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10 March 2022

Dear Sir/Madam,

Re: Oxon Local Transport & Connectivity Plan 5 (LTCP5) – Consultation, Spring

CPRE Oxfordshire response

The Campaign to Protect Rural England Oxfordshire works to improve, protect and preserve the landscape of Oxfordshire and its towns and villages for the benefit of everyone.

Transport & connectivity are key issues for our rural communities, essential to ensuring healthy and sustainable lifestyles and part of protecting our broader environment.

LTCP5 – Overview

Overall, we strongly support the Draft LTCP5 Vision and its focus on a transport hierarchy that reduces the need to travel and prioritises cycling and walking. We support the 'decide & provide' approach, rather than 'predict & provide'.

We also welcome the recognition that there are transport and connectivity challenges specific to rural communities and that these require more tailored solutions, although this needs to be carried through to measurement and evaluation (e.g. the Key Performance Indicators).

We agree that the '20 Minute Neighbourhood' is a useful concept and are generally in favour of policies designed to support this, including those within LTCP5 and the higher density housing policies that should be included in the Oxfordshire Plan 2050.

Headline targets & Key Performance Indicators (KPIs)

By 2030 our target is to:
• Replace or remove 1 out of every 4 current car trips in Oxfordshire
By 2040 our targets are to:
• Deliver a zero-carbon transport network
• Replace or remove 1 out of every 3 current car trips in Oxfordshire
By 2050 our target is to:
• Deliver a transport network that contributes to a climate positive future

These targets are too slow and say nothing, for example, about the type of car trip that will be replaced or removed. Car trips themselves are not the primary problem, although an important KPI to track to monitor congestion levels. It is the fuel used by the cars which has a larger detrimental impact on pollution levels. In addition to these targets an additional KPI might be to replace or remove 50% of car trips that use an internal combustion engine with EVs. Similarly, the 2040 target could also target a reduction in the overall number of cars and a reduction in those using an internal combustion engine.

Key Performance Indicators

Focus area	KPI
Transport emissions	Road transport emissions (Mt CO2)
Walking and cycling	Percentage of residents walking / cycling utility vs leisure
	Number of walking / cycling trips
Physical activity	Percentage of adults / children meeting physical activity recommendations
Healthy Streets	Healthy Streets score improvements
Road safety	Total number of KSI
	Number of KSI per mode
Public transport	Number of bus passenger journeys
	Number of rail passenger journeys (rail station entries and exits)
	Number of park and ride passenger journeys
Digital connectivity	Percentage of premises with superfast broadband
	Percentage of premises with full fibre broadband
Air quality	Transport emissions in Oxfordshire
	Years of healthy life lost due to air pollution
Private car	Car vehicle miles in Oxfordshire
	Number of car trips
	Number of registered battery electric vehicles
Road highways maintenance condition	Percentage of roads in good/fair/poor condition

Generally, we support the monitoring of these KPIs, alongside the additional ones which we propose:

- The total number of journeys undertaken by all modes; which will help to understand both modal switch and journeys not undertaken due to factors such as better connectivity and service provision in rural areas and home working.
- Percentage of car trips undertaken by non-fossil fuel vehicles.
- Relevant KPIs for trip undertaken on rivers and canals. See Omissions at end of this document.
- A relevant KPI to capture taxi usage and innovative embryonic rural schemes such as the present unsubsidised community buses, dial a ride, shared taxis and combined public services (school, health, and subsidised regular services). See Omissions at end of this document.

   We feel that more work needs to be undertaken in data capture to represent a truly reflective picture of road safety. Reported accidents are statistically very rare events and the "All Injury Rate", although more difficult to capture, is a better indicator particularly over a short to medium term. More work is needed on the statistics to be used here rather than the KSI proposed that masks many of the real public concerns such as unreported minor pedestrian and cycle accidents that could easily have been worse.

Specific Comments

1. **Private car use in rural areas**
   "*if we are to truly achieve these targets some measures will be required that make private car use less attractive*" (p26)
   Whilst we support the overall ambition, the Plan itself recognises that rural communities are more heavily dependent on private car use, due to the distance to services and lack of public transport.
   There should be a clear statement that those in rural communities will not be unduly penalised for private car use unless and until viable alternatives are in place.

2. **Rural journeys**
   We agree with the description of the challenges around rural journeys and support the measures outlined, including Policy 93 "*Oxfordshire County Council will work with partners and stakeholders to develop tailored solutions for our smaller market towns and rural areas that improve connectivity, accessibility, and contribute to delivery of our transport vision*".
   On the basis of what isn't measured, isn't achieved, **we believe this ambition should be reflected in some way within the Key Performance Indicators.**
   This target also needs to recognise the need for the development of services, both directly and remotely, to rural communities allowing greater self sufficiency and negating the need for journeys.

3. **Rights of Way Network / Greenways**
   We welcome the focus on increasing walking and are therefore particularly disappointed that little to no mention is made of Oxfordshire's Rights of Way network – it is merely swept up in broader green infrastructure policy. This network is an amazing resource stretching to thousands of miles, including both local routes and longer distance trails such as the Oxfordshire Way, the Ridgeway and the Thames Path, providing vital access to the countryside. It could, and should, be an integral part of thinking around

The ROWMP should form a more important component of the LTCP than it appears to have been given. The Rights of Way network deserves its own standalone policy within the LTCP so that this can be clearly articulated.

Rights of way can play a vital role in linking rural communities at the expense of car usage, if made to be attractive and easy to use. The ROWMP covered the period 2015-2025 and the aim was more on improving access to the countryside than improving connectivity. We note that on the timeline for various actions cycling and walking comes after 2025. This is too slow if villages are to be linked for walkers and cyclists as part of the Strategic Active Travel Network. We therefore recommend that a review of the ROWMP should begin in the next twelve months, with the focus being on improving connectivity.

We recommend that volunteer groups, such as the Chilterns Society and the Cotswold Wardens, which are already being used, should be expanded to assist in this review of improving the connectivity of rights of way; this would also support the Council's policy of encouraging greater outdoor exercise to improve health and well being

The section on Greenways, notes that there are disused railway tracks that could provide a set of high-quality Oxfordshire Greenways. Is the county council actively looking at this before Historic Railways Estate restarts its programme to infill & demolish historic bridges? https://nationalhighways.co.uk/our-work/historical-railways-estate/ News item Dec 2021.

The Greenways proposal is welcome in principle but recent experience suggests that maintaining the existing network is a sufficient challenge in itself and this, followed by changes in connectivity, should be the priority for any available funding. **Where Greenways are created, they must be sensitive to the surroundings, for example avoiding artificial lighting and tarmac.**

4. **Horse Riding Policies 2-8**
   We are supportive of the Transport user hierarchy proposed . Policy 9 specifically refers to the safety of horse riding and is supported by the aims of Policy 25, however we also feel that horse riders should also be included in the aims of polices 2-8.

5. **Policy 10**
   This Policy must ensure that current Safe Ways to schools which include cycle paths & shared pathways are included within cycle/walking networks. There needs to be a central publicly accessible mapping system for these routes. For example, in Chinnor there are numerous, on-road cycle paths, & shared footway/cycle paths, however, not all of them appear on developers' Travel Plans, nor even the Chinnor Neighbourhood Development Plan.

6. **Policy 32 London Oxford Airport**
CPRE Oxfordshire objects to the policy of supporting the growth of London Oxford Airport, with the possible exception of initiatives focussing on low carbon technologies. We are aware electric aircraft are already being used for short haul routes in Canada and Norway and that London Oxford Airport has ordered some Pipistrel electric training aircraft. However, we would be concerned about any proposals that would increase traffic or have other negative impacts on the surrounding Green Belt and countryside.

7. **Policies 72-4 Drones**
An urgent addition to this suite of policies is needed to address the issue of tranquillity and to ensure this is taken into account when making decisions on the use of this technology. The safety of third persons, with many drones flying at less than 500m above housing is another critical consideration.

8. **Policies 28 & 29 Park & Rides**
We welcome the more nuanced approach to Park & Rides and the fact that they will be considered on a case-by-case basis CPRE Oxfordshire remains of the view that if communities are planned properly, with co-location of employment and housing, and adequate provision of high-quality public transport, then Park & Rides should not be necessary.

However, if P&Rs are required, CPRE advocates their location as close as possible to the home origin so that users can walk, cycle or 'kiss and ride' (acknowledging that this solution might potentially be described a 'local bus service'!).

The next 'least worst' option would be to locate P&Rs as close as possible to the final destination, allowing speedy transfer across the 'last mile'.

The worst option is a half-way house which sees P&Rs located in rural sites between major settlements. This would do nothing to reduce the number of car journeys but would shift congestion to rural roads and villages with inadequate supporting infrastructure, as well as impacting on the local landscape.

We would propose that all Park & Ride parking areas should have solar PV canopies across the whole parking area to make full use of the area for the production of electricity with excess energy being stored in on site batteries. All parking places should have type 2 EV sockets, with a bank of at least 10 rapid or super rapid EV charging posts installed at each P&R.

9. **20mph limits**
We are supportive of 20mph speed limits where appropriate and supported by the local community, particularly in rural villages. However, whilst speed limits are useful in the right locations, blanket coverage may not work well. Slower speeds allow time to react and when an incident occurs reduce damage to people and property. Their use needs to be carefully located according to the potential

dangers to those walking and cycling (such as outside schools) but not in areas where there is little or no danger as they just become abused. They do not reduce and arguably increase pollution from vehicles running on petrol or diesel as to go this slow requires the vehicle to be in a lower gear and therefore very inefficient.

10. Policies 86 & 87 Freight Consolidation Centres

Careful consideration as to the location of such centres must include assessment of their landscape and visual impact and should prioritise brownfield sites. The temptation, especially for Oxford, may be to site such centres around the perimeter, within the Green Belt. This should be avoided as being contrary to the openness and permanence of the Green Belt.

Draft Freight & Logistics Strategy

p28 "*The county council do not currently have any funding available for work to address inappropriate HGV movement.*"
This is not an acceptable situation. What steps are being taken to secure funding or advise communities on where funding can be resourced? How is the County Council raising this issue with Government?

Action 17: Support the provision of strategic rail freight interchanges

"We will support the provision of appropriately sited strategic rail freight interchanges, subject to funding being available and having regard to the impacts on local communities and/or any other relevant planning considerations, and on the capacity and suitability of impacted road and rail networks."

We would add that '**SRFIs may not be suitable in locations that are mainly greenfield sites, requiring significant loss of open countryside, the presence of which is still a distinguishing feature of Oxfordshire**".

Omissions

No reference is made on the use of the canals and rivers of Oxfordshire and to our knowledge no consultation was made with the Canals & River Trust. With such an extensive number of opportunities across the County from towpaths and river walks to the use of the systems for transport and leisure a section on this, with relevant KPIs, should be added to the policies.

We also propose a policy which relates to accessibility for disabled people, especially in relation to new transport developments.

Data collection and a relevant KPI is needed to capture taxi use and innovative embryonic rural schemes such as the present unsubsidised community buses, dial a ride, shared taxis and combined public services (school, health, and subsidised regular services).

Yours faithfully

Helen Marshall
Director, CPRE South Oxfordshire