

# ENGLAND'S ECONOMIC HEARTLAND OUTLINE TRANSPORT STRATEGY FRAMEWORK FOR ENGAGEMENT

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

October 2019

## 1 Who we are

POETS (Planning Oxfordshire's Environment and Transport Sustainably) is a group of current and former local authority officers and academics working in the field of planning and transport, whose aim is to support sustainable development in Oxfordshire.

We have not responded to each of the questions raised in the Outline Transport Strategy (OTS), but instead wish to raise some overarching points.

## 2 Key points

- a) There is no discernible or coherent transport strategy. In part this may be because promised documents which might have set some context for the strategy have not yet appeared. *(See 3 below)*.
- b) There should be much greater recognition of the climate emergency, despite both central and local government paying lip service to it. *(See 5.4 below)*.
- c) There needs to be an emphasis on the need to minimise the need for movement by locating homes, employment, schools, shops and medical and other community facilities close together.
- d) It would appear that the strategy is predicated on measures of "growth" which were outdated 50 years ago and which are now almost totally discredited. *(See 5.3 below)*.
- e) The document contains vague aspirations (e.g. to achieve a shift to more sustainable modes of transport) without any practical measures as to how they are to be achieved.
- f) The proposal for an expressway between Oxford and Cambridge should be opposed. Amongst other things it is inconsistent with the chair's ambition to "achieve a zero carbon transport system by 2050". *(See 5.6 below)*.
- g) The transport strategy is premature. The promised public engagement on the Oxford to Cambridge Arc needs to be undertaken first. Once there is a clear understanding of the purpose and future of the Arc, a transport strategy can then be developed followed by the individual measures needed to deliver it.
- h) The very structure of "England's Economic Heartland" highlights the democratic deficit attached to this attempt at planning, and makes it very difficult for there to be any meaningful public engagement. *(See 4 below)*.

## 3 What is the strategy?

It is difficult to understand what the 'strategy' of the Outline Transport Strategy is.

The report includes many attractive pictures, quotes and case studies, but few clear statements of intent. The clearest statements seem to be the foreword p.5, the

principles of p.14; the 'emphasis on connectivity' of p.25, and the priorities map of pp. 42-3. Beyond that, it is difficult to see what the OTS's priorities are, how decisions will be made and how the OTS links with other strategies etc. For instance pages 69 and 92 of the OTS refer to 'levels of service' but give no indication of what these levels might be. The zero carbon and net environmental gain ambitions of the Chairman on p5 are totally inconsistent with the expressway as road priority number one p43.

#### 4 Democratic deficit

We are concerned about the EEH's lack of directly elected accountability and secrecy.

Who will decide on the final OTS? Who are we 'engaging' with? And if someone is not happy with the OTS, which elected representative can that person turn to? Indeed, there is a question mark over the very existence of a region calling itself "England's Economic Heartland". A government which earlier this decade set its face against regional planning now appears to be reintroducing it on a wholly ad hoc and largely undemocratic basis.

We believe that there is a strong case 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.

#### 5 Detailed comments on the Outline Transport Strategy

##### 5.1 Land-use planning

The context for the OTS is unclear.

For instance p.14 refers to supporting 'the delivery of planned economic and housing growth', but there is no indication of whether this is for existing Local Plans, the National Infrastructure Commission's proposed million homes, or something else. Page 15 of the OTS mentions 'the arrival of new communities' but does not explain where these will be located. Page 27 refers to the overarching ambition for the region', without specifying what this is.

##### 5.2 Transport and the environment

The OTS also suffers from the absence of a clear transport framework with no factual information on the problems, plans and opportunities of the existing transport networks.

This conflicts with the Government's budget statement accompanying the National Infrastructure Commission's report on the Oxford- Milton Keynes-Cambridge Arc in autumn 2017, which provides the context for this study and highlights the importance of planning infrastructure "*in tandem with housing and jobs growth*" (para 1.11 Autumn 2017). Professor Leinster makes a similar point in the consultation document itself (p.10), adding the need for environmental objectives to be integrated

and for an environmental strategy to be prepared and given equal weight to economic and transport strategies.

The Ministry of Housing Communities and Local Government promised that there would be a “*public engagement exercise over summer 2019*” considering: Productivity, Place Making, Connectivity and Environment (The Oxford-Cambridge Arc, March 2019). Also, of critical relevance to the EEH transport strategy is the proposal for an Oxford-Cambridge expressway, publication of routes for which is due to take place this autumn. The OTS report makes no reference to either of these. The former ought to provide a context for this transport strategy, while the expressway route consultation should provide further information. In its present form the current EEH document is both inadequate and premature. It should have followed the broader public engagement and awaited the almost concurrent expressway route consultation.

The report refers to being informed by the “regional evidence base” yet that appears to be available only to “partners”, despite requests that it was made available to us to help with this response. Similarly the “connectivity study” (p39) commissioned by the government in 2017 (Autumn Statement) appears to be unavailable. This serves to strengthen the impression that the EEH’s approach is neither open nor inclusive.

We believe that EEH and the Government have got the sequence of actions the wrong way around. What is needed is first a public discussion and agreement about the future of the entire Oxford-Cambridge arc area; then the OTS should indicate how this future could be delivered; and then individual transport projects such as East-West Rail and any new roads should be considered. Instead, Highways England has proposed a new motorway between Oxford and Cambridge, the National Infrastructure Commission (also unelected) is proposing a huge number of new homes in the region, and the OTS appears to be attempting to bind everything together with vague talk of ‘connectivity’ and ‘transformation’.

### **5.3 Growth and economic objectives**

The OTS should be clear about the kind of economic growth that is wanted in the region.

England’s Economic Heartland and the OTS seem to take for granted that (undefined) economic growth is good, and that the role of the transport sector is to facilitate growth: “investment in improved connectivity therefore plays a key role in... supporting new opportunities for economic growth” (p.67). However, there is no discussion of what measures of “growth” the EEH deems appropriate.

The document appears not to acknowledge the observation over 50 years ago of Robert Kennedy, endorsed by a UK prime minister this decade, that GDP measures everything “except that which makes life worthwhile”. In the light of the climate emergency Kenneth Boulding’s observation that “anyone who believes in infinite growth on a finite planet is either a madman or an economist” seems more relevant than ever, and has been repeated in that context by Sir David Attenborough amongst others. Yet the EEH document is silent on all of this.

A million more homes in the region will clog up the roads, increase accidents, increase air pollution, fragment habitats, and add to greenhouse gas emissions. It will also draw energy out of other regions that need an economic boost more than the Oxford-Cambridge arc, and have more capacity to accept it. We support the proposals by Smart Growth UK<sup>1</sup> for 'arc' concepts in other parts of the country, again with the provisos set out in this document about the kind of growth that is promoted. There needs to be a public discussion about the type and level of growth that the region wants, and the OTS should aim to support this agreed growth, not any and all growth<sup>2</sup>.

#### **5.4 Climate emergency**

The 'zero carbon by 2050 ambition' of p.14 is not strong enough, not rapid enough, and not borne out in the rest of the document.

In Oxfordshire, Cherwell, Oxford, South Oxfordshire and Vale of White Horse councils have all declared a climate emergency. Movement towards zero carbon must be much faster, and the OTS should aim (not have an ambition, which sounds like "we'll do it if we can fit it in with everything else") of zero carbon transport by 2040 at the very latest.

More importantly, it is difficult to see in the OTS how even the 'ambition' would be implemented. We strongly recommend that the OTS should set a zero carbon aim for 2040 (or earlier) and then back-cast to determine what action is needed to achieve that aim.

This will include, to start with, electrifying all new railway lines (e.g. East-West Rail); rapidly converting all existing railway lines to electric; stopping virtually all new road construction; and sending strong price signals (e.g. congestion charging, workplace parking levies) to achieve a modal shift.

On this last point we need to move rapidly to pricing transport in such a way that the true costs of each mode, including those relating to the environment and climate change, are reflected in the price paid. This would require action at both national and local level, and is something on which the EEH should be taking a lead if it is serious about tackling climate change and bringing about a shift to more sustainable modes of transport.

#### **5.5 Incorrect emphasis**

The OTS should emphasise access to services over connectivity.

The OTS often seems to use the term 'connectivity' as an alternative to 'mobility' (e.g. 'frictionless travel' p.23; 'east-west strategic roads connectivity' p.39; 'emphasis on connectivity... enable choice in mobility options' p.25). However, what is most needed is not mobility/movement but accessibility/access to services. It is access

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<sup>1</sup> [http://www.smartgrowthuk.org/resources/downloads/Arc\\_Report\\_2.pdf](http://www.smartgrowthuk.org/resources/downloads/Arc_Report_2.pdf).

<sup>2</sup> See also the points made in <http://www.neednotgreedoxo.n.org.uk/wp-content/uploads/2015/12/NNGO-Oxfordshire-Plan-Jan-19-FINAL.pdf>

that should be the focus on the OTS: can existing and future residents get to their jobs, shopping, etc. easily on foot, by bike, by public transport, by videoconferencing?

In particular, the OTS needs to justify any new transport links. What will a new transport link achieve? Is it really necessary, or can something else with fewer environmental and social impacts be developed instead?

## **5.6 The Expressway**

The OTS should oppose an Oxford-Cambridge Expressway.

The points above – the need for rapid carbon-emission reduction, the need for accessibility not mobility, unclear and undemocratic decisions about housing numbers in the region – all argue against a new motorway between Oxford and Cambridge, as do what appear to be the aims and objectives of the OTS. The POETS group has put forward alternatives to a new motorway<sup>3</sup>, which we believe should be incorporated into the OTS instead of the expressway.

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<sup>3</sup> [https://poetsplanningoxon.uk/POETS\\_Oxford\\_Cambridge\\_Corridor\\_Alternative\\_Strategy\\_final\\_June19.pdf](https://poetsplanningoxon.uk/POETS_Oxford_Cambridge_Corridor_Alternative_Strategy_final_June19.pdf)

## 6 Members of POETS

**Katie Barrett**, former planning policy manager at Vale of White Horse District Council, local plans officer at South Oxfordshire District Council and transport policy manager at Oxfordshire County Council

**Chris Cousins**, former head of sustainable development at Oxfordshire County Council

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