given to commuters, since they are essential to the economy but also contribute to problems. The point was also made that every individual appeared at several points in the hierarchy at different times. Once again, five groups questioned whether the hierarchy was actually being used to determine the actions which the Council took. The examples of traffic signal design which appeared to give priority to cars over pedestrians, and of Germany Beck, which appeared to be designed without any provision for cyclists, were cited.

The general view from this session was, again, that York's new Local Transport Plan needed to be bold and visionary, and that it and any short term action plan should set specific targets and monitor performance against them.

4 Potential strategies

In the introduction to this session, strategies were introduced as broad directions which a Local Transport Plan could adopt for meeting its goals. Participants were invited to consider alternative strategies and combinations, and encouraged not to dwell in too much detail on specific solutions. However, where these were mentioned they have been recorded, as outlined in the next section. A few highlights from the survey responses, largely relating to specific types of policy measure, were highlighted, and the following strategies, which have been considered in Local Transport Plans elsewhere, were offered for discussion:

- Reducing the need to travel
- Reducing car use
- Improving public transport
- Improving operation of the road network
- Improving walking and cycling
- Improving freight

- Introducing improved technology.

On that basis, participants were invited to discuss the following four questions:

1. Which of these strategies would be most appropriate for meeting your goals?
2. Are there any other strategies that we have overlooked?
3. Which of these strategies are the most important?
4. Might some strategies be in conflict, and how can such conflicts be addressed?

4.1 Which strategies are appropriate?

All of the strategies above were mentioned by several groups. In order of frequency of mention, they were:

- Reducing car use (12)
- Improving public transport (12)
- Improving walking and cycling (12)
- Reducing the need to travel (9)
- Improving operation of the road network (5)
- Improving freight (3)
- Introducing improved technology (3).

Some specific points made were that new technologies would have a wide range of impacts and needed to be better understood (5 groups); reducing car use should be an outcome of the other strategies rather than being pursued in its own right (2); walking and cycling were different and required different strategies (1); and that designing the walking environment to meet the needs of people with disabilities would benefit everyone (1). One group argued that reducing the need to travel was undesirable, since it reduced opportunities, but others stressed that these opportunities could be provided in alternative ways, for example through mixed development or the promotion of telecommunications.

4.2 Are there any strategies which we have overlooked?

The groups made several additional suggestions, related both to the way in which strategies are combined, and additional approaches. In order of frequency of mentions, these were:

- The importance of adopting an integrated approach, either among the sustainable modes or for all the elements of strategy (10)
- The need to provide up to date information on options and awareness of the implications of using them (8)
- A “hearts and minds” approach which encourages and incentivises change among all users (8)
- The need to use both carrots and sticks, but with a greater reliance on measures which encourage change and the avoidance of undue restrictions on movement (7)
- The need to focus on people rather than on vehicles (2).

4.3 Which are the most important strategies?

Not all groups attempted to rank these strategies, but those strategies which were ranked by four or more groups, were, in order (with, for each strategy, the average of the ranks given by those groups which ranked it):

- Reducing car use (average rank 1.55)
- Improving public transport (1.90)
- Improving walking and cycling (2.40)
- Reducing the need to travel (2.50)
- Improving operation of the road network (2.75).

This ranking confirms that above for the number of times each strategy was mentioned. Several groups also stressed the importance of learning from successful cities elsewhere in developing a strategy for York.

4.4 Are there conflicts between these strategies?

The consensus from the groups was that there did not need to be a conflict between these strategies; instead it was important to implement them in ways which complemented and reinforced one another. However, a number of areas of potential conflict were identified:

- Financing generally, including issues of cost-effectiveness, sources of finance, and the contributions of tourists, residents and transport users (7 mentions)
- The conflict between those which are easy to implement but potentially less effective, and those are more effective but controversial; once again the emphasis was on the need to take bold and early decisions, particularly to reduce car use (6)
- The role of the private sector, particularly for public transport, and the conflict between commercial goals and public need (6)
- The differing needs of different areas of the city (noting the point above that these areas need to be carefully specified) and of the wider catchment area, which has fewer alternatives to using the car (6)
- The differing needs and perceptions of different users; as well as considering users in different areas of the city, this included differences between commuters and residents, car users and others, the needs of elderly and disabled travellers for whom some modes might not be suitable, the specific needs of traders and small businesses, who might be particularly vulnerable to restrictions on car use, and the conflict between social and selfish preferences (6)
- The inconsistency of national policy and local needs (2).

Other points mentioned included the need for consistency between the Local Transport Plan and other policies (e.g. for the economy, health and the environment); the apparently conflicting views of political parties and the unwillingness of politicians to take bold decisions, the role of developers, and the need to involve major stakeholders such as the hospital, station and universities.

Once again, discussion in this session highlighted the need for bold action, to develop and implement a holistic, visionary strategy which achieves significant changes in travel behaviour while protecting the needs of those who might otherwise be adversely affected.

5 **Suggested solutions**

Groups were not invited to suggest specific policy measures which might be adopted, since this is the intended focus of the second set of Forum meetings. Several groups stressed the importance of understanding the financial, regulatory and governance frameworks within which the Council has to operate, and that constraints which these impose on specific solutions.

5.1 Highlighted solutions

Despite this, specific suggestions inevitably came up in discussion. For the record they are listed here by strategy, in the order of priority for those strategies, with the number of groups mentioning each. Of particular interest are the number of suggestions made for developing York's public transport strategy, and the large numbers of groups who, unprompted, suggested:

- A city centre ban on non-essential traffic (9)
- A more restrictive parking policy (9)
- A city-wide car sharing scheme (7)

- Expansion and enhancement of the park and ride service (7)
- Lower targeted fares (7)
- Simplified fares and an oyster-style card (6)
- A more comprehensive cycle route network (6)
- Better design and operation of cycle lanes (6)
- The importance of not designing new residential developments for the car (6).

The full list of suggestions is given below.

5.2 Reducing car use

- A ban on (non-essential) cars in the city centre, while noting that any ban needs to be sensitively designed (9)
- A reduction in parking spaces, and a moratorium on building new car parks (9)
- Congestion charging (4)
- Increased charges for parking, including at outer shopping centres, to change the relative costs of travel by car and by bus (3)
- A low emission zone (2)
- An “odds and evens” restriction based on number plates (2)
- A workplace parking levy (1)
- A wider ban on through traffic in inner York (1).

5.3 Improving public transport

- A city-wide car sharing scheme (7)
- Park and ride services expanded, and charging per car rather than per passenger (7)
- Lower or potentially free fares, generally or for specific groups of user (7)
- Simplified ticketing, including an all York ticket and an oyster-style card (6)
- A more integrated bus service with through routes and effective services to the hospital, shopping centres and stadium (6)
- An outer orbital bus service (5)
- A system of public transport hubs in outer York, potentially with demand responsive services (5)
- An effective bus station and bus-rail interchange at the station (4)
- Better bus service coverage in the evenings and at weekends (4)
- Reopening rail stations (4)
- Franchising of bus services (3)
- Cross-city trams or tram-trains (2)
- Water taxis (2)
- Better information (2)
- A free electric bus service on the inner ring road (1)
- The need to consider taxis as part of the public transport fleet (1).

5.4 Improving walking and cycling

- A more comprehensive network of cycle routes and green corridors, based on need rather than ease of provision (6)
- Better design of cycle lanes, and a ban on parking on them (6)
- Greater priority and improved and wider routes for pedestrians, including at traffic signals and in the centre (5)
- More cycle parking (2)

- Better training in responsible cycling (2)
- A shared bike scheme (2)
- A policy on the use of e-bikes, electric scooters and powered two-wheelers (2)
- Effective signing (1)
- Walking buses for schools (1).

5.5 Reducing the need to travel

- Avoiding designing new communities for the car (6)
- Designing new developments around public transport provision and, preferably, in inner York (4)
- Mixed development including both housing and employment (2)
- Enhancing local centres so that they provide more services (2)
- Increasing the range of facilities in the city centre and stemming its decline (2)
- Promoting telecommunications and flexible working (2).

5.6 Improving operation of the road network

- Reallocation of road space, including more bus priorities (5)
- Traffic signal operation to be more flexible and smarter (5)
- More effective enforcement of existing traffic regulations (4)
- Better maintenance of roads (particularly cycle lanes) and pavements (4)
- Controlling the timing of roadworks, a wider 20mph zone, making the Inner Ring Road one way, dualling the Outer Ring Road, and applying the concepts in Manual for Streets 2 (1 each).

5.7 Improving freight

- A freight transhipment depot (5)
- An extended network of consolidation and collection points (4)
- More restrictive and consistent controls on timing of deliveries (1).

5.8 Introducing new technology

- Communication technology to support signal control, guidance, car sharing and pricing (6)
- Electric buses and taxis (4)
- E-bikes and scooters (3)
- Extended EV charging facilities, including in new developments (3) (but three groups pointed out that electric cars would not reduce congestion)
- Electric delivery vehicles (2).

5.9 Concluding comments

This long list of unprompted suggestions reinforces the findings elsewhere that members of the public offer a rich source of ideas for the development of Local Transport Plans. As noted at the outset of this section, these proposals need to be assessed and developed in the context of the financial, regulatory and governance frameworks within which the Council operates. This will be the starting point for the second round of Forum meetings, and we encourage the City of York Council to draw fully on the contributions of the Citizens' Transport Forum as it formulates its Local Transport Plan.