

Planning

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Your reference:

Our reference: EEH Draft Transport
Strategy

Date: 6 October 2020

Dear Sir/Madam,

South Oxfordshire District Council Response to 'England's Economic Heartland's Draft Transport Strategy' and Statutory Body status consultation.

Thank you for providing South Oxfordshire District Council (South) the opportunity to comment on the England's Economic Heartland's 'Draft Transport Strategy' and the proposal to establish a statutory sub-national transport body.

Overall, the Council is supportive of the vision to realise sustainable growth harnessing the region's globally renowned centres of innovation to unlock a world class, de-carbonised transport system. This will support the Council's desire to address climate change. Recently the Council welcomed the aim of the Government's emerging Transport Decarbonisation Plan to end the UK's transport emissions and agreed that ambitious policies are required to ensure this aim is achieved. However, the Council believes the aim to achieve this by 2050 is not ambitious enough and request this is brought forward to 2030. The Council also considers that the vision set out in the draft Transport Strategy to not be ambitious enough given the critical role this region can play in leading on this agenda.

The Council welcomes the Strategy's intent to improve the quality of life and wellbeing for people in the region, and the decarbonisation of transport. However, industrialising and urbanising the rural areas that make up the EEH will be extremely detrimental to biodiversity, and will necessarily incur massive and ongoing carbon emissions, however successful the decarbonisation of transport might be. The policies should clearly articulate how they are prioritised and focused upon the delivery of the vision and key principles.

This Council has declared a Climate Change Emergency. We have set a date of 2030 by which we expect to reach carbon emissions of net zero or near to net zero. The Council is working hard to reduce carbon emissions across the district and queries why the England's Economic Heartland's (EEH) Draft Transport Strategy is not being more ambitious or bold in its target date? We request that the target date is brought forward to 2030 and suggest it would also be beneficial to have a midway target to track progress.

The Council considers that in order to achieve net zero by 2050 UK wide, there will be the need for radical steps across the UK economy and wider society, and thus far reaching policies will be required by Government and the EEH Transport Strategy.

The Council acknowledges that there are challenges to be addressed to achieve the goal of developing a net-zero transport network across the EEH region, but believes that these need to be addressed and overcome to ensure that climate change targets are achieved.

The Council's wishes that the following points are considered when finalising the Transport Strategy, briefly these are:

- A request to change the ambition to achieve net-zero carbon emissions sooner.
- Greater prioritisation of connectivity, in particular the needs of rural areas across the EEH area.
- Overall we support the focus on rail and sustainable travel, along with the electrification of the East-West Rail line.
- Support the need to appropriately plan for freight movements.
- Clarity on the relationship between EEH and the Ox-Cam Arc and the future spatial framework for the Arc.

Comments on England's Economic Heartland's Draft Transport Strategy

The Council is pleased to expand on the above points in relation to the draft Transport Strategy:

1. The Council welcomes the reference to the ban on petrol, diesel and hybrid vehicles being brought forward to 2035, but understands the Government is actively considering bringing this forward sooner, to 2030, which the Council would welcome. Transport accounts for 40% of Oxfordshire's energy use, and therefore switching to electric or other ultra-low emission vehicles for private cars, commercial vehicle fleets and public transport, will not only be a key component in achieving carbon reduction targets but also in addressing air quality issues in our towns and villages.
2. The Council understands that the shift to zero emission vehicles will require appropriate charging infrastructure across the districts, in both domestic and public places. To address this the Council has emerging planning policy, the South Oxfordshire Local Plan 2035, Policy TRANS5 requires proposals for all types of development to, where appropriate, be designed to enable charging

of plug-in and other low-emission vehicles in safe, accessible and convenient locations. Upon adoption, this policy will ensure that charging infrastructure is designed into new development, making it more accessible to all. This will help to support the transition to low/zero emission vehicles across the district. The Council is also considering rolling out electric vehicle charging points across Council car parks. The aim is to have these up and running by September 2021. The Strategy provides an opportunity to drive this agenda forward with even greater emphasis and that would be supported by this Council.

3. The Council considers there needs to be a much greater focus on reducing the need for travel in the first instance. If paired with making public and active transport the easy and obvious choice for short, and eventually longer journeys, creating a behavioural shift towards making fewer journeys overall will contribute significantly to reducing emissions from transport. The Council supports the aim of reducing the reliance on the private car.
4. In order to reduce the need for travel and facilitate modal shift, the Council supports the Strategy's recognition of the importance of investing in technology and infrastructure. In particular, the Council considers that digital infrastructure provides an important opportunity to reduce the need to travel – allowing people and businesses to be connected digitally in order to reduce the need for movements. It allows businesses to be more flexible with their workplace arrangements, and thus allows greater numbers of employees to work from home (as have been the cases during the COVID-19 pandemic). As a result, the Council considers that the Transport Strategy should give prominence to the importance of investing in digital services and infrastructure (fixed and mobile), and the influence they have on reducing the need for travel. The strategy could make more emphasis on the opportunities the recent remote/home working practices have presented and how these can be seized upon to support the vision. It will be important in the more detailed work, such as the connectivity studies, to seek to understand the likely longer-term implications on travel behaviour and demand and how this should influence priorities on infrastructure investment.
5. An important way in which modal shift to public and active transport can be achieved is to design communities that encourage the use of public and active transport, and make those transport methods the most attractive option, which is recognised in the National Planning Policy Framework. Through delivering high quality design, active modes of transport can be prioritised over motorised traffic, which increases safety and encourages the use of these modes of travel over unsustainable transport methods. Delivering housing at higher densities can result in an increased concentration of people in an area, creating higher demand for public transport services, local services and commercial uses, which together reduce the need to travel longer distances and maximises options for walking or cycling. The planning system plays an important role in creating communities that contribute towards modal shift, and therefore it should be better reflected in the Strategy. The relationship between the strategy and the planning powers of local authorities should be articulated in the Strategy.

6. The Council considers that Science Vale, a world-renowned science, research and innovation hub that crosses the border of both Vale of White Horse and South Oxfordshire districts, can play a key role in developing the UK a hub for green transport technology and innovation. The Oxfordshire Energy Strategy¹ sets out a shared ambition to become a low carbon county, and explains the need to harness and use Oxfordshire's strengths in innovative vehicle and transportation technologies to deliver the 'future of mobility'. The Council considers that the work undertaken in the Science Vale will play an important part in ensuring the UK is a world leader in green transport technology and innovation. The Council welcomes the reference to the Science Vale, but this could go much further to reflect the vital role the Science Vale already has in ensuring that the UK realises its commitment to the decarbonisation of transport. Thus, the Council considers it important the Strategy acknowledges the importance of Science Vale and the need for Government's continued and increased support for science, research and innovation taking place at Science Vale - particularly the work that is contributing towards tackling climate change.
7. The Council acknowledges that integrated rail and bus is important at the regional and sub-regional levels (Policy 19). Given the rural nature of South Oxfordshire, the physical connections villages/rural communities have with transport hubs, are of importance. The Council supports the recognition of this in the strategy (Policy 27) and hopes this can be developed further.
8. The Council wishes to see the Strategy developed to prioritise freight movements on the rail network, to reduce carbon emission of road freight. It further supports road vehicles powered by electricity or other low carbon fuels. The Council welcomes the Strategy's acknowledgement of the need to work with others regarding road freight (Policies 33-36), but requests that Local Planning Authorities are also identified as a group to work with.
9. The Council considers that the Transport Strategy should be clear on the need to work alongside the proposed spatial framework for the OxCam Arc. The Council believes that the Transport Strategy should more clearly articulate the on-going work at the OxCam Arc level, in particular the emerging spatial framework led by Government (Overall and Policies 12 and 13). The Council is unclear of Strategy's position of the Oxford to Cambridge Expressway, as it is currently silent on this matter. The supporting wording to policies 12 and 13, references improving connectivity between Oxford and Milton Keynes as being a strategic issue for the region. This Council passed a motion (see copy at Appendix 1) opposing the construction of the Expressway.
10. The Council supports the delivery and electrification of the East-West Rail as set out in the Strategy (Policies 1, 7 and 8). Following recent Government announcements, the Strategy now also needs to address the removal of franchises across the rail network to ensure services and planned improvements are not impacted.

¹ <https://www.oxfordshirelep.com/sites/default/files/uploads/Oxfordshire%20Energy%20Strategy.pdf>
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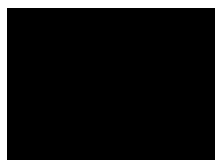
Comments on the proposal to establish a statutory sub-national transport body

The Council notes of ambition for the EEH sub-national transport body to obtain statutory status. Transparency and good governance are high on this Council's Corporate Plan priorities. This Council would like a better understanding of the democratic accountable, governance arrangements and relationships with all tiers of Government, before it supports the move to statutory status.

The Council is generally supportive of the idea of additional powers, currently with centre government, being devolved down to lower tiers of government. However, clarity is sought on the links between the proposed statutory body with local planning authorities and other plans: the Oxford-Cambridge Arc, Oxfordshire 2050, Oxfordshire Local Transport Plan, district level Local Plans and Neighbourhood Plans. The Council would also wish to understand the relationship with other such bodies (statutory and non-statutory), particularly as it borders with Transport for the South East.

The Council notes from Baroness Vere's letter sent to EEH in August, that the Government is not, at least at this time, looking to establish any further statutory bodies, including EEH. Clarification is therefore sought on whether you intend to pursue this further.

Yours faithfully,



Andrew Lane
Senior Planning Policy Officer

Appendix 1 – South Oxfordshire Council Motion 18 July 2019:

Council notes that the UK Government, in tandem with the National Infrastructure Commission, has proposed the construction of a motorway-style expressway between Oxford and Cambridge. This new road will have significant adverse impacts on Oxfordshire: it will create a major source of air and noise pollution, destroy farmland and habitats, increase CO2 emissions - incompatible with the recent Climate Emergency declared by this council in April 2019 and bring more traffic onto the county's existing roads. Actual and proposed consultation on the Expressway, and indeed on the Ox-Cam Arc proposal and associated major housing growth across the region, has been wholly inadequate and a proper Strategic Environmental Assessment should have taken place before this project left the drawing board. Instead, it has become the basis for regional planning with little democratic legitimacy. Whilst this council supports partnership working and strategic planning and practical links with authorities across the region, it does not support the addition of a major road such as the Expressway in a time of climate emergency – as declared by this council on 11 April 2019.

Highways England's own analysis of the Expressway shows a benefit:cost ratio (BCR) in the range of 1.1 – 1.3, far lower than most other road schemes analysed by the Department for Transport in 2015, (2:1). The Oxford 2050 plan process has thus far welcomed the perceived benefits of the Oxford-Cambridge Expressway. It is also mentioned as a factor in a wide range of council documents and plans, including LP2034. This council asks that its new position on the Expressway is taken into account in all council documents that refer to it.

The Expressway would cause major harm to the quality of life of residents if it passes through the district; this council wishes to withdraw any assumed consent, including any possibility that roads such as the HIF-funded Thames crossing, or the Stadhampton or Watlington bypasses, could later be used or expanded to form part of the Expressway or act as feeder roads for it.

This council fully supports an upgrade in the East-West rail route, with full electrification, as part of the Ox-Cam arc discussions. Such an upgrade must include inter-modal centres, along it and at both ends, to enable maximum use of rail for freight. Any road upgrades necessary to support the East-West rail route should connect to that route and be proportionate to the primacy of rail freight.

Council therefore resolves to:

- Oppose the Expressway project in all forms, including expansion of existing 8 or new roads in the district to form part of it.
- Support fully-electrified East-West Rail, including freight capacity and connections, and better public transport and active travel connections.
- Update all council documents to reflect this new position on the Expressway and related Arc development proposals.
- Continue to support partnership working, especially with regard to landscape scale conservation and nature recovery networks.
- Communicate its opposition to Government, MPs and Highways England.