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Dear Adam,

LTP3 Consultation: "Policies"

- 1. "Develop and increase cycling and walking for local journeys, recreation and health"*
- 2. "Improve the condition of local roads, footways and cycleways, including resilience to climate change"*

CycloX, as an advocacy group for cycling and cyclists in Oxford, is very glad that these two Objectives were agreed by the County in developing the LTP3 draft. We pick them out from the other Objectives because they specifically mention cycling, but some of the others too should benefit Active Travel as a major preferred transport mode. Good!

The question now is whether the Policies, as drafted, will support these highlighted Objectives. We regret to say that, by and large, we think the policies, especially the Cycling policies, will not. Not so good! They need strengthening, integrating with each other, and re-focussing.

As the member of the CycloX committee holding the Strategy portfolio, I am now submitting the following comments and specific suggestions, on behalf of our whole membership. They are based on an open meeting for CycloX members held in November, together with committee comments and input since then. Thank you for giving us an extension of time for this. (When, in these comments, we sometimes refer to "you" we intend to refer in the plural to the officers and consultants who have made the proposals, not of course to you as an individual officer).

We'd like to **consider first the overall context**. We presume Oxfordshire's LTP3 will start with an overview explaining the thinking behind the listed Policies. On their own the policies, as drafted, are bald statements (many of them are simply business-actions, not policies at all). We strongly believe that such an overview must make reference to:

➤ **The DfT's recent Active Travel Strategy**

(www.dft.gov.uk/pgr/sustainable/cycling/activetravelstrategy/ Feb 2010)

Pragmatically, Oxfordshire's LTP3 is much more likely to win DfT approval if it is based on, refers to and quotes from DfT guidelines! But also the DfT stresses an underlying set of requirements with which CycloX wholeheartedly agrees. Here for instance is the very first point it makes: *"Cycling and walking are a very simple way for people to incorporate more physical activity into their lives and are very important for increasing access to jobs and services for many*

people. When replacing trips by car they can also help reduce emissions and ease local congestion.” We support, too its emphasis that Transport Plans must mesh with other Plans and with NHS strategies: “With local authorities developing the next round of LTPs, the NHS cannot afford to miss the opportunity to ensure that local transport policies maximise the health benefits that walking and cycling can bring¹”. “With new Local Area Agreements and Local Transport Plans due to start in April 2011, the latter looking as far as 25 years ahead, there is an unmissable opportunity for health and transport professionals to work together to make sure cycling and walking are a core part of their area’s plans²”

Suggested insertion

Overall Policy 1: OxonCC will strategically align the policies in this LTP with the Council's wider strategic priorities. It will co-ordinate with and purposefully influence Local Strategic Partnerships³ and the NHS to enhance communities’ quality of life, sponsoring improvements to the built environment that meet people’s needs, including promoting safer and more attractive streets and opportunities for active travel⁴

- **Transport Integration.** We sorely regret that you appeared to ignore the arguments we presented in Oxfordshire Active Travel Strategy when you reviewed the LTP3 Objectives. The draft Policies fail properly to consider Transport Integration. They are not coherent. For instance, public transport is accessed by other modes of travel. Promotion of rail services needs to be accompanied by facilitating the trip to and from the station. The journeys people make are mostly multi-modal, not single-mode. An overall Policy is needed to embed this natural truth into strategic planning and interchange provision and design⁵.

Suggested insertion

Overall Policy 2: In planning for transport, OxonCC will always take account of the multi-modal nature of most journeys. It will facilitate interchange between all modes but especially those involving Active Travel.

- **Inclusivity.** We deeply regret that **the draft Cycling Policies make no reference to cyclists of different levels of ability and experience.** Only by formulating policies that assist *novices* to choose and use their bikes will the agreed Objective of “*Developing and increasing cycling*” be achieved. This is one instance – a very important one – of the failure of the draft Policies to refer to inclusiveness. Provision for the *disabled* would be another. Relating transport policies to the needs of the *elderly* would be a third. The draft

¹ Para 1, Executive Summary, page 6

² Para 5.3

³ Such as the Oxford Strategic Partnership

⁴ Adapted from para 5.4 of the DfT document. It is lamentable that the current “Oxford’s Sustainable Community Strategy 2008–2012” <http://snipurl.com/uif1e> [www_oxford_gov_uk] makes no reference at all to Transport Policies. They could contribute effectively to meeting the Oxford Strategic Partnership’s Objectives. This is a clear example of poorly-joined-up thinking.

⁵ A good example of this is the cyclist-pedestrian interchange, for which sensible and plentiful cycle-parking is necessary. Another would be the provision of Journey Planners that include Active Travel as well as public transport components. The draft PTI2 Policy does make a reference to bus interchanges, but not to any other kind of interchange. It is far too limited.

policies, unlike the previous LTPs, make **no allusion to increasing individual choice**. Why not?

Suggested insertion

Overall Policy 3: Every proposal by OxonCC for development of transport facilities will be reviewed so that, when delivered, it will improve their inclusiveness for all sections of the population

- **"Soft measures"**. We think that the present draft LTP3 does not take into sufficient account **the value of "soft measures"** for improving transport. When developing the Plan, considering Schemes and Projects by a long-list then a short-list inevitably mainly concentrates on "hard measures". By formulating good Policies, the Plan can counteract this inherent imbalance. We do not see this in the present draft Policies. In our very strongly-held view, the Plan ought to encompass staff development and embedding of specific expertises in planning personnel, e.g. by the appointment of a Cycling Officer. The Plan ought also to support a 'skilling' training programme for potential cyclists. This policy statement is intended to cover all these:

Suggested insertion

Overall Policy 4: OxonCC will advance 'Smart Measures' developed by well-trained and expert staff. These measures will combine incentives, information, training and promotion, closely tailored to the needs of a specific target market

- **Quality Audit**
'Road Safety' was founded in the desire to make motoring more convenient and it largely continues in this vein as operated by the County. The use of 'Quality Audit', as defined in the DfT's Manual for Streets should be the key process, which includes a safety aspect but also the whole design.

Suggested insertion

Overall Policy 5: Every transport proposal will pass a Quality Audit that will include a properly documented design and road safety audit and a sign-off system that at least meets national standards⁶

- **Modal shift/change** of transport, especially in relation to the ways in which Active Travel can help ameliorate Climate Change⁷.

Suggested insertion

Overall Policy : OxonCC will ensure that all of its transport proposals comply with the Government's UK Low Carbon Transition Plan 2009⁸ and any successors

May we urge you to take advantage of Cycling England's professional support service for Authorities developing LTP3s, which is free of charge:

www.dft.gov.uk/cyclingengland/encouraging-cycling/professional-support/

⁶ As described in the DfT's Manual for Streets chapter 3, especially 3.7

⁷ See DfT's Active Travel Strategy 2.7 and 2.8 and elsewhere

⁸ <http://snipurl.com/uii5t> [www_decc_gov_uk]

Cycling Policies

We turn now to the specific Cycling Policies. We think the first one, CY1, should be the prime cycling policy that will positively support the cycling-related plan Objectives, rather than, as proposed, insist on an origin-and-destination survey test, which will be expensive to fulfil and will be unable to reveal latent demand. This statement incorporates and strengthens the proposed CY4 (...*"promote cycling as a healthy, convenient and mainstream mode of travel"*).

Suggested replacement

Policy CY1: OxonCC will enhance and legitimise cycling as a mainstream transport mode, recognising that a cycling journey is often faster, more reliable in predicted time to destination, and more convenient than other modes. The Council will promote cycling and walking (Active Travel) as the cheapest, healthiest and most flexible modes that can be combined into multi-mode trips.

The present CY2: "... *develop programmes to improve facilities for cycling where this will effectively encourage more cycling trips*" puts the bar too high for implementing cycling-related projects. It demands a level of proof of "effective encouragement" that will be impossible to demonstrate in advance. An amended form of this could be "OxonCC will develop programmes to improve facilities for active travel where this is likely to improve modal shift to cycling". However, we think there is an opportunity in CY2 to emphasise inclusiveness, and to take account of the highest-priority Project that Oxford cyclists want. So we prefer:

Suggested replacement

Policy CY2: Networks of attractive, well-maintained, accessible and safe cycle routes will continue to be developed for both experienced and novice cyclists, where delays are minimised by giving priority to the safe movement of cyclists through congested junctions, and where recreation and tourist routes will invite newcomers to cycling.

Policy CY3 is defective (...*"ensure that the design of all transport improvements considers the needs of cyclists and helps to encourage more cycling"*) because merely to "consider needs" is not enough. It should also emphasise inclusivity.

Suggested replacement

Policy CY3: OxonCC will ensure that the design of every proposed transport project will satisfy the needs of cyclists and will help to encourage more cycling by all sectors of the population, including existing cyclists and those who would like to shift to cycling

We suggest incorporating Policy CY4 into CY1 (see above), and **renumbering CY5 as CY4** (...*will work closely with other interested groups to encourage greater levels of cycling*). We welcome CY5 as it stands, and we look forward to being one of the collaborating interested groups with Oxon CC.

The drafted Parking Policies (P1 to P3) reflect car parking, we presume – an indication of a mind-set in the drafters that needs changing. Cycle parking that is inclusive must be treated equally with car parking (taking into account, for instance, cycling by couples or families whose bikes may be a lot longer than usual). Cycle parking is linked to modal interchange. Therefore LTP3 needs a Policy such as:

Suggested insertion

Policy CY5: Oxon CC will put forward Active Travel (walking and cycling) as integral parts of every transport project. The design of interchanges between transport modes will include cycle parking of a quality and quantity that at least meets national standards⁹

The Policies dealing with New Development mention exclusively with public transport considerations (Policy PTS5). They omit Active Travel. This deficiency needs remedying.

Suggested insertion

Policy CY6: OxonCC will ensure that all new developments in Oxford shire are served by a convenient and effective Active Travel infrastructure¹⁰.

We have seen the submissions by Sustrans, by Oxford Pedestrians Association and by Graham Smith, which we fully support. We re-submit the Oxfordshire Active Travel Strategy, since its discussion directly bears on LTP3 Policies as well as on Objectives.

Finally, may I say that these suggestions are offered in the spirit of constructive improvement. We look forward to learning how you intend to incorporate them, or if you don't, why you don't.

Sincerely,

[Emailed, therefore unsigned]

Simon Hunt

Prepared by Simon Hunt (svhoxford@gmail.com; daytime phone: 01865 275575) on behalf of Cyclox, following internal discussions and consultation.

⁹ The commentary should specify the DfT's Manual for Streets, chapter 8: www.dft.gov.uk/pgr/sustainable/manforstreets/

¹⁰ The preamble or commentary here should explicitly refer to the discussion and guidelines on new developments written by our sister organisation Cambridge Cycling Campaign www.camcycle.org.uk/planning/guidance/newdevelopments/