Policy and Programmes

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Local Transport Connectivity Plan - Draft Documents Consultation

Thank you for consulting our Councils on the above documents. This joint response is provided on behalf of South Oxfordshire District Council and Vale of White Horse District Council. This consultation response provides feedback on the range of policies included in the draft Local Transport Connectivity Plan submission and accompanying documents.

Main Local Transport Connectivity Plan (LTCP) Document:

We welcome policies that embed the modal shift and decarbonisation agenda into both managing existing and planning future transport infrastructure, specifically:
- Improving provision for active (walking and cycling) and multi-modal travel
- Measures to make walking, cycling and public transport genuinely appealing
- Freight management and consolidation
- Planning for electric and other fuel transport capabilities

However, we also recognise the limitations of delivering a number of policies for rural communities like South and Vale, particularly:
- Zero-carbon transport system by 2040 and the associated impact of this on residents in rural areas. What mechanisms will be in place to encourage and support modal shift by our residents and discourage use of diesel or petrol cars? The level of investment required to improve bus and rail services to the required frequency to replace car journeys would be substantial.
- Limiting parking in the rural districts before there are more attractive, affordable non-car alternatives will be controversial and impactful for residents.
- How will the LTCP proposals impact the agricultural sector and farming equipment?
- Use of the Hierarchy approach may be more challenging in rural areas, which has been acknowledged in the draft LTCP, however we are keen to understand how this approach will be developed through the area transport strategies.

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INVESTOR IN PEOPLE

We recognise that careful land use planning decisions will be essential to achieve transport decarbonisation and private car trip reductions. We question whether it will be feasible to continue land use patterns, which have protected employment-led growth in Oxford City, and exported housing growth to satellite locations across the districts. This approach has fuelled traffic congestion and air pollution. It has also caused many residents of South and Vale to have slow and expensive journeys to work into Oxford, to the detriment of their quality of life. Solving this may need more housing within Oxford near jobs. Going forward, spatial planning is likely to need more focus on locating new homes only in locations which can function as 20 minute neighbourhoods, with active travel rather than the private car. We would therefore encourage LTCP Part 2 to contain recommendations for the Oxfordshire Plan 2050 and Local Plans on spatial planning.

We recognise that LTCP is very ambitious. However, some ambitions have been transferred from existing LTP policies. To ensure that the LTCP work has the best chance for success, we would highly recommend evaluation of existing LTP policies to pick up any lessons learnt on delivery of these policies and aspirations.

For example, feedback from our councillors shows a high level of frustration that County Council responses to planning applications often fall well short of the LTP's ambitions for active travel or public transport.

The draft plan sets out ambitious targets for the reduction of journeys by private car. It is not clear from the Plan exactly how it is expected that these targets will be achieved by the policies in the document. This needs to be clear for the Plan to have credibility.

Considering connectivity, the draft LTCP states: *"reduce the need to travel and provide residents with the ability to work, shop and access services such as GP appointments from home"*. This statement fails to recognise the desire of people to travel to visit facilities. While we agree and support the notion of reducing the need to travel by car, it is also pertinent to highlight here the need to develop local facilities for local people (20-minute neighbourhoods), particularly in more rural communities. Although there are clear benefits to facilitating work, shop, and access to services from a home computer, mobile or tablet, people in rural communities still value the human interaction that comes with accessing a range of local shops and services in person. These interactions help keep many local businesses and facilities going, serving the rural hinterland. It would be helpful to provide context to support this section, acknowledging the need to strike a balance between digital (fibre / 5G) and in-person connectivity (local facilities and 20-minute neighbourhoods).

The LTCP should not be assume that everyone is going to be able to work from home, with a range of non-office employment types unsuitable for working from home.

When considering rural journeys, it is relevant to highlight that some journeys are not suitable for travel by public transport, walking or cycling and require personal transport for longer journeys, such as those for GPs and other healthcare facilities. Instead, the need to use sustainable travel for some journeys which do not need to be undertaken by a car should be highlighted.

In light of the reliance on private vehicles in many rural areas of Oxfordshire (Car of van ownership per household is 1.6 in South and 1.5 in Vale), there should be more in the LTCP about how we support the transition from diesel / petrol to electric vehicles. For example, how to support the installation of charging points at key services and facilities. Additionally, beyond electric vehicles, consideration of how rural residents and businesses may move away from private or individual transport modes should be considered.

According to the [Oxfordshire Joint Strategic Needs Assessment](#), Oxfordshire is the most rural county in the South East, with 40% of Oxfordshire's resident population living in the County's smaller towns and villages. Therefore, further policy development is needed to consider the needs of residents living outside Oxford City and the County's main towns and the associated challenges they face in accessing services. For example, the JSNA notes that the areas with the greatest areas of population growth in people aged 86 are expected to include rural areas of South Oxfordshire and the Vale of White Horse.

It is unfortunate that the draft LTCP's sections have been organised so that consideration for rural journeys falls toward the end of the document (on page 118). As above, it may be appropriate to consider this large proportion of Oxfordshire's population at an earlier stage in the document.

We understand from LTCP webinar explanations that the Strategic Active Travel Network will connect less densely populated areas to more densely populated areas (which will have Local Cycling and Walking Infrastructure Plans [LCWIPs]). It would be helpful if the interrelationship could be more clearly set out in supporting text and / or illustrations for Policy 7, as well as their interrelationship with Greenways. We are pleased to note that the Icknield Greenway (Wantage to Harwell Campus) in the Vale is the first example of the new Greenway approach in Oxfordshire. We would like to highlight our support for developing LCWIPs in relevant areas of South and Vale, and also to ensure this work develops in a timely fashion and with close involvement from our Councils.

We would also like to highlight the importance of the interrelationship and wayfinding for other existing walking, cycling and horseriding routes when implementing new infrastructure. For example, at the West Lockinge extent of the Icknield Way wayfinding for National Cycleway No.544 (which extends south and west) is not provided.

It is also important to highlight the need for existing cycle friendly roads and cycleways to be regularly maintained, with a need for quick response to pothole infilling, or resurfacing, and regular cleaning and clearing of vegetation and debris as appropriate. Cycle safety has come into sharp focus in recent weeks with recent tragic fatalities.

It would be helpful to add information about the connectivity studies being progressed by England's Economic Heartland and set out how the LTCP relates to the current and emerging Regional Studies produced by EEH. It would be appropriate to also consider the regional studies that fall near our County, including those covering Reading.

We note that consideration of cross boundary planning is limited in the LTCP such as the proposed Thame-Haddenham Cycleway for example, which would stretch between Oxfordshire and Buckinghamshire.

When considering provision and improvements to public transport services, it is pertinent to ensure that services work together for multi-modal travel. Particular attention should be given to service connections for trains and buses, particularly at standard commuter times (e.g. the 136 bus for Wallingford departs 1 hour before the rail service from London arrives at Cholsey station).

The draft LTCP document showcases just one of the four scenarios in Environmental Change Institute's (ECI) report "*Pathways to a Zero Carbon Oxfordshire*" namely "*proliferation of low traffic and higher density neighbourhoods*". This implies a preference for the type of area strategies to be explored (i.e. Greater Oxford and Market towns, as opposed to Better connected rural areas and Less well-connected rural areas), which may or may not be intentional.

Supporting text for Policy 16 on 20-minute neighbourhoods highlights that a large proportion of Oxfordshire do not have access to local services, further detail needs to be provided explaining how the 20-minute model may be applied in rural environs.

Noting the review of Park and Ride facilities in the County, the draft LTPC states: *"There is a need to fundamentally review the P&R operating model, including charging, ticketing and its positioning as part of the overall transport network"*. It would be helpful to clarify what is meant by "*positioning*", i.e. geographical locations of P&R facilities or order in the modal hierarchy, for example.

When considering unmanned aerial vehicles (UAVs, like drones) the draft LTCP acknowledges the negative impacts of this technology, however, unlike other innovation topics in the report, no example is explicitly provided. Considerations for innovation are included in the Environmental Change Institute report, which could be included in the LTCP. Additionally, Policies 72-74 use the term 'drone' as opposed to 'UAV', clarity or consistency of terminology may be helpful here.

Policy 83 states: *"The impact of transport schemes and development on specific groups will be identified to promote equitable intervention"* this wording is not in plain language and should be revised. More information should be given to explain what is intended. The following sentence also requires revision and clarification of what the range of benefits explicitly are: *"Developing a delivering a freight and logistics strategy around our key principles will deliver a range of benefits to people in Oxfordshire"* (Page 109).

When considering freight logistics, it may also be sensible to consider mechanisms used by other local authorities to manage ongoing deliveries to establishments / development areas, i.e. use of framework and site-specific Delivery and Servicing Plans.

Policy 92 considers transport corridor strategies and considers the M40 and A34 in the same bullet point however these roads should be considered separately.

Considering the recent step change in national policy, whereby the deadline for applying for new Footpaths, Bridleways and Restricted Byways has been removed, it would be prudent to reflect this in the LTCP work, highlighting that County will seek to explore the introduction of new Footpaths, Bridleways and Restricted Byways to support SATN, LCWIP and Greenways connectivity and infrastructure.

Figure 35 considers a range of measures to be implemented as part of the draft LTCP along a timeline. The order of some of the items appears to be unhelpful and may not match expectations e.g. air travel and connectivity is considered before cycle and walking networks.

Figure 35 also highlights the Oxfordshire Electric Vehicle Strategy. This document is important, but it will quickly become out of date as electric vehicles become more prevalent. OCC should commit to reviewing the document regularly along the timeline. Reference could also be made to the new Building Regulations which make EV charging mandatory for new developments (Infrastructure for the charging of electric vehicles, which takes effect on 15 June 2022 for use in England).

The LTCP should set out clearly how the targets will be achieved and consider how this may vary across different settings (town centre, village, rural).

In consideration of the 20 minute neighbourhoods, and across the work as a whole, a greater emphasis should be made on the development of mixed use places for both working and living. This will help to move away from a tendency to provide housing development outside of Oxford and employment development within Oxford, and associated commuting required (noting: reduce the need to travel).

Consideration of light rail could be added to the range of shared travel methods to be explored. Light rail could also be an effective way of re-allocating road space.

Appendix 2 should reflect the Healthy Streets principles, such as stating that new roads and junctions should be easy to cross.

Responses Specific to Vale of White Horse
The range of policies targeting decarbonisation and a modal shift to active travel align with the Corporate Plan 2020-2024 which target both "*Tackling the Climate Emergency*" and "*Building healthy communities*".

Consideration should be given to the addition of an LCWIP in Wantage and Grove, as well as Faringdon. Page 38 only refers to Didcot LCWIP and does not consider LCWIP being developed in Abingdon.

Responses Specific to South Oxfordshire
The range of policies targeting decarbonisation, green and blue infrastructure, and a modal shift to active, travel align with the Corporate Plan 2020-2024 which seek "*Action on Climate Emergency*", to "*Protect and restore our natural world*", and provide an "*Improved economic and community well-being*".

Consideration should be given to the addition of an LCWIP in Wallingford, Thame, and Henley-on-Thames. Page 38 only refers to Didcot LCWIP.

Additional Documents:

Draft Active and Healthy Travel Strategy (AHTS)

The draft Active and Healthy Travel Strategy (AHTS) considers data from the annual national survey. The survey has published data for 2019-2020. Noting that the baseline year for cycling targets is 2015, current progress towards the cycling targets from 2015 to 2020 could be shown.

Details and explanation of who or what comprises the Active Travel Hub would be helpful.

The AHTS states that LCWIP design will consider target cycle flows not existing cycle flows, however there is no further detail about the measure(s) that would be implemented with different cycle flow volumes. If available, examples of the type of infrastructure to be implemented for a specified range of cycle flows would be helpful, perhaps as a minimum standard for a range of flow volumes.

AHTS Policy 10 states *"Independent expert reviewer to review cycle plans on major schemes"*. It would be helpful to clarify if this would be sourced and or funded by the Council (District or County) or the developer.

AHTS Policy 12 states a preference for network improvements as opposed to individual improvements to walking and cycling infrastructure, however the mechanisms for funding mean that this will be challenging to achieve.

AHTS Policy 13 states that; where cycle routes are not able to support both confident and cautious cyclists, a dual choice network should be provided. For clarity it may be appropriate to state that cautious cyclist routes may use less direct routes giving better separation from motor vehicles, while confident cyclist routes will prioritise route directness over separation from motor vehicles.

Cycle training is currently provided free of charge for primary schools; however, this should be also provided for adults and children, free of charge, who have missed this opportunity or have lost confidence. Also, incentives could be provided for businesses to encourage them to provide cycle storage and associated welfare facilities (cycle maintenance stations, lockers, showers and changing facilities).

AHTS Policy 17 states that in the short-term cycle measures will be prioritised and concentrated for frequent cyclists. Clarity as to what constitutes measures specifically for frequent cyclists would be helpful.

As part of the AHTS there is a consideration of creating a cycling culture, it is important in doing this to highlight that not all cyclists are lycra wearing hobbyists, and that work on culture creation should focus on all types of cyclists including cycle commuters, cycling to school, cycling for exercise, cycling to shops, recreational cycling etc.

We would like to emphasise a preference for improvements to cycling routes between train stations and residential developments, with adequate and safe cycle parking provided at rail stations. Additionally cycle routes should be explored that follow non-road infrastructure such as the railway lines (e.g. Wallingford to Cholsey), rivers and canal towpaths.

We welcome AHTS Policy 31 which indicates that district authorities are to introduce best practice cycle parking policies.

AHTS Policy 40, which states: "*OCC will produce an annual report and analysis of cyclist and pedestrian casualties to monitor the trend in STATS 19 casualty data*" uses specialised terminology (STATS 19) which could instead be written as casualty data provided by national government, with accompanying text explicitly stating the use of STATS 19.

AHTS Quality Pedestrian Corridors considers minimum widths for pedestrians (minimum width 2-3m relative to footfall). It explains that these widths are also not to be shared with cyclists. It should be acknowledged that these are ideal scenarios for urban areas and that in many cases this will not be possible, particularly in rural areas where footways are not present, narrow and/or shared with cyclists.

We welcome Actions 16 and 18 which seek to review walking and cycling routes to and from retail business parks, large supermarkets, and suburban centres.

AHTS Policies 66 and 67 state that, where there is significant pedestrian demand, pedestrian phases will be added for signalised junctions, and zebra crossings will be installed for roundabouts. Definitions for significant demand should be set out and it would be prudent to consider different demand proportions for town centre, edge of town centre, and urban areas, to reflect differences Oxfordshire. Given that what is appropriate in Oxford may not be appropriate for the local circumstances in Didcot or our market towns.

Reference to the updated Highway Code will need to be revised following its recent publication.

AHTS Policy 70 considers use of minimum kerb radii. Although consideration for larger vehicles is mentioned, it is pertinent to highlight that this measure may increase the number occurrences of HGV movements which mount the kerb and therefore encroach on pedestrian areas. This may also increase occurrences of damage to footway surface treatments and kerb stones.

The AHTS could consider cycle safety in more detail, setting out relevant measures to be applied to areas where cycle safety issues have been identified through assessment of safety. Vision Zero is a strategy to eliminate all traffic fatalities and severe injuries, while increasing safe, healthy, equitable mobility for all. This strategy should be considered in both the AHTS and LTCP.

Addressing the use and general public opinion for cycling on rural roads is a challenging topic to address both from a safety point of view and encouraging people to cycle in these locations. These topics should be explored in greater depth.

Innovation Framework (IF)

We welcome innovation and solutions to decarbonising our transport system through innovation, recognising that Oxfordshire is well placed to test out new technologies having strong expertise in Science Vale and in the automotive sector.

The draft Innovation Framework (IF) considers how innovative measures should be developed. However, concern is raised over the wording of the following statement, in terms of explicit reliance on a specific supplier / contractor: *"for more significant – strategic, or complex major – planning applications or infrastructure, it is recommended that a member of the iHUB is consulted to provide expertise"*.

Additionally, a number of weblinks on page 36 of the IF need reviewing.

Sustainability Appraisal Report

The Sustainability Appraisal Report considers **four** growth area options, while the Transport Stage 1 Oxfordshire Plan 2050 / OxIS work considered **five** area strategies. Also noting 6-7 area strategies are considered in the draft transport scoping for Stage 2 Oxfordshire Plan 2050 / OxIS. Consistency across these documents may be helpful.

Freight and Logistics Strategy (FLS)

We support the introduction of freight management to develop efficiencies across the county and to ensure minor / residential roads are not used as alternative routes for through traffic. Action A2 considers the development of a Heavy Goods Vehicle (HGV) route map, we would welcome early engagement in this exercise.

The Freight and Logistics Strategy (FLS) could consider 'Last Mile' measures and strategies, as well as 'Delivery and Servicing Plans', as detailed earlier in this response.

In considering the placement of future consolidation centres, we would not wish to see such centres in greenbelt, Areas of Outstanding Natural Beauty, and conservation areas. Concern is also raised by localised increase in traffic, noise, and pollution by consolidation centres, through the re-routeing of HGVs onto different parts of the network.

Action 15 of the FLS should also state promotion in addition to monitoring of water freight, while Action 16 should also include monitoring in addition to promotion of rail freight.

Local Cycling and Walking Infrastructure Plans (LCWIPs)

We have been informed that Kidlington's LCWIP is nearing publication and as such should be included in the supporting documents alongside Oxford's and Bicester's LCWIPs if possible.

Other Considerations:

To ensure that the LTCP work has the best chance for success, we would highly recommend evaluation of the effectiveness of existing LTP4 policies. It would be helpful to undertake a "lessons learnt" exercise from the LTP4 document to understand what was not achieved and why, and how this may be adapted to provide a more successful strategy to achieve the desired outcome.

When collecting data to monitor modal change, a key consideration for methodology will be when data is collected. When seeking to measure progress towards the mode shift targets it will be important to determine if data will be based on average statistics across the year (such as one or multiple days per month) or perhaps focused on fair weather periods (when walking and cycling are more likely). Either way it is expected that there will be a seasonal change in travel behaviours, which needs to be considered in detail for all modal travel data collection. Development of a standardised data collection strategy for all modes may be suitable.

Please note that the Oxfordshire Rights of Way Management Plan 2015-2025 is referred to as an *"Improvement"* plan in the draft LTCP. This document includes targets up to 5 years from adoption (i.e. until 2020). Considering the potential importance of public rights of way in the development and delivery of the SATRN network, it would be appropriate for the Public Rights of Way Management / Improvement Plan to be updated.
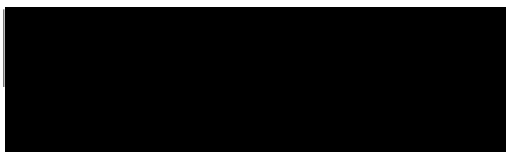
Appendix 4 includes Implementation Plans for Walking and Cycling, Healthy Place Shaping, Road Safety, Public Transport etc which are colour coded, however the colour coded key only matches table contents on page 138, and not on pages 139-141.

We would like to express our interest in involvement with the Park and Ride working group and associated supporting document.

We understand as part of the LTCP work there will be the development of new parking standards for car and cycle parking, we would welcome early engagement in this process and information about when the public will be consulted.

We welcome the overarching message of the LTCP policies and associated work. Particularly, the emphasis on active travel, decarbonisation and use of innovation, which accords with the corporate plans for both South and Vale Districts. The LTCP work targets relevant planning considerations in addressing the climate emergency. The range of policies focus on what we want to achieve, but could provide further detail as to how this can be achieved and delivered successfully, in a way that is appropriate for more rural areas located within South and Vale Districts.

Yours faithfully

Senior Transport Planner