England's Economic Heartland Outline Transport Strategy

'Engagement' Consultation Questions: A Response from CPRE – the Countryside Charity

1. Does the draft vision ("connecting people and places with opportunities and services") provide sufficient focus for the Transport Strategy?

Generally, we think that it's a good start. However, the emphasis should be more on *reducing* the need to travel and, where travel or freight movement is necessary, on reducing journey lengths. This has major implications for planning how much and where development takes place.

The Outline Strategy should therefore reflect a more appropriate hierarchy, namely:

- Reducing the need to travel at all
- Reducing the distances people travel (especially commuting)
- Cycling and walking
- Public transport
- Then, lastly, roads.

More focus is needed on the strategic co-ordination of Local Transport Strategies and ensuring that these support Local Plans and vice versa. The lack of specific geographic proposals (other than the projects listed on p.43) make it quite difficult to get to grips with the Outline Strategy.

The idea that there should be an integrated transport strategy for the Arc – and indeed for other parts of the country – has long been argued for by many commentators. Unfortunately the Heartland Transport document does not provide any concrete recommendations on what that strategy should look like. It lacks specific details about actual plans although it is strong on platitudes. It starts from the premise that population growth in the region is a good thing – which is contestable (especially as there is a risk that a significant proportion would be London commuters) – and that economic development will automatically follow that growth. It doesn't provide any in-depth analysis of potential traffic congestion, air quality implications or the impact on existing communities of ever-increasing levels of house building. In this respect the document fails to address the probable impact of the proposal for up to 1M new homes in the region. From a transport point of view 1M new homes equates to approximately 2M more cars and 1M more home delivery addresses unless lifestyles radically change.

2. Is the ambition to have a zero-carbon transport system by 2050 sufficiently challenging?

This is not a question that can be decided at regional level alone. Nevertheless, it is a worthy ambition which we would support, although there is no clear 'map' of how to get there. But 'zero carbon' has to include the construction of infrastructure and the manufacture and disposal of vehicles together with other external contributors to emissions, not merely the use of fossil fuel. It is not clear how including it in the Strategy can realise the ambition. Merely exporting our carbon emissions will not do.

Railway electrification can make an important contribution, which in the Heartland area should include the Chiltern Line (Marylebone northwards – the only all-diesel line remaining to/from

London), Didcot to Oxford and East-West Rail. Other zero-carbon methods of propulsion, e.g. hydrogen or battery, may develop into viable options during the lifetime of the Strategy.

This is not merely about CO_2 reduction, of course. Air and noise pollution generated by transport are particular problems in a number of the larger towns and cities in the EEH area. The final Transport Strategy should set out meaningful policies for tackling these. Interim goals for 2030 and 2040 against which the trajectory was measured would be useful – but who is going to monitor it and who is going to take responsibility for achieving it?

As we also mention in response to Q.15, it is of little benefit if a low- or zero-carbon transport system is supporting high-carbon industrial, commercial and residential development and lifestyles.

3. Do the three key principles (enabling economic growth; accessibility and inclusion; quality of life and environment) provide an appropriate framework within which to develop the Transport Strategy?

These are, of course, the three pillars of sustainable development which all strategies and plans should adhere to. All three principles should be met without trade-off between them. Another problem is the extent to which national factors should influence more local ones, e.g. is there a greater need to rebalance the economy by investing in transport and infrastructure in the Midlands and the North rather than pumping yet more into southern England?

Existing rural communities should not be forgotten. They need services – not least quality broadband – but want to retain their separate identities. Policies therefore need 'rural-proofing'.

Additional (unnumbered) Question (p.21): What do you think?
Are the elements within this future vision: a) Ambitious b) Attainable c) Desirable

We welcome the future vision of the 'High Street' illustrated on pp 20-21. But who is going to ensure that this is realised? High Streets have been in decline in recent years and need extensive support to ensure that they do not merely survive but thrive. The old model of their being anchored by major national chains may no longer be appropriate: smaller independent shops may be more attractive. High Streets are still the most sustainable location for retail and other urban activity and as hubs are more easily served by public transport radial routes.

4. What are the key factors influencing people's choice of travel mode?

The key factors that influence people's choice of travel mode are cost, journey time, frequency, reliability, comfort, access, convenience and communications connectivity. Public transport should aspire to all of these factors, although there can be some degree of set-off between them. For example, someone may be prepared to pay more for a faster journey time; for someone else cost may override all other factors; for yet others ease of modal transfer is important. The comfort factor should not be under-estimated, though: the personalised ambience of the modern private car is highly attractive even at higher cost, and public transport has to work a lot harder at the other factors to overcome this high barrier.

Bus frequency leaves a lot to be desired in some areas. The aim should be for a 10-15 minute minimum frequency within urban areas and 30-min maximum interval beyond, with a reasonable service maintained during evenings and on Sundays. Even if someone can be persuaded to use the bus on an outward journey, if the wait is too long for the return then the car is more likely to be used for both directions. Bus operators' timetables should be co-ordinated: 'two buses per hour' should not mean two services 10 minutes apart and then nothing for another 50 mins, as is the case on some routes today.

Integrated or cross-validity ticketing would remove one barrier. Too many tickets (on both bus and train) are not valid on other operators' services.

In most towns and cities, bus stations leave a lot to be desired (including one photographed in the Outline Strategy!) Other than the most modern ones (Peterborough might be a good example), they tend to be squalid, litter-strewn and uninviting, and often bereft of helpful multi-modal travel information. This has to change.

Many out-of-town developments built over the past 30 years or so are scarcely served by public transport at all. The right location for business parks, offices and shopping centres is within urban areas or at public transport hubs: the mistakes of the past must not be repeated.

Trunk roads and motorways should be tolled, using modern electronic systems as is used for congestion charging. Whilst this needs to be addressed nationally, what better place to start than in the Oxford–Cambridge Arc? As mentioned in answer to Q.7, this could be accompanied by workplace parking charges and congestion charging.

With climate change climbing up the national agenda, people's travel choices will increasingly be influenced by projected carbon emissions and sustainability issues.

5. What are the key barriers that need to be addressed if we are to achieve frictionless travel?

Interchangeability between modes is probably the number one factor. There are too many routes in today's networks where bus services could serve railway stations (for example) but do not, or station car parking is woefully inadequate making interchange difficult. Bus services need to become much more reliable, with actual real-time running information provided to users (as opposed to mere timetable displays). Bus stops should be provided at closer intervals (350m is recommended for built-up areas), whereas in many cases stops are located at the same places as they were 30 years ago, not allowing for more recent development or changes in travel patterns.

There are some excellent examples of interchange in the Heartland area, one of the best being at Milton Keynes Central station (the only problem here being the bewildering amount of information which is confusing to anyone but the regular traveller). Cambridge, Oxford and Bedford have excellent park-and-ride sites with easy interchange, the only problem at Bedford being that the service runs only hourly in the evenings and on Sundays, which limits its usefulness. Northampton badly needs park-and-ride for a town of its size. However, large edge-of-town P & R sites become unnecessary if rapid transit or bus services from outlying areas are adequate.

As mentioned in our answer to Q.20, bus services need to be regulated and co-ordinated by a central authority, which can specify routes, frequencies and stops.

6. What performance measures should be used to identify the levels of service users require of the transport system?

Logically, these would be related to the factors that influence people's choice of travel mode, as answered to Question 4, namely cost, journey time, frequency, reliability, comfort and convenience. Users and potential users in the area could be surveyed, and their responses compared with actual data on public and private transport performance. Such desires may need to be moderated, however, in cases where users seek unsustainably high service levels of private car transport use over longer distances.

7. Should the strategy include and define appropriate 'nudge principles' (small changes which can influence user behaviour) to encourage more people to use public transport in the Heartland area?

Yes, but these will be insufficient in the longer-term. New development should be well-served by public transport from the outset, which with a few exceptions is not usually the case at present. This could be accompanied by such 'nudges' as workplace parking charges and congestion charging.

Additional (unnumbered) Question: What do you think? (p.33)
Are the elements within this future vision: a) Ambitious b) Attainable c) Desirable

The artist's impression of new housing development illustrated on pp.32-33 all looks very nice, including sustainable transport solutions, but how much unspoilt countryside is all this going to take up? We must avoid wastefully low housing densities which actually make walking, cycling and public transport less attractive propositions. Higher density development associated with urban regeneration, brownfield land and transport hubs is preferable to urban sprawl and greenfield development.

8. What weight should be given to the changes in travel demand arising from the delivery of transformational infrastructure?

It is not clear what this Question is asking. If it implies that demand will increase when additional transport infrastructure is provided, then this has to be taken into account. If that additional demand is going to contribute to additional emissions or other environmental impacts (e.g. noise, loss of tranquillity, light pollution) then that calls into question the justification of that element of new infrastructure in the first place.

9. What weight should be given to the potential of the rail network to accommodate a higher proportion of future travel demand?

For locations served by rail, high weighting should be given, as rail is the most efficient form of mass transit over medium and longer distances. This includes journeys where access to a rail station a short distance away has to be by another mode, e.g. cycle, local bus.

10. Have we identified the key strategic transport corridors?

The journey-to-work diagrams on pp 28-30 of the Outline Strategy are interesting and informative. However, such diagrams need to be provided for more towns, e.g. including Aylesbury, Bedford, Stevenage, and at a more detailed level of granularity. (For example, the travel needs of someone commuting from Dunstable to Luton are very different from Biggleswade to Luton, but both are lumped together into 'Central Bedfordshire'; similarly Bicester and Banbury are both grouped together under 'Cherwell District', but the travel solutions are different.) The travel needs of others making frequent journeys, e.g. for shopping, hospital visits and college, could usefully be added. When this has been done, the adequacy or otherwise of existing transport networks, especially public transport, can be determined, not only to see what remedial action is needed now but also to serve as a baseline for future network development.

Bedford to Stevenage is missing. This is a commuting corridor for which no public transport journey is currently viable.

The road scheme priorities listed on p.43 of the Outline Strategy rather belie the Heartland's approach, as does the (separate) list of road projects submitted in August 2019 to Government for funding. The Strategy contains many supportive ideas on public transport, walking and cycling,

pedestrianisation and novel personal transport solutions, but EEH still calls for these major road schemes. Each of these would induce new road journeys including some drivers travelling further than previously, as well as attracting traffic diverted from more congested routes. *This is yesterday's solution.* The emphasis should shift completely towards public transport investment so as to make most of these road projects – including the Expressway – unnecessary. A few schemes that provide local congestion relief or safety benefits without providing a noticeable increase in capacity may be acceptable.

The maps on pp 44-63 are very telling. By comparing the pair of maps for each town or city covered it will be seen that there are very few locations where journey times by public transport are shorter than driving times. In many instances the differences are dramatic. *This is not how it should be*. East-West Rail can be expected to make an impact, but only for those locations which it will serve. This illustrates what an uphill job has to be done – and one which should not be undermined by major new road construction.

Trams or 'light rail' are ideally suited to an intensive service through built-up areas or linking satellite hubs with their host town/city. This has been well demonstrated in cities such as Nottingham, Sheffield and elsewhere where the mode is very popular. They have the advantage of segregated running where space permits and penetration of town/city centres by street running.

Maps of the existing major road and rail networks in the Arc area have been provided in the Outline Strategy document, but where are the maps for cycling and bus/coach networks?

As mentioned in answer to Question 1, the Strategy should reflect a more appropriate hierarchy, namely: reducing the need to travel at all; reducing the distances people travel (especially commuting); cycling and walking; public transport; and, lastly, roads.

11. Are there specific issues that should be taken into consideration as part of the connectivity studies?

There has been a lack of integrated and multi-modal planning hitherto. Take the A428 improvement scheme. This has been considered in isolation from both the East–West Rail Central Section and the future of the A1, and it has not been integrated with local 'last mile' connections into Cambridge. Any development in the A1 corridor is dependent on decisions about this route – considered multi-modally, of course.

All suburbs, smaller towns and larger villages should have good public transport and cycling links to their nearest railway station, secondary school, further education, doctors' surgery, hospital and shopping areas, with services continuing into the evening This may be direct or part of a first/last mile service feeding into another network, with seamless transfer between the two. No community should be isolated.

12. To what extent should we look to the growth in digital services to change the nature and scale of future travel demand?

High speed and high quality digital communications (throughout the area, not merely in towns and cities) can and should reduce the need to travel, especially for business meetings and education purposes.

13. What are the core connectivity requirements for businesses operating from the region?

We are not convinced that access to Luton Airport from e.g. Oxford is a priority (c.f. p.57), and in any case East-West Rail will not be a great deal of help here as a change of train in the Bedford

area will be necessary. Whilst we want to see modal shift in surface access to airports away from the car, we should also be looking to reduce air travel for climate change reasons.

We note that no specific Question has been asked about the list of 'strategic infrastructure priorities' listed on p.43. With the possible exception of the A428 scheme which is already at an advanced stage and various local road safety improvements, the list of road priorities is highly contestable and does not reflect the objectives of reducing CO_2 emissions or air pollution.

14. What are the key performance measures for the Transport System from a business perspective?

Logically, these would be related to the factors that influence people's choice of travel mode for business purposes, not dissimilar to the answer given in Q.6, although the weighting of some factors may be different, e.g. time may be valued more highly and cost may be a less important factor. Existing and potential business users in the area could be surveyed, and their responses compared with actual data on public and private transport performance. As with private journeys, such desires will need to be moderated in cases where users seek unsustainably high service levels of road transport use over longer distances, the cost of which being borne by business is less apparent to the actual driver.

15. What measures should the overarching Transport Strategy include in order to enable the potential that exists within the four Grand Challenges of the Industrial Strategy to be realised?

The Transport Strategy should seek carbon-neutral growth. But it is of little benefit if a low- or zero-carbon transport system is supporting high-carbon industrial, commercial and residential development and lifestyles.

16. To what extent is investment in digital infrastructure more significant and/or urgent than physical infrastructure?

Digital infrastructure should have a higher priority than road infrastructure, as the latter has greater negative environmental impacts, including emissions, pollution, noise, lighting and loss of countryside. Physical infrastructure supporting walking, cycling and public transport will remain urgent and important.

Additional (unnumbered) Question: What do you think? (p.77)
Are the elements within this future vision: a) Ambitious b) Attainable c) Desirable

Again, the illustration on pp.76-77 looks fine, but how will it be achieved? Who is going to mandate the vision? The idea that business parks should be completely separate from residential areas and thus necessitate commuting (by whatever means) is outdated, based on the desire to keep heavy polluting industry separate. Future modern business parks should be integrated with residential, shopping, educational and community uses, heavily reducing the need to travel. We would in principle support more mixed uses on existing business parks (c.f. bullet-point 7 on p.77) provided that the sites in question were served by enhanced public transport, and segregated walking and cycling facilities.

17. How will the way we access goods and services continue to change, and what are the key issues that need to be addressed in the Transport Strategy?

The traditional High Street does not have to continue to decline if the right model for the future is adopted, including social and recreational activities. High Streets and town centres form important hubs for public transport and so are more sustainable than dispersed or remote facilities.

However, the future of large out-of-town shopping centres (often poorly served by public transport) may well be numbered.

18. What freight and logistics services are important for people and businesses? For example, accessing goods (via delivery or in person); a thriving high street; access to health, education and leisure facilities?

We are concerned that the environment may be blighted with yet more massive and inhuman 'logistics centres' as well as all the HGV traffic and delivery vehicles that they generate. Both HGVs and local delivery vehicles have environmental impacts which we should seek to reduce. Both have high CO_2 and particulate emissions which look likely to persist long after the majority of private cars have become electric. HGVs' impacts comprise noise and vibration as well as demands for access and parking. Vans increase congestion in our towns and cities: a system of sharing delivery vehicles between suppliers would be a step forward.

We want to see more freight carried by rail, with subsidies where necessary. In particular, East–West Rail should be designed for freight use throughout (including gauge, capacity, passing loops and junctions with other lines), and other routes similarly equipped where not already.

19. Just in time and last minute operations are affecting the way people and businesses access goods and services. How should this growing trend affect the way we plan transport now, and in the future?

'Just in time' has its own disadvantages, not least its current over-dependence on heavy road transport. Greater use should be made of rail freight for regular flows. In the meantime, more facilities are needed for drivers' rest breaks on trunk routes.

Additional (unnumbered) Question: What do you think? (p.87)
Are the elements within this future vision: a) Ambitious b) Attainable c) Desirable

We appreciate attempts to address rural issues, not least the current lack of public transport in rural areas. However, this must not be used as an excuse to overdevelop or swamp rural communities, and we do wonder how idealistic the illustration on pp 86-7 really is. Agriculture will need to remain a major land-use in the rural area.

20. Is the approach to investment the right one? If not, why not?

The Outline Strategy has very little to say about how the running costs of the public transport network would be funded. Everyone wants more and better public transport, but who is going to provide it, who is going to pay for it (as farebox revenues are likely to be insufficient on their own), and who is going to co-ordinate it? Left to a 'free market', bus operators will merely cherry-pick the profitable routes as they do now without any concern for the wider interest. Public transport has to be in place at the start of new development, before occupants get into the habit of doing without it, otherwise it's too late.

A mechanism has to be provided whereby a central authority can specify bus and rapid transit routes and timetables. (It is understood that this power is currently only available to 'metro mayors' of combined authorities.) However, this cuts across existing local authority responsibilities (e.g. unitary and county councils), and the Outline Strategy makes no proposals as to how this would be achieved.

A good standard of public transport has, of course, to be accompanied by segregated surfaced walking and cycling routes – grade-separated where roads are crossed – in order to encourage use of these modes. (The Milton Keynes 'Redways' are a good example.) But these need to form

an integrated network, not stop at the development boundary, and should connect to popular destinations such as schools, colleges, healthcare facilities, shops and transport hubs, even if these are outside the 'designated area'. Many existing National Cycle Network routes in the area are little more than muddy bridleways!

21. Is the approach to delivery the right one? If not, why not?

There are many wise words in the Outline Strategy about 'collaboration' and 'partnership', but these aspirations cut very little ice on the real ground of development plans and planning applications. Very few planning consents include, through planning conditions or s.106 Obligations, requirements to provide or support public transport. s.278 agreements may be used for road improvements, including for cyclists and pedestrians, but are usually limited in scope and rarely take account of the wider network. Small amounts of Community Infrastructure Levy (CIL) income may be put towards public transport but this tends to get lost in a transport authority's overall pot rather than be directed towards provision for a particular development site. In any case, some authorities have not yet even implemented CIL.

This is a real issue outside the major metropolitan cities and needs to be solved at an early date. Otherwise, the same old pattern of road-centred development that we have experienced for many years will merely continue. The Outline Strategy (and many other EEH documents) talk about 'transformational change' – well, here is one area where it really does need to be transformational, or the result will be failure.

A proper network approach is required, following a thorough analysis of people's travel needs, including those that do not at present use public transport.

Concluding point:

The Heartland (or Oxford-Cambridge Arc) has had far too little exposure amongst local communities and the general public. Beyond specific schemes (such as the Expressway and East-West Rail) there has been no widespread public discussion, no environmental assessment and no 'rural proofing'. In particular, that has been the case with this consultation on the Outline Transport Strategy, which has largely been aimed only at 'stakeholders'. If local communities and the general public are ignored, there will be no 'buy-in' and only hostility will be generated. Local authorities too need to be more pro-active in involving their residents in discussions about the future of the Arc.

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