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**SUBMISSION: Local Transport and Connectivity Plan - vision consultation: Part A of the CATG submission**

This is Part A of the Cowley Area Transport Group submission to the above consultation. Part B is the CATG submission to the questionnaire already provided for this consultation. The need for a Part A is because there are numerous assumptions in County transport documentation which need to be strongly questioned.

The Cowley Area Transport Group (CATG) is a loose network of individuals interested in transport issues, covering the council wards of Cowley and Lye Valley plus Temple Cowley, in Oxford. It has already been responsible for the *Cowley Area Transport Strategy* – 3rd edition 2020,[[1]](#footnote-1) based on consultations with residents.

Whilst CATG is interested in local transport improvements in its main area of coverage, it also has wider concerns about transport which it will raise in reports on specific topics periodically. The first of these, on Electronic Road Pricing for Oxford,[[2]](#footnote-2) was sent to key County Councillors on 15th November 2018. CATG has also responded to public consultations periodically.

Failures in assumptions, and omissions: [updated from our previous submission on LTCP5, since insufficient action has been taken to improve County documentation on transport]

**A date for a carbon free County, no later than 2030**:

Reasons for a much earlier carbon neutral date for Oxfordshire, and other local council complete areas, include:

1. **There has been NO progress in reducing global carbon dioxide emissions**: The increase in global carbon dioxide emissions 1990-2018 was 67%, meaning that ideas of meeting targets by specific countries have not impacted upon the global trend towards a far hotter planet.[[3]](#footnote-3) In consequence, radical cuts in greenhouse gas emissions in all willing States are needed now, with targets for carbon neutral societies no later than 2030, to compensate for States failing to implement rigorous targets. This means Oxfordshire needs to be a carbon neutral County no later than 2030, to make a contribution to this process. Since, at present, very few countries have committed themselves to better Climate goals for COP26 at Glasgow in November 2021, we need to improve UK goals and address the contradictions in policies – particularly in the biggest UK emitting sector which is transport.
2. **The capacity of the Oceans to absorb carbon dioxide may have been significantly over-estimated**:[[4]](#footnote-4) However, new research suggests heating might occur at earlier dates and more severely than expected if carbon dioxide absorption by the Oceans is less than believed, or reaches a point at which absorption is no longer occurring.[[5]](#footnote-5)
3. **Countries seem generally unwilling to improve upon their inadequate Paris Agreement targets:** The UN has warned that the Paris Agreement country targets would lead to an absolute minimum of 3 degrees C of warming, and has urged States to improve their goals significantly.[[6]](#footnote-6) The Paris Agreement State by State goals promised us a 3 degree C warmer world by 2100 as a minimum. The UK has not improved its minimalist 2050 carbon neutral target. But aviation, shipping and import-related emissions must be included in each country's emissions to identify the full extent of their emissions.[[7]](#footnote-7) If the difference between inadequate counting and reality takes UK emissions from about 2% each year of the global total to more like 12%,[[8]](#footnote-8) then clearly very deep cuts in UK emissions need to occur year on year. If the world can take revolutionary steps to counter the Coronavirus, then the Climate Emergency must be reflected in equally radical sector by sector transformations as the virus recedes - starting in the UK and council by council if the Government is too slow.[[9]](#footnote-9)
4. **The catastrophic end of warm waters from the Caribbean reaching northern Europe is coming nearer to reality**: As more freshwater from melting onshore ice reaches the Oceans, ocean currents can be influenced and even changed. The Gulf Stream plays a large role in water temperatures and weather in north West Europe. But it is susceptible to slowing.[[10]](#footnote-10)
5. **Heatwaves are occurring above the Poles**: For example, in Antarctica, once deemed to be proof against global warming until after 2100[[11]](#footnote-11), and in the loss of 2 billion tonnes of ice from Greenland.[[12]](#footnote-12) In addition, about a quarter of the ice of the Himalayas has already melted, over a 40 year period.[[13]](#footnote-13) In short, areas of ice cover around the world that reflected heat and kept the Planet cooler are disappearing at unexpected speed, justifying far more radical efforts to achieve year on year deep cuts in greenhouse gas emissions, consistent with a goal of a carbon neutral Planet no later than 2030. For the UK, this might mean making cuts of 10-15% p.a. The UN suggested, in 2019, cuts in global carbon emissions of 7.6% per year just to meet the 1.5 degree C ceiling on global temperature rise.[[14]](#footnote-14) [[15]](#footnote-15)
6. **The Coronavirus recession is unlikely to have long-term effects on greenhouse gas emissions, without radical changes of policy**: A full year of lockdowns globally might lead to a 10% overall reduction in carbon dioxide emissions, but this is not enough to make much impact on the long-term warming trend and does not prevent resurgence in pollution if the post-crisis emergency reconstruction is not planned to be sustainable and resilient.[[16]](#footnote-16) Unfortunately, there is already evidence that failure to implement Green recovery programmes is pushing up carbon emissions.[[17]](#footnote-17)
7. **Coal production has not stopped, and new coal mines are possible**: China continues to exploit and import coal;[[18]](#footnote-18) Australia is exporting coal particularly to Japan, China and South Korea;[[19]](#footnote-19) Poland continues to produce and to import coal from Russia, even under adverse price conditions.[[20]](#footnote-20) Without a general effort to cut coal production to zero in a few years, any realistic hope of making radical cuts in greenhouse gas emissions seems unreasonable optimism. Even in the UK, there are plans to open new coal mines.[[21]](#footnote-21) The Cumbria coal mine proposal may lead to other countries citing a decision in favour of this development, if taken, as a reason for delaying action on their own coal emissions.[[22]](#footnote-22)
8. **Fossil fuel industry subsidies have not been stopped:** UK fossil fuel industries receive over £10bn per year in subsidies; about £2bn of UK funding is also supporting fossil fuel industry projects abroad.[[23]](#footnote-23) [[24]](#footnote-24) In short, it is impossible to envisage reaching targets likely to achieve the preferred UN goal of only 1.5 degree C of warming whilst countries are committed to heating the Planet through such subsidies.
9. **Carbon Capture and storage**: It is not possible to use untried, costly and possibly ineffective technology to sequester carbon indefinitely on a global scale. Such technology would mean achieving guaranteed no leakage into the environment *forever.* Generalising a reliable form of such technology could take decades, if it is actually possible, by which time a runaway greenhouse gas emissions event could be in progress and adaptation to global warming could have overtaken other policy options.[[25]](#footnote-25)

Other areas of concern relevant to Oxfordshire’s overall role in transport-related greenhouse gas emissions include:

**Aviation**: The total volume of passenger and freight-only flights made to and from the UK with point of transport mode origin in Oxfordshire or destination in Oxfordshire are part of the greenhouse gas emissions of both Oxfordshire and the UK. Defence aviation has been estimated at about an additional 10% on top of other aviation emissions globally and Oxfordshire has a share of those too, with Brize Norton being the premier military air base of the UK. Before the Coronavirus crisis, there was already accumulating evidence that people had begun cutting passenger flights.[[26]](#footnote-26) However, the growth rate in aviation emissions has, up to now, reached about 5.7% p.a. Also, the UK is 3rd in the world for aviation emissions at 4% of the global total, after the US (24%) and China (13%).[[27]](#footnote-27) In consequence of these considerations, local authorities in Oxfordshire should all campaign for voluntary cuts in flying and access to the continent, and especially to the rest of the mainland UK, to be more often accomplished by rail. That this encourages staycations and day trips within Oxfordshire should be seen as advantageous. This all needs to be emphasised in the final version of the new Local Transport Plan. Similarly, councils should oppose any attempt to add to scheduled flights from any airport in Oxfordshire. Serious and rapid attempts to cut emissions should be a major priority, not offsetting:

“Greenpeace describes it [offsetting] as paying lip service to action, saying: “When compared to ideas like frequent fliers paying more and more heavily for trips abroad, [carbon offsetting transport falls very short](https://www.greenpeace.org.uk/press-releases/greenpeace-reaction-spring-statement/).” In 2016, the Institute for Applied Ecology also called the practice’s effectiveness into question when it analysed the Clean Development Mechanism. That’s the platform that made it possible for [green projects in developing countries to earn carbon credits](https://cdm.unfccc.int/about/index.html), each equivalent to one tonne of CO2, which could be traded and used by industrialized nations to help meet their emissions reduction targets. Its findings make for gloomy reading. “Overall, our results suggest that 85% of the projects covered in this analysis and 73% of the potential 2013-2020 Certified Emissions Reduction (CER) supply have [a low likelihood that emission reductions are additional](https://ec.europa.eu/clima/sites/clima/files/ets/docs/clean_dev_mechanism_en.pdf) and are not over-estimated,” the Institute says. “Only 2% of the projects and 7% of potential CER supply have a high likelihood of ensuring that emission reductions are additional and are not over-estimated.”[[28]](#footnote-28)

**Shipping:** Emissions from shipping, like aviation, have not been counted in the past as part of the UK’s greenhouse gas emissions in terms of international targets such as those included in the Paris Agreement. Shipping emissions, which are growing, are about 2.5% of global greenhouse gas emissions but are likely to increase by an absolute minimum of 50% by 2050, with 250% being possible.[[29]](#footnote-29) However, the Committee on Climate Change emphasises both aviation and shipping are part of the Government’s target areas for achieving Net Zero Carbon by 2050. Consequently, campaigns by councils to significantly increase re-use and recycling must be stepped up to help reduce imports of physical goods which end up serving Oxfordshire. The excellent example of re-use offered through charity shops can be promoted, as well as the Library of Things in Oxford;[[30]](#footnote-30) businesses offering repair are to be supported also; councils can consider how they improve their offer of recycling services to increase recycling of things which may not readily be re-used. Advice to households on how to use some things in compost is valuable: egg shells can be dried and crushed into compost; plain cardboard can be allowed to soak in rain and then can be ripped up for adding to compost heaps, etc. An effect of the Coronavirus has been to increase cultivation of food by households, so this needs council recognition and support throughout the County.

**Import substitution and local employment**: Reducing the distances physical goods travel is an essential feature of reducing impacts on transport infrastructure and cutting traffic movements and resulting emissions. Energy and land use issues are critical areas for increasing localisation, and both have transport implications.[[31]](#footnote-31) Successful reduction of physical imports is also desirable to help create new employment throughout Oxfordshire. Some examples, consistent with improved Climate goals, include: more farmers markets; increasing forest cover to include commercially valuable species for construction, furniture etc; allocation of land to production of more organically grown fruit, vegetables and flowers in the County – all of which are being imported in large quantities at present.

**Road user hierarchy reflection in spending priorities**: Spending priorities are not made clear in documentation for this exercise. If a road user hierarchy is accepted as the documentation in the earlier Engagement consultation suggests, and the physical vulnerability of both pedestrians and cyclists is properly recognised, then clear commitments about giving much higher priority in spending to pedestrians and cyclists need to be made abundantly clear. Documents stating the importance of active travel are nullified by continuing spending on new trunk roads, a known source of more journeys of longer distance.[[32]](#footnote-32)

**Trunk Road building**: A country that has a 14 year (minimum) backlog in road repairs cannot built any new trunk roads.[[33]](#footnote-33) The rate of repair is subject to unpredictable road damage done by very cold winters and very hot summers. In terms of reducing transport emissions as the largest UK sector for emissions, not encouraging more traffic movements is essential. This will involve abandoning the fantastically expensive Cambridge-Oxford Expressway – and ‘stealth’ versions thereof - and undertaking specific actions to reduce traffic on roads with a high burden of traffic such as the A34. In practical terms, this means research on road user groups to establish which ones may be amenable to reduction eg school run traffic becomes electric school bus transport; delivery vehicles become cargo bikes through formal adoption of more transhipment points; cars disappear as home working and flexitime are strongly promoted and implemented; less vehicles moving waste because of more success in household and enterprise re-use of materials, etc. Alternatives for such roads should also include: restoring bus subsidies and securing additional funds to support other reasonable bus and coach services; more bus lanes; re-opening disused rail lines.

**Comprehensive expansion of pedestrianised areas**: Reduction in air pollution must include the suppression of PM 2.5s arising from: brake pad erosion, road surface abrasion, wear of tyres, dispersal of toxic dust from the road surface. But this can only be achieved where pedestrianised areas, with through cycling access, are expanded in urban centres. Since it has often been demonstrated that pedestrianised areas benefit commercial outlets, economic objections can be set aside. Special pleading by some transport users or groups for continuations of heavily trafficked polluted and congested areas in urban centres need to be countered by positive examples such as Norwich and York. CPZs and LTNs should continue to be increased throughout the County. Active travel for health promotion must be stressed as an alternative to short distance car, bus and taxi use. Retail regeneration and Low Traffic Neighbourhoods would benefit by this approach; notorious ‘rat runs’ could be closed, or access to them could be reduced to single-lane.

**Utility access points are a road repair problem:** Road works blight all forms of surface transport movement. This is partly because of poor coordination between privatised utilities; partly because roads are not uniformly well-repaired leading to damage to utility infrastructure underneath, and to greater frequency of repairs being needed; partly due to issues arising from poor attention to drainage, in part due to the failure of the privatised water industry; and above all to excessive levels of traffic. This is going to be a very long-term programme, requiring a continuous effort over decades, but it should be emphasised as a goal which those involved in road repair must address every time they engage in works. Given very poor standards of road repair, councils need to ensure better service from contractors/utilities. In addition, the tests of whether a road needs repairing should be based upon the impacts experienced by cyclists and pedestrians crossing such roads. In other words, smaller scale defects should mean earlier optimum repair. This will serve all road users by providing far better average surfaces for all uses. Above all, more traffic free areas will help in Oxford as the Connecting Oxford Plus proposals offer.

**Car hire not ownership**: The total volume of vehicles continues to increase. Council by council encouragement of vehicle hire, and car clubs, rather than ownership should be a shared effort. Only electric vehicles should be supported in this way, to assist the decline of more polluting vehicles.

**Re-opening disused rail lines**: The available network of disused rail lines should be re-opened, with electrification, to give people more choice of transport modes on more routes.[[34]](#footnote-34) This long-term process should be planned carefully, so that – for example – communities with significant brownfield site population increase should obtain new rail services, including stations where desirable, to prevent new car commuting adding to traffic burdens. We emphasise that obstructions created on some disused rail lines should not be regarded as insurmountable: we believe in rail investment to deal with such difficulties, and full electrification of the railways.

**Implement the Gilligan report**: The Gilligan Report which proposed £150m for improving cycling-friendly infrastructure in Oxford should be promoted strongly for implementation.[[35]](#footnote-35) We do not see local councils doing enough on this in Oxfordshire at present.

**Electronic Road Pricing**: Funding transport in areas of very high transport movements requires a more sophisticated and selective approach than congestion charging or ‘Connecting Oxford.’ CATG has prepared *Electronic Road Pricing for Oxford,* an outline for such a trial scheme in the Oxford City Region, to forward this idea – in use in Singapore since 1998.

**Locality specific complete transport strategies**: CATG is unconvinced by transport strategies or overall policies which lack locally-specific policy innovations. Our development of the *Cowley Area Transport Strategy*, in cooperation with a loose network of people in a part of East Oxford, is an example of what we mean. It seems likely, judging by the Headington Neighbourhood Plan, that some communities have already made significant steps towards their own local transport strategies. How might these types of strategies be funded? Firstly, by the abandonment of the Major Roads Network category that the Government has created which will divert more money spent on transport infrastructure away from the specific needs of small localities.

**Encouragement to home-based working and use of flexitime by all employers:** This can be encouraged, and practiced, by local councils but they should campaign for national legislation on this as well.

**Waterways as a more important transport mode:** None of the documents for the earlier Engagement consultation deal with waterways as transport networks, leisure routes or the site of an increasing number of very low cost housing units in the form of canal barges and similar vessels. A growing waterway population needs some specific facilities to make their lives easier. Freight movements by water also need to be considered and (re)introduced as part of relieving impacts upon the road infrastructure, where possible. Whilst the Oxford City Plan does envisage a small increase in moorings, we favour a County-wide approach to increase secure moorings and the facilities needed to sustain them. This will require research, investment and implementation over a period of years. It should include fully engaging with the Electric Boat Association which can offer advice in this area.[[36]](#footnote-36)

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1. Under Reports at [www.catg.org.uk](http://www.catg.org.uk) [↑](#footnote-ref-1)
2. Under reports at [www.catg.org.uk](http://www.catg.org.uk) [↑](#footnote-ref-2)
3. See for example: Kevin Anderson: <https://www.bing.com/videos/search?q=Kevin+Anderson+Cliamt+Change+You+Tube&view=detail&mid=7D8EEEF98FF1D4861DFB7D8EEEF98FF1D4861DFB&FORM=VIRE>

 [↑](#footnote-ref-3)
4. <https://www.ecowatch.com/one-third-of-commercial-fish-stocks-fished-at-unsustainable-levels-1910593830.html> [↑](#footnote-ref-4)
5. <https://www.theguardian.com/environment/2020/apr/03/oceans-capacity-to-absorb-co2-overestimated-study-suggests?CMP=share_btn_fb&fbclid=IwAR2A4YKlR3htDF-TMScjOfgP8rKNJYap4YEsXPscOwasoY83WR5l0drbWHg> [↑](#footnote-ref-5)
6. See ‘Three Degrees’ chapter in Mark Lynas – *Six Degrees, our future on a hotter planet,* 2007. [↑](#footnote-ref-6)
7. See for example: <https://www.theguardian.com/environment/2007/dec/10/carbonemissions.climatechange> [↑](#footnote-ref-7)
8. As researchers such as Dieter Helm have suggested. [↑](#footnote-ref-8)
9. <https://www.climatechangenews.com/2020/04/02/governments-still-due-submit-tougher-climate-plans-2020-despite-cop26-delay/> [↑](#footnote-ref-9)
10. <https://climatenewsnetwork.net/northern-europes-warm-water-flow-may-falter/?fbclid=IwAR0XptHQSjHZeYVRkxVghSt3MnnYkv-SKUrONcum39VBYoAKcCbcvCHSNIw#.XoSKgi3xaqk.facebook> & <https://www.nature.com/articles/d41586-018-04086-4> & <https://phys.org/news/2019-12-north-atlantic-current-cease-temporarily.html> [↑](#footnote-ref-10)
11. <https://www.theguardian.com/world/2020/mar/31/antarctica-what-it-means-when-the-coldest-place-on-earth-records-an-unprecedented-heatwave?CMP=share_btn_fb&fbclid=IwAR1sHZYD3d7oOrEZuzTmjcCdITfk4GmWeWu6pu38A84Io-hUSgYdl8h7p5s> [↑](#footnote-ref-11)
12. <https://edition.cnn.com/2019/06/14/us/greenland-sudden-ice-melt-wxc/index.html> [↑](#footnote-ref-12)
13. <https://www.nationalgeographic.co.uk/environment/2019/06/himalayan-glaciers-melting-alarming-rate-spy-satellites-show> [↑](#footnote-ref-13)
14. <https://unfccc.int/news/cut-global-emissions-by-76-percent-every-year-for-next-decade-to-meet-15degc-paris-target-un-report> [↑](#footnote-ref-14)
15. See: <https://www.bbc.co.uk/news/world-europe-49125391> & <https://public.wmo.int/en/media/news/unprecedented-wildfires-arctic> [↑](#footnote-ref-15)
16. <https://www.climatechangenews.com/2020/03/26/coronavirus-hawaii-scientists-seek-signs-economic-slowdown-air/> [↑](#footnote-ref-16)
17. <https://www.theguardian.com/environment/2021/mar/02/fossil-fuel-emissions-in-danger-of-surpassing-pre-covid-levels?CMP=share_btn_fb&fbclid=IwAR0kQob5Ag8x5OdKW7lKutGEvZrgepRZdAhmYzP-FkOpucYMHBI6b7PzL8w> [↑](#footnote-ref-17)
18. <https://unearthed.greenpeace.org/2020/03/20/china-coal-power-plants-building-coronavirus/?fbclid=IwAR3wuGZSm95gYs_XWCAJ1k7Ibn9dU4Y6-pYxCYtQC1-zmUo1hHJBDMwbiM4> [↑](#footnote-ref-18)
19. <https://www.theguardian.com/environment/2019/oct/23/australias-hopes-to-expand-coal-exports-in-south-east-asia-delusional-experts-say> [↑](#footnote-ref-19)
20. <https://www.politico.eu/article/poland-coal-mining-deep-trouble/> [↑](#footnote-ref-20)
21. See: <https://www.theguardian.com/environment/2019/mar/19/deep-coal-mine-gets-go-ahead-in-cumbria-despite-protests> & [↑](#footnote-ref-21)
22. <https://www.bbc.co.uk/news/science-environment-56223327?fbclid=IwAR2frQC7P4EUHdIHivYxkYSCQi7CaacU6T21C6rGGKbld0voBkH1a8g1ma0> [↑](#footnote-ref-22)
23. <https://www.theguardian.com/environment/2019/jan/23/uk-has-biggest-fossil-fuel-subsidies-in-the-eu-finds-commission> & <https://www.theguardian.com/environment/2019/jun/27/uk-spent-nearly-2bn-on-fossil-fuel-projects-overseas-last-year> [↑](#footnote-ref-23)
24. Global fossil fuel industry subsidies have been calculated by International Monetary Fund at about $5.2 trillion per year, or a staggering 6.4% of global gross domestic product; <https://www.vox.com/2019/5/17/18624740/fossil-fuel-subsidies-climate-imf> [↑](#footnote-ref-24)
25. <https://www.greenpeace.org/archive-international/en/campaigns/climate-change/Solutions/Reject-false-solutions/Reject-carbon-capture--storage/> & <https://www.scientificamerican.com/article/will-carbon-capture-and-storage-ever-work/> & <https://theconversation.com/its-time-to-accept-carbon-capture-has-failed-heres-what-we-should-do-instead-82929> [↑](#footnote-ref-25)
26. See p.2.: <https://www.aef.org.uk/uploads/2020/02/AEF-response-to-6th-carbon-budget-call-for-evidence.pdf> [↑](#footnote-ref-26)
27. See: <https://www.theguardian.com/business/2019/sep/19/airlines-co2-emissions-rising-up-to-70-faster-than-predicted> [↑](#footnote-ref-27)
28. <https://www.weforum.org/agenda/2019/06/what-is-carbon-offsetting/> [↑](#footnote-ref-28)
29. <https://ec.europa.eu/clima/policies/transport/shipping_en> [↑](#footnote-ref-29)
30. See: <https://shareoxford.org/> [↑](#footnote-ref-30)
31. Colin Hines – *Localization,* 2000. [↑](#footnote-ref-31)
32. See the major source on this topic: <https://bettertransport.org.uk/sites/default/files/trunk-roads-traffic-report.pdf> [↑](#footnote-ref-32)
33. See for example: <http://home.bt.com/news/uk-news/repairs-backlog-time-for-english-roads-up-by-nearly-third-in-decade-to-14-years-11364108889406> [↑](#footnote-ref-33)
34. See fore example: [https://railfuture.org.uk/Missing+Links](https://railfuture.org.uk/Missing%2BLinks) [↑](#footnote-ref-34)
35. <https://www.nic.org.uk/publications/running-out-of-road-investing-in-cycling-in-cambridge-milton-keynes-and-oxford/> [↑](#footnote-ref-35)
36. <http://www.electricboatassociation.org/> [↑](#footnote-ref-36)