



North East Combined Authority Local Transport Plan Consultation January 2025

We are the Newcastle Cycling Campaign. We are a constituted group of over 1000 members, both individuals and families, who campaign for a safe, segregated, connected cycling network in Newcastle upon Tyne.

We would like to thank you for the opportunity to comment on your Local Transport Plan.

In responding, we are representing the views of our many members, but have also encouraged them to respond individually as we know you are keen to hear a wide range of voices.

Ambition

“To create a green, integrated transport network that works for all.”

We agree with and support this ambition wholeheartedly.

Principles

“LTP holds the principle that making any form of journey in the North East is good.”

We strongly object to this principle. It is simply not true that making any form of journey is good. All journeys have some form of cost both financially and in terms of time, convenience, environmental, and health and wellbeing. This statement prioritises the



benefits of travel over and above costs and makes the massive assumption that any journey “stimulates the local economy and improves the physical and mental wellbeing of our people.” and therefore outweighs any disbenefits.

“Transport is a means to an end, a way of being able to do the things that make up our lives.”

Neither does transport simply enable us to do the things that make up our lives. Sometimes these things can be achieved without travel or by travelling less, and sometimes the means of transport has its own benefits. Walking and cycling for transport is a perfect example of this. Time associated with transport is often considered to be “dead time” whereas active and sustainable transport can serve a purpose in and of themselves. It is physical activity, enhances community relationships and improves health and wellbeing.

Conversely the negative externalities of some forms of transport pose a serious threat both to the health and wellbeing of North East residents and our ability to meet our legally binding climate change and pollution targets.

We should strive for an efficient transport system that maximises the benefits of necessary travel whilst eliminating or minimising the negative consequences, where they exist.



Climate Change

Traffic Reduction Target

As you are aware, the UK has legally binding climate change targets. As well as this, many individual local authorities within the North East have declared a climate emergency with a target of reaching Net Zero by 2030.

From your own reports:

In the North East region, transport takes up the largest percentage of emissions at 30%, which is a higher proportion than in the UK as a whole (where transport makes up 26%).¹

and

Transport contributes a significant proportion of carbon emissions. Approximately 97% of transport generated greenhouse gas emissions in our region are from roads, with A-roads being the greatest contributor.²

It is clearly acknowledged therefore that transport on roads, that is motor vehicles, are a huge contributor to greenhouse gas emissions in the North East.

This transport plan should acknowledge that reducing the need to travel has to be the first commitment and following from this, the Greener Journey's Decision Tree should begin with the question "Does this journey need to be made?"

It should also be stated clearly that there is an urgency to meet our climate obligations and that there is a need for change to occur swiftly, most of it within the current and subsequent term of office.

From the Integrated Sustainability Appraisal prepared for this Local Transport Plan:

*It has previously been shown that **measures to reduce traffic demand will be most important during the 2020s and early 2030s**. The LTP contains measures that will impact on travel demand over this period, but it will also be important to consider complementary measures to further motivate travel behaviour change, including (for example) parking and other demand management policies.³*



Because of this we believe that “supporting people to make greener journeys” does not go far enough:

“Across the region, an overall 20% growth in traffic is forecast between 2020 and 2050, which will exacerbate the challenge in reducing transport user carbon.”⁴

With traffic growth in the region forecast at 20% or more, what is needed is a target of traffic reduction and an associated plan that does more than invite people to “make the right travel choice”.

*There is clear evidence that complementary measures are needed to encourage people to make more sustainable travel choices. **The provision of improved active travel and public transport facilities is often not sufficient to encourage the scale of mode shift needed to address the decarbonisation challenge.** The CAP showed that measures to manage travel demand can be highly effective in motivating people to modify their travel choices. At present, the LTP contains very little information on it.⁵*

We would like the North East to follow other areas such as Oxfordshire and York in having a specific target for traffic reduction and a plan to achieve this, incorporating such ideas as workplace parking levy.

Refuse Capacity Building Road Schemes

Whilst the guidance for Local Transport Plans has yet to be published, it suggests that publishing Quantifiable Carbon Reduction targets should be part of the Local Transport Plan and that the carbon emissions of infrastructure should also be considered.

*In addition to user emissions, we also want to encourage the consideration of **infrastructure carbon emissions** associated with both interventions set out in the LTP and the maintenance of existing infrastructure.⁶*

Again from your own reports there is significant concern that the outlined enhancements to the Strategic Road Network may induce traffic, contributing to the projected increase in traffic and making it harder to achieve our climate change targets.



There are 32 road-based schemes in the Delivery Programme, from which there is a significant potential risk of induced traffic. It is strongly recommended that these schemes are reviewed in more detail, to address this potential risk. ⁷

We suggest that the plan also includes a commitment to refuse any capacity building road schemes.

Safety

Vision Zero

We welcome the aim of drawing up an action plan to reduce the number of road casualties on North East roads by 2040, however suggest that this needs to go further.

We would like to see the development of a Vision Zero Strategy in conjunction with both the Northumbria and Durham PCCs.

This approach should encourage local authorities to be proactive and take a safe systems approach to implement changes before deaths and injuries occur. We highlight the tragic and utterly preventable death of John Liddle where a Prevention of Future Deaths Report ⁸ by the coroner has been sent to Gateshead Council requesting that they reduce the speed limit on this stretch of the A694. The change in speed limit is currently under public consultation. To achieve Vision Zero we need to identify and address issues before tragedy occurs and take swift action.

Safe Streets

We would like to see in the plan an appreciation that there are areas where motor traffic is permitted but it is not appropriate to prioritise it over the liveability of the area. While this included briefly in the standards outlined in the plan (oddly under standard 19 which is about ensuring integrated transport meets legal accessibility requirements) it is not emphasised. It's important that there must be a commitment to ensure that quiet roads do not become an overflow for the Key Route Network and that the KPI to improve speeds on the KRN isn't achieved at the cost of increased traffic on roads outside the KRN.



It is also important that changes to the transport system are supported by the police with a co-ordinated approach from the Combined Authority and both Police and Crime Commissioners and that a consensus is reached on the position of the police on these schemes. Currently police frequently have a negative or at best cautious approach when commenting on design elements that restrict through traffic. It is essential that an evidence based approach is taken.

Improving safety is also necessary in locations without obvious casualties as perception of danger restricts and prevents active travel with negative consequences. We remind you that every active journey starts at a front door and so ensuring that the streets on which we live are quiet and safe is imperative to enabling active journeys. While an LCWIP may outline strategic routes to be prioritised, every route needs to be safely accessed, and these initial stages can be major barriers.

Many have already been included within the plan but we would like to point out the barriers of (although this list is not exhaustive):

- road design that makes it difficult people to cross safely and so reduces mobility and independence,
- multi stage crossings that are slow and encourage risk taking (or discourage active travel due to time cost),
- residential roads that are open to through traffic and discourage community interactions and doorstep play,
- speed limits that increase risk, discourage active travel and increase noise pollution,
- wide roads where perception of speed encourages risky driving,
- parking which reduces visibility when crossing, again reducing mobility, independence and increasing risk taking,
- cycling barriers which slow riders down in specific areas and have the unintended consequence of increasing the opportunity for crime,
- absence of dropped kerbs that make wheeling difficult and so reduce access and mobility,

Therefore we would also like to see support and funding for safety interventions such as:

- reducing speed limits
- skylighting crossings
- removing barriers on cycling routes



- dropped kerbs

These are just as important as large-scale capital schemes but are often overlooked.

Route Design

We would also like to see safety included in the development of LA LCWIPs and funding bids to ensure that they do not avoid difficult and potentially controversial cycling schemes that seek to reallocate road space, in favour of routes that divert people cycling through parks and down back streets. This is particularly important when encouraging women and girls to take up cycling.

While wagonways and parks can be a delightful escape from urban life on sunny summer days, they are intimidating and frightening on dark mornings and evenings. Equally, at night quieter roads invite speeding and more dangerous driving and may not be always be a safe route.

Storage

We would also like to highlight the need to ensure that secure cycle storage is safe and accessible regardless of the time of day. This is critical to the safety and perception of safety by users. Windowless cycle cages, particularly those currently in multi storey carparks, with little natural surveillance are intimidating and frightening. Equally many destinations such as shopping areas have cycle parking tucked away out of sight.

We hear concerns about being followed into storage areas and how to access assistance once inside. CCTV is helpful but is not a replacement for help in the moment. Consideration must be given to location and design, particularly at public transport hubs.



KPIs and Delivery

Targets

“Due to the infancy of the North East CA any implementation of specific targets for KPIs is likely to become quickly outdated as our region realises its potential as a combined authority. Therefore it has initially been decided to move forward with directional targets, with the intention to review and potentially introduce more specific targets in the future.

We disagree that specific targets at this point are a pointless exercise. Targets can be always be revised and their ambition strengthened. Delivery of many of the schemes will be the responsibility of individual authorities. As things stand there is no guarantee that they will take place or that they will deliver the changes needed. It is impossible for Local Authorities to develop transport plans and their own targets without a clear understanding of their individual contribution to the goals of the region as a whole. Without individual responsibility how can NECA hope that this plan will be successful? There is no mention of either incentives or consequences for Local Authorities to deliver schemes or contribute to the overall regional target. Our concern is that some schemes could be politically difficult and simply avoided.

The plan needs specific, measurable, timebound targets, broken down for each constituent local authority so that they can be held accountable for their contribution to the success or failure of this plan.

We would also like to see these targets being meaningful enough to actually deliver real change. For example a target of decreasing the annual mean levels of NO₂ and PM_{2.5} may never achieve reductions at some of the worst pollution hotspots in the region. Local Authorities should commit to work together to identify and reduce their most highly polluted areas.

Equally a target of reducing CO₂ emissions per capita when the North East population is expected to increase ⁹ could actually result in an increase in overall CO₂ emissions. Given the legally binding targets which the North East must achieve, this target is simply not strong enough to meet our legal obligations.

Priorities

There is no mention in the plan or priorities for these interventions.



The Mayor's Manifesto stated *“we'll start by working with local authorities to make sure it's safe for families to walk or cycle to school.”*

While we notice in the delivery plan that there is some Behaviour Change and Active Travel funding for School Streets in the region this programme isn't to be fully delivered until 2030 and so hasn't had the priority that we anticipated from Manifesto pledges. The school run is a key a priority for many women with families. Women often make more frequent, shorter journeys – trip-chaining – due to the nature of the demands of caring responsibilities, often alongside work. To support cycling for these journeys, the evidence shows that it is cycling facilities (e.g. segregated cycle lanes) that have the greatest impact.¹⁰

Equally prioritising active travel interventions around schools enables children to make active travel choices from a young age. Whilst we recognise that this is unlikely to contribute substantially to the overall reduction in CO₂ emissions, we believe it should be prioritised due to the substantial benefits to levels of physical activity, health and well-being.

Travel choices also have consequences for how children mature, removing vital opportunities to explore and experience their neighbourhood. Compared to children who walk and cycle, children who travel in cars have less knowledge about their neighbourhoods, have fewer opportunities for outdoor play and exploration and gain less experience in assessing risk and becoming independent.¹¹

This also particularly impacts girls who are less likely than boys to participate in sport as they get older.¹² For them, active travel is an important alternative to competitive sport as a means of achieving the recommended levels of physical activity.

It should be noted that children without mobility needs only qualify for free school transport if:

They go to their nearest suitable school and any of the following apply:

- the school is more than 2 miles away and the child is under 8
- the school is more than 3 miles away and the child is 8 or over¹³

Without safe cycle routes, travel to school has the potential for both a financial and/or time cost. When attempting to reach faith or independent schools the likelihood that this will involve a substantial journey only increases.



Elsewhere in the plan there is no indication of priorities, particularly should funding not be as expected. We believe these priorities should be clear and be based on the interventions that make the largest contribution to the objectives of the plan.

Reporting Progress

“We will monitor and evaluate progress towards meeting these KPIs and report on this on a yearly basis.”

In the delivery plan it is stated that progress will be reported to North East CA’s Cabinet on a regular basis. In addition we believe that NECA has a responsibility to report back to the people consulted and to hold individual authorities to account. Monitoring, evaluation and accountability is what ensures any plan is successful.

We suggest that this process be as public and well promoted as the initial consultation.

What Should You Measure?

We are also concerned that the KPIs are restricted and not measuring some of the key outcomes from the proposed standards.

Noticeably lacking is any KPI for measuring the perceived safety of women and girls on the transport network. There is the opportunity to measure this using the perception and harassment data from the ONS Opinions and Lifestyle survey.¹⁴

Specifically with regards to cycling, evidence shows that a good cycling network is demonstrated by equal numbers of men and women cycling. While this may be difficult to establish via the national Travel Survey due to small sample sizes, an easier metric is that evidence shows when 7% of journeys are cycled¹⁵ it is seen that this is a threshold for equal numbers of men and women cycling.

The current KPI is simply percentage of journeys made using sustainable travel, making it hard to identify how much we have improved the take up in active travel, never mind whether we have achieved gender equality. If you are serious about improving safety for women and girls, it is imperative that this is measured and reported against.



FOR A CITY WITH SPACE FOR CYCLING



We recommend a KPIs that assess progress against perception of safety for women and girls and that have a target for cycling that would suggest we have achieved equal access for men and women.



Ambitions/Service Standards

Planning journey/informing users/supporting customers

1 Information, help, or assistance should be easily available and accessible to everyone before, during and after a journey.

This should include any cycle network. Wayfinding can be difficult, particularly when routes end abruptly and often prior knowledge of the area is needed to find safe and quiet connections. This should also include information about accessible cycle storage at destinations and if ebike charging points are available. Customer support for an integrated network would include route-finding support.

2 Live journey information should be accurate and consistent wherever and however it is being accessed. It should be presented in a way which is understandable and trusted by people.

When disruption is suggested on a particular route it is often only aimed at people driving with little or no information for those walking or cycling. Not only would it be helpful to understand if other modes are disrupted, but would highlight the additional resilience in these modes of travel.

3 The integrated network should have a strong identity to give confidence in the network and encourage people to make greener journeys.

We agree and would like to see agreement across the region on colour, standards and signage for cycle tracks as well as accurate mapping of the network.

Ticketing and fares

4 Fares and tickets should be as simple and easy to use as possible

We agree and would like to include here that access to cycle storage, particularly at public transport hubs should be ideally accessed using one system. Currently different providers (Railway stations, local councils etc) require separate applications in advance



of travel and issue separate fobs to gain access. This must be simplified. Requiring application in advance excludes visitors and tourists. Thought should be given to charging to ensure that cycle parking for families is not cost prohibitive and unintentionally dissuades active travel as a first choice.

5 People should be able to travel across the whole region, between rural and urban areas, incorporating bus, Metro, rail and the Shields Ferry without needing to buy multiple tickets and with payment methods that enable seamless travel.

See above

Reach and Resilience of infrastructure

6 The geographical reach of the integrated transport network should extend into every community of the North East, including our rural and coastal areas.

With many of the regions current P&R sites sitting empty most of the time, Park and Ride provision should start out considering routes, access and secure storage options for cycling and micromobility. These are less costly both in terms of budget and environment than large parking lots which may increase vehicle miles travelled. ¹⁶. We agree that the current cycle network should be expanded with priorities given to routes that lead to and from public transport hubs. These are traditionally challenging areas to access by cycle.

7 To support the development of the integrated network, there should be a joined-up approach to transport infrastructure investment and spatial planning.

We strongly support sustainable travel links to new housing and employment areas. However, currently where this happens there is often lip service or a lack of enforcement meaning that cycle lanes become free parking areas and routes are short, tipping riders out onto a main road at the earliest opportunity.

It is critical that an effective LCWIP identifies potential sites, prioritises links timeously and considers design features that will ensure the space is used as intended.



8 Transport services should meet the demands of people, accommodating shift patterns for work and late evening social activities, enhancing the reach of the network.

This includes, as a matter of urgency, safe cycle routes that are well lit, smooth, direct but avoid major roads. Fewer drivers at night does not mean less risk. With public transport often not running, those working shifts or in the nighttime economy have reduced options when deciding how to travel to and from work.

9 There should be strong transport connectivity beyond our boundaries for both people and freight.

It's not clear here if the Key Routes Network will also include walking and cycling routes.

10 Infrastructure that enables people to walk, wheel or cycle should be central to the transport network and should link to public transport for longer journeys.

We completely agree with this statement. We would like to ensure that not only should the infrastructure be joined-up but as per LTN 1/20 it should be direct and inviting. Currently many routes are circuitous, giving priority to on road motor vehicle traffic. Flow of motor traffic is also prioritised with people walking and cycling often restricted to lengthy multi stage crossings with an inevitable delay because there is always a need to request to cross before a light turns green. It is not enough to say routes should be connected. Wherever possible priority should be give to people walking, wheeling and cycling to improve their journey times and reduce delays.

11 The network should be able to deal with disruptions, accidents and extreme weather more effectively.

It's good to see the ambition to secure maintenance funding for different types of infrastructure. This must include pavements and cycle tracks, not only to ensure that they remain useable after general wear and tear, but also improving routes that are impacted by extreme weather events such as those that send users through flood-prone underpasses with no safe alternatives. It is also important for pavements and cycle tracks to be cleared regularly and gritted as necessary.



12 Our high way network should provide essential access to all areas of the region with particular emphasis on rural and coastal communities who often bear the brunt of disruptive weather patterns.

This should not just be about roads but also walking and cycling infrastructure.

13 Charging infrastructure for Zero Emission Vehicles (ZEVs) should be present across the whole network, including at key stations and interchanges and rapid charging hubs.

It should be firmly stated within the plan that this should not take up space from pavements and cycle routes causing crash and trip hazards. There should be consideration when placing EV charging on if it will “bake in” parking in an area where parking reduction or cycle lanes should be prioritised.

Charging infrastructure for ebikes should also be included in this section, particularly at stations and interchanges.

14 Capacity should be boosted on the East Coast Main Line and Durham Coast Line to meet out need for more long-distance rail passenger and freight services, supporting strong connectivity beyond our boundaries.

We agree.

Safety, especially of women and girls and other improvements in service quality

15 There should be clear and effective channels through which to report harassment and violence against women and girls on the network.

This should not simply be about public transport. Women and girls, particularly when cycling, regularly face abuse. The London Cycling Campaign recently highlighted this issue ¹⁷, but we hear similar stories from our members with many stating it occurs very regularly. This would partly be addressed by segregated, connected cycle routes that remove the conflict between those cycling and driving.



However, it is also important that this is extended to “quiet” roads that are used as shortcuts to bypass main roads at busy times by reducing the opportunities for traffic to travel through areas not designed appropriately. We particularly find that abuse and/or aggressive driving is worst when a perceived time saving shortcut is slowed by someone cycling.

16 Targets action should be taken and resources assigned to prevent violence against women and girls on the region’s transport network. This should cover preventing offences from happening but should also look to tackle the root causes of violence and prevent it from developing.

We would also support a campaign to raise awareness of the seriousness of violence and aggression towards cyclists, particularly women and girls, and supported by the relevant police authorities.

Many drivers are unaware of how to safely drive near/past people cycling. Whilst Bikeability training (given to children) trains people cycling to cycle defensively in order to keep themselves safe, this can then be interpreted as “selfish” and used to justify dangerous behaviours.

Fundamentally however, the provision of safe segregated infrastructure and quiet residential streets where motor vehicle traffic does not have priority is the best way to reduce violence and aggression towards women and girls.

17 Women and girls should have increased trust, confidence and perceptions of safety of the transport network.

We agree and support these suggestions. We would also like to highlight the need for a way of reporting areas where change is needed. While the ambition is admirable, many of these interventions will be implemented by councils with few resources available to extensively audit their areas and will need to rely on the public to make them aware of interventions that are needed. Currently the process of contacting local authorities can vary significantly from council to council and without robust internal processes in place this will simply not happen.

18 Roads should be made safer with a specific focus on the most vulnerable users



We absolutely agree, but how that is achieved is very important. We advocate specifically reducing speed limits, segregated space where possible and tackling junctions. Priority should be given to spaces outside schools to ensure the safe and swift movement of children at peak times and the routes to schools, as per the Mayor's manifesto pledge.

19 Integrated public transport services on the network must comply with legal and policy accessibility requirements, including ensuring that services are accessible for all. Drivers and staff should ensure that everyone feels welcome and safe at stations and on services, strengthening confidence in the network.

We particularly support the reference here to communities not being negatively impacted by vehicular traffic. While it seems an odd place to shoehorn this important point into the plan it is crucial to supporting active travel and therefore the goals of the Transport Plan. The plan needs to expand here to explain how it will address this issue.

20 The customer experience should be transformed setting the highest standards where users can expect the provision of safe, reliable, clean and efficient transport infrastructure.

We agree.

21 The network should have consistent and cohesive branding such as colour schemes, signage, design standards and quality of service so that there is a clear look and feel of the network on routes, stops and stations.

We agree and support unified wayfinding for cycle routes to make it easier for people unfamiliar with the area to navigate safe routes. Like the Manchester Bee Network, clear branding and consistent signage will raise awareness of cycle routes.

22 The North East should set the highest standards for a fleet of green public transport vehicles

We agree, however the priority should be an expansive and reliable service with a view to reducing motor vehicle traffic overall. Getting more people out of cars onto two diesel buses is still better than getting fewer people on a single electric bus.



23 People should feel a sense of pride in the network and be keen to use it again.

We agree and ask that this includes a straightforward method of being able to report necessary maintenance to walking, wheeling and cycling routes. As many routes cross authority boundaries it would be good to be able to report these centrally or on a single app.

Connections between different transport types

24 The region should no longer consider different forms of transport as separate networks and move to one integrated and highly interconnected network where people can make seamless door to door journeys.

We agree.

25 The integrated network should be based around making it easier to switch between different types of transport including public transport active travel taxis and other transport options such as Park and Ride micromobility and community transport.

We agree and further to discussion on single ticketing we suggest that the same approach is taken for both cycle parking and cycle hire.

26 There should be well co-ordinated public transport timetables and services which complement each other and enable seamless and smooth transfer from one type of transport to the next.

We agree.

27 The Shields Ferry should continue to be a vital part of the integrated network with even better linkages with other types of transport

The Shields Ferry is also a vital active travel link. We would like to see the Pedestrian Tunnel included here as while it has recently been restored and the new lifts finally



opened there appear to remain significant maintenance issues resulting in closures being common.

Due to the fact the bikes cannot be transported on the metro through Newcastle City Centre and the ferry finishing at 8pm weekday and 6pm on Sundays, the tunnel closures have a major impact of the reliability of journeys for people travelling actively. As discussed in points 8 & 11 it is important to have a resilient network for all modes of travel and the Pedestrian Tunnel is key to this.

28 Park and ride provision should be comprehensive enabling people seamlessly switch on to fast and frequent onward journeys.

As discussed in point 6, this should also include routes and storage options suitable for cycling and micromobility.



Appendix

Manifesto commitments for walking and cycling from the May 2024 election:

- *“I want to make the North East the best connected and greenest region in the UK. From the most environmentally-friendly buses to the largest electric vehicle charging network in the country and **a joined-up walking and cycling network that helps people make an active, but safe choice.**”*

The Mayor’s Manifesto (p11).

- *“I’ll work to **expand our cycle network and introduce an electric bike hire scheme and appoint an Active Travel Champion** to deliver improvements across our region, making sure **bike and walking routes are joined up and active travel hubs are introduced.** I’ll work with cycling groups to help them **design a region-wide campaign to get people out of their cars and on to their bikes -- we’ll start by working with local authorities to make sure it’s safe for families to walk or cycle to school.**”*

The Mayor’s Manifesto (p13).

¹ NE LTP ISA Report section 8.3

² North East Local Transport Plan (Consultation Version) section 2.6

³ ISA Carbon Assessment Report Section 5.4

⁴ ISA Carbon Assessment Report Section 4.2

⁵ ISA Carbon Assessment Report Section 5.4

⁶

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1009448/decarbonising-transport-a-better-greener-britain.pdf

⁷ ISA Carbon Assessment report Section 5.3

⁸ <https://www.judiciary.uk/prevention-of-future-death-reports/john-liddle-prevention-of-future-deaths-report/>

⁹ <https://evidencehub.northeast-ca.gov.uk/report/population-projections>

¹⁰ <https://www.sciencedirect.com/science/article/pii/S0965856424001423>

¹¹ <https://www.sciencedirect.com/science/article/pii/S0966692324000267>

¹² <https://womeninsport.org/news/more-than-1-million-teenage-girls-fall-out-of-love-with-sport/>

¹³ <https://www.gov.uk/free-school-transport>

¹⁴

<https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/bulletins/perceptionsopersonalsafetyandexperiencesofharassmentgreatbritain/16februaryto13march2022>



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¹⁵ <https://www.tandfonline.com/doi/full/10.1080/01441647.2021.1915898>

¹⁶ <https://uwe-repository.worktribe.com/preview/825943/Park-and-RidePolicytext.pdf>

¹⁷ <https://lcc.org.uk/news/get-off-the-road/>