



Oxford Civic Society

Response to Oxfordshire County Council Central Oxfordshire Travel Plan Consultation

1. Introduction – the County Council proposal

The Central Oxfordshire Travel Plan has been developed by Oxfordshire County Council as part of its countywide Local Transport and Connectivity Plan (LTCP). The LTCP was approved by council in July 2022 and *'sets a clear vision to deliver a net-zero transport system that enables Oxfordshire to thrive, protects the environment and makes the county a better place to live for all residents'*. The LTCP includes ambitious targets and to achieve them, area travel plans are now being developed across Oxfordshire. The first to be developed is the Central Oxfordshire Travel Plan.

1.1. The Central Oxfordshire Travel Plan

The COTP sets out a vision to develop a world-leading, innovative, inclusive and carbon neutral transport system with a focus on how people move quickly and safely around the area. The plan area covers the urban area of Oxford and the immediate movement and connectivity corridors to and from the city, as well as the main villages that lie on these corridors (Kidlington, Eynsham, Botley, Cumnor, Kennington and Wheatley).

In particular, the COTP aims to free up the limited road space in Central Oxfordshire to create a place where buses are fast, affordable and reliable, where people can walk and cycle, in pleasant and safe environments, and where high polluting, unnecessary, individual car journeys are reduced in number so that zero-emission buses, taxis and delivery vans are the norm, and that those who need to take essential journeys by car can do so without congestion.

A set of 22 actions intended to help achieve a sustainable and reliable transport system across the Central Oxfordshire area are recommended, including three major transport proposals for Oxford City: traffic filters, a workplace parking levy and zero emission zone. The three key projects are, and will be, subject to detailed and separate consultations, with the first, on traffic filters, open for public consultation until October 13, 2022 (Oxford Civic Society has responded separately to this consultation).

1.2. What are the targets of the COTP?

The targets for Central Oxfordshire are the same as those of the County Council's agreed Local Transport and Connectivity Plan for the county: By 2030 the target is to:

- Replace or remove 1 out of every 4 current car trips in Oxfordshire

- Increase the number of cycle trips in Oxfordshire from 600,000 to 1 million cycle trips per week.
- Reduce road fatalities or life changing injuries by 50%.

By 2040 the targets are to:

- Deliver a net-zero transport network.
- Replace or remove an additional 1 out of 3 car trips in Oxfordshire.

By 2050 the targets are to:

- Deliver a transport network that contributes to a climate positive future.
- Have zero, or as close as possible, road fatalities or life-changing injuries.

2. Oxford Civic Society comments on the draft Central Oxfordshire Travel Plan

2.1. Strategic Transport Planning

- The COTP is strategic in the sense that it crosses the boundaries of the Oxford City Council, Cherwell District Council, West Oxfordshire District Council, Vale of White Horse District Council and South Oxfordshire District Council. The timing of this consultation appears not to be synchronized with the updating (to 2040) of the Local Plans of these District Councils and the Oxford City Council¹. In addition, it appears not to be cognizant of the differences of opinion about employment and housing growth rates and distribution of growth in these Districts and the City, and the consequent abandonment of the preparation of the Oxfordshire 2050 Plan. Exactly as was said in the OCS report published just before the Oxfordshire 2050 Plan abandonment, the links between the Local Transport and Connectivity Plan (and now Oxfordshire Travel Plans), the Local Industrial Strategy and the Oxfordshire Infrastructure Strategy need to be carefully considered. Optimisation of strategic infrastructure (including transport infrastructure) investment could be the major casualty of the abandonment of the Plan – care needs to be taken that the damage is limited.
- Should the preparation of COTP measures be synchronized, coordinated or, even better, integrated into the development planning of the District and City Local Plan updates? Would achievement of the COTP targets perhaps be made simpler with such integration?
- Most importantly, should all the area travel plans be prepared in a synchronized way with the District and City Council Local Plan updating, and with the consequent benefit of ensuring strategic (cross District / City boundary) transport infrastructure planning². Currently the 19 area travel plans are being developed sequentially, whilst the five Local Plans are being progressed broadly in parallel.

¹ It is noted that to talk of synchronisation with the current round of LP preparation is bit of a tall order given that the draft COTP does not even address the transport implications of the LPs already adopted

² At the same time the Oxford Futures Group of the Oxford Civic Society recognises that to update the Local Plans of the districts and city, some kind of agreement on Oxfordshire growth rate and distribution is still necessary: without evidence that the Local Plans have been prepared in cooperation with neighbouring local authorities (the 'Duty to Cooperate'), the Local Plans will not be approved by the Planning Inspectorate / Secretary of State.

- The environmental and social implications of the COTP will still need to be exhaustively considered and respected and could use some of the agreed principles and guidelines established for the now abandoned Oxfordshire 2050 Plan.
- The area plan might be better described as a ‘strategy’ – a grouping of types of action intended to contribute to the overall targets but without (in most cases) giving details of what is likely to be implemented where and when. (This depends on further work developing and prioritising individual schemes in the context of funding and delivery opportunities).
- Perhaps surprisingly whilst the location of strategic sites to be developed during the current plan period is identified, the associated planned transport improvements are not, even though these are likely to be the focal points of local change.

2.2. Baseline and forecasting data

- COTP reiterates the LTCP5 overall targets in respect of reducing car trips, zero carbon emissions and ‘vision zero’ accidents. However, it does not establish what the ‘baseline’ conditions are for these or other attributes in the Central Oxfordshire area, the projected change during the plan period (to 2040), or the likely impact proposals put forward in the plan would have (i.e., their potential effectiveness).
- We are very disappointed by this absence of a strategic level piece of work to document the baseline and impact of forecast changes from interventions proposed in the Central Oxfordshire Travel Plan. If the baseline is not stated and the value of the interventions in aggregate is not forecast, how can the Cabinet know that they will be sufficient to meet their high-level objectives? This is just wrong and appears to be a failure of policy!
- Furthermore, it is hard to see how consultees can be convinced of the value of the proposed interventions, let alone reasonably comment on the draft Central Oxfordshire Travel Plan, without some quantification of the base position and the impact of proposed changes. Unlike the traffic filters the possibility of introducing the demand management schemes collectively on an experimental basis is not available. The combined effect and interaction of the three demand management schemes (WPL and ZEZ in addition to the traffic filters) is particularly significant. To us it appears that, in view of the scale of the ambition of the plan, a commensurate level of transport modelling should be carried out and evidence published.
- **In the absence of such evidence public discussion on the area plan, like the core LTCP, is necessarily speculative and centred on aspiration.** Work to develop a selection of KPIs (Key Performance Indicators) is nevertheless proposed as part of the plan’s future monitoring.

2.3. Limited scope of COTP

- In line with the cessation of work on Oxfordshire Plan 2050 no reference is made to possible or desirable improvements beyond the immediate Local Plan period. Also, no reference is made to the future of the A34 (the responsibility of National Highways) which is to be the subject of a separate Corridor Plan.

2.4. Demand management in the City of Oxford

- To complement the overarching LTCP targets, COTP puts forward a number of descriptive ‘outcomes’ which are in the nature of aspirations (e.g., ‘congestion-free roads for essential journeys’). To deliver these, the plan proposes 22 actions which represent the application of LTCP policies. Actions 1-3 comprise the three strategic demand management measures proposed for Oxford City (ZEE, traffic filters and WPL). Additional actions include reviews of public parking, the promotion of active travel and public transport (including via mobility hubs), liveable streets and publicly accessible EV charging.
- It is particularly unfortunate that the City and County Councils have become committed to the city-wide system of traffic filters before details of their likely impact have been published and consulted on. (Commitment is necessary to achieve a claimed 10% reduction in bus journey times for operators to justify investment in electric vehicles for use in the city (itself a desirable innovation - Action 13) and in time to take advantage of the Government’s ZEBRA funding grant).
- However, the extent of potential vehicle displacement and enforced use of the Ring Road for many journeys internal to the city is generating considerable public opposition to the filter scheme. The consequent additional mileage and increases in congestion and pollution risk negating many of the ‘savings’ otherwise achieved through the suppression or shift to sustainable modes of a proportion of existing trips. Additional concerns relate to the absence of quantitative, rather than anecdotal, data on the “tidal” nature of congestion in Oxford City, reflecting commuting and school runs, as well as retail -linked journeys, particularly at weekends. Forecasting of modal switch to bus travel will also be affected by changes to bus pricing and routeing.
- **In an ideal world a longer planning timescale would have allowed investigation of other options such as a congestion charging scheme within the Ring Road which would have achieved the desired reduction in overall traffic levels without the adverse effects of journey displacement. Is it too late to consider this?**

2.5. Is the consultation meaningful?

- The ambitious aspirations characterising COTP, like the core LTCP, are welcome but the lack of evidence surrounding proposed actions and their likely effects inhibits further comment. Feedback via the County Council’s ‘Let’s Talk’ questionnaire is invited on the individual ‘outcomes’ and ‘actions’ but in a fragmented manner. It is very possible that respondents will agree with the desirable outcomes whilst objecting to the actions needed to deliver them! The question of balance within an overall strategy (and whether the area plan achieves this) is missing.
- There is nothing in the questionnaire on the *adverse* outcomes (impacts) of the proposed actions, in particular the effect of the demand management measures on motorised accessibility (journey distances, times and costs). This is an attribute of special importance to businesses and individuals with restricted mobility who have no alternative to using cars or vans. Not acknowledging – and preferably quantifying – losses of this kind leave a void which objectors to the overall strategy are likely to seize upon.