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From: Steve Dawe, Cowley Area Transport Group

22nd March 2020

**SUBMISSION: CONSULTATION ON INTEGRATED SUSTAINABILITY APPRAISAL, SCOPING REPORT – England’s Economic Heartland**

The Cowley Area Transport Group exists to develop sustainable alternative transport policies. To this end, it has produced reports on a Cowley Area Transport Strategy (3rd edition due summer 2020) and on Electronic Road Pricing for Oxford. Like dozens of organisations across the Cambridge-Oxford Arc, it remains opposed to the Cambridge-Oxford Expressway on grounds of need (not proven), the Climate Emergency (not compatible), air pollution reduction in the UK (not compatible), biodiversity damage on any route for the Expressway (intolerable and avoidable), waste of financial resources when railway lines need re-opening and full electrification (needed for a fully sustainable transport system).

1. Do you agree with the policy context and baseline information presented?

No. The introduction to the Scoping Report makes no mention of the travel to work areas of Cambridge, Milton Keynes and Oxford which have been shown to be highly localised – undermining any case for the Expressway. Re Localisation: Local district council and unitary transport strategies favouring more walking, cycling, locally-based employment and home working plus public transport improvements as an alternative to trunk road building, and a long-term disused rail lines re-opening programme with electrification. Encouraging more long-distance commuting or freight movements by road is to be strongly discouraged in line with cutting greenhouse gas emissions, air pollution and traffic growth and congestion.

1. Are there any additional sustainability issues which should be identified?

Yes. The Government’s favoured 2050 deadline for a carbon neutral deadline for the UK is not adequate in relation to the UN’s desire to avoid loss of life due to delay: the UN report on 1.5 degrees C of October 2018[[1]](#footnote-1) indicated that any progress in reducing temperatures and greenhouse gas emissions will be helpful in saving lives and species, making speed essential. We note that the *One Million Climate Jobs* costed programme and the *Zero Carbon Britain* reports provide ample evidence of where the financial sector and public spending need to be directed to deal with the Climate Emergency and associated ecological crisis. In the transport sector, decades of inadequate policy responses to Climate Change in the UK, and everywhere, mean all transport-related consultations, policy initiatives and Government-supported development programmes need to have the goal of reducing greenhouse gas emissions in the transport sector. It also means that each Local Plan in every local authority needs amendment to include local actions to deal with the Climate Emergency, in respect of the full range of transport policies as in other areas. This consultation is consequently unfit for purpose as it provides a basis for additional road capacity which will inevitably lead to rising transport emissions.[[2]](#footnote-2)

1. Do you agree with sustainability objectives?

No. You cannot make trunk road building sustainable, so reports or assessments intended to give such an impression are not compatible with an elementary notion of sustainability. Building new roads is inconsistent with the need to properly address the backlog of road repair: the entire road system is riddled with potholes and that there is a minimum of a 10 year backlog to do road repairs.[[3]](#footnote-3) It makes no sense to add to the road network when it is not been kept in decent condition, nor can it be done without adding appreciably to greenhouse gas emissions so new approaches are needed for our roads and pavements.

Additionally the proposed assessments are heavily dependent upon EU legislation and it remains unclear how much of this will still apply at some future point should the UK leave without entrenching these laws into UK law, and bearing in mind when the paused Expressway might still be built. In consequence, it is not a prudent use of public funds to commission assessments of this type at this time.

1. Is there any other data or information you would like to see?

Data supporting localisation. As above: local transport strategies favouring more walking, cycling and therefore active travel and health promotion, locally-based employment and home working, plus public transport improvements as an alternative to trunk road building, and including a long-term disused rail lines re-opening programme with electrification.

Data indicating precisely how 1 million extra homes by 2050 are going to be provided with water given serious water shortages in the Cambridge-Oxford Arc. The Oxford and Swindon water catchments reach capacity usage during 2020. Rational planning would make better use of the existing built environment, and brownfield sites, in locations with better records of water supplies, and better projected water supplies over the coming decades. Given that 1 million extra homes are proposed for the Thames Gateway in Essex and Kent near London, water supply is an acute and unanswered barrier to such development. It is also clear that the Cambridge-Oxford Expressway would not serve the north-south movement preferences of people in this EEH area, given the concentration of jobs in London.

1. Do you have any other comments on the approach to assessment?

Yes. It is a waste of public money, particularly in the current crisis. Rebuilding local communities and economies is paramount in a post-Coronavirus UK and facilitating large scale infrastructure such as the Expressway or HS2 should be abandoned. \*\*\*\*\*\*\*\*\*\*\*

1. See summary and full report at <https://www.ipcc.ch/sr15/> [↑](#footnote-ref-1)
2. Adapted from an Extinction Rebellion Oxford submission to EEH’s outline Transport Strategy consultation, as with some other material presented here. [↑](#footnote-ref-2)
3. Hannah Walsh -*Britain’s Pothole Problem,* Which, September 2019. [↑](#footnote-ref-3)