

Oxford Civic Society Comments on the draft Oxfordshire Local Transport and Connectivity Plan

1. Introduction

1.1. Overarching Comments

Oxford Civic Society continues to support the Council's overall policy trajectory but the latest document confirms our reservations about its deliverability.

This issue is brought to the fore by the introduction of 'headline targets' for carbon emissions and car trip reduction. It is not explained by what means (and with only limited powers itself) the County Council can expect to deliver a 'zero-carbon transport network' by 2040 when the policies of Central Government are geared to 2050. The accelerated target in Oxfordshire is especially challenging over the shorter term given the planned scale of development growth.

The role of car trip reduction as distinct from other measures in contributing to the emissions target (complementing the transition to electric vehicles) is not made clear. Nor is the significance of the various sources of trip reduction (e.g., digital substitution, modal shift, traffic restraint) explained and their deliverability demonstrated.

The practicability and acceptability of these measures will vary widely across the county. We think that the Council's intention to proceed directly to individual area and corridor strategies in Part 2 of the LTCP provides insufficient guidance on the strategic opportunities and constraints. This needs to be remedied in time to deliver an integrated spatial strategy in the Oxfordshire 2050 Plan. Consideration of the targeted period after 2035 should also give more attention to likely changes in the nature and pattern of travel behaviour particularly arising from technological innovation.

Overall, the further development of the LTCP, including its integration into the Oxfordshire 2050 Plan and Oxfordshire Infrastructure Strategy, and the underpinning housing and employment growth projections, needs to be presented and discussed more effectively¹. The full engagement of businesses, (including the big employers), the universities and colleges, schools, community groups and charities, social enterprises and citizens in general is required if consensus is to be built and innovations supported.

1.2. Lack of links to other plans

In the recent Oxfordshire 2050 Plan, Oxford Infrastructure Strategy and current Local Transport and Connectivity Plan consultations it was necessary to be able to understand the following:

- The level of employment and housing growth committed to 2035/40 (to meet committed growth in existing district and city local plans) and what level of employment and housing development is

¹ It is noted that these projections are not yet confirmed for the Oxfordshire 2050 Plan (as at March 16th 2022).

being assumed for the period to 2050. As noted, currently the projected employment and housing growth trajectory (and spatial distribution of the growth) to 2050 is not yet agreed by the district and city councils.

- If the locations of employment and housing in the committed local plans are being serviced adequately by the current and new transport plans and by the Stage 1 Infrastructure Strategy;
- What are the longer-term transport plans and Stage 2 Infrastructure Strategy to service employment and housing areas to 2050? Although the LTCP aims at 2040, the agreed projection to 2050 needs to be known before finalisation of the LTCP, if the transport foundation of the Oxfordshire 2050 Plan is to be provided.
- This information is not clearly presented in the draft LTCP (nor in the consultations of the Oxfordshire 2050 Plan or Oxfordshire Infrastructure Strategy). Clear presentation of this basic information is necessary for and by the district, city and county councils and the Future Oxfordshire Partnership – and importantly for meaningful discussion with community and interest groups and the public.

2. Walking and Cycling

We welcome the emphasis on cycling and walking in Oxfordshire's LTCP and the updated Active and Healthy Travel Strategy. Increasing cycling and walking is fundamental to achieving a zero-carbon transport system and to reducing motor traffic and car dependency. If the council is serious about achieving its targets to increase cycling, from now on cycle facilities must be provided consistently, continuously and to high standards. The proposals to invest in better facilities for both cycling and walking must be given a high priority.

The council is intending to prepare an Oxfordshire Cycling Design Standard. We consider that Oxford and Oxfordshire are not unique and wish to see that infrastructure changes use the standards set out in LTN 1/20, rather than the locally developed Oxford Cycling Design Standards.

The plan needs to be inclusive. We object to the concept of the dual cycle network set out in the Active and Healthy Travel Strategy. All parts of the cycling network should be useable by people in adapted bikes, by children and people with mobility problems.

There is inadequate mention of the problems of car dependent developments in the document. There should be a policy around reducing car dependency and increasing active travel in developments. We note the reference to the standards for residential developments. These do not seem to be part of the consultation but are crucial to reducing car dependency. Will there be opportunities to comment?

3. Healthy Place-shaping

We welcome the policy of Healthy Place Shaping. Below is a list of the policies which we consider need changing.

Following figure 13, Healthy place shaping explainer - shaping the built environment, at the most fundamental level, means the street network which people use.

The current County Street Design Guide does not address the issue of making a place which has the ability to grow and prosper, and to be able to make journeys by active means. These points demand proximity and connectedness. The Guide is too tightly defined in spatial terms so that any contribution to making connected places is excised, the endorsement of the document carried an immediate rewrite:

“It is important to stress that this is a First Edition and will evolve as we learn from its use and reflect any new policies and guidance. We will commit to bringing out a Second Edition within 18 months. We hope everyone will agree it is a very positive step in the right direction.”

Page 4; Under ‘Why is this policy needed?’ - “Major development can impact on health in a variety of ways including through noise and pollution during the construction phase, increased traffic movements, making the use of a car an essential, and greater competition for limited open space.” – we suggest that the emboldened phrase is added as the form of places is such a key element in modal choice.

“Equally, development can deliver improvements such as improved access by walking, cycling and public transport and the provision of opportunities to access green spaces, services, cultural and community facilities”. It needs to be understood that providing paths is not sufficient, connectedness and nearness are essential elements.

In Guidance Standards for new development - “Standards for new developments will also help to deliver our vision by ensuring that walking, cycling, public and shared transport are the natural first choice for travelling within new developments and between new and existing settlements”.

We agree, yes, and suggest that this means two key things: (i) proximity, to make walking and cycling a real choice; and (ii) connectedness, so that places are on routes. At the scale of a large new area this means a ‘High Street’ type, not yet included in the Street Design Guide therefore, implicitly outlawed.

Page 5: - “Designing new developments that prioritise walking and cycling will also create healthy, vibrant communities that have good air quality, low noise pollution and will achieve carbon reduction targets. Being active outdoors with the opportunity to be sociable also brings important benefits to mental wellbeing”. Yes but, what is the built-form consequence of this objective? What examples?

We suggest the example of Summertown, astride the Banbury Road, is a clear example, yet effectively outlawed by County policy whilst ‘promoted’ by Manuals for Streets.

Low Traffic Neighbourhoods: - we are concerned that high levels of on-street car-parking diminish the experience available, especially on older streets. At some point a brave decision will have to be made - to limit on street car-parking to enable other uses, including children’s play. This is particularly so for streets where housing has small gardens/private outdoor space.

In newer developments the situation seems to be quite awful with the County’s policy of ‘non-adoption’ of parking spaces, which in practice means ubiquitous parking over kerbs in narrow residential streets, blocking often inadequate footpaths.

Page 11; School Streets – “One of the main opportunities for children to walk or cycle is travelling to school. A generation ago, 70% of children walked to school, now it’s less than half. This is damaging children’s health and congesting our neighbourhoods. Even in a more active county like Oxfordshire, 41.6% of children don’t meet physical activity recommendations”. This is over-simplistic. The form-implications of Policy 18 must be considered, otherwise the implication is that schools will be ‘stuffed at the back’ of developments.

The establishment of ‘parental choice’, of Academies, of local financial management etc., has dramatically affected the possibility of local access by foot or bike. What can be done to reverse these detrimental policies?

4. Road Safety

We are disappointed by the lack of ambition in the road safety plans. During the consultation period of the LTCP two tragic deaths of women on their bikes occurred. Road safety should not be delegated to a small mention on page 57 of the plan but should pervade the whole document. We wish to see within the LTCP vision a mention of safe travel for all modes and no injuries or deaths, while maintaining or exceeding the target growth in levels of cycling.

We suggest the County Council should set challenging objectives, to guide decisions by officers and councillors. We propose the County adopts a Vision Zero objective – for no fatal and serious injury road accidents on roads controlled by the Council by a target date, say, 2040. Essential steps are needed to support achievement of this objective:

- A supervisory process to be responsible for the delivery of the Vision Zero objective should ensure full commitment through the County Council's Highways team.
- Up to date incident data is required, including full investigation of each incident, to inform future safety measures and infrastructure.
- Effective joint working between County Council officers and other authorities - especially National Highways, Thames Valley Police and DfT - to ensure integration of safety measures between strategies.
- Well-maintained and level surfaces of footways, cycle ways and roads, and easily visible road markings should be achieved, including where work has been carried out by utility companies. Checks should be carried out after work is completed.
- The development of a continuous network of safe segregated walking and cycling routes should be seen as the norm as road works and developments take place across the County.

5. Digital Connectivity

We generally support the broad thrust of this section, which is consistent with the County's declaration of a Climate Emergency. However, it should focus on reduction of all road trips, rather than private vehicles alone.

We have not seen research that indicates what the medium- and long-term impact of the technology changes accelerated by the COVID-19 pandemic will be on road traffic. In particular, we are unclear how the work-from-home revolution will change Oxfordshire road use in the traditional peak and off-peak periods. This is in contrast to bus and rail, where the data is showing trends in trips for commuting, business and leisure needs. We are therefore unclear whether increased remote working will, as the draft text states, help to tackle congestion by reducing both the number of trips and the length: what it has done is reduce peak period public transport use, but whether it has reduced all road trips or just transferred them to other times of day is unclear.

The proposed Policies seem to be aspirational ("promote") rather than normative ("ensure"); within the limits of OCC powers, a normative approach would yield greater benefits. We therefore suggest changes to Policies 38, 41 and 42, where the active verb should be changed from "promote" to "give priority to ensuring" or similar.

The benefits of new technologies to reduce accidents (e.g., 5G interconnectivity between all forms of transport) should be promoted.

Finally, as regards remote working (Policy 43), to allow equity of access to new technologies, the development of local hubs should be a priority, at least in the short to medium term, as an alternative to connectivity in individual residences.

6. Public Transport

The COVID-19 pandemic and the accelerated switch to home working are causing immense problems for the viability of public transport operators, whose revenue models used to depend on high peak period earnings to underpin a good level of all-day services. The draft document only refers to this by way that the Council “will seek to understand and address the impacts of the COVID-19 pandemic as more data becomes available.” We are fearful that the County could face further reductions in rail and bus services. Whilst revenue support for loss making services would be a difficult issue for the County as a highly financially-constrained local authority, we suggest the Council should make explicit a policy to investigate and support options for change within its control that will increase use of public transport and strengthen the financial robustness of operators.

All travel except going for a walk is multi-modal, so maximising the use of public transport to reduce emissions needs to be achieved with a coherent transport network for walking, cycling, bus and rail use.

Proposals for multi-modal travel and mobility hubs are therefore essential, not an “option”, and individual strategies and policies (33, 34, 35, 36) need modifying to achieve this. Policy 36 needs to include safeguarding of land for hubs. A new policy is needed to support these, introducing an Oyster-style card for greater convenience and productivity, useable on all public transport in Oxfordshire.

We support the reopening of the Cowley branch for passenger trains, new stations at Begbroke, Oxford Science Park, Cowley and Wantage/Grove, new direct trains from Oxford to Bristol and increased rail frequency between the County’s principal stations. The Civic Society has promoted the concept of building on enhanced rail services to create an integrated metro for central Oxfordshire, in which modal transfer at hub stations is made as easy as possible. This involves linking of rail and bus arrival and departure times (as in Switzerland), comprehensive real time travel information and co-ordination of ticketing.

We suggest that the County, in addition to bus and heavy rail, should include other forms of public transport in evaluating options. Light rail can be considered for the Witney–Eynsham-Oxford corridor, automated forms of high frequency shuttles are being developed and trialled elsewhere, and some cities are starting to consider cableways to meet specific transport needs.

Policy 27 should include measures to reduce the need to travel in smaller communities by fiscally supporting local facilities where necessary, such as village shops, pubs and health centres.

As one of the most polluting methods of travel, Policy 31 should only be supporting air transport growth if by zero-carbon fuelled aircraft.

7. Environment, carbon emissions, air quality

OCS broadly supports these policies but there remain some questions. The key policy on Environment and Carbon issues is not in this section but is the ‘headline target’ to deliver a ‘zero-carbon transport network’ by 2040. It is not clear how this target will be achieved as a result of these policies. Each policy has the potential to deliver some percentage of the cuts that are needed but the levels are not clear and if this Plan is deliver its goal, then more clarity and specific emission reduction goals should be built in.

This is apparent in Policy 44. It is easy to have the aim to ‘manage and minimise embodied and operational carbon in transport infrastructure projects’ to ‘use less carbon-intensive methods, and generate less waste’ but the final plan must have more detail. How much less is ‘less’, and at what speeds will the reductions take place? It is also the case that emissions from infrastructure will depend

on national policy changes and technical improvements outside the control of OCC. We would suggest that the Plan should include a commitment to manage and minimise carbon emissions from all forms of public transport from its own fleet and transport activities.

We endorse the aims within the Plan to cut traffic related air pollution and support electrification. These specific aims will relate to other County, City, and District plans – spatial, climate, air quality and economic – and the final Plan should be clear on how these relations are implemented.

8. Network, parking and congestion management

Network Management - the 'core purpose' of network management is explained in terms of the County Council's responsibility as highway authority. This should be expanded to incorporate its role as transport authority, collaborating with other agencies in the management of transport facilities and services to deliver outcomes in accordance with the Council's objectives

The text should be revised to distinguish between the physical management of infrastructure and the dynamic (real-time) operation of the transport system.

Parking Management - this section presents parking management as 'a transport planning tool', i.e., as a means of influencing where and how people travel. It should be edited to focus on the basic functions of on-street management and to explain its links with the provision and management of off-street space. Material referring to the control of both forms of parking as a means of influencing travel behaviour should be transferred to the section on Demand Management.

Demand Management - the material in this section needs to be presented more forcefully, e.g., 'there will also be situations where it is necessary actively to discourage private car use'

Road schemes - development of the county's road network should be conditional on it being impracticable to deliver satisfactory outcomes via traffic reduction or management measures

9. Innovation

The planning system in UK is rather historic, resulting from a mish-mash of policies over the 20th century to deal with problems as they arose. It is ripe for innovation. Before making changes, evidence and testing new systems are required.

Innovation in new building construction is not discussed, nor is innovation in transport in this paper. There is mention of the need for zero carbon and sustainable growth and the circular economy. Fortunately, they do mention flexibility because repurposing buildings and infrastructure is likely to be a key element in reaching net zero carbon emissions

From the 3 charts the following are omitted: Cableway transport, nuclear, hydro-electric and tidal power and autonomous pavement delivery vehicles. Too much attention is given to autonomous vehicles which will never mix with normal traffic in a historic city. Future proofing innovations is a good concept, particularly if it involved consulting actual citizens.

In their recommendations, it seems that the main objective is to add an "Innovation Plan" to the already lengthy documentation to be submitted for Planning Permission. It is doubtful that new developments could ever be fully "future-proofed". Land Value Capture (an innovative political and economic system) which can be used to finance public infrastructure and facilities is not mentioned.

10. Data

This focusses on the operation of the transport (highway?) network. Contrary to claims in the text it provides limited insight into current or future 'needs' which are a product of the characteristics of the

local population and economy, changing land use and activity patterns, values and attitudes etc. How are these other dimensions to be understood?

Modelling - the text refers to the 'limitations of modelling' in predicting behavioural change. In the context of Policy 80 ('decide and provide') how are these limitations to be overcome to provide estimates of outcomes under scenarios different from those based on current behaviour and policies?

Monitoring - there is considerable overlap between this section and the separate chapter headed 'Monitoring' on page 126. We suggest the latter, including the KPIs, should be brought forward and, suitably edited, integrated with this section. It would be helpful if the distinction were drawn between monitoring of: (i) the impact of individual developments; and (ii) on-going county or area-wide conditions.

Further work in developing the KPIs should demonstrate the relationship of each indicator to the outcomes being sought under the LTCP key themes. At present the absence of any indicators measuring performance in respect of accessibility or connectivity is a serious omission.

11. Freight and logistics

The two key strands (freight consolidation and cycle freight) identified in the draft are, whilst admirable and well worthwhile in themselves, completely inadequate to meet the scale of the tonnages lifted and ton miles of freight on the move through Oxfordshire.

The strategy does not acknowledge that HGV (and to a significant extent) LGV vehicle decarbonisation will be achieved as a result of central government actions, as the great majority of HGV vehicle miles are made on the Strategic Road Network (SRN) managed by National Highways. It is the LTCP's role to define how these electric-, biofuel- or hydrogen-powered vehicles are managed, off the SRN, in Oxfordshire.

HGVs impose noise, air quality and congestion disbenefits on local communities, and safety risks for other road users especially cyclists and pedestrians. All these will continue even when vehicles operate on zero carbon fuels. We propose:

- County-wide, there should be an objective to reduce HGV trips and miles on the line of that for cars - say 25%.
- Within defined areas (urban and deeply rural areas for example), the reviews of road classifications (Action 4) and HGV route map (Action 5) should include opportunities to reduce, constrain or eliminate HGV movements through the imposition of weight or other restrictions.
- The movement of freight by road in these defined areas would be compelled to transfer to smaller and lighter electric vehicles, and cycle delivery. This may or may not involve consolidation hubs adjacent to junctions with the SRN, or rail, but that will be up to operators to manage the transition efficiently.

Policies 86 and 87 on Freight Consolidation need to be bolder, in view of successful demonstrations elsewhere:

"Oxfordshire County Council will take steps to identify suitable sites on the periphery of Oxford for Freight Consolidation Centres, at least one of which will have good rail access, and support their operation. It will work with local planning authorities to ensure that land is made available for such sites and not built over, with a priority focus for enabling zero-emission delivery when working with partners to design them with good access".

12. Regional Connectivity

The Strategic Road Network (SRN) managed by National Highways, the road networks managed by neighbouring authorities that interface with Oxfordshire's network, and the rail network managed by Network Rail, have enormous influence on the pattern and scale of movements with the County. Oxfordshire County Council cannot deliver its own transport objectives without strong and effective co-working with other authorities.

If Oxfordshire is to be serious about achieving its key quantified objectives, for example the 25% reduction in car trips, it will be essential that it is handled in part through co-working across the boundaries of other organisations.

We propose the establishment of quantified measures of the people and freight movements baseline, and targets expected to arise from actions during the plan period which would be delivered through the relationships with major public bodies like National Highways and Network Rail, and the County's neighbouring transport authorities.

The baseline would show the current pattern of movements in the County. From the baseline can be derived the extent to which the County's key objectives can be delivered through its own initiatives, and the scale of co-working necessary with other organisations.

Action plans can be developed which build from the baseline and provide the framework for officers to work with the other authorities, and a means to judge their success.

13. Local Connectivity

Area Strategies - the text refers to these strategies providing 'an indication of how LTCP policies might be applied in different geographical areas. A more focussed ambition is warranted, viz an examination of the opportunities and constraints for reducing unnecessary car use on the one hand and promoting alternative modes on the other – hence the scope for each area to contribute to achieving the Plan's headline targets.

The role of area strategies in influencing Local Plans, identifying development locations which reduce the need to travel and foster the use of non-car modes also deserves to be made explicit.

Corridor Strategies - the text acknowledges that 'our approach needs to change'. Instead of defining the studies in terms of major highways they should instead be identified on the basis of the county's principal inter-urban movements including access to external centres (see regional connectivity)

Rural Journeys - the specific connectivity challenges facing rural communities are highlighted but the proposed approach to dealing with them appears ad hoc. To address this the role of individual towns as service centres and mobility hubs for surrounding rural areas could be considered in the relevant area strategy.

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