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working locally and nationally to
protect and enhance a beautiful,
thriving countryside for everyone to
value and enjoy

Dear John Disley

**RE: CPRE Oxfordshire response to Consultation on Connecting Oxfordshire:
Local Transport Plan, 2015 - 2031**

The Oxfordshire Branch of the Campaign to Protect Rural England (CPRE) is primarily concerned to ensure that transport in the county enables people living and working in the countryside, villages and country towns to enjoy an environment protected from intrusive inter-urban traffic and be able to use all modes of travel on public roads themselves. This very rural county is about to accommodate unprecedented population influx and demand for travel on inadequate infrastructure.

SUMMARY

1. **Overarching goals and Objectives.**
2. **The growth figures on which LTP4 is based are unsound and unsustainable, and have not been subject to public consultation.**
3. **Lack of focus on existing rural transport needs.**
4. **The Park & Ride strategy will undermine both the Green Belt and the sustainability of the broader region in favour of continued expansion of Oxford.**
5. **Taken together, the proposals represent a concerted attack on the Oxford Green Belt.**
6. **There is a lack of information relating to key areas including:**
 - **A40**
 - **Rights of Way**
 - **Green Infrastructure Plan.**
7. **There is a lack of Plan B for highly ambitious projects such as the transit tunnels.**

8. This strategy should have complied with the Duty to Co-operate, but there is no evidence that this has been complied with.
9. The commitment to ongoing road maintenance should be clarified.
10. The proposal to expand London Oxford (Kidlington) Airport is unacceptable and in conflict with the County's own Strategic Environmental Assessment.
11. The Knowledge Spine - the LTP4 does not take into consideration the Government's stated policy of an Oxford-Cambridge expressway.
12. The Plan is heavily dependent on improvement of the A34, although significant proposals are not yet in place.
13. The changes to certain Road Classifications are questionable.
14. The Rail strategy requires better integration with other modes of transport and consideration of new stations at sites such as Kidlington.
15. Waterways, Footpaths and Cycleways - improvement to Wilts & Berks Canal, support for AONBs, and national trails.
16. Air Quality.
17. We welcome the discussion of the impacts of Noise and Light Pollution within the Strategic Environmental Assessment and would like to understand what policies and mitigation measures will be put in place as a result.
18. Volume 2 Area Strategies.
19. The A420 Strategy is very welcome but needs further detail to be convincing.
20. Strategic Environmental Assessment (SEA).
21. There is a lack of independent scrutiny.

1. Overarching goals and Objectives.

In general, CPRE Oxfordshire is supportive of the goals and objectives as outlined on p.7 of the Plan.

However, we find it hard to reconcile the praiseworthy Goal 3 ('To protect and where possible enhance Oxfordshire's environment and improve quality of life') with all the actions proposed in the Plan. At best we are talking about attempted mitigation of an all-out assault on the natural environment. At worst this is pure

'greenwash'. Local examples just from the Bicester area include driving new roads through open countryside and even a Conservation Target Area.

2. The growth figures on which LTP4 is based are unsound and unsustainable, and have not been subject to public consultation.

Connecting Oxfordshire Vol. 1 p.6 says 'economic and population growth is due to continue: the SEP programmes a growth in Oxfordshire of 100,000 homes and over 85,000 jobs.' It is this anticipated growth which underlines much of the transport proposals subsequently outlined.

The Oxfordshire Strategic Economic Plan (SEP) is a marketing document drawn up by the unelected Oxfordshire Local Enterprise Partnership (LEP), and has not been subject to any public consultation.

In the past we have argued that it is a 'programme' (as stated above) and therefore should be subject to a Strategic Environmental Assessment. This has been categorically denied by the LEP.

CPRE therefore does not believe this is the appropriate starting point for the County's transport strategy, which means that later conclusions on what is required are fundamentally flawed.

This also applies to the Strategic Housing Market Assessment (SHMA). A critique commissioned by CPRE Oxfordshire found the proposed figures to be over 2.5 national projections.¹

In fact it is not clear what evidence base is actually being used for the Plan. Para. 49, p.34, says that the traffic forecasts 'do not take into account the full level of housing need in the SHMA'. It is not made clear what level of housing need was actually taken into account and on what basis.

Many of the transport plans outlined are ambitious, to a degree unrealistic and unfunded. Even if all aspirations are delivered, the infrastructure will not cope with the planned population growth. Bearing in mind it is likely that infrastructure upgrades will be way behind the curve, it is clear that the planned growth in the County cannot be supported by its infrastructure either now or in the future. Added to that, many of the proposed infrastructure upgrades will have a significant impact on the environment. Taking all this into account, we believe the planned growth and associated infrastructure upgrades are fundamentally unsustainable.

3. Lack of focus on existing rural transport needs.

¹ *Unsound & Unsustainable: Why the SHMA will increase greenfield use but not meet housing needs* - A critique of GL Hearn's April 2014 Oxfordshire Strategic Housing Market Assessment (SHMA) Urban & Regional Policy, May 2014 <http://www.cpreoxon.org.uk/news/item/2369-local-authorities-must-reject-shma?highlight=WyJzaG1hI0=>

This edition of the LTP does not contain a specific section on the rural transport network, but does illustrate where the network is already overloaded and where capacity will be even more inadequate in future.

Clear policies to remedy this situation are lacking. The Plan is almost entirely focused on the urban growth areas and appears blind to the consequences on the wider road network.

The most important inter-urban road in the control of the County Council is the A40, yet there is still no comprehensive plan to deal with the consequences of overload of the A40 Oxford Ring Road at North Oxford. Traffic is unable to increase here because the road is full and consequently it diverts onto a series of other roads through villages:

- The A415 through Standlake, Kingston Bagpuize and Marcham is having to accommodate Witney - Abingdon traffic that should be on the A40 - A34 route
- The A4095 carries Witney Area - Oxford traffic via A44
- The B4027 carries traffic bypassing or accessing Oxford through Islip.

The minor improvements planned for the Wolvercote and Cutteslowe roundabouts will not overcome the problem and a new A40 - A44 strategic link is not yet policy.

For decades now heavy reliance has been placed on the Highways Agency and developers to provide or finance capacity enhancement and there is a considerable backlog of problems that are not being addressed in the Plan.

There is local concern in many villages such as Bloxham and South Newington on the A361 between Banbury and Chipping Norton, where traffic is growing on barely adequate principal roads. Towns that have not benefited from developer funded relief roads like Chipping Norton and Henley-on-Thames are barely mentioned if at all.

Para. 50 of Connecting Oxfordshire Vol. 1 says the A338 will be over capacity and experiencing severe delays, and yet there are no proposals in place other than a study to be considered in 2026. This is not sufficient.

The A420 is identified as another route needing enhancement (p.8). As a potential trunk road the Department for Transport paid for bypasses at Faringdon and Shrivenham, but further upgrading of this and the A40 to a dual carriageway was opposed in the mistaken belief that traffic would not increase. Significant investment by the County Council is needed if traffic is not to continue to be dispersed onto ever more unsuitable country rat runs.

Data is presented at para. 31 on overloaded roads but not followed through into policies for the next 15 years (Figures 8 and 9). Whilst we accept that there are no easy solutions, and that things will take time, not to address these issues at all appears short-sighted. Later in the document great reliance is placed on changing modal choice and whilst this is generally supported particularly for the City and the A34 spine, the scope to relieve existing problems elsewhere is ignored.

Policies and programmes are needed to support sustainable transport in the rural areas. Walking and cycling has declined largely because of justified fear of higher risk of injury on roads in rural areas and public transport rarely offers a viable alternative to the car. Much could be achieved through lower speed limits on minor roads (40mph) and on narrow village streets (20mph), particularly where footways are discontinuous, and through maintaining grass verges as safe refuges for pedestrians on minor roads. Lack of maintenance of road surfaces deters cycling and opportunities to provide wide shared cycle/footways along traffic routes are not being pursued. Comprehensive cycle networks for relatively short journeys such as to schools and shops could transform cycle use throughout the county.

A fundamental re-appraisal of rural public transport is called for including integration of public and school transport to accommodate journeys to college and apprenticeships and peak hour journeys to work. Feeder services from towns and villages are needed to rural rail stations and to frequent bus services along main road. Subsidy of innovative feeder services should be examined. Opportunities to improve local rail services also need to be developed.

Park & Rides need to be located near residential trip origins to encourage walking, cycling and kiss-and-ride and reduce car travel demand on rural radial roads as well as to reduce traffic within Oxford.

A comprehensive strategy for the A40, which includes tackling the overload at North Oxford and rural rat-running, should be prepared as part of the LTP.

The LTP should be amended to include a specific section on the rural transport network, with data on overloaded roads followed through into policies to tackle this situation over the next 15 years.

4. The Park & Ride strategy will undermine both the Green Belt and the sustainability of the broader region in favour of continued expansion of Oxford.

CPRE Oxfordshire is strongly opposed to the outlined Park & Ride strategy which will see a total of nearly 8,000 car park spaces created at six sites within the Oxford Green Belt.

This policy would undermine the openness and permanence of the Green Belt, and encroach upon the countryside.

The policy of 'remote' Park & Rides will do nothing to get people out of their cars - it will just increase the amount of traffic to and from the radial routes to surrounding towns

Fundamentally, it is ill-conceived as it will continue to put the focus on increasing jobs in Oxford, leading to even more pressure on both the Green Belt and transport infrastructure.

There is a complete lack of detailed research or supporting evidence to justify such a policy.

We do note however that the Strategic Environmental Assessment para. 6.3.4 states: ‘there will be elevated noise levels in other areas (e.g. at park and ride sites located further from towns and the city, and in more rural tranquil areas)’.

This policy should be dropped entirely from the Oxford Transport Strategy.

5. Taken together, the proposals represent a concerted attack on the Oxford Green Belt.

While we agree that measures are needed to cope with existing problems, we disagree with the implicit assumption that more and more journeys will be focussed on Central Oxford. The aim of Green Belt policy is to restrict the growth of Oxford and for it to divert this growth elsewhere in the County or further afield, thereby easing the pressure on the City. This implies coordination between land use planning and transport planning which seems to be lacking in this document other than references to the highly optimistic assumptions of the Local Enterprise Partnership. We appreciate that such coordination is difficult now that strategic planning has been much weakened. Therefore, at the very least there should have been some consideration and evaluation of alternative integrated land use and transport strategies under different growth assumptions.

The National Planning Policy Framework (NPPF) says: ‘the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence’.

We believe the proposals outlined in LTP4 would undermine this policy. For example:

- Six park & rides providing car parking space for 7,600 vehicles
- A potential freight services area at Lodge Hill, north Abingdon (Connecting Oxfordshire Vol. 4, para. 14).
- A potential new link through the Green Belt south east of Oxford (Connecting Oxfordshire Vol. 1, para. 70).

Some of these are still only suggestions rather than concrete proposals, but it is important that the likely cumulative effect on the Oxford Green Belt is considered upfront. There appears to be no consideration of this within any of the lengthy documents prepared by the County Council.

The Council should assess the impact of all proposed transport infrastructure on the Oxford Green Belt and delete any proposals that will adversely affect its essential characteristics or key purposes.

6. There is a lack of information relating to key areas including:

- A40
- Rights of Way
- Green Infrastructure Plan.

These are all critical areas in relation to the Local Transport Plan and it is hard to understand how sensible decisions about the Plan's soundness, for example in relation to cumulative impact, can be made in their absence.

Our concerns around the A40 are mentioned above (Section 3) and elsewhere in our response.

The LTP seems to take scant notice of the Oxfordshire Rights of Way Management Plan (RoWMP), adopted by OCC in 2014 - the result of a lot of work by members of the Oxford Countryside Access Forum, a consultative body set up by OCC in line with government legislation.

The LTP should acknowledge the fact that the RoWMP forms an intrinsic part of all of the five goals of the LTP's strategic objectives and it should show that it will address what the RoWMP says in regard to Strategic Objective 10, 3, 4, 5 and 9 as set out on page 6 of the RoWMP.

Work on the County's Green Infrastructure Plan has been ongoing for several years and it is particularly disappointing that this element has yet to be brought forward. We are in danger of agreeing every possible type of development plan for the County, and then looking at what green infrastructure we have left (if any!), rather than jointly considering economic, environment and social impacts as outlined in the National Planning Policy Framework.

The Local Transport Plan should be reviewed once these strategies are in place and a further public consultation undertaken.

7. There is a lack of Plan B for highly ambitious projects such as the transit tunnels.

We recognise the value of innovative and ambitious solutions to Oxfordshire's transport needs. However, it is inappropriate to plan for large-scale development that will rely on massive infrastructure projects that are not yet fully researched or funded.

For example, the bus tunnels proposed under Oxford City centre, an incredibly ambitious plan in terms of the costs (benchmark in excess of £500m) and the land grab required in the centre of Oxford. However, there is no assessment of the highly complex adverse environmental effects of construction or effects on heritage settings of tunnel portals (which is a high level effect of national importance to which great weight should be attached) or the archaeological effects; nor is any realistic delivery plan in place and much more work will need to be undertaken to assess the feasibility of this idea.

It is also quite possible that this will ultimately represent poor value for money compared with other options within Oxford and at other pinch points on the county's road network. Furthermore, the future uncertainty of the bus tunnel strategy calls into question the whole basis of preferring fast buses to other, more reliably deliverable options if, as seems likely any feasibility, cost or delay problems resulted in even worse bus congestion than the present situation. It appears that

this option is being proposed with no reference to national strategic studies of the environmental and economic problems of delivering tunnel-based transport solutions and makes entirely unsubstantiated assumptions that such problems are of no significance.

Either specific, funded proposals should be in place for the necessary transport infrastructure to support the proposed growth, or the growth should be put on hold or at least phased until such plans are in place.

8. This strategy should have complied with the Duty to Co-operate, but there is no evidence that this has been complied with.

This strategy should have complied with the Duty to Co-operate but, where is the evidence that this has been achieved, as required by s33A of the 2011 Localism Act to show that the County Council has “engaged constructively, actively and on an ongoing basis...” “in maximising the effectiveness” of “(a) the preparation of development plan documents, (b) the preparation of other local development documents, (d) activities that can reasonably be considered to prepare the way for activities within any of [the above] that are, or could be, contemplated, and (e) activities that support activities [above]”?

Para. 178 of the National Planning Policy Framework says:

‘Public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the **strategic priorities** set out in paragraph 156. The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities’.

As far as we can see, there is no evidence that this has been complied with. For example, it would appear that Oxford City Council was not consulted on the closure of some of its Park & Rides in advance of the publication of the draft Plan.²

This is critical to understanding the soundness of the Plan in terms of being able to deliver proposals that lie outside the remit of the County Council, for example the closure of Park & Rides and the expansion of London Oxford Airport.

In addition, the actual wording of the s33A Duty (paraphrased in the summary above) makes it clear that the Duty must go further than mere consultation or ‘referencing’ national development objectives; it applies equally to environmental aspects of sustainable development, including the preparation of the Plan and its accompanying SEA, for which the Duty is mutually shared with environmental agencies equally bound to ‘engage constructively, actively and on an ongoing basis...’ ‘in maximising the effectiveness’. While reference is made to consultation and issues raised, there is no evidence that those issues have actually been explored to the full extent required by the Duty to maximise the effectiveness of such co-operation, which should have entailed rigorous application of the SEA Regulations

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http://www.oxfordtimes.co.uk/archive/2015/01/24/11747109.Oxford_City_Council_promises_to_keep_its_park_and_ride_sites_open/

within clear standards set by environmental statutory consultees and detailed discussions of the identifiable implications of all aspects of the Plan. There is no evidence that this was done; nor whether the advice consultees gave adequately met the test of *maximising effectiveness* of consideration of such matters.

9. The commitment to ongoing road maintenance should be clarified.

We welcome the commitment to ‘Improve the safety and condition of local roads, footways and cycleways, including resilience to climate change’ (Connecting Oxfordshire Vol 1, p. 57).

However, this does not appear to be carried forward into a specific policy. Policy 17 merely states that the Council will ‘publish and keep updated its policy on prioritisation of maintenance activity’.

We also note that ‘Funding levels over the last 25 years have been such that roads are able to be rebuilt approximately every 255 years on average, as opposed to the optimal 40 years’ (para. 38).

Policy 17 should be amended to include a more specific commitment to the level of maintenance that may be expected with regards to local roads, footways and cycleways.

10. The proposal to expand London Oxford (Kidlington) Airport is unacceptable and in conflict with the County’s own Strategic Environmental Assessment.

The policy chapter includes an aspiration to develop internal air travel (p.9 and Policy 10).

CPRE is opposed to this strategy in principle. This is the most polluting and environmentally intrusive mode of travel and we support CPRE’s national policy of opposing any further increase in airport capacity in the South East.

The doubling of rail travel in the last 20 years and the commitment to develop high speed rail on both existing and new lines shows that such development at the so called London Oxford Airport is unnecessary as well as environmentally damaging.

The County’s own Strategic Environmental Assessment 6.2.3 says: ‘A significant conflict was identified between LTP4 Policy 21 (*‘Oxfordshire County Council will support the development of air travel services and facilities that it considers necessary to support economic growth objectives for Oxfordshire’*) and SEA objectives 5 (noise pollution), 6 (air pollution) and 7 (greenhouse gas emissions).

New infrastructure to support the development of air travel services (e.g. supporting the growth of London Oxford Airport) could encroach on undeveloped land, with the potential to impact on biodiversity, green spaces, cultural assets, the built environment and the wider landscape’.

In addition, London Oxford Airport is within a short distance of the Blenheim Palace World Heritage Site, the main flight path passing over nearby settlements and across the principal southern vista from Blenheim Palace. The SEA has identified the conflict with some relevant objectives but has made no attempt (as required by the regulations) to assess the probability of likely significant effects occurring for particular local communities, and has not even recognised the WHS as a further highly significant issue to which great weight must be attached.

We therefore recommend that Policy 11 is deleted from the Plan.

11. The Knowledge Spine - the LTP4 does not take into consideration the Government's stated policy of an Oxford-Cambridge expressway.

Government policy would appear to be to develop a knowledge spine across county boundaries to Cambridge including Milton Keynes and Bedford. The National Roads Strategy identifies the need for an expressway between the M40 Junction 9 at Bicester and Milton Keynes / M1. This will have a significant effect on planning the expansion of Bicester and yet it is not even mentioned in the Plan as a route requiring further study.

The LTP4 should be amended to take into consideration the Government's stated policy of the Oxford-Cambridge expressway.

12. The Plan is heavily dependent on improvement of the A34, although significant proposals are not yet in place.

The Plan is heavily dependent on improvement of this route by central government, yet there is no commitment to do so. On the contrary, improvements to junctions along the route in Oxfordshire will enable the Highways Agency (Highways England) to regulate the amount of local traffic using the road to safeguard its strategic role of carrying long distance through traffic.

In the Highways England Solent to the Midlands route study of the A34 past Oxford, conflict between local and strategic traffic is identified as a significant problem. No solution is offered except improvements to the junction design at Peartree interchange, following identification of a safety problem.

Para. 70 (Connecting Oxfordshire Vol. 1) says, with regards to the A34, 'a longer term solution is needed to accommodate planned development and trip growth'. One must therefore question why the growth has been accepted without such a long term solution in place.

Development of public transport will never accommodate all the new demand for movement and the proposed housing figures outlined in the Oxfordshire Strategic Housing Market Assessment (SHMA) should not be accepted without obtaining commitment from the Highways Agency. Mention of a new link through the Green Belt south east of Oxford is both alarming and ill-conceived as this could only duplicate the Oxford Southern and Eastern bypasses and bring further development pressures on the Green Belt.

We consider the Plan unsound in the absence of agreement between the County Council and Highways England on how this conflict between the needs of local and strategic traffic on the A34 is to be resolved and the growth of traffic arising from major development in this corridor is to be accommodated.

The Oxfordshire SHMA figures, and the underlying Strategic Economic Plan ambitions, should be revisited in light of the fundamental constraints on growth posed by the A34. Under the Duty to Co-operate and the statutory and policy position of the SHMA as influencing future planning, it should have been subject to a SEA to establish the environmental capacity of the environment to absorb the amount of development envisaged, including indirect effects through transport and other requirements, but this was not done (this also applies to the LEP and other economic plans). This Plan (and the failure of its SEA to assess the cumulative environmental capacity issues raised by the pressures of growth for the transport infrastructure) compounds the more general problem of the fundamentally unsound approach that is being adopted to strategic planning in Oxfordshire. In all these plans, environmental issues are being considered secondary to growth not - as NPPF paragraph 7 defines - as an equally important core part of the definition of sustainable development.

13. The changes to certain Road Classifications are questionable.

There are worrying inconsistencies in the tabulation on pages 46 and 47.

With the growth planned at Bicester, downgrading of the A41 former trunk road towards Aylesbury and the M25 to become a non- strategic primary route is questionable.

The correct identification of the A40 and A44 Strategic Primary Routes through the Northern Gateway area brings into question apparent acceptance by the County Council of urbanisation without effective replacement or capacity improvement.

The removal of the A338 from the A415 to the A420 from Class 3a is inexplicable.

It is noted that new weight restrictions may be contemplated on other principle roads (class 3b). It is highly unlikely that suitable alternatives exist and this will raise expectations. If implemented, high levels of contravention may be expected with diversion onto even less suitable roads. Such restrictions may be popular but damaging to other rural environments. Their introduction must therefore be preceded by careful study of the source and destination of non-local HGV traffic, to ensure there are adequate alternative routes so that the weight limits do not shift the problem to other unsuitable roads. Enforcement of weight limits can be effective if local communities and Oxfordshire County Council cooperate to police them and prosecute offenders.

With the exception of the reclassification of A44 which is hinted at in the section on air quality management, explicit proposals for weight limits on principal roads and changes in classifications are not included. These policies should therefore

be deleted from the Plan until supporting evidence and consideration of adverse consequences can be presented for proper scrutiny.

14. The Rail strategy requires better integration with other modes of transport and consideration of new stations at sites such as Kidlington.

This section merely reports proposals by others and includes no initiative from the County Council. It does not appear to be integrated with public transport proposals and in places appears almost to promote competition from buses rather than integration.

CPRE fully supports the aspirations of the [Witney Oxford Transport Group](#). Network Rail acknowledges Witney Branch Line as worthy of further study for the future. Support from OCC for an off road public transport solution would be welcomed.

With the Water Eaton parkway hub likely to be a run-away success it is odd to see promotion of a bus park & ride at Bicester and removal of a Park & Ride at Water Eaton to a new site away from the rail station rather than integrate the two modes.

A constructive review of charging policy is needed. The County Council should treat funding for provision of P&R parking at rail stations equally with Bus park & ride for Coach travel.

Integration with the express bus network and the Cowley branch is encouraging, but the opportunity to sponsor a new station at Redbridge is missed.

The planned electrification and re-signalling of the Oxford - Banbury line is not followed up with consideration of local services on that route, such as possible integration of a Kidlington Station for which land was safeguarded, with employment north of the village or a Park & Ride. Improved signalling and electrification should open up opportunities to enhance local services from all rural stations and this needs to be vigorously pursued, together with active support from the County Council for station parking and feeder road services.

The recent Network Rail announcement of intention to electrify the Cotswold line at least as far as Charlebury is not mentioned. OCC should press for this to go as far as Kingham or Moreton in Marsh to enable local services to adequately serve Chipping Norton and the north Cotswolds.

The Plan needs to make clear what enhancements to rail as a means of local public transport will be sought by the County Council as new opportunities open up, and how they will support this mode of transport through, for instance, opening new stations and the provision of car parks at or near rail stations to effect transfer of traffic from road to rail.

15. Waterways, Footpaths and Cycleways - improvement to Wilts & Berks Canal, support for AONBs, and national trails.

The opportunity is missed specifically to support the leisure industry through partial restoration of the Wilts and Berks canal as promoted by Wiltshire County Council and Swindon Borough and possibly Vale of White Horse District Council. The mention in Policy 28 on towpaths falls short of support.

The Plan should include a clear statement of support for the economically important rural leisure industry through sustainable transport provision, including maintenance and development of the rural footways and cycle path network

16. Air Quality.

We note that the Strategic Environmental Assessment, 6.3.5, states ‘increases in air pollutants may result elsewhere from the re-routing of traffic (particularly freight traffic) and the improvements to the transport network, which will increase road capacity and may encourage further traffic growth in the long-term. The construction of new road and rail infrastructure and associated facilities is also likely to elevate air pollution’.

The treatment of Chipping Norton is unrealistic and could have wide ranging and unexpected consequences. It would appear that air quality is being used to revisit earlier failed proposals.

Chipping Norton has until recently had less growth than other towns and so little opportunity for developer funding for infrastructure. Local people clearly resent the intrusion of through traffic in the town centre and removing HGVs is seen as a soft option even if it would be largely ineffective. This would be unlikely to reduce NOX levels sufficiently. The A44, A361, B44450 and B4026 all converge on the town centre. Buses, vans and diesel cars all contribute to pollution. Furthermore, the comparison here with international standards is questionable because of the very narrowness of Horsefair and the problem of proximity of measuring instruments to vehicle exhausts as at Oxford.

Chipping Norton presents very complex problems, both because of its historic status as a Conservation Area with listed buildings facing the main street and the sensitivity of its surroundings; the whole of the area north of the town being in the Cotswolds AONB.

The three North Cotswold towns of Chipping Norton, Stow on the Wold and Moreton in Marsh lie across several cross-country routes, not just the A44. Changing the colour of road signs is unlikely to change the route choice of the majority of users and with Sat Nav, road signage and even road maps are of declining significance. The A44 is a typical Primary route serving longer distance inter-urban as well as local traffic, and a change to this status, if effective at all, could simply transfer the problems at Chipping Norton to Burford High Street. HGV traffic is probably only some 6% of the traffic at most, much of which will need to service the three towns and villages around. Weight restrictions with exemption for access have been found to be only around 50% observed in the area South East of Oxford.

In view of the wide ranging implications of major re-routing of traffic, such suggestions need to be fully considered outside the Air Quality Management Plan and be subject to full SEA.

The SEA for the LTP4 is entirely silent on the need to identify the highly complex interaction of pollution, heritage landscape and public amenity/ health issues involved - both in and around Chipping Norton and further afield. A much more robust strategic study of all the complex issues is needed that will properly address the very real problems of finding a suitable means of dealing with the multiple issues arising from increased traffic crossing the Cotswolds AONB, in line with the statutory duty set out in s.85 of the CROW Act 1981.

Para. 216, Connecting Oxfordshire Vol.1, states that in certain areas, such as Air Quality Management Areas, 'A detailed assessment of air quality and noise impact *may be required*' (our italics). We believe this should be altered to '*will be required*'.

We note that Cambridge's growth plans were accompanied by a joint [Air Quality Action Plan](#) and believe that a similar plan might be appropriate for Oxfordshire. This would tie in with the suggestion in Appendix C that 'The LTP4 could take an integrated approach to reducing air pollution and carbon emissions from road transport through the adoption of reduction targets for transport emissions within the LTP'.

Consideration should be given to producing a joint Air Quality Action Plan.

17. We welcome the discussion of the impacts of Noise and Light Pollution within the Strategic Environmental Assessment and would like to understand what policies and mitigation measures will be put in place as a result.

P.35 of the Strategic Environmental Assessment says that even without LTP4 the baseline situation is that 'Light pollution from development will continue'.

We welcome sub-objective 16, p.40, of the SEA to minimise the light pollution caused by transport. But Policies 8, 20 and 27 need to be strengthened to make a much stronger requirement to promote and enhance dark skies by reducing existing light pollution, especially where already recognised in AONB Management Plans, by Dark Skies Discovery Sites, other designated landscapes as part of the setting of historic places and assets, and in Local Plan policies.

P.18 of the SEA says 'The increasing pressure for development and new infrastructure is likely to result in continued traffic growth, which can result in greater proportions of the population being disturbed by transport-related noise. However noise is usually a local issue and can often be mitigated with careful design of infrastructure and abatement technologies. The overall evolution without the Plan is therefore uncertain'.

However, it is not clear what policies and mitigation measures will be put in place to tackle noise and light pollution. Whilst we agree that detailed measures

may need to wait until project application stage, the overarching principles need to be clarified here.

18. Volume 2 Area Strategies.

It is surprising that the Transport Plan should be brought forward before the Cherwell Local Plan has been agreed. The document should be withdrawn until after Cherwell has had the opportunity to respond to the Planning Inspector's report (probably June). After this, a real plan can be proposed with roads shown and upgrades required.

In the Banbury area there is growing concern about the A361 corridor and particularly HGVs through Bloxham and South Newington. The amount of general and HGV traffic on the A361 could be increased by the proposed link road from the A4260 to the A361 south of Salt Way. This is an example of a local issue that only the County Council can address as this is unlikely to be of concern to Local Enterprise Partnerships.

The A361 is an important route from the north of the county to the south-west and the Vale of Evesham and beyond via the A44 from Chipping Norton. There are numerous acknowledged issues along the route but LTP4 lacks a strategy for the route that identifies issues and provides a coherent plan for their mitigation.

The chapter on Bicester raises more questions than proposals. We have major concerns over the proposed new M40 junction (page 21 para. 6 of the Plan) near Arncott, which we understand is an aspirational goal associated with the packaging of Bicester's growth as one of the government's 'Garden Cities'. We feel strongly that there is no need for such an expensive project which will merely spill overwhelming traffic flows on to a very rural road network. A better, cheaper solution would be to upgrade Junction 9 to a proper 'clover-leaf' system, removing the need for traffic lights and hold-ups.

The proposed Oxford Cambridge Expressway must take precedence over this suggestion.

Reference to a junction with the rail line as part of the Western peripheral road is unclear.

CPRE has strong concerns over the suggested road proposed to cut through the Upper Ray Conservation Area (Bic 12) to Gavray Meadows, which will degrade important habitat.

The Witney chapter is seriously deficient in its treatment of mass transit and lacks realistic proposals to deal with the existing A40 problem.

The main focus of the Plan is Oxford and the heavy reliance on achievement of very significant modal shift to accommodate additional traffic generated by development, may not be fully achievable.

The policy on Park & Ride, that we thought we had reached agreement upon when permission was granted for the Water Eaton incursion into the Green Belt, was that this would be the last, and any future P&R provision would seek to intercept potential car traffic on the inter-urban roads at the point of origin. The current proposal is more of the same 1970s failed policy that has enabled employment growth in the city, without balanced housing provision. This has created serious overload on the major roads between residential towns and the city stifling economic growth in towns such as Witney.

We remain opposed in principle to these proposed incursions into the Green Belt and call for this policy to be reworked.

Whilst the pie in the sky bus tunnel proposal is not of direct concern to the rural areas, CPRE is concerned with Oxford's heritage as part of the wider landscape, and for reasons set out in our critiques of the SEA it is of concern in so far as it indicates an unworkable Plan that would eventually create pressure for more road building around the city to relieve the pressures created on the transport system, with the obvious danger that if as seems likely it proved unfeasible for as yet un-assessed environmental, logistical and funding problems, it is likely to result in more not less bus congestion. It could also distract time and funding from smaller but ultimately more practical and beneficial projects.

The Lye Valley bus road proposal would be severely damaging to a rare wildlife habitat, a valuable formal and informal recreational area, and palaeo-environmental heritage. This would not appear to be justified against the major harm that it would cause

The Didcot and Abingdon plans highlight the weaknesses of the present road system in that area that have depended on the A34. With the scale of development now contemplated additional infrastructure south and east of Abingdon may well be needed and we will follow studies carefully to attempt to minimise harm to the rural area.

The provision of new crossings of the Thames north, south and east of Abingdon with connecting roads between the Didcot / Harwell area and east Oxford are the most significant new suggestions in the Plan. This could be necessary to accommodate the scale of development and generated traffic that would exceed the capacity of the A34 and Oxford ring road.

The Wantage and Grove area is served by both the A338 and the A417/A34. Reinstatement of proposals in the Harwell area such as Featherbed Lane / A4185 links are timely but the lack of proposals to address serious overloading of the A338 should not be left to beyond the Plan period. We would strongly support the re-opening of Grove station.

In the absence of any clear policies to increase the capacity of the A34 corridor, the major development of the Vale Triangle would appear to be heavily dependent on such new infrastructure. The Plan must be considered unsound until its financing, timing and feasibility can be demonstrated.

19. The A420 Strategy is very welcome but needs further detail to be convincing.

The A420 strategy leaves too many questions unanswered. This is a strategic cross country road that is already not fit for purpose and yet the Plan loads more traffic onto it with no firm commitment to address the issues.

Short term up grading of junctions on an overloaded single carriageway will be of limited benefit and more ambitious proposals may need to be revisited if the minor road network is to be protected.

We believe the County Council is aware of the excellent research work of the Western Vale Villages (WVV) consortium which, together with Hindhaugh Associates, has demonstrated that the A420 is already at or over capacity not just “in need of enhancement” (section 2).

CPRE strongly supports the submission of the Western Vale Villages with regards to the need to tighten up the wording in this strategy (such as the removal of the words ‘subject to change’) and the need for definitive action within clear timescales.

20. Strategic Environmental Assessment (SEA).

We note that the SEA, 6.3.12, states:

‘Potential for significant negative impacts on landscape character identified as a result of delivering the Science Vale Area Strategy (e.g. impact on landscape features, loss of open countryside, loss of tranquillity, and change in visual amenity). Road and junction improvements (including a new Thames river crossing), and park and rides are likely to have a negative effect on landscape character.’

We also note para. 6.3.13.1 ‘The negative effects predicted on landscape character, soils and biodiversity are chiefly due to the cumulative effect of transport measures in combination with development pressure and land-take within greenfield sites and the countryside in general. Few of the Area Strategies will, alone, lead to any significant impacts on a strategic scale, but the additive effect of loss of greenfield land would lead to a significant overall effect’.

Nonetheless, consideration of these significant cumulative impacts appears to be kicked down the road to the project stage, saying that further assessments should be considered at this stage.

CPRE does not consider this to be an adequate response to the significant impacts identified by the SEA. It is our belief that the overall mitigation strategy should be clear and deliverable at the Plan stage, and if this is not possible then the level of development should be reduced accordingly.

In addition, key elements of the Plan remain unknown, for example the A40 strategy, so it appears impossible to assess the cumulative environmental impact adequately at this stage.

More significantly, CPRE has examined the overall approach of the SEA in relation to the Regulatory requirements and finds that on multiple counts it falls a very long way short of what the Regulations actually require to be assessed and reported. This has had major implications for the whole approach to the Plan and whether it can be considered sustainable - which as indicated above it is not. **The SEA falls so far short of what should have been iteratively assessed in developing the Plan that we consider the inadequacy of the SEA when viewed against the Regulatory requirements to be a further basis for considering the Plan unsound.** Details are given in Appendix A.

21. There is a lack of independent scrutiny.

We are disappointed that the Plan is not to be the subject of independent scrutiny by a Planning Inspector, which would allow for a proper assessment of the Plan's soundness.

In summary, CPRE believes that considerable further review of the Connecting Oxfordshire Local Transport Plan is still required, followed by further public consultation, and preferably submission of the Plan to independent scrutiny.

Yours sincerely

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APPENDIX A.

Review of LTP4 Strategic Environmental Assessment for Compliance with SEA Regulations (SI 1633)

Introduction

The purpose of a Strategic Environmental Assessment (SEA) is ‘*to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development*’ (SEA Directive Article 1). The requirement of the SEA should be to demonstrate that the Plan meets strategic planning requirements to achieve sustainable development, meeting the high standards of environmental protection and sustainable development that EU and UK require.

SEA Regulation Schd 2 (1) An outline of the contents, main objectives of the Plan or programme and relationship with other relevant plans and programmes:

The relevant Policies Plans and Programmes and Guidance documents set out in Appendix B do not mention several relevant items (including various International Conventions, National infrastructure and water management plans, the Core Strategies and LDPs of adjoining authorities that share strategic routes and environmentally sensitive areas; Oxford City Council’s emerging Heritage Plan). As a result the SEA has failed to address some cumulative effects and falls short of the Duty to Co-operate to *prevent, reduce and as fully as possible offset any significant adverse effects*.

Schd 2 (2) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the Plan or programme; Schd 2 (3) The environmental characteristics of areas likely to be significantly affected:

The very broad-brush description of *the environment* in Section 4 is very superficial, and does not adequately describe the *state* of the environment, eg: the condition, rate of loss, management status, etc., from development and other pressures. Moreover, it fails entirely to describe in these terms the environment of the areas defined in the Plan as being where development of various kinds will be located, as presented in Volumes 2 to 4 of the Plan. The coverage of how the state of the *environment* would be likely to evolve without the Plan is equally thin and patchy. This matters because it is crucial to weighing up whether the Plan has been developed with a proper consideration of environmental protections that require ‘great weight’ to be given to them.

Schd 2 (4) Any existing environmental problems which are relevant to the Plan or programme including, in particular, those relating to any areas of particular

environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC:

This requirement **includes** but is not restricted to EU designated wildlife sites. There is no discussion of other environmental problems affecting national designations.

Schd 2 (5) The environmental protection objectives, established at international, community or Member State level, which are relevant to the Plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation:

Section 3 covering 'Objectives' covers National Goals for LTPs (DoT 2008) but does NOT cover "*The environmental protection objectives, established at international, community or Member State level, which are relevant to the Plan*" let alone explain "*the way those objectives and any environmental considerations have been taken into account during its preparation*" This is in spite of comments on the scoping (para 2.4) concerning AONB Management plans, National Heritage Protection Plan, National Heritage List, Heritage at Risk Register, Historic Landscape Characterisation; National Planning Policy Framework's aims to conserve heritage assets. There is also no mention of the Blenheim WHS Management Plan, statutory duties that public bodies and officials have towards environmental conservation enshrined in national heritage, landscape and wildlife legislation; or the 'great weight' that NPPF requires to be given to conserving nationally and internationally designated heritage assets, wildlife, AONBs and the Green Belt. By not thoroughly identifying objectives "*which are relevant to the Plan*" in the context of the particular proposals being put forward, numerous readily identifiable potential impacts have simply not been recognised, let alone assessed.

Schd 2 (6) The likely significant effects* on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors (*these effects should include secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects):

The assessment approach is based entirely on abstract objectives and regulatory procedures and fails to identify most actual *likely significant effects on the environment*. The SEA Regulatory requirement is not just to 'identify' a few exemplars as is done in text or tables of the SEA Report, but in relation to a proper consideration of 'the environmental characteristics of areas likely to be significantly affected' (see above) meet the Schd 1(2) requirement to assess *the probability, duration, frequency and reversibility of the effects* and their complex interactions etc. There is no attempt to define at a *generic* level the full range of impacts known to arise at different stages in the life-cycle of the different sorts of

development envisaged or give a general probability of whether they would arise, and if so whether they would trigger the ‘special weight’ that by statute and national policy must be given to such issues. Likewise there has been almost no attempt to assess how the combination of LPT4 development and the scale of development indicated by other local plans would contribute cumulatively to loss of Green Belt land, AONBs etc., or the great weight to be accorded such matters. The SEA generally fails to *describe and evaluate* any effects within the context of NPPF policy and statutory environmental protection to which great weight must be accorded, merely ticking boxes covering multiple aspects of the environmental and multiple different kinds of effect without actually indicating how the environment would change.

More strategically, neither the Oxfordshire LEP nor the SHMA has been subject to SEA or SA screening or reporting (which is of highly questionable legality) and the capacity of the LEP and SHMA area to absorb the scale of development envisaged has never been assessed under the SEA Regulations.

Schd 2 (7) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the Plan or programme:

The failure to apply properly NPPF (para. 157) policy and statutory considerations to exclude areas from inappropriate development sites that affect some of the most environmentally sensitive landscapes and assets indicates that the most effective measures available to **prevent** significant environmental effects have NOT been given due weight (especially vis-à-vis AONBs, Green Belt and heritage settings). Since so little consideration is given to the known characteristics of the areas most likely to be affected by the plan or the generically identifiable impacts likely to arise, the SEA is largely silent on the nature of any actual “*measures prevent, reduce and as fully as possible offset any significant adverse effects on the environment*”. Instead, the SEA merely refers to policy - and that in itself is inadequately covered in relation to the planning weight that environmental policies carry.

Schd 2 (8) An outline of the reasons for selecting the alternatives dealt with...:

The coverage of alternatives demonstrates the flaws noted above in relation to the baseline coverage. The consideration of site options in the SEA Appendix F does NOT consider any alternative strategies routes or locations - even for Oxford - despite the clear evidence from the main report that alternative options were looked at.

Schd 2 (8) ...and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information:

The Report states that ‘*The SEA identified a number of areas where further information would either have been helpful to the SEA or will benefit the future assessment of environmental effects at the project level*’ and enumerates several, but few stand up to scrutiny. They do not arise from “technical deficiencies or lack of know-how” but simply from a failure to obtain professionally qualified expert advice or address rigorously the actual requirements of the SEA Regulations rather than applying a crude, oversimplified and largely uninformative Sustainability Appraisal tick-box methodology.

Schd 2 (9) A description of the measures envisaged concerning monitoring in accordance with Article 10:

The monitoring measures proposed are only partially relevant to the likely impacts of the developments that the Plan proposes, and many of the most significant effects will not be covered by them (eg: effects on species for ecology; loss of Green Belt; achievement of AONB management plans; heritage setting issues or archaeological effects. No monitoring is proposed for how many cases where environmental material considerations to which great weight must be attached under NPPF arise; nor whether such harm is *prevented* or only reduced or offset; nor whether it is even possible to “*undertake appropriate remedial action*” where adverse effects on such considerations arise.

Schd 2 (10) A non-technical summary of the information provided under the above headings:

In so far as the Non-Technical Summary does summarise the required information under the above headings - it is equally deficient in presenting an adequate assessment of the likely environmental effects of the LTP4.

Overall likelihood of compliance

The SEA Report fails to meet adequately the statutory requirements of the SEA Regulations and Directive on all Schedule 2 criteria for the information to be included in an Environmental Report. These failings are sufficiently serious as to demonstrate that the whole process of trying to reconcile perceived development needs with environmental objectives has failed to give due weight to the likely serious adverse effects on the environment, and as such makes LTP4 unsound.

END