31 October 2019

Lyndsey Cox  
Business Unit Manager  
England’s Economic Heartland Business Unit  
c/o Buckinghamshire County Council  
Walton Street  
Aylesbury  
HP20 1UA

Dear Lyndsey,

Re: England Economic Heartland Outline Transport Strategy Consultation

Thank you for the opportunity to respond to the draft Outline Transport Strategy consultation.

We welcome the vision and support the broad outline of the proposals put forward for a transport strategy for the region, as portrayed by England’s Economic Heartland, (EEH). As well as providing benefits for local residents, businesses and the wider economy, we believe that the strategy will give a steer for the development of a transport network that is increasingly attractive for growing numbers of visitors to the region as well. We commend the work that has gone into the formulation of the Strategy and welcome the realisation of the various schemes contained within it going forwards.

As a Hertfordshire local authority, North Hertfordshire District Council supports and endorses the formal response provided by Hertfordshire County Council, (HCC). As such we would like to officially express our support and endorsement of HCC’s response, (see attached).

In addition, we would like to add the additional comments:

In response to question 9:

In addition to the response provided by HCC would add the additional comments. NHDC believes that greater emphasis should be given to the potential for promoting local public transport links, which when combined together throughout the EEH region have the potential to make a big difference, with regards to providing alternatives to the private car for travel in the region. For example, London Luton Airport, already a major destination in the region, is expected to continue to grow and as such sustainable transport measures need to be introduced now to offset the otherwise likely increase in private traffic in the area, adding to already congested roads, especially in the North Hertfordshire District.

As an alternative, with improved interchange facilities at Hitchin Station between train and local bus services, via one change could provide an attractive alternative for passengers travelling to or from the airport, from destinations in the east of the District and Cambridgeshire, which might otherwise have driven. Schemes, such as these are relatively easy to deliver, don’t rely on the development of new advanced transport modes that may not be delivered for some time, but can make a difference now. No doubt there are similar opportunities elsewhere in the EEH region that could be enacted to make a positive difference now, which should be identified and included to be taken forward.

North Hertfordshire District Council, Council Offices, Gemon Road, Letchworth Garden City, Hertfordshire, SG6 3JF

David Scholes  
Chief Executive  

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As stated in the response by HCC, we believe the A505 corridor presents a key opportunity for growth and would encourage future development such as that being considered by the study that is currently being undertaken by NHDC, HCC, Luton Borough Council and Central Bedfordshire Council, for which we would welcome EEH support and alignment.

Additional comments:

All of the maps throughout the document that show either the whole EEH area or include all or part of North Hertfordshire area should show some of the towns in the District, as currently none are shown. This is especially important given the growing significance of towns such as Royston to the east and the Baldock, Letchworth Garden City and Hitchin towns which are all closely linked, and form part of the Stevenage – Cambridge hi-tech corridor, reflected both in the existing and planned investment in advanced manufacturing in the District.

Yours faithfully

[Signature]

Ian Fullstone
Strategic Director-Regulatory
Response to England’s Economic Heartland

Outline Transport Strategy; Framework for Engagement

Response of Hertfordshire County Council

Date: 31st of October 2019

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Response

Hertfordshire is a relatively new member of England Economic Heartland (EEH), we are facing a range of transport challenges associated with a significant level of growth planned for the County. Our Local Transport Plan (LTP) provides the foundation for our approach to the future of transport for the county, moving away from private car travel and ownership, and towards a more sustainable transport-based solution that supports us in tackling the climate emergency Hertfordshire has declared. The EEH document ‘Outline Transport Strategy; Framework for Engagement’, sets out the scope of a future strategy that will clearly have a significant impact upon the transport solutions being delivered within Hertfordshire and the wider area. For that reason, it is felt that the fundamentals of the EEH strategy must support sustainable transport as the priority for the region to be acceptable.

The document sets out a vision that focuses on connecting people and places with opportunities and services. A key part of this is to bring together the various high-tech clusters in the EEH area. Therefore, to take full advantage of this approach, we are keen to ensure that the strategy fully includes connectivity between all such sites in Hertfordshire, such as the Hatfield Living Lab, the Herts IQ project at Maylands, and the substantial life sciences industry in Stevenage and East Herts.

We welcome the interest in East-West corridors across the EEH geography. This interest mirrors our focus on the A414 and A505 corridors across Hertfordshire, as evidenced in our fourth Local Transport Plan and our emerging strategies for these two corridors (underpinned by the A414 Mass Rapid Transit proposals, Local Industrial Strategy, and growth board programme of work. We are therefore keen to ensure that the strategy
includes East-West corridors across the whole of EEH, beyond the Oxford-Cambridge Arc. Notably we believe the A505 presents a key area of interest and are currently undertaking a study, for which we would welcome EEH support and alignment.

While the strategy focuses on East-West transport, we also note that many of the travel patterns illustrated, such as those indicating HGV movements and commuting patterns – indicate trips northward into Luton and Cambridge and southward into London. The strategy needs to recognise the need for investment in the strategic north-south corridors running north through EEH and south into London, such as the A10/M11/WAML, A1(M)/ECML, and M1/WCML, as well as East-West Rail.

We welcome recognition of the importance of connectivity to key sites outside of the EEH area, such as Birmingham, Norwich, and Felixstowe. However, we would like to ensure that connectivity to and from key sites to the south of EEH are included, as these are important to Hertfordshire’s – and EEH’s – growth. Additionally, we would therefore also welcome the extension of and investment in strategic corridors across the south of EEH to key nodes outside of the area - such as the Port of London, Stanstead Airport, and Greater London.

Hertfordshire County Council - as well as many of our District/Borough councils - have declared a climate emergency. Improving and building new rail and public transport and active travel infrastructure will be an essential part of how we respond to this challenge. In light of this we are planning to include Mass Rapid Transit as the key scheme in our A414 corridor strategy, which we envisage becoming a core strategic public transport route across the county and in the south of the England's Economic Heartland geography and are keen to see this reflected in the strategy. While we welcome support for the East-West rail project, we would also like to see Crossrail 2 - a key project in the London-Stansted-Cambridge corridor - emerge as a priority for EEH to support.

In addition to securing the development of key strategic transport corridors, the emerging strategy also includes proposals that impact on the urban realm and the ‘last mile’ of journeys, such as bicycle lanes, autonomous pods, and cargo bicycles.

We are therefore keen to seek strategic alignment between the EEH transport strategy and our fourth Local Transport Plan (in particular LTP4 Policy 1, which sets out a clear hierarchy of transport so that when travel is necessary, active travel is prioritised, public transport is the next preferred alternative, and single occupancy vehicles as a last resort). Further alignment with the emerging Local Industrial Strategy, and programmes such as Herts IQ and the Hatfield Living Lab will also be important.

In general, this document appears to mainly focus on areas outside Hertfordshire. The emerging strategy needs to include greater reference to the growth corridors, transport challenges and business initiatives in Hertfordshire and our proposals regarding improving transport connectivity, in particular the A414 Strategy/MRT concept. The future vision pages include a lot of ideas that align with our current thinking for transport solutions including transport hubs, DRT and improved public realm, but these visions are very conceptual and delivery in any particular location needs to consider the specific opportunities of that location.

We are aware that EEH have formed a Bus Operators Association which is mentioned briefly as a case study on p104. On their website it states that this is focussing on the Oxford-Milton-Keynes-Cambridge corridor, but it would be useful to know more about this as it may
have relevance to the Enhanced Partnership with bus operators which we are implementing in Hertfordshire and other bus initiatives we may bring forward. A co-ordinated approach to working with bus operators across the wider area will ensure benefits are maximised and any case studies can be learnt from.

Response to specific questions

1. Does the draft vision ("connecting people and places with opportunities and services") provide sufficient focus for the Transport Strategy?

   Whilst the vision covers key principles needed for our region to thrive, it is considered more weight should be given to social and environmental impacts our transport systems have.

2. Is the ambition to have a zero-carbon transport system by 2050 sufficiently challenging?

   Hertfordshire County Council has declared a climate emergency and therefore 2050 should be seen as a minimal target with the strategy seeking to bring forward this ambition. We however recognise the key constraints to this are the development of suitable vehicle technologies and the scale of housing and employment growth proposed in the EEH area.

3. Do the three key principles (enabling economic growth; accessibility and inclusion; quality of life and environment) provide an appropriate framework within which to develop the Transport Strategy?

   Accessibility and inclusion - does not refer to reducing the need to travel (e.g. through use of technology and good development planning). This should be recognised.

4. What are the key factors influencing people’s choice of travel mode?

   We would suggest that the following are key factors: Cost, journey time, convenience, ease of access, quality of user experience, presence of alternatives, information provision and ability to park (both car and cycle) at the destination. For active modes disability, topography and weather are factors. The need / desire to undertake multi-purpose trips (e.g. dropping off children at school on the way to work) is also a key influence.

5. What are the key barriers that need to be addressed if we are to achieve frictionless travel?

   • Understanding and willingness amongst decision makers including the public and politicians of the need to consider radical solutions if we are to reduce reliance on the private car and facilitate attractive sustainable transport solutions.
• Relevant parties working together – public and private sector and the partnerships that will be needed to facilitate this – e.g. Enhanced Partnership for bus operators only gives us certain powers. Challenges of working within powers that we have e.g. with deregulated commercially run bus network and with rail industry.

• Funding availability – sources, private sector, developer contributions, innovative methods of sourcing. This is a particular issue with new passenger transport schemes which are likely to have high upfront costs and require ongoing revenue support.

• The public will need to have trust in the systems that may be required for frictionless travel e.g. that electronic payment systems are secure, and that data will not be misused. Payment systems should allow for cross-boundary travel.

• Information sharing and coordination of timetables between different transport modes.

• Reliability, both actual and any perception by the public, and the barrier to behaviour change that causes notably to public transport.

6. What performance measures should be used to identify the levels of service users require of the transport system?

The key indicators are punctuality and delivery i.e. can you rely on the journey being made to the time specified.

Patronage, commercial viability, economic benefits could also be used as measures but may be more difficult to demonstrate.

7. Should the strategy include and define appropriate ‘nudge principles’ (small changes which can influence user behaviour) to encourage more people to use public transport in the Heartland area?

Yes. We see Travel Planning/Smarter Choices measures as being essential to influence behaviour alongside the provision of new infrastructure / development. Reviews of parking policies and changes to charging regimes are also crucial.

Provision of good information on public transport options is also key.

There needs to be a greater systems approach to delivering the transport network i.e. the infrastructure, marketing and behavioural change methods being seen as one scheme and planned together at the same time. This is the approach that Hertfordshire will be taking for its Sustainable Travel Town programme.

8. What weight should be given to the changes in travel demand arising from the delivery of transformational infrastructure?

The strategy needs to be bold and include transformational infrastructure even where traditional appraisal techniques do not show a good BCR. Alternative appraisal
techniques need to be used in tandem, including evidence where delivered schemes have had additional positive benefits.

‘Transformational infrastructure’ implies infrastructure that could affect travel demand significantly – important if could enable sustainable growth. Obviously impact of any such schemes will need to be assessed through appropriate modelling and include measures to encourage use of sustainable modes.

9. What weight should be given to the potential of the rail network to accommodate a higher proportion of future travel demand?

Hertfordshire County Council’s view is that rail is an important part of the transport network. The county accounts for 43% of all rail passenger in EEH, and over 15% of journeys to work made by Hertfordshire residents are by rail.

The rail network will be a key element of the future transport network where there are large commuting flows. This includes flows between the major EEH settlements and to key external locations. The need to enhance capacity and reliability for flows to/from London should be a key part of the strategy.

Future rail proposals such as HS2 and Crossrail2 offer new opportunities to improve local rail services and enhance capacity within Hertfordshire.

The rail network needs to be part of a wider transport network i.e. needs to include bus and mass transit connections. Hertfordshire County Council is also supportive of the concept of the Capital Regional Transport Body concept, where local authorities around London will have a formal input to how London cross-boundary public transport services are planned and delivered.

The Framework for Engagement document puts too much emphasis on East West Rail, which does not address all the rail connectivity issues within EEH.

The other key factor is the need to enhance intercity connections from EEH to major cities to the north. In recent years the number of direct trains from Stevenage and Watford have been much reduced.

The approach to rail appears to be in isolation to other transport modes. The approach should be one of a transport package, with integration with the full range of transport modes. This should include both multi-modal journeys as well as last mile solutions.

The commissioning of a separate rail study is welcomed.

10. Have we identified the key strategic transport corridors?

No – this section focusses on East West Rail and other areas in the region. The need to improve East-West connectivity is a key issue in Hertfordshire – particularly
along the A505 and A414 corridors where we are developing strategies to identify key infrastructure requirements. It is essential that these corridors are recognised in the strategy as they are likely to be focus of our pipeline of major schemes.

The north-south strategic corridors section identifies two of our STIB/LEP recognised corridors, but there is no recognition of the A10 or A41 corridor.

The East Coast Main Line, Midland Main Line and West Anglia Main Line have not been adequately recognised.

The A414 going through Hemel isn’t shown on the figure on page 42. This needs to be shown as it is the start of corridor across Hertfordshire. There is also no recognition of the A10 on this figure. We would want STIB/LEP identified corridors through Hertfordshire to be shown.

Main corridors of connectivity shown in white – not a clear way of showing corridors in Herts where corridors are geographically closer.

11. Are there specific issues that should be taken into consideration as part of the connectivity studies?

Studies appear to focus on areas outside Herts but may still have implications for our road network – so wider impacts should be considered.

One area of critical importance will be the provision of infrastructure for freight, such as suitable HGV parking facilities. Due to the strategic nature of freight transportation, we feel this is a key area EEH could identify where provision is required to meet the needs of the freight operators.

The transport strategy should be the connectivity study for the whole of the EEH area if it is to have any meaning. The focus purely on an Oxford – Milton Keynes – Cambridge corridor misses larges parts of the EEH area and doesn’t reflect the need for connectivity to areas outside of EEH as well as within it. The current proposals run the risk of creating a two-tier area.

12. To what extent should we look to the growth in digital services to change the nature and scale of future travel demand?

Digital connectivity has significant potential to influence travel demand - in relation to reducing the need to travel, in how we access transport services (mobile apps), operation of transport services themselves (real time information, AVL on buses), and better use of available data – so very important to look to digital solutions.

13. What are the core connectivity requirements for businesses operating from the region?

We would support measures that improve sustainable access to workplaces
14. What are the key performance measures for the Transport System from a business perspective?

The reliability of the network has always been a key concern for Hertfordshire businesses. They would prefer slower but consistent journey times on the road network rather than the large variation in journey times that currently exist due to congestion.

Another concern for businesses is the accessibility by other modes of transport (particularly rail) giving them access to larger labour markets.

15. What measures should the overarching Transport Strategy include in order to enable the potential that exists within the four Grand Challenges of the Industrial Strategy to be realised?

An ageing society – measures to ensure access for all for any new transport solutions.
The future of mobility – measures that involve the use of technology to reduce the need to travel and improve the sustainable transport offer.

16. To what extent is investment in digital infrastructure more significant and/or urgent than physical infrastructure?

Digital infrastructure is a key requirement to enable smart transport and mobility services; the use of technology and innovation requires a digital network to communicate data. As we move towards connected autonomous vehicles, IoT devices and other disruptive trends, the requirements for increasingly sophisticated DI will continue to increase.

Different levels of DI are suitable for different mobility services. For example, the development of a 5G network can enable autonomous vehicles but is not necessarily required to enable IoT devices. The level of digital infrastructure should reflect the requirement from the use-cases.

However a key barrier to the deployment of digital infrastructure is the clear absence of strategic direction. As a county council, we do not fully understand the potential use-cases and specifications of emerging digital communication infrastructure.

‘Digital Infrastructure’ as a term is also open to interpretation – it can mean the digital assets on the network, such as wayfinding or navigation displays, or is can mean the communication networks that enable the movement of data.

There are however gaps in physical infrastructure for passenger transport and active travel modes across the area (particularly for East West connections). These need to be addressed in order to provide a fully integrated transport system.
17. How will the way we access goods and services continue to change, and what are the key issues that need to be addressed in the Transport Strategy?

Continued expansion of services available on the internet and via mobile apps. In relation to transport – growth of MaaS and the evolution of the sharing economy leading to reduced car ownership. Locations of business are changing as less tied to traditional markets and some are benefitting from more flexible patterns of working which may change patterns of travel.

18. What freight and logistics services are important for people and businesses? For example, accessing goods (via delivery or in person); a thriving high street; access to health, education and leisure facilities?

This is likely to vary by area typology, and the requirements of the transport systems should be identified at the beginning of any studies undertaken.

As already noted, the identification of regional freight infrastructure is a crucial area where EEH’s geographical scale would suggest it is ideally positioned to lead on future planning.

19. Just in time and last-minute operations are affecting the way people and businesses access goods and services. How should this growing trend affect the way we plan transport now, and in the future?

This is a relatively recent innovation and potentially leads to inefficiencies and additional vehicle trips on the network which we should not be seeking to encourage or address. The advent of 3D printing technology may potentially reduce the level of such operations in the future.

Development of multi modal hubs and centres for parcel / goods pickup present a more efficient way of accessing personal parcel deliveries and should be encouraged.

Freight consolidation centres with use of eco-friendly vehicles for first mile /last mile element to deliveries may be an option in certain locations.

20. Is the approach to investment the right one? If not, why not?

We recognise the need to prioritise and target investment. The regional policy scenario model is a useful tool to support this but should not be the key determiner of the decision of where to focus investment.

A single pot approach to funding is welcomed. The balance between capital and revenue funding is a particular challenge for passenger transport schemes.

It is unclear what opportunities local authorities would have to get schemes on the preferred scenario list.

If the focus for investment is the strategic corridors, then it is essential that all the key corridors are included in the strategy.

We welcome the proposed multi modal approach to investment.
21. Is the approach to delivery the right one? If not, why not?

The ability to have a more coordinated approach with access to a number of potential delivery partners is welcomed.

Future Visions

P21 High Street Future vision - Are the elements in this future vision a) achievable, b) attainable, c) desirable?

There is still the need to maintain bus accessibility in central areas but there are challenges involved in delivering appropriate balance of improving public realm and conditions for walking/cycling and maintaining bus accessibility. Would support aspiration for greater bus priority – definitely desirable, but in order to deliver sufficient priority to make bus services attractive compared to the car likely to mean difficult decisions have to be made which involve radical changes to uses of some roads – need wider understanding from the public and politicians of why this is necessary.

P33 New Housing Development Future Vision - Are the elements within this future vision a) ambitious, b) attainable, c) desirable.

1. Attractive high occupancy rapid transit route, connecting to the rail network to relieve pressure on existing roads.

Not clear exactly what this means. In situations like the one shown, where rail station is a distance from the development and access to major road network is closer, may be challenging to make public transport journey involving interchange attractive compared to the car. Franchise agreements with TOC’s can include car parking increases that could undermine overall transport objectives for an area - availability/cost of parking at the station can influence how attractive rapid transit route is. There is a challenge of improving journey time by limiting stops but having enough boarding points/stops to maintain accessibility. Challenges involved in incorporating enough priority measures for rapid transit routes and the radical changes that may be necessary to the road network that may be needed.

1. Smart highways technology facilitating rapid public transport provision

Again not sure what this means from just the picture. No 2 appears to show a motorway – so does this mean giving priority to long distance coaches?

1. Local hubs at centre of new communities combining transport and civic functions.

Making interchange easier between sustainable modes is desirable but need to think what needs to be included in these hubs and how they will work. If these facilities are only in local hubs, will people walk/cycle to use them rather than using the car –
depends on balance between the two. Hubs need to be in locations that make sense in terms of the transport network as well as urban function. Land availability restricts where hubs can be located within existing areas. Ideally hubs should be located close to shops, schools and other community facilities.

1. **New transport hubs incorporating rapid transport, rail, local bus routes and cycling infrastructure.**

Depends where development is in relation to existing infrastructure. We should also focus on improving quality of existing interchanges and sustainable access to them.

7) **Communities and urban extensions along the new transport routes.**

Would support principle of development where is greatest accessibility by sustainable modes, and for transport considerations to be high on the agenda in terms of determining whether a development site comes forward. Sites that we cannot integrate well into existing transport networks are less likely to be sustainable in the long term.

Connections to the nearest existing towns are also crucial. These should focus on active travel and passenger transport.

8) **Consolidation centres adjacent to the road network providing first mile/last mile logistics hubs.**

Could be contrary to Local Authorities ambitions to attract range of businesses e.g. offices often preferred to warehousing/logistics hubs.

9) **Driverless on-demand delivery vehicles operating from consolidation centres to remove large vehicles from urban roads.**

Does this work both in technology terms and in terms of business case for the company involved? Not all deliveries could be done this way – larger objects/those needing moving/handling/installation couldn’t be done this way.

**P76 Business Park Future vision – Are the elements in this future vision a) ambitious, b) attainable, c) desirable**

‘Highways redesigned to support a reduction in private vehicles, freeing up the street section to support walking and cycling.’

See comments on p21 - Still need access by bus to key destinations.

‘Introduction of a system of on-demand shuttle pods connecting to local transport hubs/stations’

Technology still in early stages. At the moment small minibuses cost per passenger is more as still have to use a driver – cost would be more competitive if were driverless but still need more vehicles to transport same number of people than regular bus/tram etc – needs to be consideration of which model would work in what circumstances.

‘Removal of at-grade car parking frees space for creation of new public spaces....’

So parking would be undercroft/roof or not at all, or park-and-ride? Would be difficult to persuade private sector businesses to give up their parking space for development without financial incentives.

‘New mixed-use buildings on former car parks, introducing local shops, coworkspace and residential uses.’
Would support mixed use – would reduce need to travel and coworkspace would better reflect move towards flexible working. Mix of uses ensures vitality throughout the day but assumption that people may live and work close by may not be realised as there are many other factors which determine where people live (e.g. cost of housing, schooling, presence of wider family, desire to have separation between home and work).

‘Provision for local deliveries to be made by electric/hydrogen vehicles on side roads.’
Delivery vehicles would need planned access routes.

‘Airborne delivery by drones’ would require docking / collection areas. There are currently a number of legislative barriers to this model.

**P86-7 Rural Setting Future Vision – Are the elements in this future vision a) ambitious, b) attainable, c) desirable?**

1. Local Transport Hubs, at the centre of rural communities, gathering together other civic functions.

Yes, although still does not solve fundamental problem of lack of critical mass within smaller settlements to support frequent bus services or indeed other services such as shops and pubs.

2. Rural bus routes supported by digital interfaces and payment systems, supporting mobile payments and on-demand bus stops.

Not everyone is able/comfortable with using technology – may exclude some people. Currently many rural bus services struggle for commercial viability due to lack of critical mass necessary within smaller developments to support viable services. Best served settlements are those on inter-urban routes between larger settlements. On-demand services would still need a minimum number of people sharing in order to be viable, and may struggle to gain patronage as the nature of the service makes them potentially less visible than traditional bus services. The vision shows a rapid shuttle bus route – not sure if this means rapid due to limited stop or due to bus priority measures. If it means limited stop, obviously limiting numbers of stops may reduce patronage if stops are over reasonable walking distance and may again exclude some less mobile people. Agree however that innovative solutions need to be looked at to link smaller settlements to hubs where a wider range of transport options can be offered.

6. *Segregated cycle routes* – may be difficult to obtain funding for off road cycle routes with less demand due to lower population in area.

7. Supporting development of brownfield sites within rural communities through improved public transport connectivity.

Development along existing transport corridors within smaller settlements would be preferred so as to add patronage to existing rural bus services and potentially improve frequencies with developer contributions.

**Other specific comments**

P10 map needs to show East Herts and Broxbourne
P22 map needs to show East Herts, Broxbourne and the A10 corridor

Pg. 24 – Development of a new orbital ring road is only a good case study if it also includes the provision of improvements for sustainable transport modes. Otherwise it is simply building more road capacity which may attract more traffic.

P25-27 Improving end-to-end journeys, integrated ticketing
Idea of first/last mile connectivity and access to transport nodes – challenges involved around how to make overall journey attractive compared to car. DRT still an emerging technology, opportunities for integrated ticketing presented by Enhanced Partnership, although challenges involved in relation to revenue apportionment for any integrated ticketing products.

P38 – map should show East Herts and Broxbourne districts and A10 corridor and Greater Anglia rail line.

P42/43 Immediate strategic infrastructure priorities
See comments for Q10. This map focusses on road/rail improvements – what about other sustainable transport interventions - e.g. Herts Mass Rapid Transit. Why does the map not show the A1 as a freight corridor? The map also cuts off East Herts and Broxbourne districts and the A10 corridor which is key for freight.

Map should also show Hatfield Business Park as Digital creative (University / Ocado) There is also a cluster of hi-tech space science companies in Stevenage (e.g. MBDA)

P44 Current journey times by public transport – Oxford
Methodology – assumption that max distance people are prepared to access public transport is 800m (bus stop/train station) – we use the 400m criteria for access to a bus stop, but whilst the 800m distance for rail stations is mentioned in the same IHT guidance that the bus stop distance is set, we do not use this as people do access stations from further away than this particularly if access by car is included. Maximum distance people are prepared to travel to interchange between public transport services is 500m – would be useful to know if this is based on any research or if is just an assumption in the software used.

P54 – Photos are overlaid strangely – it looks like the bus station has been flooded!

P56 Current journey times by public transport - Luton
Improved connectivity for Luton has implications for Herts - significant growth to east of Luton in North Herts, Luton is a key source of workers for Maylands business park in Hemel Hempstead in particular.

P81 There is a need for a greater understanding of logistics hubs and HGV parking. Ideally the transport strategy should identify current provision and the gaps.

P104 Case study - Integral role for the regions bus operators.
Would like to know more about this – likely to be relevant to our development of an Enhanced Partnership in Hertfordshire and initiatives that we bring forward. According to the EEH website this covers the Oxford-Milton Keynes-Cambridge corridor – but may give useful case studies for our area.
We thank EEH for the opportunity to respond and be part of this process and look forward to continuing to do so as the strategy for our region develops.