

Appendix 2 – Proposed Response to Draft Provisional LTP 2006-2011

1.0 General Comments

- 1.1 The City Council welcomes the opportunity to comment on the draft Provisional LTP, although concern is expressed about the limited time provided for consultation on this important document.
- 1.2 The City Council had hoped that this would be a bold and forward-thinking document. Unfortunately, with the exception of the development of a Central Oxfordshire Transport Area Strategy, the draft document appears to lack a radical vision. Given that work is still in progress on some important elements of the new LTP, such as the development of targets and the accessibility audit, it is hoped that the final document will set out a clearer explanation of the County Council's strategic vision for transport in Oxfordshire and how the various measures proposed fit into that vision.
- 1.3 It is recognised that the County Council has been faced with a very challenging timescale to produce the Provisional LTP. Nevertheless, it is regrettable that there is no evidence of any programme schedule for the 2006/07 financial year and that stakeholders in the LTP process will not, therefore, have an opportunity to comment on the programme of schemes to be included in the final version of the Provisional LTP.
- 1.4 The usefulness of the Provisional LTP as set out in draft is therefore somewhat limited. Furthermore, the draft Plan tends to read as a series of separate documents put together. The readability of the final version of this document, and more importantly the full LTP that follows, would be improved by the addition of a contents page and clearer linkages between the different sections.

2.0 Priority Objectives

- 2.1 The draft Provisional LTP identifies 5 priority objectives and seeks to weight these on a countywide basis. In the City Council's view, there should be a more reasoned justification for the weightings allocated, as these objectives will be key in allocating resources for transport schemes over the coming years. It is questionable whether applying weightings in this manner is appropriate when prioritising schemes. If weightings are to be applied, they should be specific to each local authority area rather than being applied countywide. This would allow local circumstances and priorities to be more accurately reflected in outcomes.
- 2.2 The City Council considers that road safety and air quality should have equal top weighting in Oxford, followed by congestion, accessibility and street environment. Re-ordering of weightings in this manner would be a more appropriate response to local concerns, and would avoid

undervaluing the air quality issues in Oxford by taking a countywide perspective.

3.0 Central Oxfordshire Transport Area Strategy

- 3.1 The City Council welcomes the proposed Central Oxfordshire Transport Area Strategy, which recognises the need to improve access into Oxford and therefore enable the City to fulfil its role as a “living centre” and a regional hub. This approach is consistent with the Regional Transport Strategy, the draft South East Plan and the report of the Panel that conducted the Structure Plan EIP.
- 3.2 It is interesting to note that the draft Provisional LTP highlights the central role of Oxford as a service and employment centre for Oxfordshire, and the importance of its contribution to the dynamism of the Central Oxfordshire sub-regional economy, in a way that is not reflected within the policies of the emerging Oxfordshire Structure Plan. Moreover, the analysis of the interaction of other settlements with Oxford demonstrates the arguments the City Council has been making for a number of years about the deficiencies of the Structure Plan’s Country Towns Strategy in terms of commuting patterns and resultant transport impacts.
- 3.3 The concept of developing ‘expressway’ bus services in conjunction with the provision of remote park and ride sites near to Witney, Abingdon and Bicester is supported in principle. However, the City Council will not support infrastructure proposals that would have an unacceptable impact on local residents and the quality of the local environment/streetscape, particularly if they fail to deliver tangible benefits for local communities in Oxford.
- 3.4 Proposed schemes should be subject to full consultation with the City Council and the local community, through the Area and other committees as appropriate. In particular, proposals for the upgrading of key junctions on the Oxford ring road, and the modification of radial routes through Oxford (e.g. Woodstock Road and Abingdon Road), will need to be subject to very careful scrutiny by the City Council and local residents. Preference should be given wherever feasible to measures such as Intelligent Transport Systems that adjust timings at traffic signals to favour buses, rather than expensive infrastructure projects.
- 3.5 Section 6.8.9 indicates that the Central Oxfordshire Transport Strategy, in tandem with the OTS, “will also need to consider if further expansion is needed for the City’s park & ride network to allow it to function in the future”. Given that there could be a need for some additional park and ride capacity in connection with the proposals for the redevelopment of Westgate Shopping Centre, it is important that this issue is examined in more detail in the full LTP so that there is an appropriate transport policy context against which any planning applications for extension or decking of existing sites can be considered.

4.0 Oxford City Strategy

- 4.1 It is disappointing that the strategy for Oxford City in Section 8.3 of the document has not been fully developed and to a large extent merely summarises measures that have been carried out under OTS both prior to and during the first LTP period. The City Council hopes that the final version of the LTP will go much further in terms of re-evaluating the transport priorities and potential solutions within the City in the light of an informed assessment of the success or otherwise of the schemes implemented in recent years.
- 4.2 The provisional LTP appears to focus on an approach where it is envisaged local problems exist, without assessing the impact of the proposed measures across the whole City. It is necessary to work towards an approach that considers the citywide impact of schemes. Assessments of previous schemes have shown that schemes in one area may have an environmental impact in another area.
- 4.3 The results of appropriate environmental impact assessments, such as a SEA (Strategic Environmental Assessment) should be available for consideration of appropriate measures in the final LTP.
- 4.4 With reference to sub-section 8.2.2, it is urged that greater attention be paid to improving accessibility to the major suburban employment areas in Oxford. In the Headington and Marston area, there is ongoing concern that the pace of progress, in terms of improving accessibility, is inadequate given the development pressures being experienced. Furthermore, the Watlington Road / Garsington Road corridor at Cowley, which includes the Oxford Business Park, BMW Cowley Works and the Oxford Bus Company depot, is currently undergoing considerable employment expansion, yet is relatively inaccessible by non-car modes.
- 4.5 There is no acknowledgement that traffic volumes have increased in some areas outside of the City centre, including Headington, and how this is to be addressed based upon the requirement for road traffic reduction.
- 4.6 The latter part of this sub-section refers to social exclusion issues in Oxford. However the text contains little information on how social exclusion issues, particularly for wards lying on the southern fringes of Oxford, are actually related to transport issues.
- 4.7 With reference to sub-section 8.2.3, the setting of an LTP objective target for reducing air pollutant emissions within Oxford's Air Quality Management Areas needs careful and thorough consultation with the relevant City Council officers, alongside appropriate monitoring indicators and a baseline assessment of air quality in central Oxford.

4.8 In addition, the City Council would wish that a Low Emissions Zone be considered as a longer-term option for Oxford City centre. It is acknowledged that such a scheme would be subject to the reasonable support of key stakeholders, practical considerations and longer term funding priorities.

5.0 *Draft Bus Strategy*

5.1 With regard to the draft Bus Strategy, Section 2.13 dealing with bus access to healthcare, education and employment is welcomed, particularly with specific reference to the Headington and Marston Area Transport Strategy (HAMATS). It would be useful for this section to include a recognition that new, strategically vital services required to improve accessibility to the area, such as the proposed Kidlington – Water Eaton – JR Hospital, are likely to require some form of pump-priming. The City Council would urge that a high degree of priority explicitly be afforded to HAMATS, particularly the implementation of controlled parking zones, given the scale and pace of health, education and employment development in the area. The City Council also remains committed to the removal of buses from Queen Street at the earliest possible opportunity.

5.2 The City Council also welcomes moves towards a Quality Partnership approach, and the development of a Core Partnership with its potential benefits for bus passengers in Oxford. The attention given to the potential for increased through-ticketing is also welcomed, and the City Council looks forward to having the opportunity to make detailed comments on this under the separate consultation proposed. It is, however, urged that the opportunity for developing comprehensive journey through-ticketing, off-bus ticketing schemes and single ticketing for park and ride users, is exploited more thoroughly in the Core Partnership agreement. The aim of improving boarding times is strongly supported. It is further urged that the County Council should stipulate bus emission standards as part of all quality partnerships for routes into central Oxford, in consultation with the City Council.

5.3 Whilst provision of subsidised services tends to be an issue of greater relevance to rural districts, there are nevertheless some subsidised services serving Oxford City, particularly during evenings and weekends, which provide an important function. The City Council will be keen to ensure that such services are protected and, where possible, enhanced unless demonstrably unnecessary. The City Council also needs to be kept aware of any opportunities to seek new subsidised services, particularly where decisions to alter or withdraw commercial services lead to a gap in service provision which might have a serious impact on accessibility to services for local residents.

6.0 Rail Services

- 6.1 The references within the draft document to the enlargement or possible relocation of Oxford Station are supported, as are the comments about the importance of the East West rail link proposals to the Central Oxfordshire area. However, the issue of the future of the Oxford to Bicester branch line appears to receive only a passing mention within sub-section 5.3.2 on community rail development. Given the strategic importance of the Oxford to Bicester corridor, as recognised in the Central Oxfordshire Transport Area Strategy, it is important that opportunities to improve services on this branch line be fully explored and given greater attention in the LTP.

7.0 Car Usage

- 7.1 Reference is made in sub-section 5.13.2 of the draft document to the possible introduction of charges for resident parking permits in Oxford. The City Council strongly opposes charging residents in the current special parking areas (SPA's) on the grounds that it would be unlawful and is unnecessary as the County Council's car parking account is in surplus. Residents of Oxford should not be expected to subsidise the introduction of similar schemes in the rest of the County, which should be paid for out of fines by those people who contravene the schemes. The City Council, along with local residents and other key stakeholders, will wish to be fully consulted on the introduction of charges, and, if pursued, the proposed level and structure of charges. A commitment to consultation on charging proposals should be highlighted in the text of the LTP.
- 7.2 The proposed expansion of controlled parking zones in Oxford is strongly supported in principle. It is acknowledged that there is already a significant amount of consultation in relation to the introduction of CPZ's. It may be that fewer rounds of consultation would be acceptable if this would speed up the current process.
- 7.3 The LTP should include more robust support for investigating the feasibility of a workplace parking charge in Oxford in the longer-term. Such a scheme has the potential to ease congestion on Oxford's radial routes, particularly during peak hours, and provide a source of revenue for improvements to other modes of transport. However, alongside any measures to restrain private car use, it is important to ensure that sufficient, well-located information is made available to motorists. It is considered there should be a commitment to the introduction of Variable Message Signs on the Oxford Ring Road and approach roads.

8.0 Cycling and Walking

- 8.1 It is considered there should be a greater commitment to developing the walking and cycling strategies published in 2001. These modes are particularly important in Oxford as a compact urban area with

excellent opportunities for walking and cycling, but where there is still high potential for their further development. For example, more should be done to improve existing on-highway routes and accident blackspots to promote the attractiveness and safety of walking and cycling in Oxford. There is also significant unmet demand for cycle parking spaces in parts of Oxford, which results in pavement parking to the inconvenience of pedestrians. This should be addressed through adoption of a specific target for provision of public cycle parking spaces in the City centre and suburban district centre locations where there is the greatest unmet demand.

9.0 *Other Issues*

- 9.1 There is some concern that the issue of taxis and private hire vehicles has been paid inadequate attention. Whilst the Provisional LTP recognises that taxis and private hire vehicles could provide a key role in increasing accessibility in many areas, there is no detail on the potential for improvements to interchange facilities, which is particularly relevant to Oxford as a regional transport hub. An example is the improvement of the Gloucester Green taxi/bus interchange arrangements.
- 9.2 There is also no evidence of a strategy relating to freight movement in Oxfordshire, other than general background discussion relating to rail freight movement. The Provisional LTP should include a strategy to increase opportunities for transshipment of freight to encourage freight movement by rail and water, and should explore the possibility of provision of a freight transshipment facility on the outskirts of Oxford.
- 9.3 The draft document also lacks sufficient consideration of the development of a tourist coach strategy for Oxford currently being progressed jointly by the City and County Councils. This is an important component of the overall thrust towards improving the City centre environment and development of improved accessibility to central Oxford. The involvement of the County Council is vital in progressing this strategy, and as such explicit support should be given in the LTP.

Suggested Detailed Amendments to the Wording of the Draft Provisional LTP 2006-2011

In addition to the City Council's main comments set out above, a number of amendments to the draft document are suggested below. These principally relate to detailed matters of clarification. However some amendments or additions are suggested where there has been an unjustified omission, which may have wider strategic or resource implications.

Include targets "Mode share of journeys to work" (based on travel plan monitoring for major employees) and "Index of walking trips".

Introduction to Section 2.2 – Regional Policy (page 18-19): it is misleading to state that "[Development Plan Documents] form part of a 'Local Development Framework' which is generally (although not necessarily) aimed at a more local level of spatial planning than the District-wide Local Plans were." Both the LDF under the new Planning Act, and the Local Plan under the old Act, cover a district-wide area, and it is therefore confusing to suggest that the LDF will cover a more limited local area, particularly as the LDF will include a Core Strategy relevant to the whole district area.

The table of 'links between Strategy and Plan Objectives' included in Section 4.2 gives limited information, and needs further refinement to accurately reflect the inter-relationships between the Plan Objectives and wider County Strategy.

Sub-section 5.8.3 on developing a strategy for workplace travel planning should include a clear reference to the involvement of local planning authorities, who are responsible for the securing and enforcement of travel plans submitted with most planning applications. It would also be helpful to state that, as part of the proposed review of aims and approaches to workplace travel planning, the procedures for liaising with district council planning officers will be improved, as a key part of improving the quality and enforcement of travel plans.

Section 5.10 – Network Management Duty: It would be appropriate to make clear reference in this section to effective management of the network in respect of enforcing against obstruction of footways and cycle lanes or paths. The current text implies that this duty relates exclusively to managing congestion on vehicular routes.

Sub-section 5.11.4 – Maintenance and the Priority Objectives: under the sub-heading 'Street Environment', reference should be made to the Oxford Public Realm Strategy adopted in 2000.

In sub-section 8.1.2, amend second sentence such that it reads: "Their transport policies require a transport assessment and travel plan to be submitted for developments that are likely to have significant transport implications, as defined by the criteria and standards set out in the Oxford Local Plan 2001-2016." (for clarification)

It should be noted that a proposal for a new AQMA at Green Road Roundabout, Headington has recently been endorsed by the City Council, therefore the text of Section 8.2.3 of the draft provisional LTP will need to be amended.

There is a lack of reference in Section 8.3 to increasing access to Oxford services and jobs by walking and cycling as part of the Oxford Transport Strategy (OTS); furthermore there is no reference to improvements made to cycle facilities and the cycle network under OTS. It would be appropriate to include development of cycling and walking as travel modes within this strategy.

Table of solutions, Pages 41-42

- The proposed solution for problems in George Street is 'bus gate enforcement', however much of the problem arises from conflicts between buses, taxis and pedestrians. It would be more appropriate to refer to the Oxford Public Realm Strategy as an appropriate instrument to improve the street environment in this busy City centre street.
- Reference is made in the table to the 'Headington and Marston Transport Study'. This should be corrected to read 'Headington and Marston Transport Strategy'.
- Some of the 'solutions' are missing for certain 'problem locations'; it needs to be clarified as to whether this is intentional, or whether the current table is incomplete. It is requested that in future 'problem locations be brought to the attention of the City Council's Area Committees as they are identified.