To: [RIS3Consultation@dft.gov.uk](mailto:RIS3Consultation@dft.gov.uk) Consultation on ‘Shaping the future of England’s strategic roads’

**PLEASE NOTE THAT THIS IS PART ONE OF OUR SUBMISSION TO THIS CONSULTATION, PART TWO (the questionnaire) HAS BEEN SUBMITTED BY POST USING A SUPPLIED PDF**

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**PART ONE – ‘Analysis to inform RIS3’ – challenging these assumptions**

This analysis document has explicit and implicit assumptions which we find exceptionally questionable. Since your form does not provide enough space to challenge these assumptions, this document is Part One of our submission and Part Two (also attached) is our response to your questionnaire.

**OMISSIONS:**

One: Any increase in road capacity between settlements induces more traffic movements with negative implications for traffic within settlements. This is abundantly obvious but does not feature in Government thinking on surface transport, which we find extraordinary.

Given predictions of very large traffic increases by the DfT, despite its general failure to accept the known impacts of induced traffic, nothing which increases road capacity between settlements should be contemplated in any circumstances. Instead, avoding road capacity increases should be pursued by use of a) electronic road pricing; b) more bus/coach lanes; c) support for a general increase in cargo and ecargo bikes for entry of goods into settlements instead of vans and HGVs; d) banning road-widening. This would involve creating a variety of transfer points making use of existing infrastructure such as: lay-bys, car parks, motorway service stations, existing Park and Ride sites, warehousing areas not in full occupation. A general expansion of pedestrianised areas in settlements and reductions in car parking would also help to relieve pressures on strategic and major roads by discouraging avoidable journeys. This approach carries with it the implication of ensuring good cycle networks with cycle tracks colour-marked by a durable surface layer of material. Cycle tracks must always be physically segregated by kerbs and half kerbs from roads.

Two: There is a long-term strategic need to resist avoidable car movements which requires ‘culture changing’ approaches to infrastructure and its use. This should include the creation of Cycling and Walking Engineers, as a controlling influence over the seriously limited Highways Engineers and their focus on accommodating traffic, in order to prioritise Active Travel and promote public health. The promotion of EV hire rather than ownership is needed to keep vehicle numbers down as part of traffic reduction goals. Scrappage of the most-polluting vehicles is needed; a high rate of VAT on new ICE vehicles should be applied to speed up EV-equivalent hire, or purchase.

The idea of mobility as a positive value needs challenging as part of making local economies of settlements, and their facilities, better used.[[1]](#footnote-1) More specifically, the alleged desirability of mobility needs to be set against the benefits of localisation: how many types of facilities are within walking and cycling range? If the facilities people need are within walking or cycling distances, then we may say that localisation has been achieved.[[2]](#footnote-2)

Three: Road and pavement renewal should be put together as priorities, backed up by an end to pavement parking in England. If pavement parking can be removed in London, then it should be done everywhere as part of discouraging avoidable car movements in particular. Pavements are not supplementary parking spaces: the Twitter feed *Badly-parked Oxford* indicates the scale and carelessness of on-pavement parking in this City. Vehicles moving between settlements often have settlements as their destination and often avoid paying parking fees by pavement parking. Road renewal, after decades of neglect, needs to be reduced for strategic (and Major) roads. More important, the renewal of roads impacted as a result of being parts of the strategic/major road interface with settlements should be a key priority for communities. We note that patching potholes leads to uneven road surfaces and emphasises the need for proper road renewal. The latter should be combined with improvements such as more pedestrian crossings and colour marked cycle tracks using a layer of coloured material not just a thin coat of paint.

Four: There is a general failure to see transport as an overall system in planning. To reduce vehicle movements, free buses are needed to provide a compelling alternative. Similarly, rebuilding rail use should begin with a 50% cut in rail fares, with fares being frozen at this level as rail use and passenger-carrying capacity is increased. The health, air pollution and Climate benefits of all the measures above should be obvious. Both bus and rail industries need renationalisation as a result of obvious and continuing market failure. Specifically, under-investment in the least-impacting forms of transport has been well below what is needed to encourage an end to traffic growth.

Five: Nothing is ‘levelled up’ by building more strategic or major road capacity. Key transport infrastructure for public health and the environment is improved walking and cycling routes, with the latter clearly colour marked with a durable surface layer not thin and unsustainable paint markings. Noise can only be removed by reducing vehicles that move into and out of settlements, as a result of providing free and cheaper means of avoiding such vehicle use. In relation to ‘levelling up’, it is the overall qualities of communities which needs attention to build quality of life and sustainable lifestyles for all. The current tax base places burdens on low and middle income groups in relation to pay increases which are often below inflation; people on highest incomes and those with wealth are seriously under-taxed and tax havens remain in operation. Transport spending, where desirable, needs adjustment to increase tax take from those who are not contributing enough.

Six: There is a failure to recognise the impact and potential impacts of remote working and allied changes which might have strategic road infrastructure implications. For Oxford, about 20% of those working in the City are wholly remote working/ another 30% are partially remote working. More than half those working in the City commute in from outside, and not all will use Park and Ride, or public transport. If a prudent Government made remote working a right rather than a voluntary matter for employers - for all eligible employees defined by statute - then these figures might be increased with positive implications for traffic movements and the need for road renewal. However, the addition of this right should be accompanied by a statutory right to flexitime. These initiatives are valuable for quality of life, may diminish the need to move home for work and are good for those with childcare or caring responsibilities. Anything which decreases strategic road spending is of great value in redirecting public spending to other areas of transport.

Seven: the DfT 5 case business framework (p.4) offers no reference to the sustainability implications of environmentally-informed approaches to business activities. These would include reducing transport costs for the business and perhaps offer the redeployment of some associated staffing best used elsewhere in the enterprise. It also follows that statutory rights to remote working and flexitime will diminish use of office space, allowing some of this to be converted to very low-cost council housing. The physical implications of car commuting including stress should be part of a realistic business framework – as a goal for business to decrease commuting.

Eight: Stakeholders for strategic or major roads should include far more groups representing walkers, cyclists and public sector public transport, as part of increasing space for all these sectors and reducing overall road capacity. Experts consulted should also reflect this list. We feel these are the predominant stakeholders, before motoring/distributive or other concerns. Our reasoning is that these stakeholders have clear sustainability concerns in a way that other stakeholders may not recognise they actually need for the long-term.

Nine: The vision for strategic roads should, of necessity, include primary consideration of the impacts of the Climate and associated ecological emergencies. New strategic road building is destructive and should not occur in the UK as one of the most nature-depleted countries in the world. Both Climate and ecological emergencies have been made worse by failures to cut emissions and impacts of all forms of surface transport used in the UK, with aviation and shipping adding to the woeful picture of failure which makes transport the number 1 sector for carbon emissions. In practice, given decades of policy implementation inadequacy, radical and rapid changes of policy to reduce traffic are needed. This should be part of goals for all types of roads, with priority action for the busiest and most polluting.

Ten: Public health is worsened by excessive reliance on forms of transport which encourage sedentary behaviour, and expose the user to regular doses of air pollution. Therefore, the NHS should be a major stakeholder to advise on how surface transport use needs to be decreased in favour of active travel and public transport, in the interest of public health.

Eleven: Bus/coach lanes should be introduced on strategic roads to diminish road capacity and increase average speeds of buses/coaches using these roads.

Twelve: We need prosperity without conventional economic growth. The failure to consider impacts of uncontrolled economic growth has diminished the UK environment radically since 1945, encouraged unhealthy diets and behaviours and fostered forms of investment which are unsustainable such as short life vehicles, fast fashion, low standard building, trunk road construction, urban sprawl, ‘foods’ known to be injurious to health, etc etc. See work by Tim Jackson on this topic.[[3]](#footnote-3) Changing to a circular economy where re-use, recycling and waste reduction are strongly emphasised will have a variety of transport impacts which this analytical document does not consider.[[4]](#footnote-4)

Thirteen: Improving safety is not enough(p.9). We need a ‘Vision Zero’ approach which the Government has yet to adopt.[[5]](#footnote-5)

Fourteen: ‘Offsetting’ to compensate for the GHGs created by transport schemes(p.10) is the language of alibi, not effectiveness. There is a substantial literature questioning the value of offsetting, monitoring of its effectiveness and the supposed capacity of the overall environment to provide immense areas set aside for offsetting.[[6]](#footnote-6) It remains far more effective to prevent GHG emissions at source, engaging in the pursuit reducing GHGs from specific sectors rapidly – especially transport.

Fifteen: There is a lack of awareness in this analysis about the ageing population in rural areas. Mobility by car is being assumed, to access strategic roads for some routes. This is wholly inadequate:

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 dearth 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.[[7]](#footnote-7) 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.[[8]](#footnote-8)

Concerning illustrative examples of transport trends in rural areas of Oxfordshire:

Oxfordshire County Council is planning for a 50% increase in cycling by 2031 and expenditure of £300m including walking schemes to achieve this.[[9]](#footnote-9) The number of cycling groups in Oxfordshire is substantial, indicating a comparatively high level of cycling County-wide.[[10]](#footnote-10) Oxford is 2nd only to Cambridge for numbers of people cycling at least once a week: 39.6%.[[11]](#footnote-11) The Ramblers Association has 10 groups in Oxfordshire, with 1000 organised walks each year.[[12]](#footnote-12) See also the Oxford Pedestrians Association.[[13]](#footnote-13) The prevalence of cycling, particularly in Oxford, is reflected in a high concentration of bicycle shops – especially on the Cowley Road.

“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.”[[14]](#footnote-14)

Rural bus subsidies, once restored and enhanced, will cut currently unavoidable car journeys. Also: 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 parking is present near more 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 then we can expect significant road traffic reduction. None of this requires more strategic or major road capacity.

Sixteen: We consider all references to health in this analysis to be under-emphasised. The erosion of health, and deaths, from air pollution, road accidents and damage to quality of life by noise and community severance by busy roads are all seriously neglected in terms of transport policy priorities.

Seventeen: You cannot claim to be protecting the environment(p.10) if you bury it in tarmac. As the UK is one of the most nature-depleted countries in the world, the potential public, private and not for profit sector useful employment which could be obtained by taking the environment seriously is without doubt considerable. Health, Climate and air quality improvements are all considerable benefits to productivity and length of life. Adding to strategic road capacity is not compatible with a better environment for all.

Eighteen: Value for money (p.13) cannot be achieved in public or private sector projects unless the perennial problem of cost over-runs is addressed. Bidding for contracts should be based upon companies offering goods/services including projected cost over-run risk. There may well be a case for such companies to insure themselves against cost over-runs so that the State is not obliged to cover them. This should be compulsory for the company concerned.

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1. See particularly, John Whitelegg – *Mobility,* 2016. [↑](#footnote-ref-1)
2. 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-2)
3. Tim Jackson – *Prosperity without Growth*, 2016. [↑](#footnote-ref-3)
4. Kate Raworth – *Doughnut Economics,* 2017. [↑](#footnote-ref-4)
5. See: <https://tfl.gov.uk/corporate/safety-and-security/road-safety/vision-zero-for-london> & <https://integratedtransport.org.uk/project/vision-zero-oxford> [↑](#footnote-ref-5)
6. See: <https://theconversation.com/carbon-offsets-can-do-more-environmental-harm-than-good-26593> & <https://edition.cnn.com/2022/02/07/business/companies-net-zero-climate-report-intl/index.html> & <https://www.greenpeace.org.uk/news/the-biggest-problem-with-carbon-offsetting-is-that-it-doesnt-really-work/> & <https://www.theguardian.com/environment/2023/jan/18/greenwashing-or-net-zero-necessity-climate-scientists-on-carbon-offsetting-aoe> [↑](#footnote-ref-6)
7. Stockholm Declaration – *Third Global Ministerial Conference on Road Safety: achieving global goals 2030,* February 2020. [↑](#footnote-ref-7)
8. About 75% of English councils declared Climate Emergencies by late 2020. 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-8)
9. 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-9)
10. See: <https://www.cyclinguk.org/cycle/cycling-oxfordshire> for links; <https://www.cyclox.org/> [↑](#footnote-ref-10)
11. <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/906698/walking-and-cycling-statistics-england-2019.pdf> [↑](#footnote-ref-11)
12. See: <https://www.ramblers.org.uk/go-walking/group-finder.aspx> [↑](#footnote-ref-12)
13. <http://oxpa.org.uk/> [↑](#footnote-ref-13)
14. <https://www.activeoxfordshire.org/news-and-events/2020/11/walking-back-to-school> [↑](#footnote-ref-14)