To: info@oxfordshireplan.org

From: Steve Dawe – Cowley Area Transport Group – [www.catg.org.uk](http://www.catg.org.uk)

53 Bulan Road Oxford OX3 7HU – 07747 036192

**OXFORDSHIRE 2050 PLAN CONSULTATION SUBMISSION**

*PART B To which part of the consultation does this representation relate?*

Spatial Options: Stage 1 Review of Spatial Options (Transport)

*What is the nature of your comment?*

OBJECT

Introduction:

This submission deals with the Transport assumptions of Oxfordshire 2050, with particular reference to the Spatial Options paper associated with this consultation. However, the key weaknesses in County and district council assumptions about transport must be considered first, as they undermine any reasonable version of long-term sustainability.

We must bear in mind the IPCC report concerning the Climate Emergency. We must also pay attention to the additional leaked IPCC report indicating that there is a global need to peak greenhouse gas emissions no later than 2025. Globally we are way off target with the UN originally predicting a 3 degree C global average temperature rise by 2100 instead of the 1.5 degree C rise preferred by States at the Paris Climate Conference. The 3 degree C figure may be optimistic as some estimates suggest 3.6 degrees is possible.[[1]](#footnote-1) The most recent IPCC reports suggest 3 degrees C under ‘business as usual’ scenarios is highly optimistic. This means minimising the creation of additional physical infrastructure - including the use of concrete and tarmac - is a vital part of cutting UK greenhouse gas emissions and of protecting existing biodiversity. It also means the UK needs to urgently achieve deep cuts in emissions in the transport sector as the number one sector for emissions, including aviation, shipping, surface imports and their embedded carbon.

# Conventional, polluting and resource-intensive economic growth cannot be sustained and is not sustainable in any sense. There is no ‘sustainable economic growth’ or ‘green growth’. We need to use what we have, within the existing built environment and brownfield sites, to meet our needs with the least possible use of concrete, tarmac and other physical resources – to help minimise greenhouse gas emissions. We can have *Prosperity Without Growth[[2]](#footnote-2)* and *One Million Climate Jobs* without fossil fuel dependent economic growth. The costed programme offered in *One Million Climate Jobs* is of particular value. We are sceptical about the notion of ‘sustainable economic growth’ without a clear move away from growth that is fossil fuel dependent. Similarly, many physical resources are going to be in shorter supply as this century continues, notably the rare metals in mobile phones and computers. Recycling and re-use need to reach exceptional levels. Transportation, construction and refurbishment and all forms of energy use have to be based on renewable and sustainable sources, preferably by 2030 rather than 2050. Each council in Oxfordshire needs more comprehensive targets for reducing greenhouse gas emissions and to recognise how external factors contribute to the overall ecological footprint of Oxfordshire including the use of aviation by residents, imports of food and other goods from abroad by air and sea, and the forms of land use throughout the County. When every road and pavement in Oxfordshire is in a good state of repair, and the same throughout England, then ideas of larger scale infrastructure might be re-examined, but only in a future carbon negative UK. Both HS2 and the ‘paused’ Cambridge-Oxford Expressway are examples of unwanted and unsustainable ‘giantism’ which diverts funding from a much wider range of infrastructure maintenance. Building a dualled A40 instead of re-opening the Witney-Carterton to Oxford rail line is very short-sighted and ignores the obvious limitations of the Cutteslowe-Wolvercote roundabouts. For most people, having safe and segregated cycle tracks, repaired pavements and roads are all key elements of infrastructure needing investment throughout Oxfordshire to improve quality of life. Without a ramp up in local government funding, we do not see how this is going to change.

New homes on greenfield sites create new roads and a variety of other infrastructure including schools, play areas, GPs surgeries, shopping units etc. So, homes bought by local councils for council and keyworker housing in existing urban settlements will generate far less carbon emissions in retrofitting and operation than the total carbon burden of new construction. There is also reasonable hope that such an approach will keep traffic to a minimum, especially where car free covenants are present. However, without such action, new settlements and peripheral communities tacked on to existing ones are liable to be mainly 2 car households due to Oxfordshire home prices and rents and go directly against the Climate declarations and stated policies of Oxfordshire’s councils.

We reiterate our opposition to any trunk road building and our support for re-opening all disused rail lines. We note that the supposed infrastructure requirements for Oxfordshire have about £3bn of projected funding against a deemed need for £9bn. This alone provides a good reason to drop ALL road building, and most road ‘improvement’ projects other than those adding bus lanes, or creating more (preferably segregated) cycle tracks.

Dual use of car parks is a key general omission in Oxfordshire 2050. We can reduce traffic movements by diminishing car parking, using car parks private and public for housing around their fringes, above surface level and with the abolition of car parks in areas with heavy traffic congestion - all to discourage car movements in favour of active travel and public transport use.

Where new build for passivhaus standard housing is desirable is on the disused plots in industrial estates and science parks. With increased home working, use of such sites may diminish allowing more space for homes - especially if Oxfordshire's councils actively promote and support home working to cut traffic movements, improve family life and support facilities in the localities where people live.

We reject the building of new Park and Rides and expansion of existing ones since public transport services and Active Travel should deal with commuting. Maintaining and hopefully increasing levels of home working makes less commuting achievable. Encouraging car movements by over-generous car parking provision is what has encouraged substantial vehicle movements in the County; progressive reduction in car parking year on year will contribute to cutting car use on Climate, noise, air pollution and damage to infrastructure grounds.

Reducing road transport emissions depends upon a) avoiding induced traffic increases by not increasing roads or road space for vehicles; b) ensuring existing settlements use the existing built environment for additional housing units, and car parks, and industrial-science park spaces to ensure people are able to live near where they work; c) a major effort to ensure that those who can work at home and wish to do so have the right to do so, to cut commuting by car; d) increasing the cost of journeys into urban areas by the use of Electronic Road Pricing – see our report on applying this to the Oxford City Region under REPORTS at [www.catg.org.uk](http://www.catg.org.uk)

Better walking arrangements require more pedestrianised areas, with improved cycle tracks, to help stop tailpipe and non-exhaust emissions from vehicles. These are strategic County-wide needs for urban settlements of more than 10,000 people as a minimum and in some communities of smaller size plagued by traffic.

There is too much proposed road building in the County, implied road widening and emphasis on junction improvements which appears to be for vehicles rather than cyclists. Active Travel spending should exceed such spending to compensate for decades of under-investment as a health promotion measure, and as an action to reduce greenhouse gas emissions.

Mobility and connectivity assumptions have been dealt huge blows by the importance of local facilities to households through the Coronavirus crisis. Also, mobility and connectivity are less important to the millions who can and should be enabled to work from home. And online deliveries cut the need for movement by road too.

Mobility is not an intrinsically good thing and worse when it specifically assists with unsustainable economic growth, for example in consumption. Claims for the benefits of mobility exist but are rarely quantified or set against the disadvantages for people in terms of commuting time, traffic congestion and air pollution. Mobility as a ‘good’ also appears to conflict with the physical needs of the population for more exercise for health preservation. Mobility for commuting by cars generally means that employment is well away from home, and moving nearer the job may be impossible due to high housing costs, and that working from home should be supported as an alternative. Clearly, if people live nearer to where they work, or have flexitime or are able to engage in internet-based working, they have more time for their family and life in general. Having about 46,000 people commuting on a working weekday into Oxford pre-pandemic can be seen as a failure to provide very low cost housing in the City at high density over a long period, a failure to make dual use of car parks, a failure to take a strategic view of the County in terms of where employment is most needed by relevant local authorities, and a failure to allocate disused employment land to housing. These are mobility problems and need addressing more intelligently than encouraging more commuting across country or County. We are concerned that the construction of a corridor of 1 million housing units across the country between Cambridge and Oxford would, in practice, mean people commuting OUT of such a form of ribbon development into other areas for work and leisure eg. to Birmingham and London.[[3]](#footnote-3) Car based commuting, encouraged by decades of under-investment in rail and buses, may also be added to by other car journeys as new developments may be accompanied by infrastructure funding that is likely to be inadequate. Community development including strong emphasis on building local economies and employment within existing small communities is a great potential gift to quality of life because it keeps commuting down, and should be supported. A full length treatment and discussion of the issues around the largely unquestioned idea of mobility has been written by Whitelegg.[[4]](#footnote-4)

Local facilities and infrastructure are a priority for all these reasons, and in a country with far more online shopping than before. Strategic networks for cargo bikes in urban settlements for deliveries is not mentioned enough and they are of vital importance. The hollowed-out town and City Centres with their empty shops should be re-purposed for very low-cost housing with no car parking covenants etc, rather than being sustained by the idea that the ‘new normal’ looks just like pre-pandemic.

Concerning rail, and buses: We favour a general restoration of Oxfordshire’s disused rail lines wherever practical, with full electrification of all of our rail lines. We would like to see the same for the whole country. There is no prospect whatsoever that our road system could be adjusted to accept a further 7 million cars, as forecast, by 2040, PLUS an accompanying increase in other types of vehicles.[[5]](#footnote-5) Since a ‘2050 Transport Strategy’ is apparently being considered for the ‘Arc’ across the country,[[6]](#footnote-6) there are major unanswered questions about road capacity given massive projected increases in traffic – this applies particularly when vehicles attempt to enter existing settlements which were not designed to accommodate them. Whilst technological optimism has run ahead of actual technology with regard to driverless cars, they may in the very long-term add to the numbers of people able to be on the road since inability to drive may cease to be an issue.[[7]](#footnote-7) However, it would require artificial intelligence of a high order for driverless vehicles to be fully autonomous and to be able to respond to all conceivable normal conditions that drivers can cope with on a daily basis – such as anticipating traffic conditions ahead, recognising pedestrians may be about to cross a road, giving space to cyclists etc. It is clear that Community Rail Partnerships, Light Rail and other comparatively low-cost options to reduce car travel can be achieved – considering implemented examples from the UK.[[8]](#footnote-8) There is an appreciable heritage of disused rail lines in Oxfordshire, as in other places, much of which could be put back into service.[[9]](#footnote-9) We also fail to see how new trunk road building would be consistent with the Precautionary Principle,[[10]](#footnote-10) or with addressing the combined Climate and Ecological emergencies.

Concerning Oxford: Too many vehicles are entering Oxford, and too many car parking spaces are available to them. Of all these vehicles, it is cars entering the City that most need to be reduced year on year. It is forecast that there will be 7 million more cars by 2040 in the UK. This projection should be accompanied by the consideration that these will be distributed inequitably, favouring those areas with conventional unsustainable economic growth such as Oxford.[[11]](#footnote-11) However, this is only the figure for cars. Proportionate increases are also expected in delivery vans and HGVs. The implications of having driverless vehicles for overall vehicle numbers require investigation too.

**COMMENTS: ‘STAGE 1 OF SPATIAL OPTIONS: TECHNICAL NOTE (Transport) – July 2021**

p.4 Assumptions about connectivity mention the desire to reduce the need to travel, but not the need to support as many people working at home as possible. This has implications for reducing the need for road repair (which currently has a 14 year backlog), abandoning ideas of new road-building or widening and helping local economies of communities in Oxfordshire, and elsewhere, that will benefit from having more people working at home indefinitely.

p.4 We cannot achieve the goal of ‘significantly reducing greenhouse gas emissions’ if we do not acknowledge the appalling failures to do so in the overall transport sector in the UK. This is, in part, a failure to ensure the most polluting forms of transportation are taxed: no increase in fuel duties since 2011, making car journeys too cheap and congestion and air pollution too common; wholly inadequate Air Passenger Duty, making flying absurdly cheap; no effective action to reduce pollution from shipping, or to discourage avoidable imports on grounds of transport emissions caused.

There is a strong case for free bus fares, which already exist in 96 locations and have the potential to cut car use.[[12]](#footnote-12) The Government’s national bus strategy indicates:

“Average bus fares have risen by 403% since 1987, compared to 325% for rail fares and 163% for motoring costs.”[[13]](#footnote-13)

We support ensuring that using buses and trains must become cheaper than using cars, to radically reduce tailpipe and Non-Exhaust Emissions. We affirm that the best way to do this is Electronic Road Pricing, as used in Singapore since 1998.[[14]](#footnote-14)

p.6 Growth is not acceptable where any aspect of it is causing additions to greenhouse gas emissions, or raising consumption of finite resources, or generating more polluting traffic, or recklessly consuming greenfield sites.

p.7 Cuts in car parking can and should be made particularly to reduce urban centre car parking which creates the most congestion and pollution where both are already concentrated. This is essential for well-being and quality of life, and enhances Active Travel by cutting traffic.

p.9 Given the seriousness of the Climate Emergency, and the related ecological emergencies, large-scale house building should not occur on Climate and environmental grounds. It is the duty of Oxfordshire’s councils to use the existing built environment for very low cost homes as market housing is over-priced and private rents are too high. The lower the housing costs of a household, the more they will have to spend in the local economy. Each council should zone private and public car parks with 6 spaces or more for passivhaus homes using Parker-Morris space standards.[[15]](#footnote-15) These spaces should be used for council homes and keyworker shared ownership schemes to tilt the balance of tenures in each area in favour of very low cost homes. We recognise that lower income households domiciled in this way are quite likely to have low car ownership, and this can be reinforced through car free covenant arrangements.

Pp11-12 We agree that walking and cycling must have high quality networks making use of space available to have segregated routes. Road space offers too much space for cars and opportunities for excessive speed in areas with low speed limits. Bus connectivity needs more bus lanes.

p.29 Oxford-led growth promises even more commuting into Oxford in future, if even more of the County’s jobs are based there. We emphasise more working from home, including flexitime, to cut commuting for those moving in and out of Oxford for work particularly. This might deter any particular desire for moving into Oxford for those who may be able to afford to do so, and deter the phenomenon of even more of Oxford homes being high private rent than the current half.

p.48 We reject the idea of new settlements. The greenfield sites of the County should be preserved and hopefully enhanced in a wide variety of other uses. These include:

* Growing food for people, not animals;
* Biodiversity improvement including wildlife corridors;
* Commercial forestry to reduce wood and wood product imports;
* Eco-tourism, with council-led strategies to increase staycation and short distance tourism instead of flying;
* Flood plains, restored wetlands and peatlands for carbon storage and biodiversity enhancement;
* Allotments;
* Shared ‘nature’ school facilities including for Geography A level;
* Extended designations of the landscape to protect it from unsustainable development – more SSSIs, nature reserves, AONBs etc.

Such usages will generate employment in the green economy.

p.106 ‘Oxford-led growth’ as the ‘best performing option’ suggests an unwillingness to consider an enlarged role for other districts to have more employment in an expanding Green economy and revived public sector in the future. As an approach, it has the potential not simply to increase Oxford’s population but – under current very bad planning practice – dump low quality little box homes on many of the Oxford greenfield sites which remain. The commuting implications are also negative and to be challenged by promoting work at home for as many who can, and who want it.

\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*

1. See, based on an article in *Nature:* <http://kdvr.com/2017/07/31/studies-earth-to-warm-3-6-degrees-by-end-of-century/>But this is only an average, some countries might well have higher temperatures e.g. Spain with up to 6 degrees C increase by 2100: <https://uk.reuters.com/article/us-spain-climate/spain-sees-temperatures-rising-3-to-6-degrees-by-2100-idUKTRE66Q5H120100727> [↑](#footnote-ref-1)
2. See: <https://www.routledge.com/Prosperity-without-Growth-Foundations-for-the-Economy-of-Tomorrow-2nd/Jackson/p/book/9781138935419> & <https://www.campaigncc.org/greenjobs> [↑](#footnote-ref-2)
3. It is very difficult to imagine where the labour force would come from for another 1 million homes in the Thames Gateway, also in the period to 2050. See Thames Estuary Growth Commission, 2018: <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718805/2050_Vision.pdf> & <https://nla.london/news/from-the-archive-turning-the-tide-regenerating-londons-thames-gateway> & <https://www.gov.uk/government/news/brokenshire-backs-2050-vision-for-the-thames-estuary> [↑](#footnote-ref-3)
4. John Whitelegg – *Mobility: a new urban design and transport planning philosophy for a sustainable future,* 2016. [↑](#footnote-ref-4)
5. Sutton, John C – *Gridlock,* 2015, pp37-39. [↑](#footnote-ref-5)
6. CPRE – Ox-Cam Forum for Strategic Environment: Expressway Corridor Consultation – response from CPRE p.1. [↑](#footnote-ref-6)
7. Christian Wolmar – *Driverless Cars: on a road to nowhere,* 2018. [↑](#footnote-ref-7)
8. Paul Salveson – *Railpolitik: bringing railways back to the community,* 2013. [↑](#footnote-ref-8)
9. Terry Moors – *Lost Railways of Oxfordshire,* 2009. [↑](#footnote-ref-9)
10. See for recent comment on this issue: <https://agroecology-appg.org/ourwork/article-by-rupert-read-on-the-precautionary-principle/>. [↑](#footnote-ref-10)
11. John C Sutton – *Gridlock: congested cities, contested policies, unsustainable mobility,* 2015, p.37. [↑](#footnote-ref-11)
12. Whitelegg, John Whitelegg, John - Free Fare public transport and Climate Change, 2021, pp5-10: <https://www.mobilitaetskultur.eu/wp-content/uploads/Free-fare-public-transport-v2.pdf> [↑](#footnote-ref-12)
13. Department for Transport, *Bus Back Better: national Bus Strategy for England,* 2021*,* p.59. [↑](#footnote-ref-13)
14. See our report on Electronic Road Pricing for the Oxford City Region, under REPORTS at [www.catg.org.uk](http://www.catg.org.uk) [↑](#footnote-ref-14)
15. Which were applied in the UK 1961 to 1980. We now have the smallest new homes in terms of space per person of any country in Europe. [↑](#footnote-ref-15)