

**ENGLANDS ECONOMIC HEARTLAND DRAFT TRANSPORT STRATEGY
OXFORDSHIRE GROWTH BOARD COMMENTS**

22 September 2020

Thank you for giving us the opportunity to comment on the Draft Transport Strategy.

Statutory Body

Whilst we support appropriate and consensus driven strategies, the Oxfordshire Growth Board is not clear about the nature of the strategy as it emerges or once it is completed. We note proposals accompanying the strategy which look to put EEH on a statutory footing and therefore understand the intent would be the strategy itself could become a statutory plan. However, the recent letter from Baroness Vere and Simon Clark (attached) suggests Government is not, at least at this time, looking to establish any further statutory bodies, including EEH.

Our comments therefore are based on the strategy emerging on a non-statutory footing (our preference). We would like it registered though that if there were moves to put this on a statutory footing, we would have many questions about the nature, impact and the appropriate language of the strategy and would want to be assured that, notwithstanding the views of any of our individual councils, that statutory responsibility for strategic and local transport planning, scheme development, funding and delivery were not removed from Oxfordshire-based authorities and not placed in a quasi-regional transport body.

General Comments

The strategy reads as a growth vision rather than as a transport strategy. This is understandable as the connection between a spatial strategy (i.e. where things are and how they inter-relate) and the connectivity needed to make a spatial strategy work is fundamental. However, the transport strategy should not lead the spatial strategy for either the region or Oxfordshire.

The Oxford to Cambridge Arc, which makes up the vast majority of the EEH area, has been identified as an area of national economic significance by Government. Given this commitment, the Growth Board believes it would be sensible to consider greater organisational alignment between EEH and the emerging Arc structures to ensure better join up and better value of public expenditure. There will always be an edge or a boundary to our joint working, and we would see working closely with Swindon and the West (indeed others outside of EEH such as Berkshire) as a priority regardless of artificial administrative boundaries.

The Arc will also be subject to an emerging Spatial Framework led by Government. It is fundamental to its success that any regional transport strategy is developed in

an iterative way within that Framework. In our view the work done to date provides very useful evidence for the development of the Framework, but it should not be treated as a final strategy until such time as we can see that it responds to the spatial strategy emerging for the Arc.

Further, we are developing the Oxfordshire Plan 2050. This is a statutory joint spatial plan and we are at a critical stage of determining our preferred spatial strategy. The work of the EEH Transport Strategy is helpful again as evidence but must not hinder or prohibit the determination locally of our most preferred approach. For example, while we see there is clear and important ambition in the EEH Strategy, the document and its proposals do not really give confidence that we are changing fast enough to meet our carbon ambition by 2050. We would suggest that with our strengths of innovation, combined with our economic capabilities, we should be exceeding national targets for zero carbon. In this respect we feel the Transport Strategy should be more bold, ambitious and specific about how this can then be achieved.

We are disappointed the Strategy does not seem to start at a premise to avoid infrastructure. There is helpful wording to support better digital connectivity but wonder if this is the right place for that discussion and if so, have all players in that sector contributed enough to the strategy. We think if there is a stronger commitment to carbon zero and more ambitious targets to attain this then it would lead to a strategy that sought to avoid new and traditional forms of infrastructure through other means such as integrated strategic planning, digital connectivity and greater community resilience to avoid reliance on longer and perhaps unnecessary journeys.

We agree with Baroness Vere that really good work has been undertaken by EEH in developing the strategy, but we are reassured that the issue of placing this Strategy, and EEH in general on a statutory footing is at best premature and at this time not supported. We feel this should be seen as a positive position as the nature of the Strategy, and of those impacted most by it, should be one of consensus and collaboration, not of policy and statutory power.

If EEH embraces this then we feel the strategy can evolve alongside the Arc Spatial Framework to deliver our shared ambition for the Arc and for Oxfordshire. If the Strategy was to continue as a policy-making document, then we feel it is not written in such a way as to be successful or defensible. In general, the wording and nature of the “policies” within the draft are not written as policy but rather as directions of travel, statement of intent and support for collaboration. Again, we support this approach as it is right if it is to be a consensus building strategy rather than a statutory and binding policy document. If EEH intention is for the latter, the Oxfordshire Growth Board would have serious concerns about such a strategy moving forward.

The summary document is very good, and we feel addresses our biggest challenges and opportunities related to connectivity moving forward. It also helpfully acknowledges the importance of the Oxford to Cambridge Arc. Unfortunately, this is not representative of the Strategy as a whole and seems to have been written on its own and not as a summary of the main document which gives very little mention of the significance of the Arc to the national economy, how important connectivity is to

its success and the role this strategy can play in helping the Arc meet and exceed its potential of delivering nationally significant sustainable development whilst supporting our communities and businesses to address our biggest challenges around climate change, social inclusion and clean and sustainable living.

The Strategy rightly focusses on greater connectivity across the region. However, given the potential demise of the Expressway project, there seems an excellent opportunity missed by this Strategy to come up with alternative strategies to address our continued and growing connectivity issues. We note the Connectivity Strategies, which have been pending for some time, and will work with Oxfordshire County Council to assist these being completed as soon as possible. However, we must emphasise that in addition to new or improved east-west connectivity, north-south connections such as the A34 remain a major constraint on local, regional and national movements of people and freight. We cannot see where this major corridor is a priority to EEH – perhaps it was assumed as a Highways Agency highway it would be picked up as part of future expressway or RIS investment – however, we wish EEH not to assume this and elevate its significance to ensure it is made safe, providing appropriate capacity to support our communities now and in future.

In addition to the A34, we would like to see greater support for investment in the wider major road network for Oxfordshire, including the A420 corridor supporting the strong linkage between the Arc, Oxfordshire and Swindon and the Western Gateway. We are also concerned not to see Didcot recognised as a strategic interchange given its importance as a rail hub and area of significant employment and housing growth. Lastly there seems to be no recognition of the strategically important links west along both the A40 and A44 corridors – almost completely ignoring the western flank of the Arc, Oxfordshire and the EEH area. This misses the importance of areas of development at Eynsham, Witney and the significant national infrastructure asset at Brize Norton for example.

More generally, once agreed the Strategy should be written as guidance, we would suggest taking the opportunity to be more succinct. Its length takes focus away from really positive direction, guidance and evidence.

Specific Comments

Vision

The vision statement is more of a neutral attempt to be everything to all things – and really misses what the vision for transport specifically is in the Arc. We do believe the key principles though are strong and could be used to develop a more robust and ambitious transport vision for the region.

Strategic Importance

Inherently it is difficult to show proper comparisons across such a large and varied region. But we do not understand the basis for the table on pages 22 and 23. The language though on page 23 reads more like a spatial strategy and while we agree these matters are very much inter-related, as we have said above, we feel this integration should be between this document and the emerging spatial framework for the Arc and not left to a transport strategy introducing a spatial strategy by default or by stealth as it might appear.

Focussing on Oxfordshire, it is not really clear why Banbury is a regionally significant hub but not an area of economic opportunity; or why Bicester would not be a regional hub or Oxford an area of economic opportunity; or why Westcott features but not Culham, Harwell or Begbroke which are internationally significant? There are many more examples and we would suggest that this perhaps does not add value in its current form and needs rethinking. We have similar concerns around the map on pages 24 and 25.

Policy 12

The introduction of terminology like a northern and southern arc are confusing and it is not clear where that has come from. If it is based on evidence, then why are we not seeing the infrastructure need highlighted already in advance of the Connectivity Studies. These designations seem premature to a spatial strategy and connectivity study evidence base. If these start to represent alternatives to the Expressway, then that should be made clear as we understand both Government and the public would like clarity on what EEH has to say about this.

Policy 23

This reads like, "...if we build it then they will come...". This exemplifies our concern with such a strategy coming directly in advance of a spatial strategy for the Arc and for Oxfordshire as a much wider set of criteria need to be considered in determining how future growth should be best directed and delivered – then look at the most suitable infrastructure needed to support that approach, not fix a movement system and then build to it. This feels even more poorly timed given the societal changes in demand we are witnessing over the past 18 months in response to climate change and now to COVID-19. We understand the Strategy pre-dated COVID-19 but it must be reviewed and take account of evidence evolving around the extent demand for travel will have changed. We believe this policy needs to be removed or substantially changed.

Policy 24

It is not clear why Central Oxfordshire is not on this list. The ambition for mass transit serving Oxford City and the surrounding area has been around since 2015 in LTP4. We would also suggest this should include reference to advanced research available which looks at solutions which are viable and replicable to several towns and cities existing and emerging in the Arc and then exportable to markets beyond our region. Indeed this policy could go much further, or the Strategy benefit from additional support for projects such as Connecting Oxford whereby Local Authorities are seeking to introduce a Zero Emissions Zone.

The "pipeline" for investment reads as more of a wish list and not really developed as an integrated pipeline or programme. This could be more useful if it built on the similar format to the Oxfordshire Infrastructure Strategy (OxIS) bringing more of a programme element to it, providing more information about the critical path to delivery, major risks to delivery, who owns delivery, existing and gap funding, etc.

This list at p.60 and 61 really evidences the point that the focus seems to be on the middle of the region and really shows how the edges appear to be less significant. The list does not reflect what Oxfordshire as a whole has provided for consideration

and should be changed to do so – also staying abreast with the review of our OxIS currently underway.

While it has not been published yet due to COVID-19, EEH are partners in the Oxfordshire Rail Corridor Study and the strategy would usefully address some of its weaknesses in terms of Oxfordshire by referencing its recommendations and recognising the key strategic nature of the Oxford Cordon in its own right not just as part of East-West Rail (EWR). Oxford Station is a national not just regional bottleneck and needs major investment to address not only EWR, but the role it plays on cross-country services. This would also highlight the investment opportunities to support Cowley Branch Line, the Cotswold Line, major track investment, and potential new stations.

Whilst aspirational and hard to argue its merits, we do not understand how the Regional Centre of Excellence gets funded, how it is managed and how priorities for its attention are agreed. It is absolutely agreed that we need more capacity and capability in the Arc to deliver our ambitions and to meet Government expectations for future growth and delivery. We also endorse growing and developing our own but there needs to be much more discussion with a wider set of partners about the form, function, viability and options for such a proposal and whether this is a “centre” or “network” of excellence building on existing statutory structures across the Arc.

We believe EEH, not unlike our Growth Board in many ways, draws its strength from collaboration, evidence building and sharing at scale and networking – it should point to changes in direction and provide technical support for realising that direction change. However, it perhaps should stay clear of policy making which is better placed with statutory bodies. Developing strategic thinking, providing evidence and support and publishing guidance for Local Transport and Planning authorities is welcome and should be the focus in future.