

## Appendix 2

### Local Transport Plan 2006-2011 Public Consultation Oxford City Council Response

#### **1.0 General Comments**

1.1 The statement which follows constitutes the formal response of Oxford City Council to public consultation on the full Local Transport Plan 2006-2011. The comments below relate to the Provisional Local Transport Plan, Provisional Bus Strategy, Framework Accessibility Strategy and Strategic Environmental Assessment (pre-scheme), all published July 2005, and also to the Transport Spending Plan 2006-2011 published November 2005.

1.2 The City Council welcomes the opportunity to comment, and thanks County Council Officers for their hard work in developing and preparing LTP2. However, the Council also wishes to express concern that the nature and scope of consultation has not always been conducive to meaningful engagement. In the Full Guidance on Local Transport Plans, Annex C paragraph 10 deals with stakeholder involvement as a criteria of LTP assessment. This states that the Government will look for evidence that:

*“The Plan has been developed with the full and active participation of all relevant tiers of local government and all relevant departments or divisions within local authorities.”*

1.3 It is acknowledged that some stakeholder meetings involving City Council Officers took place during the early preparatory stages for LTP2, when general issues regarding LTP objectives and process, and ‘Access to Oxford’ issues, were highlighted and discussed. However, the greater involvement of the City Council in the crucial formative stages of LTP2, when scheme options, prioritisation and development of targets were taking place, would have been helpful.

1.4 It is noted that there is no draft Full LTP document to form a specific basis for public consultation. This is despite previous clear indications to the contrary, for example the Foreword to the Provisional LTP states in the final paragraph:

*“We will be consulting on an updated version of this Plan in Autumn 2005, to listen to and take account of the views of Oxfordshire’s stakeholders and public, before submitting a final Plan to the Government in March 2006.”*

1.5 Furthermore, it is understood that respondents are being encouraged to comment principally on the spending programme only, as opposed to the overall Plan context and strategy being developed, including outcome-based delivery targets. Previous stakeholder consultation on

the Draft Provisional LTP was carried out on a somewhat limited basis, on the understanding that there would be a fuller public debate on the full LTP in Autumn 2005. The City Council therefore feels it is appropriate at this stage to comment on all aspects of LTP2, and urges that these comments are taken into account in preparing the final LTP document.

## **2.0 Strategy and Vision**

- 2.1 The over-riding concern of the City Council is the lack of radical vision, and too little strategic integration between measures proposed and with the overall Oxford context. This arises from the wholesale adoption of a *problem-led approach*, which appears to be primarily driven by budget prioritisation but with no clear linkage to the longer-term strategy for the central Oxfordshire sub-region. This approach does not fit well with the spirit of the DfT guidance, which, for example, states in Paragraph 3 Part 2:

*“Local transport planning - perhaps more than any other area of local policy - needs to be 'joined up' with the wider planning and policy framework at the corporate level. The Department has identified this as being a relatively weak area in the first LTP round, and will therefore be looking for much stronger evidence of an effective corporate approach in second LTPs.”*

- 2.2 The recently adopted Oxfordshire Structure Plan 2016 supports a reduction in dependence on travel by private car, and promoting suitable integrated transport networks which are accessible to all. Part 1, Section D4 of the Draft South East Plan seeks to achieve a rebalancing of the transport system in favour of non-car modes as a means of access to services and facilities (Policy T1). It expects LTPs to give priority to measures that increase the level of accessibility by public transport, walking and cycling to regional transport hubs, and also to the development of high quality interchange facilities between all modes of transport (Policy T3). Policy T6 expects LTPs to employ integrated packages of measures, which may include (amongst others) charging initiatives, allocation and management of highway space, and intelligent transport systems.
- 2.3 There is also a need for LTP2 to take full account of strategic development considerations, particularly given the current uncertainty on County housing allocations. It is recognised that LTP2 comes at an awkward time, given that important decisions about the location of major housing allocations and supporting infrastructure in the county have not yet been taken. However, despite the inclusion of a chapter on the Central Oxfordshire Transport Area within the Provisional Plan, there is little evidence of joined-up land-use and transport planning or that the County Council is making any contingency plans should an urban extension to Oxford go ahead in future.

### **3.0 Access to Oxford**

- 3.1 The Provisional LTP acknowledges in Chapter 6 Oxford's role as a regional transport hub, as set out in the Draft South East Plan (Section D4 Map T1), and this lends support to development of the Premium Routes Strategy for buses (which is supported in principle by the City Council). However, there is no inclusion of any significant capital spend initiative for restraint-based demand management in Oxford, beyond on-street parking controls and bus gate enforcement.
- 3.2 The Oxford Transport Strategy, developed jointly by the City and County Council during the 1990's, is widely acknowledged as having been a radical and successful scheme, which has greatly improved the accessibility and environment of Oxford City Centre through removal of private through traffic from central streets. However, OTS is an ongoing strategy, and the City Council believes that further bold and innovative measures are required which promote progressive demand management, so as to further improve air quality and the public realm in Oxford. This viewpoint is supported, both philosophically and financially, by central Government, with the recent piloting by the DfT of the Transport Innovation Fund, which may provide a good opportunity for future external funding of progressive transport schemes.
- 3.3 In the view of the City Council, more radical restraint-based measures, which seek to actively reduce the amount of unnecessary traffic entering Oxford and regulate against poor air quality, would be the most effective way of supporting the principles of OTS and the shared priority objectives for LTP2. Integrated proposals incorporating measures such as a workplace parking levy and Low Emissions Zone for central Oxford, public parking charges review, effective freight management and strategic improvements to the cycling and walking networks, in conjunction with improvements to the public realm, are considered key in Oxford. These should be given priority over proposed road capacity improvements, which have attracted a large slice of the LTP funds available.
- 3.4 However if major road and junction capacity enhancements for general traffic is to proceed, this must be carried out concurrently with restraint-based demand management measures within Oxford. Otherwise, there would be a prejudicial effect on OTS and other integrated transport strategies, as traffic queues which currently occur on the Ring Road may be displaced into Oxford, thus adding to congestion on the Oxford radial roads. This could cancel out the benefits of improving bus priority approaching Oxford, as well as impacting on other local bus services, and potentially worsening the quality of life for communities within the City.
- 3.5 With a view to achieving wider strategic aims, opportunities for both passenger interchange and alternative freight movement should be given more attention. There is no capital funding allocated towards increasing the capacity of park and ride sites in or adjoining Oxford.

This is likely to be necessary to cope with the current growth in car journeys to Oxford, particularly given proposed commercial and other development in the City to support its role as a regional hub. Ways of managing and reducing the impact of freight movement in Oxford urban area should be given fuller consideration. The LTP2 should also support in stronger terms increasing rail- and water-borne freight opportunities.

- 3.6 In particular, the Provisional LTP highlights development of Oxford's West End as having "a considerable adverse impact on congestion and the accessibility of Oxford." The County Council has been integral to developing potential solutions to transport issues arising from the proposed expansion of the Westgate Shopping Centre. It has been acknowledged that some expansion of park and ride provision within or adjoining Oxford will be needed by the time of likely completion of the Westgate development in 2010, to meet growing demand both from Westgate and the general expansion of Oxford's economy and services. The responsibilities of the County Council with respect to park and ride development during the LTP period should therefore be reflected within LTP2.

#### **4.0 Shared Priority Objectives**

- 4.1 In response to the stakeholder consultation on the Draft Provisional LTP, the City Council requested that the weightings proposed for the five shared priority objectives, which are used for assessing scheme priorities, were changed for assessment of schemes relating to Oxford to reflect local priorities and objectives. This change would have afforded top priority to road safety and air quality problems in allocating LTP money. It is noted that this request has been rejected, on the basis that the weightings adopted are based on public consultation, and that setting different assessment frameworks in different districts would result in a "postcode lottery" in prioritising schemes across the County.
- 4.2 The "postcode lottery" argument may, arguably, apply to the other Oxfordshire Districts, all of which are largely rural and share some similar transport issues. Oxford City is, by contrast, a densely built-up urban area and sub-regional centre, with unique transport pressures compared with the rest of the County. It is therefore not accepted as appropriate that issues such as air quality, for example, should be relegated in Oxford as a priority for spending just because the problem is less acute in the Country Towns and rural areas of the County.
- 4.3 It is apparent from the proposed spending plan that schemes have been prioritised in a way which reflects the weightings adopted for the shared priority objectives, i.e. cutting congestion in the short term on the road network surrounding Oxford has been afforded top priority, whereas OTS and other integrated transport solutions have lower priority. The County Council is therefore urged to reconsider its assessment framework and scheme priorities applicable to Oxford.

## **5.0 Air Quality**

- 5.1 The specific allocation of money for addressing air quality in Oxford is welcomed. However it is vital that air quality targets for 2011 are agreed with the City Council, which ensure as far as possible that the objectives set out in the Air Quality Action Plan are met. A commitment is needed in the full LTP2 as to what measures will be pursued within the LTP programme; these measures should conform with the Action Plan. A key measure which should be considered, is the implementation of a Low Emission Zone for the City Centre. An important first step that should be undertaken as a priority is a feasibility study of a LEZ, which looks not only at the impact on NOx levels, but also at wider climatic and health-related impacts.
- 5.2 There is also a need to recognise the potential impact of new development on air quality in Oxford, and to factor this in to the measures to be agreed. It is likely that bus penetration into some parts of the City centre will increase as the central Oxford economy expands, and there are likely to be significant changes in the pattern of traffic movement generally. It is hoped that there will be evidence in the full LTP2 of an overall analysis of the impact of proposed development in central Oxford on air quality to 2011 and beyond, and measures proposed accordingly.
- 5.3 Consultation on the Draft AQAP closed on 2<sup>nd</sup> December 2005, and all relevant comments will be passed onto County Council Officers for their consideration.

## **6.0 Road Safety, Cycling and Walking**

- 6.1 It is fully acknowledged that the schemes included in the spending programme for Oxford will need to incorporate road safety as an objective. There is a concern, however, that other potentially conflicting objectives, such as solving congestion, may take precedent over consideration of the most vulnerable road users, namely pedestrians and cyclists. An example is the proposals for improvements to London Road recently endorsed by the County Council Cabinet, which are being designed with the chief objective of improving bus priority. The County Council is urged to give first consideration to vulnerable and local road users when designing such schemes, and to consider how such improvements might be integrated into the pedestrian and cycle networks. Cycle and pedestrian elements of all schemes should never be treated simply as an 'add-on' to highways improvement schemes.
- 6.2 The funds allocated to improving pedestrian and cycle network in Oxford are welcomed. However it is important that this money is spent on improving the network in a joined up fashion, whilst targeting safety blackspots, and in full consultation with the City Council given its responsibilities for implementing a number of cycle and pedestrian network improvement schemes. The development of the cycle network

should address safety problems as a priority, but also with a view to maximising benefits such as convenience and choice both for existing and prospective cyclists, taking full account of new and proposed development. The pedestrian network should likewise aim to provide safe and convenient travel on foot, and be fully integrated with improvements to the public realm (whether proposed by the County Council or otherwise).

- 6.3 The target currently proposed relating to the cycling index (Target 12) for no change on existing levels is unacceptable, particularly given that the previous LTP 2001-2006 proposed a set of far more ambitious targets for increasing and promoting cycling as a modal choice. A target for increasing the level of cycling in the County should be included in LTP2, as well as an appropriate target that specifically relates to Oxford. The County Council is asked also to consider including a target to increase walking trips. The City Council would urge that LTP2 sets out clear proposals for increasing walking and cycling as a strategic aim.

## **7.0 Central Oxford and the West End**

- 7.1 An Area Action Plan for Oxford's West End is currently being developed by the City Council, which is due to be adopted in 2008. The County Council is a partner in this project, and the Provisional LTP highlights the importance of the project to Oxford itself, and as a regional hub.
- 7.2 Proposals include the realignment of part of Oxpens Road, major improvement of Frideswide Square, and major public transport improvements. There are current plans to remodel Bonn Square. The roadway under Botley Road Railway Bridge is also in need of improvement, due to poor cycle safety and bus accessibility, and frequent flooding.
- 7.3 It would therefore be appropriate for the County Council, as the Local Highways Authority, to allocate specific funds in its spending plan to support improvements to public transport and the public realm in Oxford's West End, given that developer contributions are unlikely to be sufficient to fund all the necessary improvements.

## **8.0 Headington and Marston**

- 8.1 There is currently a funding gap in providing some key strategic services needed to support the Headington and Marston Area Transport Strategy (HAMATS), an example being the proposed 700 Water Eaton – John Radcliffe Hospital service. This is despite significant levels of developer contributions having been made available to the County Council towards development of transport infrastructure.

- 8.2 The County Council is urged to ensure that the necessary funds become available for the pump-priming of key HAMATS bus services, in the interests of addressing the chronic and worsening issues of congestion, accessibility, air quality and improving the street environment. Such funding is also vital to ensure adequate accessibility for staff and visitors to existing and forthcoming hospital services, whilst minimising increases in general traffic.
- 8.3 It is suggested that this may be explored in conjunction with a Quality Bus Partnership covering the area or specific routes within it. Significant improvements are already being made to facilitate bus access in the area, for example priority bus access to the John Radcliffe Hospital from Saxon Way and Osler Road. Further development of on-highway bus priority options could be investigated alongside funding options from various potential sources, with an integral link to the LTP2 strategy and programme.

## **9.0 Controlled Parking Zones**

- 9.1 The City Council welcomes the decision of the County Council to bring forward implementation of some controlled parking zones (CPZ's) in the Headington/Marston area. As the County Council will be aware, considerable local priority is attached to implementation of CPZ's throughout Oxford, to ensure coverage of all residential areas which are likely to suffer increasing commuter parking pressure in the coming years. The County Council is urged to investigate the further acceleration of CPZ implementation and development, particularly in view of the planned opening of major new hospital services on the John Radcliffe Hospital site in early 2007.
- 9.2 The City Council remains strongly opposed to the possible introduction of charges for residential parking permits. This is on the grounds that Oxford residents 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 paid by those who contravene the schemes.

## **10.0 Bus Strategy**

- 10.1 The City Council supports the Provisional Bus Strategy in principle, and welcomes the County Council's commitment to increase bus patronage levels by 2% per annum, or by a total of 2.71 million bus journeys per year by 2011 based on 2004 levels. The Premium Routes strategy is supported in principle, subject to the need for thorough local consultation on highway improvements to provide bus priority. However it is important that the County Council takes care in general not to reduce the viability of, or divert subsidy from, services which currently serve areas in Oxford not on proposed premium routes. There should also be recognition that the pump-priming of proposed high frequency routes should not be prioritised over other proposed services that are strategically important, such as new and enhanced services needed to support HAMATS.

10.2 The Core Quality Partnership approach is welcomed in principle. However an indicative programme of the Quality Partnerships' roll-out to 2011 should be included in the finalised version of the Bus Strategy, which should include a commitment to consult locally on potential measures and improvements on specific route- and area-based agreements affecting Oxford.

10.3 Notwithstanding the need to improve accessibility toward social inclusion, there is significant concern that there have been proposals to further cut some evening park and ride services as part of the recent Bus Subsidies Review. Late evening park and ride services are considered important in supporting Oxford's night-time economy whilst furthering aims of reducing car travel into central Oxford.

## **11.0 Framework Accessibility Strategy**

11.1 The City Council welcomes in principle the Framework Accessibility Strategy, and welcomes in particular reference to the role of District Councils and Local Strategic Partnerships in the delivery of the Accessibility Strategy (Chapter 3 page 20). Reference to Local Development Frameworks is also supported; the County Council is urged to take full account of draft and adopted LDF documents, as well as adopted Local Plans, in progressing the Strategy.

11.2 The City Council would hope and expect to be consulted on local accessibility objectives, priorities and measures as part of the Local Area Action Plan process. Measures to be supported for improving accessibility in Oxford, given its compact urban character and demographic make-up, are likely to include pedestrian and cycle accessibility as well as bus travel opportunities.

## **12.0 Targets**

12.1 There is currently little information on how targets are being developed, and there has been limited opportunity for stakeholders to comment on this aspect. The range and scope of targets is limited when compared with the previous LTP 2001-2006, and they do not at present include key (albeit optional) targets for modal share to work; school and workplace travel plan coverage; satisfaction levels relating to walking and cycling; and casualties relating to specific road users. A target should be set to limit traffic growth in Oxford (the 'outer cordon count'), and secondary local indicators relating to specific problematic suburbs, e.g. Headington/Marston area, should be considered. Further comments have been made above relating to cycling and walking targets.

12.2 It is felt that more opportunity could be afforded to stakeholders to become involved in the development of indicators and targets, either through workshop involvement or by questionnaire.