

30 July 2014

working locally and nationally to  
protect and enhance a beautiful,  
thriving countryside for everyone to  
value and enjoy

Joy White  
Oxfordshire County Council  
Environment and Economy  
Speedwell House  
Speedwell Street  
Oxford  
OX1 1NE

Dear Joy,

### **CPRE Oxfordshire Response to Consultation on Local Transport Plan 4 - Stage 1: Goals and Objectives**

The Oxfordshire Branch of the Campaign to Protect Rural England exists to protect and promote the landscape and rural communities of the county. Transport issues naturally form a key area of our work, given both the landscape and environmental impacts of many transport proposals, but also the vital role of transport services and infrastructure in keeping villages sustainable. We therefore welcome the opportunity to respond to this consultation.

#### ***Introduction***

Ian Hudspeth in his Foreword indicates that this plan is all about meeting demand. It is clear that if business and the building industry are asked how many jobs and houses there is demand for, the answer is likely to be an unsustainably high figure bearing in mind the capacity of the infrastructure of the area. We therefore challenge this basis for the preparation of the plan

For half a century Oxfordshire local authorities have resisted pressures for growth based on unrestrained demand. Given its central location and relatively good transport connections, the county is geographically an attractive location for warehousing, distribution, offices and commuting to the London conurbation, all relatively foot-loose development. However Oxfordshire's attraction also stems from its world class higher education and associated activities, the small human scale of the city and the high quality of the surrounding countryside, small towns and villages. Infrastructure, particularly the transport network, is already at or near capacity.

The first step should therefore be to look at the maximum practical capacity of the roads and public transport including rail that can realistically be provided given available finance by 2030 (15 years is a short time in which to realise major projects) and then to model the extent of growth that the area could accommodate. Similar economic constraints might well apply to other infrastructure.

To put the suggested quantum of growth being considered into context, it represents the equivalent of Milton Keynes New Town that was developed over two decades. It is worth reflecting that this is the only new town to achieve that level of development and it was only made possible by the New Town powers. Covering almost 9,000 hectares, huge areas of countryside had to be acquired through special compulsory purchase powers and opened up for development. This entailed the provision of the necessary infrastructure - roads, sewers, schools, utilities etc before workers and residents could move in. This involved massive public expenditure that would have bankrupted the Buckinghamshire County Council had special loan arrangements not been negotiated with central government. The rate of repayment of these loans only rose gradually over 20 years as the Council Tax income stream was generated.

The alternative Town Expansion model has not been attempted on this scale. Oxfordshire's principle expansion town, Banbury has absorbed 40,000 people over half a century, many re-housed from London Boroughs and Birmingham City. The principle was initially to take up spare capacity but infrastructure has tended to lag behind. The towns within the 'Knowledge Economy Spine' have all seen major expansion and their central areas could not be further enlarged to accept growth on this scale. In Milton Keynes, Bletchley and two very small towns initially provided some facilities but soon had to be supplemented by a major new city centre. Oxford itself is very constrained. It is difficult to see how major growth on the scale envisaged can be planned, financed and achieved within the 15 year timescale.

It should also be noted that the highly ambitious growth plans outlined in the Oxfordshire Strategic Economic Plan have yet to be tested or ratified through the Local Plan process, and may still be overturned. Work on an updated Local Transport Plan Strategy may therefore be premature.

### ***Goals and Objectives***

The first goal should be to manage the demand for housing and employment growth to be compatible with the well-being of the existing economy and environment and in particular transport infrastructure. It is not necessary to encourage inward investment in general as this would be in competition with the higher objective of developing the 'Knowledge Economy Spine' for which this area has unique advantage for the national economy. Historically, development pressures have always exceeded what is practical and acceptable in this area.

### ***Q1 Supporting Growth***

We strongly disagree that the objective should be to accommodate predicted, unfettered growth. Limitations of the existing transport infrastructure and the realistic prospects of enhancing this within the next 15 years must be a major determinant of the character, scale and pace of development in the area.

The object here should NOT simply be to allow Oxford area to achieve its full ECONOMIC potential. This needs to be balanced against the environment and quality of life of people living and working in the area.

We welcome the acknowledgement that 'It is also important not to focus entirely on urban areas or locations of major development - over a third of Oxfordshire's population live in rural areas. Any future transport policies and strategies will need to consider these rural areas as well as major growth areas.' However, we are concerned that this is not carried through to the remainder of the document where existing rural needs are side-lined in the face of the challenges of accommodating the growth-led strategy.

The eight broad objectives for transport are supported.

**Q2** Travel is merely a service and not an end in itself. The aim of reducing the need to travel can be a false objective in isolation.

Travel and communication in general on adequate infrastructure can be preferable to striving to reduce distance travelled through over concentration of land use resulting in congestion, pollution, and the inability of public transport, particularly buses, to function efficiently. A balance needs to be struck to limit harm to both rural and urban environment from inefficient over-loaded transport infrastructure. The county towns strategy of locating development where historically, relatively good transport infrastructure existed has been successful resulting particularly in shorter non-work travel within these communities, and allowing transport in Oxford to be managed to protect the unique character of the ancient University town. The rejected alternative of concentrating development around the periphery of the city and in its Green Belt to reduce distance travelled to work would not have been conducive to efficient public transport and would have been particularly damaging to the environment.

Oxford lies on the strategic road (A34) and rail corridor (Didcot - Banbury) between England's largest and fourth largest conurbations outside London, that is between Birmingham and South Hampshire. Central government predicts continuing growth of this inter-regional traffic over which the County Council has no control. Large scale local development in addition to this strategic traffic could create unacceptable congestion and diversion of traffic onto even less adequate local roads. The Department for Transport does not appear to have any plans to increase the capacity of the A34 in the plan period and only to seek to reduce delays and maintain journey time reliability for through traffic by junction improvements aimed at reducing the likelihood of local traffic queuing back onto the trunk road. It has not been the practice of central government to take contributions from developers to increase capacity of the major trunk road network to accommodate locally generated traffic.

In answer to the question, we believe that the starting point for reducing need to travel should be a realistic examination of the potential of the transport network and to work back from this to estimate the order of magnitude of traffic generation that can be accommodated by 2030 and the appropriate location of development.

**Q3** There is clearly scope for minor improvements of the existing network and traffic management as well as assisting users through real time information systems. Congestion needs to be actively managed particularly in Oxford by real time regulation of the volumes of traffic entering the central area and holding back congestion along the radial routes where it will not impede public transport. The present traffic restraint by tolerance of severe congestion in Oxford throughout much of the day with the associated levels of pollution is unacceptable. Proposals arising from the Oxford Transport Strategy were never fully implemented and existing technology for Area Traffic Management should be implemented without delay.

Other measures such as a dedicated off-road South Oxford cycle route alongside Abingdon Road to free up road space for traffic management should be re-visited. There is even scope for an elevated walk way/people mover between the railway and bus stations and central shopping area.

Failure to effectively manage traffic within Oxford and the radial routes in particular has knock on effects on the ring road junctions.

**Q4** Development of Park and Ride has been hindered by muddled policies on charging and split responsibility between county and district councils. Any new P & R facilities should be located at trip origin such as Witney rather than Eynsham to relieve rural roads and replace travel by car for the whole journey. Rail travel needs to be encouraged by removing the cost differentials between parking provided by local authorities and rail operators. Coach travel to London is subsidised through cheap parking provision at Thornhill. Similar issues are likely to arise at Bicester and Water Eaton.

In our comments on the new Great Western Rail franchise, we have asked for integration of bus feeder services (for instance between Witney and Hanborough station). There is scope for further rail P & R that is not being developed because of split responsibility between central government (rail), local Government (parking provision and bus subsidy) and rail and bus operators.

**Q5** Public transport has largely broken down in rural areas away from the inter-urban spine routes, if it ever existed. It is doubtful if subsidised conventional bus services will ever be able to fulfil these needs. Two possible improvements would be;

- a) Extensive integration of school transport and general public transport services serving rural areas. This operates very successfully in other counties and remoter areas of Scotland. There could even be scope for integration with other transport providing services such as Social Services and Health. Young people in training should be accommodated as well as those dependent on or who would prefer public transport to access social facilities.
- b) Rural Taxi services are often unreliable and expensive. Buses diverted off main routes into villages for the few passengers can make public transport both uneconomic and slow and uncomfortable for the majority. Subsidised, shared, on demand taxi feeder services to main bus routes could improve service and reduce car dependency.

**Q6** The development of the Knowledge Spine will need to be carefully managed to ensure that it becomes a significant national asset. It will be vulnerable to pressures for other development that in the short term could be more profitable. It is therefore important that other development should be channelled to the other county towns and their transport problems addressed. The poor connectivity of Witney via A40 and the lack of segregated public transport and the relative isolation of Grove/Wantage are examples.

**Q7** The main challenge must be to accommodate journeys to work and education. Priority management, such as multi-occupancy car lanes are unlikely to make a positive contribution in this county where multi-lane highways hardly exist. Bus priority lanes to allow buses to leap frog queues at junctions can be more effective use of road space than uni-directional bus lanes that are only effective in one peak period. Bus, pedestrian and cycle priority can seriously reduce capacity to the extent that bus and essential servicing traffic is badly disrupted. The unintended consequences of priority measures such as those in Frideswide Square, Oxford need to be more carefully assessed. If essential servicing traffic is not given due consideration in the management of town centre traffic, the businesses that they serve are likely to relocate to edge of town, out of range of public transport for their customers.

**Q8** The essence of attractive public transport is comfort, reliability, frequency and journey time in that order, with cost and convenience also important factors. Whilst novel modes of transport are superficially attractive these are unlikely to be practical here. However other solutions may be possible. See Q15 below.

**Q9** Restrictions on the movement of HGVs on unsuitable roads depends on effective enforcement. Unless this can be improved further restrictions are likely to be widely abused. Development of camera enforcement and point, rather than area, restrictions might help to overcome this problem.

**Q10** The emphasis on carbon emissions is misguided. This is primarily a matter for central government regulation. Of more significance locally is the effect on health of nitrous oxide emissions.

**Q11** People are walking less as they feel intimidated by and have fear of traffic. In rural settlements footways are often discontinuous and grass verges along minor roads are not maintained to provide a safe refuge. In large numbers of villages 20mph speed limits could reduce the perception of danger and reduce accidents. This should be a higher priority than blanket 20 mph zones in larger towns and the city where better facilities already exist for pedestrians.

The suggestion of banning (discouraging?) parents' cars from a zone around schools to enforce the habit of walking sounds very attractive

**Q12** Cycling remains a dangerous mode of transport. The emphasis of the cycling lobby on long distance recreational cycle routes is largely irrelevant. Even the provision of segregated routes in towns and safe mini-roundabouts have been opposed by idealists. Clearly the safety issue relates primarily to junctions and the best research needs to be followed through. Oxfordshire pioneered on carriageway cycle lanes and advance stop lines at signalled junctions. This momentum needs to be regained through better signing of cycle routes for instance through parks in Abingdon where there is the highest use of cycles in the county. The North Oxford cycle route should be extended off-road to Water Eaton transport interchange as a matter of urgency.

Where cycle tracks exist they are often unattractive because they are not swept often enough so that grit accumulates and can even be littered with broken glass. Surfaces need to be at least as good as that of the carriageway.

**Q13** The overall objectives are supported

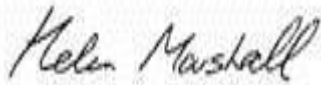
**Q14** The emphasis on non-selective encouragement of inward investment is misguided and these underlying assumptions are not accepted.

**Q15** The concrete trough guided bus promoted by a major bus company to secure a near monopoly has proved to be an expensive white elephant in Cambridgeshire. Rather than seeking funding for glamorous iconic systems it would be better to use tried and tested technology to provide a dedicated bus road, possibly single track with signal controlled passing places. Drivers are capable of steering but guidance by buried wire is a proven technology. A dedicated off highway bus-way would be an ideal solution using the old railway route for Witney Carterton that could be achieved now. The cost would be less than tram way, take less land than guided bus

with service road and preserve the right of way for future higher capacity systems should funding become available later. There is scope to develop local rail services funded from other sources.

P.17 We welcome the acknowledgement of the need for good maintenance, which is a key issue for rural areas, and look forward to being able to comment on The Highways Asset Management Plan in due course.

Yours sincerely

A handwritten signature in black ink that reads "Helen Marshall". The signature is written in a cursive style with a light grey shadow effect behind the text.

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