

## Oxfordshire Plan 2050 Policy Options Consultation

### Regulation 18 Part 2 – Consultation response form

**Please Return to the Oxfordshire Plan Team by Friday 8<sup>th</sup> October 2021**

**By Post:** Oxfordshire Plan Team,  
Speedwell House,  
Speedwell Street,  
Oxford.  
OX1 1NE

**Or by Email:** [info@oxfordshireplan.org](mailto:info@oxfordshireplan.org)

**This form has two parts-**

**PART A – Personal Details**

**PART B – Your Representation(s).**

#### **PART A**

	Personal details	Agent's details (if applicable)
<b>Title*</b>	Mr	
<b>First Name*</b>	Robin	
<b>Last Name*</b>	Tucker	
<b>Job Title</b>	Co-Chair	
<b>Organisation</b>	CoHSAT – Coalition for Healthy Streets and Active Travel (in Oxfordshire)	
<b>Address line 1</b>	19 Bostock Road	
<b>Line 2</b>	Abingdon	
<b>Line 3</b>		
<b>Line 4</b>		
<b>Postcode</b>	OX14 1DP	
<b>Telephone Number</b>	07901 622622	
<b>Email*</b>	robin.tucker1@yahoo.co.uk	

\* Required Fields

## PART B

To which part of the consultation does this representation relate?

General Comment

Paragraph

Policy Option

Spatial Option

What is the nature of your comment?

Support

Object

Observation

Please provide details of your response as necessary:

We support the Councils working together on a wider scale and a longer-term approach.  
We support the Vision and the five Themes.

Our focus is on transport, and most of our comments are on Theme Four. However, Transport has links across all the themes and so we have comments on all the themes.

We think that in many cases that it is important for the Plan to emphasise that Transport infrastructure (and other infrastructure) needs to be considered from the earliest stages of any development (including its location), otherwise, poor decisions are made leading to some of the high emissions and poorly functioning communities that we see today.

Our comments are based on the following principles:

- The County Council adopts 2040 as the year to achieve zero carbon emissions, in line with the Arc Environment Principles, EEH ambition and Oxfordshire's position as a technology leader;
- The commitment to zero carbon emissions covers the emissions that result from all activities in Oxfordshire, whether or not they are regulated (eg in households);
- The population of Oxfordshire will not grow by more than 10% between now and 2050. This is the expected level of growth across the whole UK, and we believe that Oxfordshire should be lower than the average, because of the need to level up in other parts of the country;
- The level of car journeys in Oxfordshire will decrease by a minimum of 10% per decade from today's levels. This would mean that in 2050 car journeys will be from at least one-quarter lower than in 2020.
- New developments will be dependent upon active travel and public transport networks. They will not require car ownership.
- The principles of 15-minute neighbourhoods will be implemented in all new and existing developments, so that residents do not have to travel to their essential amenities, they are provided locally.

In general, we support the Policy Options across the Plan.

### Objectives (p28)

Objective 1 is not worded strongly enough. "To demonstrate leadership in addressing the climate emergency by significantly reducing greenhouse gas emissions." It is not sufficient to 'significantly' reduce

GHG emissions, the County has a commitment to be at net zero by 2050, and it should aim for 2040 as the Arc and EEH do. This should clearly include all emissions in the county, not just those the Council(s) influence.

### **Theme One: Addressing climate change**

- Climate change emission should be on a consumption basis, not just a local emission basis. Thus, local consumption (e.g. building houses, 'goods' and food) should be included, but also crucially from a transport perspective the manufacturing of cars and other vehicles. This is important because a switch to electric vehicles gives only a partial reduction in emissions.
- Paragraph 144: an additional 'wider benefit to people' from flood management approaches, (whether natural or 'hard') is using them to enable active travel infrastructure.

### **Theme Two: Improving environmental quality**

- Paragraph 248: This is an excellent approach to evaluate the hidden costs or externalities that are baked in to the way that we currently do things. A few thoughts. (1) These apply across Themes so may be better presented with a cross-reference. (2) We note in particular that active travel (both cycling and walking) has proven benefits on all seven of these (However, you should not use 'accidents' here, you should use 'collisions' or 'casualties' because most of them are not accidents. (See Road Collision Report Guidelines, Guideline 2 at [www.rc-rg.com](http://www.rc-rg.com))
- Paragraph 253: 'Reducing speed limits in residential areas could reduce traffic accidents by half.' Is good, but fits more in Theme Four than as a benefit of 'green infrastructure'. Lower speeds also have the benefit of lower CO2 and lower NOx emissions – [see research here](#).
- We strongly support Policy Option 12 for Development to take account of its impact on air quality.
- We think Policy Option 12 should include penalties and incentives for developers linked to air quality outcomes. These can now be easily monitored by low-cost sensors linked to terrestrial or satellite networks, using technology in which Oxfordshire is one of the world leaders.

### **Theme Three: Creating strong and healthy communities**

- Policy 13, Healthy Place-Shaping, should include reference to two concepts not fully captured by the current point on street layout.
  - 15 or 20-minute neighbourhoods, where all key services can be accessed in a short walk. It is important to include this in Policy 13 for all healthy place-shaping, not just Policy 15 for New Developments.
  - Healthy Streets, which covers the detail of what makes a street healthy and a good place for people. (A similar framework could be used, but Oxfordshire has already endorsed Healthy Streets and it is very good).
  - Should explicitly include places to rest and to meet people with a list (social community infrastructure is too vague). Parks, gathering spaces like a 'square', play areas, benches along the street, public art.
- In Policy 14, we are pleased to see that active travel and access for those with disabilities (which should also include 'by active travel') is already included in the Health Infrastructure policy.
- Policy 15. To date, new developments in the 'Garden Towns' of Bicester and Didcot have fallen woefully short of their 'statement of intent that new development will be well-planned, with a high design quality'. As a result they lead to 'car-dependence', 'barren public realm', 'excessive amounts of parking' and local amenities 'being closed or failing to prosper' and disconnected communities. (Transport for New Homes, Garden Villages and Garden Towns: Visions & Reality, 2020). You must ask yourselves why these current standards have led to such poor outcomes for people. Is it the standards, or failing to apply them?

Policy 15 needs to be written such that new developments actually deliver on the intent. That same report sets out how:

- Development must only be permitted in locations where good sustainable transport links are possible, included in the plan and in situ before the first new resident moves in. This should be item 1 on the list for any development otherwise you are going to build more car-dependency and more traffic.
- These sustainable transport links must be specific in detail at the outset and project managed all the way through to delivery.
- Paragraph 322, the sustainable transport links must be existing not just 'planned', or if they are planned, they must be brought into existence before occupation of developments is permitted.
- The development itself must be self-contained with amenities and workplaces to operate as a 15-minute neighbourhood from the outset, so local amenities prosper, and a sense of community is established from the beginning.
- This is detailed further on p29/30 of the TfNH report cited above.
- Paragraph 342: 'significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.' This is not strong enough. 'Focused' should be replaced with 'restricted to' and 'can be' replaced with 'will have been'.

#### **Theme Four: Planning for sustainable travel and connectivity**

- We support Policy Option 17 overall.
  - Policy Option 17 should read 'Delivering a net zero carbon transport network', not 'Towards a net zero transport network' – because that is what we are committed to do.
  - Paragraph 334 is not strong enough. As described in 'Decarbonising Transport: Setting the Challenge' and 'Pathways to a Zero Carbon Oxfordshire' it is impossible to achieve a Net Zero carbon transport network simply by switching to lower emission vehicles.
  - In the point that starts 'Supporting delivery of improvements to the local and strategic road network', this should also include 'and rapidly reducing levels of private car usage' to be consistent with paragraph 336, the LTCP, EEH Transport Strategy and Decarbonising Transport.
- We support Policy Option 18.
  - Policy Option 18 is well structured. However, we note that active travel is actually preferable to no travel as it has a positive externality through its health benefits. Thus we suggest you could move the encouragement of active travel above reducing the need for travel in the hierarchical approach. This may be harder to explain however.
  - Paragraph 342: 'significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.' This is not strong enough. 'Focused' should be replaced with 'restricted to' and 'can be' replaced with 'will have been'.
  - Option 18, 3a: 'For residential development, each new residential unit with an allocated parking space should be provided with an electric vehicle charging point. At least 25% of non-allocated spaces (with a minimum of 2) should be provided with an electric vehicle charging point.' Does not address who many units should have an allocated parking space.
- Diagram on p103
  - 'Has high quality digital connectivity been provided to all parts of the development? Have services and facilities been designed to be integrated into the development, with easy access by walking and cycling from houses?'

Currently worded so Broadband has to be provided, but amenities only have to be 'designed to be integrated' They should be equally strong. Both provided before residents can move in.

'Are streets designed to encourage walking and cycling?' Still makes it sound as if the street is mainly for cars. Streets should be places for people (see Manual for Streets, 2007; Manual for Streets 2, etc.) "Design your street for the traffic you want, not the traffic you have." (Quote from Melissa and Chris Bruntlett

- Paragraph 364: 'Funding for more strategic infrastructure such as major transport improvements is often more complex, requiring input from a number of public and private sector partners. It can often require a package approach, with developer contributions matched with funding from elsewhere such as central Government which is often short-term and competitive in nature.' This is not necessarily a problem. We don't want 'major transport improvements' of the old kind which were usually the creation of more roads which made the new development car-dependent and generated more traffic from other places. Instead new infrastructure should only be for sustainable public and active modes, enabling a reduction of private car use. Oxfordshire 2050 should state that no major new roads will be built in the county.

#### **Theme Five: Creating jobs and providing homes**

- We support the inclusion of active travel in the job creating and supporting policies.
- Paragraph 428: 'The Plan will seek to support achieving higher densities'. We support this. Residential developments should be near existing urban centres, on brownfield sites, at high density, with no car parking. There should be a strong emphasis on social housing, as affordable housing in Oxfordshire is not, in reality, affordable to anyone on average Oxfordshire wages.
- Policy Option 28: How Many Homes?
  - This should be the first issue addressed in the Plan – Policy Option 1, because (a) it is the most controversial issue; (b) so many of the other decisions are dependent on it.
  - The UK population growth forecast 2020-2050 is 68m to 75m, about 10%.
  - With a typical 2.4 people per home (and most of the new homes being built are large ones that may house more), , the population growth range indicated by the three trajectories (~100-150k new homes) is 35-55% far higher than the national rate.
  - We concentrate on transport, and see that the roads in our towns and city are full; the roads are beyond the County Council's financial resources to maintain; we exceed our legal and environmental limits on air pollution and climate change; people are put off from walking and cycling by the volume of traffic; and new developments are built ever-further from workplaces, shops, schools and recreation without realistic alternatives to the private car, creating ever more traffic, environmental and health problems.
  - EEH and DfT (in Decarbonising Transport) have identified that we cannot achieve Net Zero unless private car traffic reduces, and EEH has put numbers on it: to reduce private car use by 5-10% per decade. Oxfordshire's LTCP is heading to include the same ambition. Even these numbers may be too low: 10% reduction over three decades still leaves 73% of current traffic on our roads.
  - Oxfordshire's roads are full in many places, are beyond the County Council's financial resources to maintain, and are beyond environmental limits on air pollution and climate change. So new developments must at the very least not be allowed to make the problem worse.
  - Our view is that this amount of population growth, relative to national growth, in an area that is already suffering from such negative impacts is not sustainable and should not be

permitted unless the external impacts can be eliminated. At the very least, new developments should not make the situation worse.

- **Hence, we propose the principle of 'Net Zero Private Car Traffic' from new developments**
- Every new development should either be car-free, or show how it will offset any car use by reducing private car use elsewhere in the county. This must be measurable and funded. Developers will have an incentive to produce models that show benefits, so their proposals must be backed with penalties and incentives for under or over achievement to ensure that the County Council can achieve its targets (e.g. by funding further active or public transport schemes, and by incentivising over achievement in other schemes).
- With current sensors, satellites and computing (in which Oxfordshire leads the world), systems to monitor this should be practical to set up, and would then create value for local businesses to sell to other regions in the same situation.
- Such an approach will spur innovation in design, by aligning developer incentives to those of the county and those of citizens. Developers would be thinking about how to solve the county's and citizens' problems, rather than how to build and sell houses in a manner that suits them.
- **Spatial Strategy Options**
  - These options have a profound impact on the transport system, and thus on the sustainability of developments.
  - The list of Opportunities for each Option is long and quantification will vary by site, so it is not possible to properly compare them.
  - There should also be recognition of the disadvantages of each Option.
  - We believe that Options 1-4 have some potential and Option 5 is likely to be worst for transport outcomes. However, they can all be assessed for their potential to create private car traffic.
  - Looking at the IPT analysis:
    - Option 1, 3 and 4 score low on 'Car driver mode share' due to high car use outside Oxford. This would need to be addressed explicitly in any new development.
    - Option 4 scores low on access to rail stations. This could be tackled for specific sites, by choosing sites that were linked to rail, adding light rail links, or shuttle bus services.
  - Any of the Options will only be successful if '15/20-minute neighbourhoods' are created, with all amenities nearby – essentially building new towns (not villages, because they need a full set of amenities). This is particularly important for Options 3 and 4 where there is not a local town or city to draw on. But for all options, the 15-minute walk must reach a sufficient range of amenities, on routes that are high quality, pleasant and not 'disconnected' by major roads or difficult crossings.

