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Response to Lincolnshire County Council LTP5 Consultation

South & East Lincolnshire Partnership

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Deadline 1st December 2021

1. Context

- 1.1 The member statutory authorities of the South & East Lincolnshire Partnership (SELCP) thank Lincolnshire County Council (LCC) for the opportunity to provide comments on the draft of LTP5. We hope that sufficient time is given to consider the feedback we offer in this response and due consideration given to properly take up the recommendations we make.
- 1.2 SELCP plays a significant role in the wider Lincolnshire economy, and it needs to be underpinned by a robust LTP. The SELCP geography is a national centre in the food chain, right in the heart of the 'UK Food Valley' and has one of the UKs top visitor economies.
- 1.3 In respect of the UK Food Valley initiative, we fully share LCC's ambitions to establish the county as a '10 ten global food cluster'. We are of the view that a well-considered and ambitious LTP is critically important in delivering upon this ambition. South East Lincolnshire is at the very centre of that cluster (42% of employment in South Holland is linked to the agri-food sector, 30% in Boston and 15% in the wider sub-region), and therefore one of the most important areas of the UK food valley geography. The SELCP geography's food industry employs over 30,000 people in Boston and South Holland and is the UK's largest logistics hub for the food chain. A total of 40% of the economic output of South East Lincolnshire is linked to the food sector.
- 1.4 Due to insufficient and substandard rail freight access, our agri-food sector is overdependent on the A16 and A17. The A16 now moves an estimated 18 million tonnes of goods per year and the A17 over 16 million tonnes. However, the constrained single lane nature of significant sections of these highways has resulted in uncertainty, delivery delays and cost to business that we can ill afford to perpetuate in order to not undermine the confidence of our food industry partners going forward. One major local logistics business reports that 44% of their movements are impacted by either a delay on either their respective outbound or returning journey. Local evidence suggests that each minute of delay equates to over £1 in additional cost for local business.
- 1.5 The key problems experienced by businesses on the A16 and A17 network in Lincolnshire are peak hour congestion and delays, resulting in unreliable journey times, agricultural traffic with negligible passing locations, and high accident rates on the A16 and A17.

- 1.6 The Visitor economy in East Lindsey's coastline based around Skegness/Mablethorpe and the inland AONB Wolds has nearly 5 million holiday visitors per year. It also has the fourth busiest seaside resort in England (Visit England). While high season bus services are robust, rail and roads in East Lindsey suffer from a historic lack of investment. Appropriate transport infrastructure investment within the coastal areas and Wolds AONB is fundamental to delivering a shift towards a year-round more resilient existing and diversified future economy, whilst addressing some acute underlying inequalities in respect of social mobility, health outcomes and life changes.
- 1.7 There is an urgent need to diversify and build resilience into the route offer for both the logistics and public transport sectors serving the food and visitor economies respectively reducing reliance on the road for SELCP economies. We have ambitions to make significantly more of rail with new interchanges, and more use of sea through Boston Port and Sutton Bridge Port to reduce carbon and develop infrastructure that further embeds our status as the home of major, modern, and zero/low carbon agri-food and agri-tech sectors. This will need a long term ambitious strategy. The draft LTP5 does not yet cover the full extent of that ambition, but we want to work with LCC to ensure that we can have a plan that can deliver those aspirations.
- 1.8 Boston's Port already processes 1.25 million tonnes of goods per annum and has the capacity to diversify and increase freight throughput creating a viable greener addition to freight movements. The coastal areas and the Wolds, with better rail connectivity, could attract year-round visitors and become home to the county's energy industry. Upgrading rail and more direct road access to the port coast and Wolds would deliver additional bandwidth for freight by Sea and for both passenger and freight by Rail.
- 1.9 Transport infrastructure is fundamental to supporting the social mobility and health needs of SELCP residents. A fifth of the population of the A16 corridor live in areas which are classed as being in the top 30% most deprived areas in England. Our large rural areas are disconnected and force private car use, and the road network around Boston frustrates the flow of the A16 north to south (and in turn, the flow of the A52 from East to West) an issue which has resulted in notorious congestion and the declaration of two Air Quality Management Areas due to exceedances of NOx air quality within the town. The LTP needs to identify urgently and sustainably funded infrastructure proposals that will address these issues.
- 1.10 To avoid perpetuating current issues for residents and businesses, we require a LTP that clearly sets out in a coherent costed timeline how as to how it will improve sustainable and active connectivity and accessibility to jobs, education, healthcare, and other key services.
- 1.11 The SELCP area is the gateway to a significant percentage of current and future importation or production of sustainable energy. With the right transport infrastructure investment it is in the ideal position to locate and create an adaptable and resilient energy network to serve the whole of Lincolnshire. Furthermore, the location of related industries in SELCP coastal areas would bring much needed employment diversification and opportunities for higher paid skilled jobs.
- 1.12 Having considered LTP5, we support the framework defined within themes that outline how LCC will respond to the social, economic, health and environmental, challenges

- that Lincolnshire faces. However, to be effective LTP5, needs to more closely connect to and reference the key subregional projects within these themes.
- 1.13 We have concerns about the ability of LTP5, in its current form, to be the effective strategic document required in a suite of such documents to give global partners, other central government departments, existing businesses, and private sector investors' confidence to continue to invest or award future funding to Lincolnshire. It is worth noting that the LTP5 is being prepared at a time when Greater Lincolnshire is being promoted globally for private sector investment in the agri-food sector, in partnership with the Department for International Trade; an investment case being made on Greater Lincolnshire striving to be one of the most competitive places globally to set-up an agri-food business.
- 1.14 In a post-covid, post-austerity world all authorities have budget challenges. To compete we must articulate our infrastructure vision with words and clear financial analysis, defining within the LTP5 themes: key costed district priority projects; realistic timelines tied to interdependencies; available funding and the strategy to address any shortfalls. The SELCP partners want to proactively work with LCC to attract investment, in the same way have done for Housing Infrastructure Fund, the Towns Deal programme, and the Levelling Up Funding to secure A16 improvements
- 1.15 Our response is structured to mirror the LTP5 order chapter by chapter with the above concerns in mind.

2. Chapter 1. - Introduction

- 2.1. LTP5 may be the one of the first documents that potential funders and/or investors investigate when carrying out due diligence checks prior to making decisions. These checks undertaken to reduce risk to spend, delivery or investment. The section is overly verbose in describing the contents of each chapter/section, and to keep an external audience engaged it could benefit from highlighting key content to come.
- 2.2. It is therefore vital that within the introduction chapter, LCC seek to instil early confidence that LTP5 and all other LCC statutory documents are aligned with the local development, transport, and economic plans of its district authorities, whilst being clear about the headline LCC and district authority total budget requirements committed to deliver key infrastructure projects.
- 2.3. A key omission in the introduction of the draft LTP5 is that the document does not define the A17 as a 'major road' within a Lincolnshire context. The SELCP partners feel that this omission needs to be addressed, given the vital importance of the A17 in a local, regional and national context. For example, A17 is critical within the context of the 'UK Food Valley' given its role in food supply from Lincolnshire, Norfolk, Cambridgeshire and local farms into the processing and distribution hubs in SE Lincs.
- 2.4. Furthermore, the effective function of the A17 (and indeed the A16) is vitally important in reducing HGV traffic through villages and rural communities. An example of a route on which this issue is most pronounced is the A151 between Spalding and Holbeach, where extrapolated data suggests that up to five million vehicles, of which 300,000 are HGV's use this route per annum, creating issues that affect villages such as Whaplode.
- 2.5. Where we have shortfalls in potential funding, we should demonstrate in this chapter that through the Greater Lincolnshire Local Enterprise Partnership, we have strong public/private partnership established. Further that our existing and new private sector partners are investing and need the transport infrastructure identified in this plan to underpin and support that investment.
- 2.6. Central government and other private sector funders need clear sight of ambition and need, potential social and economic returns of investment, and assurance that structures are in place to deliver on investment on time and budget.

Recommendation 1– add top line financial numbers defining investments required, LCC and subregional available funds and the strategy to meet any shortfalls

Recommendation 2 – Insert a reference in the early text to, and create an appendix section where subregional authorities can supply spreadsheet tables defining their key costed projects set against actual short-, medium- and long-term timelines

Recommendation 3 – Insert within the chapter how LCC plans to physically deliver projects with its private sector partners. Give examples of past successes delivered on time and budget timelines, current procurement processes etc.

3. Chapter 2. - This is Lincolnshire

- 3.1. A series of appropriate themed diagrams within a Transport Plan should come together as an overlay in a final key diagram to both identify and justify where priority projects within a region are needed. SELCP are concerned that this final co-ordinated diagram and the text that should accompany it is missing from this section.
- 3.2. SELCP has the potential to deliver significant growth in housing and job numbers in line with current central government targets. To deliver on this potential SELCP is considering a long-term multi-functional infrastructure project that would provide new flood protection, highway, rail, segregated cycle and bus lanes, and high-speed internet access if routed correctly to serve and connect our whole area. This infrastructure project would directly link our coastal tourist to major national rail and road networks, reduce flood risk making commercial and residential development sites viable; and attract new higher paid jobs in different sectors to diversify the coastal economy. Therefore, a diagram demonstrating where flood risk areas are currently and a discussion of the impact a major transport project that could also reduce flood risk would be welcomed.
- 3.3. Other diagrams vital to defining areas of priority investment are ones that demonstrate areas of deprivation and public transport accessibility levels across the region. Some rural and urban areas within SELCP are the poorest in the county and because of a lack of public and/or active travel options have to use private cars as their first transport choice.
- 3.4. SELCP is concerned that the omission of diagrams stated in the previous items, will perpetuate an imbalance of investment perceived towards the urban and western areas of LCC's administrative area. Further investment in the SELCP area is required so as to not endanger the future viability of the argi-food and visitor economies and the health, wealth, and wellbeing of its population.

Recommendation 4 – Revise the number and types of diagrams to include the omissions identified in 3.3 & 3.4. to demonstrate area of need and a clear and direct relationship between priority of investment and that need. Add text to the suggested diagrams and others in the section to demonstrate LCC thinking on how they reach of investment priorities.

4. Chapter 3. – Shaping the Strategy

- 4.1. The evidence-based approach taken specifically over the covid period is useful. However, the SELCP partners are concerned that medium to long-term infrastructure strategy decisions might be based on evidence that in 5 to 10 years' time could be considered a modelling anomaly. We would encourage a strategy shaped equally for both our urban and rural communities tackling relevant environmental, social, and economic issues using wider data sets than those currently referenced within the draft LTP5.
- 4.2. We would also comment that the evidence base does not include data that fully reflects the importance of the road network in transporting freight linked to both local, regional and national industry. These needs addressing, so as to ensure that the evidence base within the LPT5 reflects the huge reliance of the logistics sector in the SELCP area and the wider county as a whole. Capturing and understanding this data is vitally important in ensuring that the LTP5 can play a functional role in making the case for investment in the major roads identified in the early chapters of the draft LTP5, especially the A16 and A17.
- 4.3. In delivering Sustainable Urban Extensions (SUEs), the SELCP partners would like to work with LCC to develop a mechanism to facilitate greater investment in sustainable transport solutions that can serve both new built settlements and the wider rural hinterland, better bringing together policy with evidence of need. SELCP partners would welcome the opportunity to work with LCC to explore best practice elsewhere in the UK, in order to maximise this form of investment.
- 4.4. SELCP is concerned that no mention is made of what the LCC financial contribution would be to help deliver the strategy this needs to be rectified in the final draft even if that figure is Nil. We are keen to work with LCC as equal partners to make the case for the central government funds that need to be identified in this section, and to share in how the making the case for such funds is co-ordinated and resourced.
- 4.5. Regarding the future of electric charging points, we would welcome a county wide survey of current and planned private sector provision in places major petrol station and supermarket locations chains. In various locations in the UK petrol stations like ESSO are already installing ultra-fast charging bays as part of their offer. Encouraging such providers in Lincolnshire to deliver such innovations by removing timely delivery barriers may provide a more cost-effective solution to the public purse. The SELCP partners would welcome the opportunity to work with LCC on exploring this.

4.6. The SELCP partners feel that the future is now. Given the maturation period of developing long term major infrastructure projects to a point of delivery, funding is required now to carry out feasibility, consultation and optioneering work. LCC and its districts will be in a better position to apply for future central government delivery funding, with 'oven-ready' projects. Further working with partners like Homes England, as both SELCP partners and LCC have done so on Section 5 of the Spalding Western Relief Road, could deliver funding to look at infrastructure projects that could unlock significant housing numbers in SELCP and the rest of Lincolnshire.

Recommendation 5 – Ensure datasets being used to determine the future of transport infrastructure in LCC is varied and goes beyond timelines of recent covid impacts

Recommendation 6 – Where SUE's are being proposed introduce a funding mechanism built into the planning consents to develop and support sustainable access for a defined area of rural hinterland adjacent to that development.

Recommendation 7 – Engage to commence work now on the long-term infrastructure projects that SELCP and other districts/councils have in mind, and to support enabling funding applications as required to agencies like Homes England to support feasibility and scheme development work.

5. Chapter 4. – The Integrated Transport Strategy

- 5.1. The policies in 'Theme 1 Supporting economic growth' are laudable in the main. However, SELCP would like clarity inserted into this section outlining the extent of LCC's budgets that are suggested for example in EC3 for smaller and local scale projects that promote local access
- 5.2. Given the extent of the SELCP area that is rural we are concerned the policies in Theme 2 'Future ready green transport' do not go far enough to address this important community need. Given the paucity of bus penetration and lack of safe cycling infrastructure into these areas, we require further thought on how we can deliver improvements for our rural communities.
- 5.3. Our urban public realm areas and roads can go much further in mitigating. We assume it is an omission in Theme 3, but we see no mention of ensuring that all new and renewal schemes of highways and public squares incorporate sustainable urban drainage introducing significant greening back into our urban environments. SELCP would also encourage LCC when looking at renewal or new highways schemes to insist upon permeable materials where possible but especially in pedestrian areas. On ENV5 while we support the idea of mobility hubs, we would welcome clarity on the strategy for creating and maintaining them.
- 5.4. The SELCP partners consider that this section would be improved by acknowledging and signposting to specific projects within the districts that currently meet these policies. Many projects will encompass more than one of the themes set out and it would be useful to have in the appendix, project tables suggested earlier with a column that defines which of the themes are being picked up.
- 5.5. An example of this is the Theme 2 of 'Future ready, green transport'. Climate Change is an important priority for the SELCP, and the partnership is currently in the process of agreeing and publishing a Climate Change Strategy for public consultation, the first joint strategy to be published by the three sovereign councils. The draft CCS has been prepared to align with the corporate priorities of the SELCP and has been informed by the LCC Green Master Plan and from collaboration with the Lincolnshire Sustainability Officers Working Group. The LTP 5 and the integrated transport infrastructure developments should seek to support the CCS for the sub-region and deliver the multiple benefits that can be achieved through strategic cooperation with key stakeholders.

Recommendation 8 – Ensure that all street/place-based schemes going forward have a significant degree of urban greening. Include a requirement for a SUDs programme to introduced which on existing or as part of new schemes requires as a minimum, permeable paving materials to use in pedestrian areas.

6. Chapter 5. – Implementation Plan

- 6.1. SELCP are concerned about the structure of this chapter. In particular how it relates to the previous chapter where policies were set out and defined; and how information is presented in an inconsistent manner i.e. headings and the number of columns varying from topic to topic. They have the appearance of being created by different departments not agreeing on a standard template and the results having been copied and pasted into the document. The impression external stakeholder/funders reading the document may derive is not one SELCP feels is acceptable, if the LTP5 is to be used as a basis to make the case to government for investment.
- 6.2. We recommend one consistent and succinct table per mode preferably disciplined to one or maximum two pages. Currently walking, has different tables depending on whether it is infrastructure, network and connectivity, leisure and tourism, or encouraging and enabling. This should be simplified. The layout for the EV tables most closely resembles an implementation plan and therefore should be used as the template for all other topics to follow. The term policy should not appear on any table unless it relates back to ones established in the previous chapter. These needs addressing in the final document.
- 6.3. Further to better serve the districts, linking this document to their place specific projects, a similar fixed template in the proposed appendix tables mentioned earlier must be created. Additional topic columns such as costs and key risks could appear in the district plans.
- 6.4. The implementation plan specifically mentions feasibility work in respect of E-Buses. Boston has already been identified through a county council study as being a suitable location where an E-bus trial could be conducted. The SELCP partners are of the view that the LTP5 should use the evidence base contained in the E-Bus study and promote Boston as a potential location for an E-Bus trial in the event that funding is made available from government, and would welcome the opportunity to work with LCC on achieving this ambition.

Recommendation 9 – Create a standard template for the modal implementation tables and revise all tables to match. Avoid using the term policy for proposed aims, but where relevant refer to the policies set out in the previous chapter.

Recommendation 10 – The Boston should be promoted in the LTP5 as a location for an E-Bus trial

7. Summary.

7.1. We thank the officers of LCC for their hard work in inviting comments on this draft of LTP5. It has the potential to be the strategic document that SELCP and other districts and boroughs in the Lincolnshire area, require to coordinate delivery and attract funding for vital infrastructure to support our economy people.

- 7.2. However, SELCP feel that it requires a significant amount of editing and reshaping of content to properly reflect and demonstrate in a comprehensible manner, funding, specific projects, areas of need and the challenges to deliver, while also setting out our ambition and ability to deliver.
- 7.3. Lastly therefore we suggest appropriate time is given by LCC to make amendments and allow a further round of comments prior to any adoption of this Transport Plan

Ends