

15th May 2020

James Gagg
Oxfordshire County Council
Infrastructure Strategy & Policy
County Hall
Oxford
OX1 1NG



By email only to LTCP5@oxfordshire.gov.uk

Dear Mr Gagg

Oxfordshire Local Transport and Connectivity Plan

The Cotswolds Conservation Board ('the Board') wishes to make the following comments on the County Council's 'engagement activity' on the Oxfordshire Local Transport and Connectivity Plan (LTCP).

The Board understands that this engagement activity has been presented in the form of 28 topic papers, with the option of submitting comments on these topic papers individually. However, presenting the topics in this way makes it difficult to see how the LTCP will provide a coherent strategy for addressing transport and connectivity issues in Oxfordshire. In addition, the Board's interest in these issues cuts across multiple topics. For these reasons, rather than commenting on the topic papers individually, the Board's comments put forward a number of key considerations and measures that should be integrated into the LTCP as a whole.

The Cotswolds Conservation Board ('the Board') is a statutory body that has two statutory purposes:

- To conserve and enhance the natural beauty of the Cotswolds Area of Outstanding Natural Beauty (AONB).
- To increase the understanding and enjoyment of the special qualities of the Cotswolds AONB.

The Cotswolds AONB is the largest AONB - and the third largest protected landscape - in England, covering 2,038km². It extends into 15 local authorities areas, including five counties and two unitary authorities. It covers 9% of Oxfordshire. Three AONBs – the Cotswolds, the Chilterns and the North Wessex Downs - together cover 25% of Oxfordshire. These three AONBs, together with the rest of the protected landscapes family, are landscapes whose distinctive character and natural beauty are so outstanding that it is in the nation's interest to safeguard them.

This distinctive character and natural beauty makes the AONBs popular places to live and work. It also makes them hugely popular visitor destinations, with the Cotswolds AONB, for example, receiving approximately 23 million visitors per year. However, these visitor numbers - in addition to the number of people that commute (and travel for work) into, out of and through the AONBs – puts significant pressure on these nationally important landscapes.

Given their geographical extent, their national importance and their popularity as places to live, work and visit, the three AONBs should be a key consideration in the LTCP. The LTCP has the potential to play a key role in both conserving and enhancing the natural beauty of

Conserving, enhancing, understanding and enjoying the Cotswolds Area of Outstanding Natural Beauty

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the AONBs and increasing the understanding and enjoyment of their special qualities. One way of achieving this is by ensuring that the LTCP has regard to – and is consistent with – the policies of the AONB Management Plans (see Annex 1) and other, related AONB guidance, such as the Board’s Position Statements on Tranquillity and Transport (see Annex 2). The LTCP also has the potential to play a key role in delivering relevant proposals of the ‘Landscapes Review’ (see Annex 3) and in addressing the climate and nature emergency.

With these points in mind, the Board supports transport and connectivity measures that:

- Conserve and enhance the natural beauty of the AONBs, including their relative tranquillity and dark skies (for example by reducing traffic flows, noise and light pollution).
- Help to halt and reverse declines in biodiversity, for example, through the provision of green infrastructure, contributing to nature recovery networks and ensuring that related development proposals deliver significant net-gains in biodiversity.
- Reduce the need to travel, for example, by facilitating working at home and holding meetings remotely.
- Integrate different forms of public transport, for example, by ensuring that bus services connect with train services.
- Encourage ‘total transport’ schemes which integrate a wide range of government spending on transport.
- Provide effective public transport options for rural communities, for example, through the provision of bus services that enable commuting to and from work at peak hours.
- Facilitate and promote walking and cycling, both as viable commuting options and for leisure purposes.
- Improve health and wellbeing.
- Facilitate and promote car-free visitor experiences.
- Improve the network of charging points for electric vehicles.
- Integrate land use and transport planning, for example, by locating new development close to transport hubs and employment opportunities.
- Increase the proportion of freight that is transported by train.
- Facilitate and promote public transport links between the AONBs and nearby towns and cities, including for marginalised groups.
- Increase the ethnic diversity of visitors to the AONBs.
- Reduce rat-running along minor roads and through villages between major routes.
- Reduce the adverse impacts of heavy goods vehicles, for example, through lorry management schemes.
- Conserve the rural character of the local road network.
- Promote the protection and long-term management of roadside boundaries, verges and habitats.
- Ensure that measures to alleviate adverse impacts in one location (for example, air pollution in air quality management areas) do not adversely affect other environmentally sensitive locations.

Whilst many of these measures are applicable across Oxfordshire as a whole, they are particularly important in the three AONBs, for the reasons outlined above.

As outlined above, the Cotswolds AONB extends across multiple counties, as do the Chilterns and North Wessex Downs AONBs. Therefore, it is vitally important that relevant transport and connectivity measures in the Oxfordshire section of these AONBs integrate with similar measures across these AONBs beyond Oxfordshire.

If you have any queries regarding the Board’s response, please do not hesitate to get in touch.

Yours sincerely,

A handwritten signature in black ink that reads "John Mills". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

John Mills MRTPI
Planning and Landscape Officer

ANNEX 1. RELEVANT POLICIES OF THE COTSWOLDS AONB MANAGEMENT PLAN 2018-2023

The Cotswolds AONB Management Plan 2018-2023¹ sets out a range of policies to guide the management of the AONB. Whilst it is important that the policies should be considered in the entirety, the following policies are particularly relevant to the issues of transport and connectivity:

- CC1 (Developing a Consistent, Coordinated and Landscape-led Approach Across the Cotswolds AONB)
- CC2 (Compliance with Section 85 of the Countryside and Rights of Way Act (the 'Duty of Regard')
- CC7 (Climate Change – Mitigation)
- CC8 (Climate Change – Adaptation)
- CE4 (Tranquillity)
- CE5 (Dark Skies)
- CE10 (Development and Transport – Principles)
- UE1 (Sustainable Tourism)

Many of the measures outlined in the Board's consultation response are adapted from these policies.

¹ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2018/12/Management-Plan-2018-23.pdf>

ANNEX 2. RELEVANT COTSWOLDS CONSERVATION BOARD POSITION STATEMENTS

Tranquillity

The Board's Tranquillity Position Statement² provides key recommendations on how the relative tranquillity of the Cotswolds AONB should be conserved and enhanced. It also provides a wealth of supporting information.

Section 4.5 of the Tranquillity Position Statement, which addresses the issue of traffic and vehicle movements is particularly relevant in the context of the LTCP consultation. Section 4.5 highlights the 'rules of thumb' that are set out in the Institute of Environmental Assessment's 'Guidelines for the Environmental Assessment of Road Traffic' as part of the screening process for Environmental Impact Assessments (EIAs):

- Rule 1: Where traffic flows will increase by more than 30% (or the number of heavy goods vehicles (HGVs) will increase by more than 30%).
- Rule 2: Any other sensitive areas where traffic flows have increased by 10% or more.

Based on these rules of thumb, Section 4.5 goes on to state that:

- *The Board recommends that where a development [inside or outside the AONB] is likely to increase traffic flows – or increase the number of heavy goods vehicles – [on roads inside the AONB] by 10% or more, this should be considered significant. Such development proposals should require a Transport Assessment and, where appropriate, a Transport Plan and / or an Environmental Impact Assessment (EIA).*

Transport

The Board's Transport Position Statement³ sets out the actions that the Board will take to address transport issues in the Cotswolds AONB. In summary, the Transport Position Statement states that the Board will:

- pursue and support positive management measures which will conserve and enhance, and prevent further harm, to the natural beauty of the AONB. These measures would deal with increasing traffic, including reducing rat-running along minor roads and through villages between the major routes;
- pursue and support Lorry Management schemes;
- pursue and support sensitive traffic calming ("shared space") schemes in villages and off road cycling and horse riding routes;
- continue to encourage greater bus use by the provision of information coordinated across the AONB;
- support bus- rail integration.

² <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2019/06/Tranquillity-Position-Statement-FINAL-June-2019.pdf>

³ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/08/transport-2013.pdf>

ANNEX 3. RELEVANT PROPOSALS OF THE 'LANDSCAPES REVIEW'