

**Bioabundance Community Interest Company Response  
to Questions 5-14 of  
OXFORDSHIRE COUNTY COUNCIL's LTCP5 'Draft Vision' (Consultation 15<sup>th</sup> February – 29<sup>th</sup> March  
2021)**

**5 Vision in context**

The local and regional policy context has changed significantly since 2016 when the last Local Transport Plan (LTP4) was published. This section of the [vision document](#) provides more detail about those strategies to outline the local context and how they have informed the development of the Local Transport and Connectivity Plan (LTCP).

The key related strategies and policy developments we identified are:

- Oxfordshire Strategic Vision
- Oxfordshire Plan 2050 and Oxfordshire Infrastructure Strategy
- Oxfordshire County Council Climate Action Framework
- Local Industrial Strategy
- Joint Health and Wellbeing Strategy
- England's Economic Heartland Transport Strategy
- Transport for the South East and cross boundary proposals

**Have we identified the right strategies and policy developments in Oxfordshire?**

Yes / No Not entirely. The vision has to demonstrate that sustainable transport and connectivity will in future be the starting point in planning new settlements to ensure that any new housing will neither be car dependent nor destroy local natural habitats. If not, what other strategies and policy developments in Oxfordshire should we take into account as we develop the LTCP in more detail?

**Local/regional policies**

<https://www.wildoxfordshire.org.uk/biodiversity/oxfordshires-nature-recovery-network/>

<https://www.englandseconomicheartland.com/our-work/decarbonising-transport/>

**Central government policies:**

<https://www.gov.uk/government/publications/manual-for-streets-2>

<https://www.gov.uk/government/publications/cycling-and-walking-plan-for-england>

<https://www.gov.uk/government/publications/a-better-deal-for-bus-users/a-better-deal-for-bus-users>

<https://www.gov.uk/government/publications/creating-the-transport-decarbonisation-plan>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)

<https://www.theccc.org.uk/publication/sixth-carbon-budget/>

**and also take into consideration:**

<https://www.tcpa.org.uk/the-20-minute-neighbourhood>

<https://www.udg.org.uk/publications/manuals/street-improvement-manual>

<https://www.designcouncil.org.uk/sites/default/files/asset/document/10%3Dcase-studies-this-way-to-better-streets.pdf>

<https://www.arcadis.com/en/united-kingdom/our-perspectives/recovery-campaign/our-shared-recovery-plan-for-stronger-communities-arcadis/>

## 6 The challenge

Oxfordshire's transport system affects everyone who lives and works in Oxfordshire. It plays a role in connecting our communities, supporting the 30,000 businesses in the county, and enabling journeys for education, leisure, and work. Therefore, it is vital that we create a plan for a transport system that will be resilient, addresses existing challenges, enables all residents to have a high quality of life and creates a healthy, sustainable county.

The key transport and connectivity challenges for Oxfordshire provide context for why the vision is required and the issues it needs to address. The key challenges identified in the [vision document](#) are:

- High levels of private car use
- Pressures of future housing growth on Oxfordshire's transport network
- Areas with poor transport connectivity. Particularly, rural and village areas with limited or no public transport connections
- Wider challenges such as public health, inequalities, air quality and needing to take action on climate change

### Have we identified the right key transport and connectivity challenges for Oxfordshire?

Yes / No Not quite

The description fails to highlight explicitly the key challenge: the urgent need to reduce carbon emissions from transport to net-zero by 2050.

The vision would be strengthened by adding detail to define each point.

At the top of the list should be:

1. **'Reducing carbon from transport to net-zero'**: This is the biggest challenge and all the other themes and policy areas stem from it.
  - The transport strategy for achieving net-zero carbon transport works on two levels: establish the **mass-transit network (regional connectivity)** and a **sustainable transport hierarchical network (local connectivity)** to connect people to the mass transport network. As sustainable public transport becomes more attractive, private car use becomes less so; the outcome of this modal shift is net-zero carbon transport across the county by 2050.
  - There is an equally important challenge that needs to be highlighted: we have to **rethink the way we use the existing road network** which currently serves private cars/ lorries and damages natural capital: the roads, especially in rural areas have to be improved to allow safe journeys by bus, cycle, and walking ( on properly maintained verges). It is the only way to reduce car dependency and make sustainable transport a natural choice for residents of this essentially rural county.
2. Under **'High levels of private car use'** add:
  - There needs to be a clear statement right at the start of the vision that allowing private car use to grow at current rates is not an option because it will have negative impacts on the take-up of sustainable transport alternatives ( both at mass-transit and local level):
    - Car congestion lengthens bus journey times.
    - Private car journeys (especially outside urban areas) are so easy that alternatives are not attractive : perceived danger from car traffic discourages and reduces active transport levels.

- The only way to make private car use less attractive is to steadily bring on stream sustainable non-carbon alternative modes of travel by 2050.
- The transition from carbon to non-carbon modes of transport across the entire transport network will be the major funding challenge.

3. Under '**Areas with poor transport Connectivity**' add:

- Currently roads provide good connectivity only for private passenger cars and freight haulage: connectivity is poor for every other mode of transport.
- A new transport policy needs to provide a hierarchical network of sustainable transport on two levels: 1. mass-transit network for longer leisure and commuting journeys (rail, longer distance buses) between main housing and employment areas; 2. local network using feeder buses, walking, and cycling to connect into the mass-transit network
- Sustainable transport connectivity would also facilitate leisure trips from urban areas to quiet countryside areas (which currently depends on private cars)

4. Under **Wider Challenges** add:

- The way we use the road network is damaging Natural Capital: high speeds and traffic from extensive private car/lorry use endanger animals in wildlife corridors; noise and congestion harm the vital resource of 'quiet landscapes' for people to escape to.

### 7 Engagement activity

We have developed our draft vision following analysis of the feedback from our public and stakeholder engagement activity and through an analysis of transport data. We have also aligned our transport vision with broader strategy and policy work affecting Oxfordshire.

The engagement activity gave us a good overview of views on a wide range of transport topics relevant to Oxfordshire. We have analysed these responses in the [engagement report](#) and provided an overall summary in the [vision document](#).

### Based on our analysis of the engagement activity do you think that we have identified the key points? Not quite

If not, what is missing or needs changing?

This Engagement section is missing key aspects of reducing transport impacts on climate change and investment priorities.

### Add: Transport impacts on Climate Change

We cannot just replace fossil fuelled with electric cars:

- Electric cars still have 1/3 of the carbon footprint of fossil fuel cars- much higher than alternatives such as buses, cycling and rail
- Conversion to electric cars does not tackle rising car use
- Electric cars are capital intensive and not available to poorer people which increases the inequality gap.

Investment allocation must reflect the modal shift away from private cars and towards non-carbon transport alternatives.

- That means significantly less investment in new roads and more in transforming existing roads for buses and active travel.

### 8. Evidence base analysis

In developing the LTCP we have collected a range of evidence to identify the current situation, challenges, and opportunities. This data informs the LTCP vision and will be used as we develop the LTCP document.

#### Have we identified the key right evidence to inform the LTCP?

the baseline report is well organised and presented ( much better than the ‘bites’ in the vision document)

What other evidence should we review as we develop the LTCP in more detail?

- It would be useful for OCC to provide a brief summary of lessons learned from LTCP4 and an update on ‘Funding and implementation’, which appeared in *Connecting Oxfordshire: Local Transport Plan 2015-2031 Volume 1: Policy & Overall Strategy* to show how options have evolved since LTCP4.
- **Population/household formation data:**  
The Challenge section refers to ‘Pressures of future housing growth’
  - County should consider different housing scenarios based on different population data sets. We note that Oxfordshire County Council uses ‘housing led’ population forecasts that show (2018-2028) 16 percent increase in population compared to 5 percent rise based on ONS data ( see Oxfordshire JSNA 2021, Population, pdf p.37)
  - Housing-led population forecasts are based on district council local plans in which strategic allocations tend to be in rural Green Belt areas with poor transport links. This inflated housing requirement (the ‘Oxfordshire Deal’s 100,000 homes by 2031) increases the pressure on transport policy and investment.
  - It is worth looking at a scenario based on 5 percent population growth (ONS data) to see how it reduces housing projections, the location of new housing and transport requirements.

## 9. Draft vision

Following analysis of the engagement activity and evidence we have developed the following draft vision.

“Our Local Transport Plan Vision is for a net-zero Oxfordshire Transport system that enables the county to thrive as one of the world’s leading innovation economies, whilst supporting clean growth, protecting our rich and varied natural and historic environment and being better for health and wellbeing, social inclusivity and education.

Our Plan sets out to achieve this by reducing the need to travel, securing high quality gigabit connectivity, and by discouraging unnecessary individual private vehicle use through making active travel, public and shared transport the natural first choice.”

#### Do you agree with our draft vision?

Yes / No Yes (broadly)

Do you have any further comments on the vision, particularly if you disagree and have views on how it can be improved?

The first paragraph is too general whereas the second paragraph better reflects the overarching goal of net zero carbon transport and eliminating private car dependency. The two paragraphs could be edited as follows:

“Our Local Transport Plan Vision is for a net-zero Oxfordshire Transport system **by 2050** that reduces car dependency and supports innovation, clean growth, health, and well-being whilst protecting the county’s environment and rich heritage.

Our Plan sets out how to achieve these benefits by delivering high quality digital connectivity and making active travel, public and shared transport the natural first choice.”

**10 Our evidence base work has identified that 61% of Oxfordshire is rural in nature. In the context of the proposed vision, how do you think our approach to improving connectivity in rural areas should differ to more urban areas?**

This is the key characteristic of the county: transport policy must focus on the dysfunctional connectivity of rural areas where railway is not available and bus service currently non-existent or unreliable.

The objective, however, is not to replace motor vehicles with e-vehicles in rural areas but to reduce dependence on cars altogether through a modal shift to sustainable public transport and active travel.

Therefore, we have some reservations about the approach to private electric cars and the public provision of facilities for recharging them as suggested in Chapter 2 of the baseline report where it is stated, ‘the number of Electric Vehicles in Oxfordshire is continuing to grow rapidly and so provisions for these vehicles will be required.’

For much of the population, an EV will be prohibitively expensive for years to come. If there has been significant growth in electric car ownership that reflects the relative affluence of some residents: they should be able to pay for their own recharging upgrades.

Public provision of recharging points for private electric vehicles would be costly in terms of infrastructure and electricity costs. Substituting electric for fuel power cars on roads will not improve road congestion or road safety.

So, for all these reasons, **the transport strategy has to change the way we use the existing road network in rural areas.**

- At the moment all our rural roads primarily serve private cars/trucks travelling at speed on relatively narrow poorly maintained B and single-track roads. Rural bus service has been so cut back that buses are hardly a feature of the rural road network. These cars dominated roads are dangerous for cyclists and pedestrians and so discourage many people from active travel on these roads.
- An infrastructure delivery plan would identify roads to be upgraded not only for new bus routes but for bicycle lanes and verges maintained for pedestrians. By transforming the road network to serve active travel and public transport, private car use would become less attractive: drivers would have to slow down to accommodate cyclists and slower e-buses.
- A major element of the transport strategy is to find the funding for new rural e-Bus services with additional minibus or taxis via smart apps, especially for transport to hospitals. This new bus service would link rural settlements with each other and to the county’s cities/market towns which already benefit from mass-transit services (buses and railway)

To sum up, we encourage the County Council to channel public resources into a transformation of the existing road network so that it can accommodate electric buses, cyclists, and pedestrians.

**11 Key Themes**

In support of the draft vision, we have identified five proposed key themes. These are the areas we are seeking to transform as the plan is implemented and the vision comes to life. We have also identified the outcomes we hope to deliver for each key theme which can be found in the [vision document](#). Our key themes are:

- Environment
- Health
- Place Shaping
- Productivity
- Connectivity

To support the key themes, we are proposing policy focus areas which we believe are required to achieve the outcomes. The proposed policy focus areas are:

- Active and healthy travel
- Public transport
- Air quality
- Road safety
- Healthy place shaping
- Innovation
- Freight
- Digital connectivity
- Regional connectivity
- Local connectivity
- Network and congestion management

You can see the list of policy focus areas in the [vision document](#); including examples of what might be included under each area in the detailed LTCP.

**Do you think we have identified the right key themes and policy focus areas for the LTCP?**

Select the most applicable option in each row.

	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree
Key themes				X	
Policy focus areas				X	

If you disagree, what is missing or needs changing?

Our proposals for Key themes

The key themes currently in the Vision document do not clearly relate to transport challenges and policy areas. Some of the ‘Outcomes’ are circular in thinking- for example, the health theme.

We suggest these key themes:

1. Moving to Zero carbon transport
2. Achieving regional and local connectivity
3. Improving physical and mental health through transport choice
4. Protecting nature from transport impacts
5. Ensuring development location matches sustainable transport capacity

### 1. Moving to Zero carbon transport

**Outcome:** The County transport system will reduce the need for travel and delivers the vast majority of journeys by transport modes with the lowest carbon footprint. The County transport system would link local to regional transport by sustainable modes of travel; it would reduce truck haulage by shifting freight to rail.

### 2. Achieving regional and local connectivity

**Outcome:** A hierarchical sustainable transport network would link housing areas to mass-transit transport comprising rail, bus lanes and possibly exclusive bus roads for the **economically important longer journeys.**

This sustainable transport hierarchy applies both to rural areas and towns, including Oxford. Some of Oxford's initiatives are piecemeal, such as shifting traffic out of the city centre onto the ring road without considering the consequences of traffic flows on the ring road. If Oxford is to have a genuinely sustainable transport network to reduce car dependency and congestion, then there has to be an integrated plan for 'greater' Oxford that manages the interaction between a local and mass-transit network.

**Just as we have to rethink how we use the rural road network, we also have to rethink how we use the ring road to boost sustainable transport around and into the city.**

Oxford has several Park and Rides for bus links from some outer areas to the city. But apart from the P&Rs, there is no integrated plan for sustainable modes of transport – buses -- to bring people from settlements outside the ring road to employment hubs such as the hospitals in Headington. It will be necessary to have strategic 'express' bus routes with dedicated bus lanes on the ring road for the science parks and new edge of city developments: other 'local' buses would bring passengers from the ring road on 'radial' roads into depots at Headington, Botley and into the city centre.

If these strategic ring road buses work well, they will become the attractive option for commuters and discourage private car traffic around and into the city.

Digital connectivity in addition to the expanded sustainable transport network would minimise all journeys by private car while allowing more people to be more productive.

### 3. Securing improvements in physical and mental Health

**Outcome:** as a result of the strategy, there would be far greater use of active travel and sustainable transport by all of the county's residents which promotes equality and improves physical and mental health. Furthermore, the significant improvement in air quality and reduction in noise as well as light pollution from private vehicle traffic will improve health and well-being. Another key health benefit comes from regular visits via active and sustainable transport to nature within settlements, and by longer trips, to quiet countryside landscapes that are vital for mental health and leisure.

In building the local transport network, the strategy has to make greater provision for transport to hospitals from rural areas to reduce anxiety not only for patients but hospital staff about getting to hospitals on time for appointments and work.

### 4. Protecting the natural environment

**Outcome:** the kind of sustainable transport infrastructure that we envision would avoid degrading land required for nature recovery and enable visits to nature areas without the destructive impact of high car traffic. The modal shift to sustainable transport greatly reduces harm inflicted on wildlife



through air, light, and noise pollution. The reduction in speed of all traffic on roads would improve safety for all because drivers and cyclists would be better able to avoid humans or wildlife crossing the road.

### 5.Ensuring development location matches sustainable transport capacity

**Outcome:** All new employment and housing would be located near the strategic mass-transit (bus, coach, and rail) network. This maximises the proportion of sustainable transport commuting from new development and maximises the impact of development contributions to sustainable transport since increased capacity of the mass-transit network benefits the whole system.

This theme is vital for effecting the transition to Zero-carbon transport by 2050 because it directly connects new development to the zero-carbon transport goal. If the priority of achieving net-zero carbon transport is firmly observed, district councils will stop promoting developments in locations that are so far from employment/commercial hubs that the costs of sustainable transport connections turn out to be very costly or unviable. ( example Chalgrove in the SODC local plan)

This theme would focus the minds of developers and planners on the real as opposed to aspired capacity of the rail system in Oxford: just 5% of commutes into Oxford City centre are by rail, and there are very real problems with expanding rail capacity.

It also provides a reality check about the scope for bus priority lanes and bus roundabout access on the highway network that would have to be used for connecting remote new developments to urban hubs: we have failed to deliver on these kinds of upgrades for buses in the past and no doubt will again.

There will need to be some new sustainable transport infrastructure for some new developments, but infrastructure planning must preserve local biodiversity. New dwellings and infrastructure must be at least 200 metres from natural habitats and thorough ecological studies must determine their actual distance from these.

### Policy Focus Areas

To support the key themes, we are proposing policy focus areas which we believe are required to achieve the outcomes. The proposed policy focus areas are:

- Active and healthy travel
- Public transport
- Air quality
- Road safety
- Healthy place shaping
- Innovation
- Freight
- Digital connectivity
- Regional connectivity
- Local connectivity
- Network and congestion management

Our suggestions: To be strategic, the policy focus areas need to relate directly to the key themes. Some policy focus areas apply to more than one heading so there needs to be better coordination between so many policy areas.

(Our) overarching key theme is **Moving to Zero Carbon Transport**



This theme works on two levels: regional connectivity (the mass-transit network composed of rail and non-local bus service; local sustainable transport connectivity to move people to the mass-transit network. This will require

- modelling to assess impacts of policy alternatives on carbon reduction
- investment assessment tools to ensure best return for Zero Carbon reduction
- Reporting yearly on progress to Zero Carbon Transport

Our proposed policy focus areas relate to (our) Key theme 1.-

**1. Provide connectivity for economically important longer journeys.** By which we mean greater than 3 miles: this definition is more nuanced than 'regional connectivity'

- Strategic mass-transit network (combining rail and non-local bus services) has to connect housing and employment areas and build missing links. That can be achieved by co-ordinating:
  - Rail plan: realistic assessment of capacity expansion, new stations and faster journeys scheduled for commuting journeys, new links, ( and capacity for storing and carrying bikes)
  - Freight policy on consolidation and location of depots linked to rail strategy.
  - Non-local bus plan- identify some roads for buses only and space on roads for buses to secure faster bus service (e.g. the Oxford ring road) while also accommodating cyclists on roads and pedestrians on verge. These sustainable travel improvements would help to discourage car use on these roads.
  - Park and Ride provisions would be run down as Mass-transit alternatives increase.
- Mode transfer hubs on the Strategic mass-transit network
  - Area Transport plan based around Mode transfer hubs ensuring sustainable and active transport provision from housing to hubs.
  - Mode transfer hub planning to include rural buses and localised Park and Ride for some remote settlements
  - Mobility hubs for shared mobility including bike & scooter hire, as well as on demand transport and taxis (especially to the hospitals).
  - Storage provision for micro-mobility including cycles, e-bikes, scooters, mobility scooters
- Minimize all journeys
  - Digital- gigabyte expansion
  - Homeworking
  - Neighbourhood business hubs
  - Local shops and centres for essential groceries and services
- Minimize environmental impact
  - Zero emission buses, electrification of rail
  - Transport infrastructure avoids natural habitats and Nature Recovery Network, with site specific research required to determine the required buffer.
- Traffic management and infrastructure maintenance
  - Focus has to be kept on the **rural** road and sustainable transport network

2. Policy focus for key theme- **Securing improvements in physical and mental Health**

- Area Transport Plan to deliver sustainable and active transport networks that links housing to schools, facilities and services and green space in ways that are better and more convenient than by car.
  - Co-ordination of initiatives to avoid traffic displacement
  - Shared space streets
  - Reduced parking and road space for cars, indirect routes for cars
  - Car-free direct routes for cycles, and pedestrians- but not in preference to shared streets
  - Car-sharing
  - user-response transport
  - No-car housing development
- Air pollution and noise reduction
  - Promotion of zero-emission vehicles: buses, delivery vehicles, shared cars, e-bikes, ambulances, and taxi/minivans for trips to hospitals
  - Low road speed design and speed limit
- Reduced delivery vehicle trips
  - Freight consolidation
  - Alternatives to delivery vans: e-bikes, drones.
- Designation of ‘quiet countryside’ to provide peaceful enjoyment of nature and landscape, with improved sustainable and active transport links to urban areas and mode transfer hubs on strategic sustainable transport networks
  - ‘Quiet lanes’ giving priority to walkers and cyclists
  - New bridle, cycle, and footpaths
  - Rural leisure-time bus services: weekends and summer evenings
    - New transport infrastructure avoids the designated ‘quiet’ countryside areas
  - Road traffic calming and re-designed safe road junctions and crossings

3. Policy focus for Key theme- **Protecting the natural environment**

- Transport infrastructure guidelines to avoid damage to natural habitats and Nature Recovery Network based on up-to-date research on air pollution (NOX, PM2, nitrogen deposition), noise and light, direct kills, and impact of water run-off.
- Sustainable transport plans for highly visited sensitive nature conservation sites, co-ordinated with ‘decoy’ sites to reduce pressure on most sensitive habitats
- Reduction in emissions by promoting zero emission buses and cars and charging facilities, electrification of rail
- Policy to shift modes from private cars, reducing brake-pad particle pollution

4. Policy focus for our Key theme- **Ensuring development location matches sustainable transport capacity**

- Strategic analysis of where capacity (or capacity potential) exists on the mass-transit network (Rail and non-local buses co-ordinated services) to guide development location.
- Policies on investment required by developers on
  - Improving the capacity of the mass-transit network to allow development, including building a mode change hub
  - Adequate sustainable transport and active transport provision and links to the mode-change hub
  - Adequate reduction in car dependency. New developments would curtail car ownership, road space for cars and other measures to reduce the ease of car use and make the alternative of sustainable transport more attractive.

- Sufficient minimizing of journeys, through digital infrastructure, facilitating homeworking, neighbourhood business hubs and local essential shops

**12 One the key areas identified as needing careful consideration based on the engagement feedback is the future of Park and Ride. How do you think we should develop Park and Rides in order to support the vision and key themes?**

Park and Ride facilities should remain close to the Ring road around Oxford to serve as the urban hub for rural bus routes. That way commuters would take advantage of the existing bus routes to and from the P&Rs: some rural bus routes would go to hospitals, but most buses should go to P&R rather than into city centres. If sustainable transport provision at local and regional level succeeds, there would be no need to increase P&Rs unless they are being used primarily as hubs for sustainable transport hubs rather than for private cars.

**13 Achieving the Vision**

We are also working to establish how delivery of the LTCP will be monitored, monitoring details will be included in the detailed LTCP document. As part of this work, we have identified a proposed set of measurables that could be used to monitor the LTCP. These are included in the [vision document](#) and below for initial feedback:

- Biodiversity
- Walking and cycling trips
- Public transport trips
- Healthy Streets Check
- Impacts of air pollution
- Obesity
- Physical activity
- Jobs and employment
- Economic growth
- Digital network coverage
- Road maintenance condition
- Number of killed and seriously injured in road traffic accidents
- Transport emissions
- Journey times by car
- Journey time reliability
- Congestion

**Do you think the proposed measurables are suitable for monitoring the LTCP?**

Yes / No Yes

**14 Do you have any further comments on the vision document?**

The Engagement and Baseline background papers were clear and helpful: the vision paper lost the sense of priorities: all themes came out as equally important when they actually are not.

**The vision must prioritise the 2050 deadline for net-zero carbon in the transport system.**

The policy will be a massive success if by 2050 it delivers enough transport decarbonisation and such good public transport links that the county meets its targets for climate change mitigation.

Bioabundance.org.uk

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