



RESPONSE TO CONSULTATION - 20 February 2010

OXFORDSHIRE COUNTY COUNCIL'S DRAFT TRANSPORT POLICIES TO SUPPORT LOCAL TRANSPORT PLAN 3

INTRODUCTION

Oxford Pedestrians Association is a contributor to the Oxfordshire Active Travel Strategy (OATS) which local groups submitted to the County Council as a response during consultations on the County's draft objectives for LTP3.

The following comments should be read in the context of the earlier OATS submission, but are specifically the views of Oxford Pedestrians Association.

GENERAL COMMENTS

The draft policies would benefit from the addition of a prefix which puts the policies into context. The requirement for LTP3 was that policies should be directed towards delivering the government's five enduring goals for transport, and these have been reflected in the LTP3 objectives adopted by the County. However, the relationship between the draft policies and the objectives they are meant to deliver is far from clear. As presented, the draft policies lack the contextual connection with the County Council's objectives and as a result there are a number of weaknesses to be addressed to improve the policies.

A first principle of transport provision is inclusiveness. Design that encompasses the needs of disabled people is design that encompasses the needs of us all. Yet there is no policy covering this important principle, and the small reference to 'Disability' is tucked away in the draft document. This, and a statement of principles of inclusivity, should be at the beginning. They will then be able to preface policies such as NM3 and PT11.

While it is welcome (Policy D2) to read that disability awareness training will be provided for appropriate staff, the same should be provided for staff engaged on any aspect of planning and engineering that involves dealing with pedestrian activity.

There is no reference at all in the draft policies to climate change nor to the extent to which mode-change can help address it. The potential of mode-change to reduce congestion in the highway network, and indeed to help address many of the issues that will come from increasing the human population of the county is also absent.

There is no reference to actively facilitating wider mode choice, so as to enable more people to choose to travel more actively. While certain journey types are being targeted (e.g. the 'school run'), there is no reference to tackling the causes of many of the problems experienced across the County, in particular the unnecessary use of cars. Policies to discourage single-occupancy car use, to facilitate the development of car sharing clubs, to reduce over-supply of workplace parking and to examine road-user charging, are all absent and should be included.

The draft is very much about single-mode topics: the integrated aspects of travel are absent. Public transport, for example, does not 'stand alone' but is accessed by other

modes. Buses are dependent on a supply of users who have reached the bus stop, and who will continue their journeys after leaving the bus, by walking, cycling, by car. This is equally true for rail travel, but the draft policies appear to ignore the need for integrated systems. Promotion of bus services, for example, needs to be accompanied by facilitating the trip to and from the bus stop. These aspects of the personal journey need to be embraced by the policies.

The terms used in the document read as applying to a network designed for motor traffic; analysis of non-motorised travel would benefit from more appropriate vocabulary. References to off-road tracks and paths are absent and need to be specifically included. The term 'congestion' is used only in the context of reducing motor traffic congestion – whereas the reduction of pedestrian congestion and delay is as important if not more so. The section on Parking fails to address cycle parking. There need to be explicit references to improvements for non-motorised travellers where the text infers that improvements are exclusively for motor vehicle users.

A number of the policies (e.g. NM4, HAMP1, HAMP3) are more to do with technical processes to deliver policy, rather than with policy itself.

There is inconsistency in wording of different sections, which appear to reflect differences in the degree of commitment for policies to deliver real outcomes. For example, policy PT14 mentions 'offering new residents and employees real choice of using public transport'. The Cycling section, by comparison, intends to 'encourage more cycling'. Wording differences need to be remedied so as bring stronger intent to the commitments that the policies make.

While 'new developments' are discussed, the policies do not address the issues of equipping existing communities with the necessary facilities to enable those who travel to choose alternatives to the car. There is no reference to increasing individual choice, including enabling the young, the old, and those who do not drive, to travel independently. These policies are absent despite their being stated in the County's previous transport policies.

What is a 'growing county'? Such terms, as used in Policy ND1 fail to recognise the fact that mode-shift policies will in some cases enable the existing network to satisfactorily accommodate 'growth', and ND1 seems to be at odds with ND2, where a sequential test is described.

RESPONSES TO INDIVIDUAL DRAFT POLICIES

NETWORK MANAGEMENT

Policy NM1 - The policy does not address the fact that pedestrian activity is a legitimate use of highway space, and appears to be written for a network of carriageways rather than streets.

Policy NM3 - Should specifically state that pedestrians' needs will be incorporated into all highway junctions and crossings.

New policy required to reflect the objectives of the Road Traffic Reduction Act, by reducing motor traffic volumes by reducing the need to travel, by enabling travellers to have real choice of walking, cycling and public transport, and by reducing single-occupancy car use, e.g. through road user charging, workplace parking levies etc.

HIGHWAYS ASSET MANAGEMENT

At present this overlooks that many pedestrian facilities are provided away from roads. These facilities should be included in the policy. Special attention needs to be paid to issues of ponding after rainfall.

HIGHWAY NETWORK DEVELOPMENT

These policies need to acknowledge that the Highway Network is simply a means to an end, and is not to be developed for its own sake. At present the policies appear to be about delivering carriageways rather than streets. Streets fulfil many functions, including delivery of people to and from public transport. The wider role of highways needs to be reflected in the policies, in particular to enable the policies to deliver one of the key proposed schemes (the subject of earlier consultation) whereby pedestrian networks would be created in Oxford and other towns.

Policies for the highway and street networks should acknowledge the Manual for Streets, which sets out an hierarchy of provision, with pedestrians' needs at the top of the hierarchy.

PUBLIC TRANSPORT SERVICES

It would be helpful either to rename this section ('Bus Services') or to include the section on Rail here. As discussed above, the focus on policies that address 'single mode' issues does not permit the inclusion of policies about how to provide access to public transport services. The services themselves will not deliver their intended objectives if people cannot safely, securely and comfortably access them.

Policy PTS1. The policy should consider more widely the determination of people's needs for access to work, education, entertainment and recreation, shopping etc.

Policy PTS2. The policy needs to address the fact that people at present, in Oxford at least, can be faced with considerable walks between bus services. This has recently worsened with relocation of Queen Street bus services to St Aldate's. A public transport trip almost invariably has a walk at one or both ends. It is at least, if not more, important to make these elements of public transport journeys 'high quality'.

Policy PTS7. Public transport information needs to be widely available. It should also include provision of local street maps at bus stops. People getting off a bus or train need to be able to find their way, usually on foot, to their destinations.

Policy PTS9. As with bus and rail services, coach services need to be accessible, so routes to and from them need to be so. Many coaches at present used in Oxford (including those coach like vehicles offering 'local' bus services, such as the Oxford-Cheltenham service) use high floor vehicles which are far from accessible for people with any form of encumbrance. These issues need to be addressed by the policies.

Policy PTS10. Should clarify the differences between 'health facilities' – hospitals, local

services etc. The policy should confirm the intention to make it easy to walk to local surgeries and health centres.

Policy PTS11. Clean air is important, whether or not the breather is in an AQMA, and policies need to reflect that. This policy needs to be widened to address rail services, so as to deal with pollution issues at Oxford arising from idling diesel train engines there.

PUBLIC TRANSPORT INFRASTRUCTURE

These policies need to acknowledge the multi-mode nature of 'public transport' journeys and address the issues surrounding interchange.

RAIL

These policies should be embraced within the 'Public Transport' sections above.

Access to Oxford station on foot, as well as other modes, is a specific concern, in particular because of expected growth in demand of more than 30 per cent. The policies need to specifically address issues of access to public transport by sustainable modes.

The policies (e.g. Policy R4) should express support for other developments in rail services within the county – not only the proposed Great Western electrification.

CYCLING

Cycling should be promoted as a sustainable form of travel whose expansion will contribute to reducing road traffic congestion by successfully diverting some journeys from cars. Cycling policies need to give positive support for this.

Policy CY3 would usefully be applied to pedestrians too.

WALKING

The present policies for walking are inadequate to deliver the schemes proposed in the county's draft 'long list' and need to be re-cast. We suggest that the author should refer to OxPA's publication 'A More Walkable Oxford' which discusses ways to invest in walkability that will benefit the wider community. (Download from www.oxpa.org.uk)

Walking deserves better than to be described as 'fun'. It is the one method of getting about that is cheap, makes few demands on public resources, and is available (or should be) 24 hours a day, every day. It offers social inclusivity in a way that no other means of travel can. It provides the essential link between the doorstep and the bus stop or rail station. It also enables people to take the exercise that is increasingly acknowledged to improve health. It does not pollute nor do people on foot cause injury or damage to others.

Policies for walking need to reflect all the above, and to positively promote walking and set aside a proportion of the County's transport budgets for improvements to walking.

Policies should specifically state that footway parking will not be a tool used to

accommodate drivers' demands for parking spaces.

See above comments on policy CY3 and creation of a similar policy for walking.

ROAD SAFETY

Policies should build upon the success of 20mph limits in Oxford and aim to extend 20mph to all the bus routes, where the most cumbersome vehicles are to be found, and where most pedestrian activity (as well as cycling) takes place, with people crossing streets to and from bus stops and shops.

The Road Safety draft policies are technical processes rather than policies.

TRAVEL PLANNING

The section needs to include positive support for innovative approaches such as car sharing clubs (and providing car parking spaces for them on street), and electronic communications. It should also address personalised travel planning.

There needs to be a positive policy statement in support of facilitating greater modal choice, especially for the young, the old, and those for whom car access is not available.

The policy on the school run appears misdirected. All short car journeys create pollution and contribute to congestion, and offer greatest scope for transfer to carbon-free alternatives and to public transport. Driver-only short distance car journeys are particularly wasteful. More than 95 per cent of energy used in driver-only car journeys is used to move the car rather than the passenger. It is such wasteful use of energy that should be the target of Travel Planning policies, rather than targeting a particular journey objective.

Policy TP1 should be modified as suggested above.

PARKING

OxPA supports introduction of city-wide CPZ's for Oxford, and for explicit statements that footway parking will not be permitted.

Parking controls should be used, in conjunction with extended roles for the Park & Ride sites, to limit the numbers of cars coming into and through central Oxford.

The Parking policies overlook the issue of obstruction of footways by parked bicycles, and these should be addressed.

STREET ENVIRONMENT AND THE PUBLIC REALM

We recommend reference to the comments on street scene made in OxPA's publication 'A More Walkable Oxford' (download from www.oxpa.org.uk)

DISABILITY

Policies on Inclusivity and Disability need to be at the very front of the County's policies. They are key to delivering the County's objectives, and in turn the government's five overarching goals for transport. They need to refer to the County Council's policies for inclusivity and independent mobility as set out in the County Structure Plan.

FREIGHT AND DISTRIBUTION

The policies should address environmental impacts and the potential for goods vehicles to dominate the street environment, and include measures to minimise the effects goods vehicles have on road danger and community severance.

PUBLIC RIGHTS OF WAY AND ACCESS TO NATURAL GREEN SPACE

These policies are supported.

TAXIS AND PRIVATE HIRE VEHICLES

Taxis are part of the public transport system and complement bus, coach and rail services. Policies need to support that role.

Most taxis use internal combustion engines and the air pollution effects of taxis can be considerable, and felt by people out of doors in the vicinity of taxis. Policies are needed to address the air pollution and noise impacts of taxis. Policies should support the provision of cycle-taxis.

AIR TRAVEL

It is surprising to find the County concerned to reduce the impact of something over which it has little if any influence, while its policies for the travel methods that it can influence sometimes lack such concerns.

All the County's transport policies should be considered in the light of the government's overarching goals, and the policies should be written to ensure that the goals are fulfilled.

WATERWAYS

A walking network created for travel (rather than, or as well as, for recreation) needs to be surfaced and lit so as to be available at all hours in all weathers. Paths beside waterways are not like that, and should not be considered for inclusion in a walkable travel network. Nevertheless, such paths need to be safe to use, whatever the weather.