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**SUBMISSION: to consultation: FUTURE OF TRANSPORT: RURAL STRATEGY – CALL FOR EVIDENCE**

Comments on assumptions:

Rachael MacLean’s comments in the Foreword to the consultation document include references assuming that mobility is of key importance in transport. However, this can and should be questioned for these reasons:

Mobility means movement by car to most people which conflicts with the need to reduce road traffic emissions on air pollution and Climate Emergency grounds. You cannot cut traffic congestion by favouring more mobility. Mobility has an implicit and generally unquestioned assumption within it – that in some sense mobility has a higher value than the people and facilities which are proximate in one’s own community. Resilience, including under pandemic conditions, and sustainability in all senses, depend upon what may be very close, very accessible and not heavily dependent on transport links. Reductions in mobility would also follow from more people working at home, and even more so if the right to flexitime was written into law for many categories of workers. This would encourage businesses and public sector bodies to use less space for their activities, releasing such spaces for other uses – including more social housing. To put it another way, the more time people spend in their rural community, interacting and cooperating with others and using local businesses, the better that community will serve all those who live in it.[[1]](#footnote-1)

In the introduction, the idea of automation is mentioned but not the many problematic and complex aspects of the way human beings use roads, making automation of vehicles problematic – including as cyclists and pedestrians.[[2]](#footnote-2) Driverless vehicles seem less likely to enter mass production quickly if more people are both working at home and steadily increasing their shopping online. And why own a vehicle at all when an up-to-date electric vehicle could be hired? Clearly, any actions which increase the numbers of vehicles on the road have implications for the use of physical resources and energy – suggesting a need for means of conserving both within local and national transport policies. Car Club and car hire offering electric vehicles should be promoted to reduce the need for owning a car.

Similarly, the presumption of a need for connectivity presumes people will want to travel significant distances for many purposes. But the average car journey is only 8.4 miles.[[3]](#footnote-3) This is easily cycled by an able-bodied person and is not a long journey by bus. Since domestic transport was the origin of a third of UK carbon dioxide emissions in 2019, local government has a key role in making cuts.[[4]](#footnote-4)

The future demographics of rural areas needs to be considered. The introduction indicates a 50% increase in the over 65s in both rural and urban areas 2016-2039. This means that there will be an element in these populations of those who no longer drive due to age-related health factors. The qualities of their immediate communities are vital to this large social group. Evidence from the same section suggesting no real increase in younger age groups living in rural areas in the same time period, indicates both employment and social housing (bought from homes on sale) are critical in improving rural communities for resilience and sustainability. Such improvements would counter the problem of 76% of rural trips being by car, and the dirth of active travel in rural areas.

Car dependence in rural areas reflects: cuts in bus services; the failure to re-open disused rail lines; absence of underground light rail extensions into rural areas to help reduce traffic congestion; variable and often poor quality active travel networks in rural areas for both walkers and cyclists. Investment in all these areas would make rural areas more acceptable for living in, decrease car dependence and consequent negative impacts on health, and create conditions for a more diverse rural economy with better representation of younger age groups (subject to availability of social housing and keyworker homes, including part rent, part buy). There is also the issue of acting on the UK Government support for the Stockholm Declaration on Road Safety.[[5]](#footnote-5) Context is important. In this case, addressing the Climate and Ecological Emergencies and generating sustainable rural employment by doing so is an obvious overall context for rapid action.[[6]](#footnote-6)

**Question: Do you have any evidence for the issues mentioned?**

Yes, see above.

**Question: Do you think there are other issues facing rural areas that we should consider in the Strategy?**

Yes. We agree with the Green Alliance that opportunities to deal with Climate Change and rebuild local economies are in danger of being missed.[[7]](#footnote-7) But austerity for local government must end. The net spend per person in local councils has dropped 23% in the past decade.[[8]](#footnote-8) Local Government needs more resources and both Land Value Taxation and Electronic Road Pricing can achieve this.

1. **Electronic Road Pricing:** Introduction of Electronic Road Pricing to support road and pavement repair; more electric buses; joined-up walking and cycling networks; enforcement of 20 mph limits in all residential areas whether rural or urban. See an introduction to ERP as a possible trial for the City of Oxford and neighbouring key routes into the City, on our website.[[9]](#footnote-9) It is worth noting that the application of ERP may encourage more car sharing/car clubs/car hire and such cars need to be electric as a result of appropriate Government policies.
2. **Localisation:** Localisation, resilience and sustainability in rural communities of all sizes. This is not possible without a reverse to the years of austerity. Local Government needs to be, first, free to set its own Council Tax levels and second, to have Land Value Taxation as an alternative to Council Tax.[[10]](#footnote-10) Adjustments to the tax base would be needed to ensure neither ERP or LVT impacted significantly on the lowest level income groups.[[11]](#footnote-11)
3. **Economic diversification:** Economic diversification: addressing the need for food security and food sovereignty, both radically undermined by Brexit, with more food production in rural areas; energy efficiency in the built environment; progressive increase in both biodiversity through forest and species corridors, and commercial forestry to cut imports and meet the need for more use of wood in construction; better quality public transport modes in rural areas are a vital part of boosting eco-tourism.
4. **Flexitime:** Legislating for flexitime rights to allow people more time in their communities – for their families and community activities.
5. **Online working:** Legislating for a minimum percentage of each appropriate private or public enterprise to allow people to choose to work at home. For rural areas, as demonstrated under Covid 19, this would appear likely to mean more spending in the local economy – contributing to point 3 above.
6. **Acute long-term lack of social and keyworker housing:** Ensure local councils are funded to buy homes on sale for social and keyworker housing; ensure local councils are funded to buy brownfield sites in rural areas for social and keyworker housing.[[12]](#footnote-12) Ensure local councils can exercise compulsory purchase of car parks that it does not own for use as housing. Homes can be built around the edges of such car parks, apartments above surface level, and right over car parks in areas where traffic movements are problematic, as part of extending pedestrianised areas in particular.
7. **Diversification of community facilities:** Successful expansion of very low- cost housing and economic diversification in rural areas will stimulate a need for additional community facilities of all types. At a minimum, this could include increased school places; increased capacity in Medical Practices; increased capacity in community Hospitals; Children’s Centres; Youth Centres; etc. Such facilities should be concentrated within existing settlements and may involve the creation of taller buildings.
8. **Decentralisation of powers:** Parish and Town Councils will need additional powers devolved from their district/Unitary councils as a part of the above ‘rural renaissance’. Since the amalgamation of powers at a Unitary level is much to be preferred, the process of getting rid of County Councils should be accelerated.[[13]](#footnote-13)
9. **Planning for a sustainable future:** Unlike the Government’s appalling Planning White Paper of 2020[[14]](#footnote-14), the Government’s own National Planning Policy Framework assumes sustainable development as an over-arching principle, but car-orientated development and road building predominate[[15]](#footnote-15) over not travelling at all for work, and locations of homes and work within the existing built environment rather than on greenfield sites which have many other uses.

The section on ‘Increasing use of active travel modes’ is worthwhile, but the Government needs to commit £2bn a year to cycling network expansion alone, and to permit local government to raise its taxation to ensure good maintenance of expanding networks. Walking networks will probably need a similar sum per year. It is very likely that better access to good networks for Active Travel will reduce the age at which people in rural areas need to make major use of the NHS. It is of particular importance that more people are empowered to commute by bicycle into urban employment centres from rural areas. This requires ‘joined up’ cycling networks and major junction improvements.[[16]](#footnote-16)

On ‘micromobility’, whilst we are not against e-scooters in principle, we have a variety of concerns about permitting further use on roads without training. See our submission to an Oxford City Council consultation on this matter for more detailed comment.[[17]](#footnote-17)

‘More effective integration of journeys’ requires comprehensive rural bus coverage and good incidence of services. Bus services must be integrated with rail, to be much enhanced by re-opening disused rail lines and stations. Longer platforms and getting rid of first class train carriages are both needed. Village and small town car, van and minibus pools should be encouraged[[18]](#footnote-18) with shared electric charging hubs, linking to the next point:

‘Mobility hubs’ should be tailored to the extent that our points 1-8 above have successfully reduced the level of travelling needed for many people in a given week. This type of initiative needs a number of basic principles. The most important is ‘build-up not out’. The urban sprawl of settlements in the UK is an appalling use of land and should be resisted by permitting more taller buildings for homes and other facilities within existing settlements.

Digital enhancement of services and of use of transport modes depends upon digital ‘literacy’ which is very variable; access on mobile phones to information needed by potential users; very good material on Parish and Town Council websites offering links for the community (and visitors) to see what is available locally in terms of services and shops, who will deliver to homes etc. A clear objective should be: ‘How can the number of journeys by car be reduced?’ And, it is very important that people find it easy to access businesses and services within walking or cycling distance.

‘New modes’ of transporting people and goods generally needs more critical assessment than this section of the consultation documents offers. The use of drones cannot be contemplated without consideration of the customary movements of birds throughout rural (and urban) areas during the annual cycle. We have lost 40 million birds in the last 50 years.[[19]](#footnote-19) Further random urbanisation of the countryside will make this worse and use of drones could contribute to this problem. Drones need altitude and route controls. The ‘automated drone air traffic control’ in the Solent trial seems promising in principle. Given the major planetary need for carbon emissions reductions, only drones charged by the use of renewable electricity should be permissible. Also, it would make sense for smaller airports to be given over exclusively to drone or electric aircraft use; this would allow concentration of maintenance and charging facilities, and possibly construction in the case of drones in particular.

We indicated above that healthy scepticism about self-driving vehicles is warranted. More specifically, increasing the number of road vehicles is unwanted in terms of physical resource and energy use. Road traffic reduction should be built into overall transport policies at all levels. The movement of traffic towards employment centres can only be made worse if the number of vehicles and the level of their use continues to increase. The rush hours in Oxford are observable as early as 6.15am in the weekday mornings at the Thornhill Park and Ride site; in the afternoon the school run leads to a major increase in traffic movements observable from about 2.30pm onwards on school days, merging with the rush hour in the late afternoon. We cannot exclude the possibility of this continuing unless the importance of cutting traffic, emissions and the need to travel from rural areas are not all planned, with appropriate funding for local government.

Concerning examples of transport trends in rural areas of Oxfordshire:

‘Increasing use of active travel modes’ – Oxfordshire County Council is planning for a 50% increase in cycling by 2031 and expenditure of £300m including walking schemes to achieve this.[[20]](#footnote-20) The number of cycling groups in Oxfordshire is substantial, indicating a comparatively high level of cycling County-wide.[[21]](#footnote-21) Oxford is 2nd only to Cambridge for numbers of people cycling at least once a week: 39.6%.[[22]](#footnote-22) The Ramblers Association has 10 groups in Oxfordshire, with 1000 organised walks each year.[[23]](#footnote-23) See also the Oxford Pedestrians Association.[[24]](#footnote-24) The prevalence of cycling, particularly in Oxford, is reflected in a high concentration of bicycle shops – especially on the Cowley Road, which are continuing to operate despite the Covid 19 crisis.

“Schools in Oxfordshire have had an amazing increase in children travelling to school by foot, bike or scooter, with **4 in every 10 car journeys** within participating schools being swapped for more active travel options in the academic year 2019/20. Bucking the trend of many initiatives, the greatest benefits have been seen in areas of deprivation.”[[25]](#footnote-25)

‘Micromobility’ has been observably increasing everywhere in Oxfordshire we have been able to observe during 2020. We have comments about this in our submission on expanding usage of e-scooters.[[26]](#footnote-26)

‘More effective integration of journeys’ will occur when rural bus subsidies are restored and enhanced, when disused rail lines and stations are re-opened, when the railways are re-nationalised with a large cut in ticket prices, when there are more school buses to reduce school run traffic, when cycling park near bus stops, rail stations and taxi ranks is increased or indeed introduced in many locations, and when every cycle track and walking route is part of a network throughout its district council/Unitary area. Car sharing/hire and car clubs all need promotion to lower vehicle ownership. Integration in our view is very poor, and traffic volume is evidently going above pre-pandemic levels.[[27]](#footnote-27) This is subject to consumer behaviour after Xmas 2020. So, we are sceptical about meaningful change in this area without big changes in Government policy and deployment of resources to local government and its services.

‘Digital models for more effective services’ appear in many consultation documents. Refunding of local government to assist in such a transformation does not appear, with more threats of cuts rumoured in the 2021 Budget. We cannot detect more than superficial change in this area at present.

‘New modes of transport’ appears to be a reference to market activity, meaning a slow roll-out of change over decades in practice. In terms of sustainability, the increased emphasis throughout Oxfordshire on Active Travel is what matters in terms of keeping down infrastructure repair costs and using fewer physical resources and energy for transport.

‘Strong community links’ is not explained. It could mean many different things.

Question on trends in innovation:

This is covered by our 1-8 points listed above.

‘Building upon Future of Transport principles.’ The principles need rewriting in line with comments made here. Excessive reliance on market forces has no long-term reliability: we have the highest rail fares in Europe; our usage rates of cars appear to be very high in rural areas because of poor incidence and coverage of both bus and rail, as well as very poor walking and cycling routes that are yet to be networks. However, we should note declining car registration as a factor of interest in recent years.[[28]](#footnote-28)

Concerning ‘the urban principles’, a commitment to reduce private car movements is not present. Whilst these principles may appear apposite, how they will be delivered will depend on local government funding – particularly to favour Active Travel. We note that the issue of reduced use of public transport under Covid 19 conditions is not addressed here, and that increased urban and rural traffic is evident in Oxfordshire as this problem continues. Local Government needs funding to promote public transport use in order to counter the basic error Government made in discouraging public transport use. More broadly, all of these principles need to be situated in a rigorous approach to sustainability with specific targets for future years – for the country as a whole, being delivered by local authorities as the primary actors.

Question on including above principles. Apart from the failure to reference both the Climate and Ecological emergencies in the above principles, which in practice require road traffic reduction and more use of car hire rather than car ownership, there is the issue of localisation. If the facilities people need are within walking or cycling distances, then we may say that localisation has been achieved.[[29]](#footnote-29) More working at home and flexitime will also assist. All this will reduce car movements, and perhaps even online shopping of some forms. Whether sustainability has been achieved at the same time is a matter of using a range of performance indicators in local government to test performance, influenced in part by the UN Sustainable Development Goals.

‘Encouraging transport innovation in rural areas’ should primarily be about how the numbers of car journey can be cut. Many suggestions above address this issue.

Question on testing and trialling new technologies. We made reference above to our report on applying Electronic Road Pricing to the Oxford City Region. This means that Travel to Work Areas are a key consideration in the area ERP might cover. We advocated using Oxford as a trial location for ERP, but the use of ERP in Singapore since 1998 means that trials are not really needed since the matured and adapted use of this technology in Singapore has been thoroughly and critically examined.[[30]](#footnote-30)

Roles of different levels of governance: Central Government should ensure it is addressing the Climate and ecological emergencies by cutting transport sector emissions year on year, reducing the movements of cars and localising as a key principle. Sub-national transport bodies should only exist where democratic control is ensured, with the resources held and managed either by Unitary councils or – where strategic infrastructure is involved – by elected regional government. Local Government should have its walking, cycling and public transport improvements as suggested above funded by Electronic Road Pricing, increasing fuel duties to foster a quicker move towards electric vehicle use and an end to any trunk road building as unwanted capacity additions which are unsustainable in every sense of the word.

Question about encouraging the private sector to innovate in transport services. This will depend on whether the private sector observes joined up, fully integrated and wholly sustainable transport policies from statutory bodies. For example, haulage and distribution firms should be able to see cargo bike options for delivery into urban settlements which in turn depend on allocating road space to cycle tracks and creating new cycle tracks, bridges and tunnels to address obvious blockages to an effective transport network. This should help to reduce the impact of HGVs on roads near urban settlements, and permit far more pollution and congestion free transportation of goods.

The private sector has not, in our view, been able to demonstrate a capacity to provide a sustainable rail network with low ticket prices or improve potential for freight movements, perhaps of a more adequately planned combined transport approach. Renationalisation is essential, and the Government should be candid about this hopeless case of market failure. We have similar reservations about the bus services which are too expensive for users. They need to be the subject of exemptions for young people up to age 21 subject to presentation of a card, need to be free to use for the over-60s and need to be made more comprehensive in coverage and incidence by the return of rural bus subsidies as a part of re-funding local government.

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1. See this work for a thorough questioning of the idea of mobility: John Whitelegg - *Mobility,* 2016. [↑](#footnote-ref-1)
2. Critical analysis on this topic is developed and reviewed in: Christian Wolmar – *Driverless Cars: on a road to nowhere,* 2018. [↑](#footnote-ref-2)
3. From the Department for Transport statistics: <https://www.nimblefins.co.uk/average-car-journey-uk#:~:text=The%20average%20car%20journey%20distance%20in%20the%20UK,reducing%20the%20trip%20lengths%20for%20drivers%20travelling%20alone>. [↑](#footnote-ref-3)
4. Green Alliance – *The Local Climate Challenge: a new partnership approach,* December 2020, p.6. [↑](#footnote-ref-4)
5. Stockholm Declaration – *Third Global Ministerial Conference on Road Safety: achieving global goals 2030,* February 2020. [↑](#footnote-ref-5)
6. About 75% of English councils have declared Climate Emergencies. Green Alliance – *The Local Climate Challenge: a new partnership approach,* December 2020, p. 1. See also an introduction to issues in CPRE – *Greener, better, faster: countryside solutions to the climate emergency and for a green recovery,* July 2020. [↑](#footnote-ref-6)
7. Green Alliance, 2020, p.2. [↑](#footnote-ref-7)
8. Green Alliance, 2020, p.11. [↑](#footnote-ref-8)
9. Under REPORTS, at [www.catg.org.uk](http://www.catg.org.uk) [↑](#footnote-ref-9)
10. See: <https://www.london.gov.uk/sites/default/files/final-draft-lvt-report_2.pdf> [↑](#footnote-ref-10)
11. Apart from ERP and LVT, taxing sugar properly would be a good means of directing more funds to the NHS. There are Climate reasons to dramatically increase Air Passenger Duty. A financial transaction tax applied to the UK and its Overseas Dependent Territories could begin the process of shutting down tax haven activities. Fuel duties should be increased to increase the speed of transition to electric vehicle hire/use. Highest incomes and corporations need to be taxed at higher levels to cut conspicuous and carbon-intensive consumption. [↑](#footnote-ref-11)
12. It is worth recognising that the amount of social housing added each year from 1979 to 1997 was considerably greater than 1997-2008: <https://fullfact.org/news/labours-social-housing-record/> [↑](#footnote-ref-12)
13. It seems doubtful that this process can be effective decentralisation unless we have regional elected bodies throughout England. Only having them in London, Northern Ireland, Scotland and Wales is not adequate. [↑](#footnote-ref-13)
14. See our critical submission under Other relevant Submissions on our website: <https://www.catg.org.uk/other-relevant-submissions/> [↑](#footnote-ref-14)
15. Green Alliance, 2020, p.16. [↑](#footnote-ref-15)
16. See: <https://nic.org.uk/app/uploads/Running-out-of-Road-June-2018.pdf> [↑](#footnote-ref-16)
17. Under SUBMISSIONS at [www.catg.org.uk](http://www.catg.org.uk) [↑](#footnote-ref-17)
18. Land Workers Alliance – *Equality in the countryside: a rural manifesto for the parliamentary opposition,* 2015. [↑](#footnote-ref-18)
19. <https://www.bbc.co.uk/news/uk-48064500> [↑](#footnote-ref-19)
20. See for example: <https://mycouncil.oxfordshire.gov.uk/documents/s50202/CA_MAR1720R09%20-%20Oxford%20LCWIP%20Report.pdf> & <https://news.oxfordshire.gov.uk/longer-term-plans-for-permanent-increases-in-cycleways-will-lead-to-a-step-change-in-oxfordshires-cycling-infrastructure/> [↑](#footnote-ref-20)
21. See: <https://www.cyclinguk.org/cycle/cycling-oxfordshire> for links; <https://www.cyclox.org/> [↑](#footnote-ref-21)
22. <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/906698/walking-and-cycling-statistics-england-2019.pdf> [↑](#footnote-ref-22)
23. See: <https://www.ramblers.org.uk/go-walking/group-finder.aspx> [↑](#footnote-ref-23)
24. <http://oxpa.org.uk/> [↑](#footnote-ref-24)
25. <https://www.activeoxfordshire.org/news-and-events/2020/11/walking-back-to-school> [↑](#footnote-ref-25)
26. See under SUBMISSIONS at [www.catg.org.uk](http://www.catg.org.uk) [↑](#footnote-ref-26)
27. See: <https://www.rac.co.uk/drive/news/motoring-news/traffic-set-to-exceed-pre-pandemic-levels-as-lockdown-restrictions-loosen/> and <https://www.highwaysindustry.com/easing-of-lockdown-restrictions-could-see-road-traffic-exceed-pre-pandemic-levels/> [↑](#footnote-ref-27)
28. “The UK new car market declined by 2.4 per cent in 2019, with annual registrations falling for a third year in a row to 2,311,140 units (as compared to 2,367,147 new cars registered in 2018). The annual decline was driven primarily by falling private demand, with registrations from consumers down 3.2 per cent, while the small volume business market also fell, down 34.4 per cent. Fleet registrations, however, remained broadly stable, up 0.8 per cent.” <https://www.racfoundation.org/motoring-faqs/mobility#a10> [↑](#footnote-ref-28)
29. Colin Hines and Helena Norberg-Hodge offer two different introductions to Localisation: Colin Hines – *Localization: a global manifesto,* 2000; Helena Norberg-Hodge – *Local is our future: steps to an economics of happiness,* 2019. Molly Scott Cato gives a picture of ‘Relocalizing Economic Relationships’ which forms Chapter 9 in Molly Scott Cato – *Green Economics: an introduction to theory, policy and practice,* 2009. [↑](#footnote-ref-29)
30. See our document on Electronic Road Pricing for the Oxford City Region, under REPORTS at [www.catg.org.uk](http://www.catg.org.uk) for links to English language sites on the history and practicalities of ERP in Singapore. [↑](#footnote-ref-30)