England's Economic Heartland – Draft Transport Strategy

Consultation response, by Planning Oxfordshire's Environment and Transport Sustainably (POETS)

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POETS (Planning Oxfordshire's Environment and Transport Sustainably) is a small group of senior planning, environment and transport professionals and academics focussed primarily on planning and transport in Oxfordshire.

(For more information go to www.poetsplanningoxon.uk).

Key Points

- England's Economic Heartland has no geographical coherence so an overall Transport Strategy for the area should never be more than some key principles.
- There is an inherent lack of democratic accountability within such a construct.
- The strategy is premature, given the undeveloped spatial strategies for the area, which in part reflects the lack of definition of future housing and growth plans, particularly across the Oxford to Cambridge Arc.
- At this time, any connectivity studies can produce little more than broad qualitative outputs.
- There is an inconsistency at the heart of the document between the promise of broad environmental improvements on the one hand, and the references to major road construction and substantial traffic increases on the other.
- The recently published Planning White Paper will make coordinating land use and transport planning much more difficult.
- The lessons learned from the COVID-19 pandemic, both that people can adapt quickly to changing transport patterns and also that there is likely to be significantly lower demand for retail and office space in town centres, need to be built into any strategy.

Overview of England's Economic Heartland

1. England's Economic Heartland (EEH) encompasses a very large area of England, with hugely varying characteristics. What might be appropriate for one area is unlikely to be applicable to another. To achieve support across such a broad swathe of the country, any strategy can at best only rely on broad principles.
2. We remain concerned about the EEH's lack of directly elected accountability, and this is now fundamentally undermined by some of the authorities on the corridor reducing their engagement. We believe that there is an essential role for strategic planning. However it needs to cover areas which have reasonable functional coherence and, critically, to be undertaken by bodies which have direct democratic accountability. England's Economic Heartland has neither.
3. The Strategy is premature. There is no clarity about how much future housing or growth is to be accommodated across the Heartland, nor as yet, any meaningful public debate about the merit and implications of either. The long promised public engagement on the Oxford to Cambridge Arc is still awaited. Unprecedented rates of population increase in Oxfordshire by 2050 - potentially doubling in 30 years – have appeared in a number of documents and recently for example used as a basis for the Pathways to Decarbonisation report commissioned by EEH. Local authorities in Oxfordshire however, continue to insist that they do not support this level of growth - which would totally transform the character of Oxfordshire - and that it must be for them, working with the local communities, to decide what would be appropriate. A new Spatial Plan, Oxfordshire 2050, is under development and clearly any detailed transport or economic strategy for Oxfordshire must follow on from this work, incorporating meaningful engagement with residents. Presumably similar circumstances will apply widely elsewhere across the Heartland, making a meaningful Transport Strategy for the area impossible at the present time.
4. It follows that the Connectivity Studies being undertaken will be of limited value, since there is so much uncertainty about what the future spatial framework will be. While it would be possible to agree some core principles and broad objectives and also undertake an element of generic qualitative assessment, it would be totally inappropriate and misleading to attempt detailed quantitative assessments and develop programmes for implementation.
5. There are major inconsistencies at the heart of the document. On the one hand it paints a rosy picture of revitalised communities and widespread environmental enhancements, but many other parts of the document point towards a future which entails significant increases in new highway capacity and widespread increases in traffic of a third or more. There are opportunities within any "Connectivity Studies" to explore what measures would be required to achieve significant reductions in overall traffic levels – even as the population grows – and inform future policy debate and decisions.
6. In conclusion, POETS believes that while there might possibly be a useful role for the EEH in fostering cooperation, learning and co-ordination across the Heartland, it would be totally inappropriate for it to become closely involved in the detailed planning and delivery of transport measures, which should remain vested in the current agencies and democratically accountable authorities.
7. POETS does however commend EEH in undertaking this consultation, however flawed. Some organisations increasingly consider engagement with the public to be optional. When for instance will the public engagement on the Oxford to Cambridge Arc, promised last year, take place?

Transport Strategy Overview

8. The primary purpose of the strategy appears to be to facilitate "sustainable" economic growth, while achieving "Decarbonisation" (see 3 below). The report states that "*The Local Enterprise Partnerships, through their Local Industrial Strategies, have identified the potential for the region's economy to grow by more than 70% by 2050"* (p16). It goes on to state that "*Economic growth on this scale alongside the need to meet the legal target to achieve net-zero carbon by 2050 will not be realised without a step change in the way our communities are planned, including the infrastructure that supports them"*.

9. When you explore the implicit implications of the EEH Transport Strategy, it is evident that huge increases in highway capacity and road traffic are envisaged. Even allowing for ambitious increases in rail use – unlikely to be deliverable - and more active travel, across the Heartland overall this would be swamped by increased use of motor vehicles. The Report "Pathways to Decarbonisation" illustrates this starkly. Even in Option 4 [Behaviour Shift (policy-led)] which incorporates demand restraint (road-pricing), measures to discourage single-person vehicle use and promote active travel, vehicle-kilometres travelled in 2050 would increase by more than a third. Traffic growth in other scenarios would be higher still.

10. The document sets out a glossy prospectus implying we can have unprecedented rates of growth in population, activity and mobility and at the same time improve the environment and create attractive places for people to live. This is however completely incompatible with the envisaged widespread increases in highway capacity and traffic. There is much reference to environmental improvements and quality place-making, while the reality overall would be very different. While in some specific localities improvements might be achieved, overall the adverse impact on the environment, in terms of landscape, biodiversity, noise, air quality, and on community severance, health and well-being of continuing to provide unrestrained increases in highway capacity would be immense.

11. Over the next 30 years, by effectively integrating land use and transport, it would be possible by good planning and design to greatly reduce the need for travel and the proportion of trips that need to be made by cars. Firstly however, there has to be an honest public debate about how we shape our future and balance the trade-offs between high levels of growth and its adverse impacts and the much higher levels of restraint on car use which would be necessary to partially mitigate the adverse impacts. The way society has adapted to the COVID-19 pandemic shows that significant change to travel patterns is possible, and can result in a reduction in motorised travel. Consultation on the Outline Strategy last year resulted in the "Outline Transport Strategy Engagement Report". In its conclusions, this report drew out 12 key messages. POETS broadly endorses these, but does not believe they have been effectively incorporated in to the new Strategy. In as much as considerable major new highway construction is envisaged, sadly the Strategy as presented still reflects a large element of "Business as Usual".

12. Since the consultation period opened, the government has published its Planning White Paper which, by removing much control over what development is located where, will make coordinating land use and transport planning much more difficult, and be likely to lead to avoidable increases in car travel.

13. The Draft Transport Strategy also fails to reflect the changes in travel patterns that have arisen during the COVID-19 pandemic, many of which are likely to have long-term effects. In particular there is likely to be significantly lower demand for retail and office space in town centres, which provides an opportunity for an increase in sensible, well-designed housing in town centres.

Decarbonisation

14. The approach to decarbonisation in the Strategy is one-dimensional and misguided. The focus appears to be to ensure, as far as possible, that no rail or road vehicles emit greenhouse gases at the point of use. Achieving net-zero carbon across society is however a much more complex multi-faceted challenge.

15. We will have to generate vast additional amounts of electricity (from non-carbon sources) and establish new networks of transmission and storage. Policies and measures to achieve widespread reductions in overall energy use across society are needed, alongside electrification of transport infrastructure.

16. A very large proportion of the carbon emissions arising over the lifetime of a motor vehicle is embedded in its manufacture and, in relation to electric vehicles in particular, the processes surrounding extraction of minerals and manufacture of batteries. Over its lifetime, the carbon footprint of an electric car may only be about 20-30% less than a petrol/diesel powered one. If as a society we are going to achieve our broader net-zero targets, then every aspect of our consumption will need to make a contribution. With regard to transport, that means we must reduce the number of vehicles being used and manufactured and must also minimise the construction of new roads.

17. The study "Pathways to Decarbonisation" illustrates how it should be possible to ensure the rail and road fleet is fuelled by non-carbon energy by 2050. What it also clearly illustrates however, is that unless there is a very different approach to movement to the one assumed in this Transport Strategy, it will result in a very large increase in motorised travel and the need for major highway construction to provide the capacity.

18. If one takes into account the broader impacts of highways and vehicle use, it is clearly not possible to claim that this Strategy will achieve a net-zero outcome in 2050.

19. There remains however an urgent need to reduce the carbon impact of transport that can only be achieved by early reductions in traffic levels.

Connectivity Studies

20. A programme of connectivity studies is apparently underway, but little information is given about their objectives, inputs and assessment criteria. Policy 3 for Decarbonising our Transport System (p32) says priority will be given to measures that reduce single occupancy car journeys by 20%. Is such an objective being built into the studies, so that only packages that can deliver this are developed and supported? It would be better still if it was simplified to refer to all car journeys. Assessment could also be made of how 30%, 40% or even 50% reductions in traffic could be achieved. This could provide a valuable understanding of the kinds of steps we would need to take to reduce our dependency on cars, alongside an understanding of the other potential impacts for example on overall accessibility and the environment.

21. More specifically, are the studies focussed on achieving net-zero emissions by 2050?