**To:** Planning, OXFORD CITY COUNCIL re Planning Application 18/03330/OUT

**From:** Cowley Area Transport Group

c/o 53 Bulan Road Oxford OX3 7HU – 16th January 2019

Contacts for this submission: Hazel and Steve Dawe at the above address: [stevedawe@gn.apc.org](mailto:stevedawe@gn.apc.org)

**SUBMISSION IN OPPOSITION TO PLANNING APPLICATION 18/03330/OUT**

The Cowley Area Transport Group covers Lye Valley-Temple Cowley-Cowley and promotes sustainable transport modes in this area. It has done two major publications so far: the *Cowley Area Transport Strategy* – 2nd edition 2018 – and *Electronic Road Pricing for Oxford.* Both of these are available from this informal grouping, see contact details at end of this submission.

This planning application proposes to remove a sports ground and place 102 housing units in an area characterised by very serious traffic congestion in rush hours, and exacerbated by school run traffic associated with the Tyndale School. The eastern part of Barracks Lane that is open to road traffic, William Morris Close and Turner Close are all subject to the impacts of the school run in particular in school term times. This makes this area highly unsuitable for any more development likely to generate traffic.

Comments on the Transport statement - <http://public.oxford.gov.uk/online-applications/files/7A64151F4B9B717C60076D22966C4CA0/pdf/18_03330_OUT-TRANSPORT_STATEMENT_-_DEC_18-2065974.pdf>

1.3 The applicant’s consultant suggests previous applications for this site have not been the subject of highways related objections, at least from the Council/other statutory bodies. We submit that they should have been, and that the opening of the Tyndale school makes these of more significance, given obvious school run-rush hour problems in this area. Tyndale school parents have already complained to their local councillors that they have trouble exiting from Barracks Lane onto Hollow Way at school run times. We have observed the phenomenon of traffic jams in Barracks Lane at school run times.

5.1 The presence of 88 unallocated parking spaces indicates that the major problem of this development will be the movements of vehicles to and from these spaces at school run and rush hour times. In consequence, the car free housing element of these housing units should be 100% in order to restrict any vehicle movements to public utilities, taxis and deliveries, if the City Council decides to permit this application at all.

5.4 Low levels of car ownership in Oxford do not justify confidence in no traffic impacts from this development.

5.6 A Controlled Parking Zone covering this area alone would not be adequate. If the development occurred at all, it should be car free and this requires that it is ringed by Controlled Parking Zones. Since it is consistent with the Local Transport Plan that Oxford should have uniform Controlled Parking Zones, it should be possible to introduce them to protect residents from unwanted vehicle parking.

5.7 Bike storage for 2 bikes for houses in this development assumes none of these homes become HMOs in the medium term. Since this is quite possible, bike storage would need to be larger. A completely car free development allows more space for cycle storage and indeed homes, on any given site of which car parks are a neglected resource in Oxford: it is possible to build around and above the surface level of private and public car parks to create the very low cost housing that is a primary social need in the City.

7.1-7.6 There are a number of problems with these points. First, the Tyndale School has not reached its full capacity yet; second, projected traffic growth overtime – particularly for Hollow Way – needed to be considered and does not seem have been, preferably for the lifetime of the homes proposed.

8.1 Site sustainability: Assessment of this would need to include the planned lifetime of these homes and projected traffic increases over time. This is not provided.

8.13 A five year observation of a travel plan takes no account of the lifetime of the homes being constructed and projected traffic increases over that far more relevant period of time. Meaningful transport impacts of development require that the long-term be incorporated into planning considerations, not least because it can mean – as in this case – a planning application should be refused on long-term traffic grounds.

9.1 Conclusion: Since the conclusion does not take long term traffic into account, we judge this traffic assessment to be inadequate as a guide to making a planning decision.

There are, however, other areas of concern:

**ONE: Air pollution:** The proposed Zero Emissions Zone, although opposed by the bus companies and taxi companies, is part of the City’s response to the air pollution that causes about 40,000 premature deaths in the UK each year and thousands more people suffering from conditions related to poor air quality. Not only should any parking allowed in this development have electric charging points, but this adds to the case for a car free development so that air quality around the Tyndale School is in no way worsened by such a development.

**TWO: High risk of the Cambridge-Oxford Expressway taking an eastern route around Oxford:** It is really remarkable that the Traffic Impacts considered do not include the Cambridge-Oxford Expressway. Whilst the precise route of the Expressway has yet to be decided, we accept the judgement of the Horton cum Studley Expressway group that it could be down the Eastern side of Oxford. This would be very likely to mean connections to the Bypass Road, with a new source of traffic pouring vehicles into bottlenecks within east Oxford via Horspath Driftway or Garsington Road. This would add to traffic congestion and air pollution. But any significant increase in traffic will hit a number of obvious bottlenecks such as the capacity of the Corner House roundabout at the top of Hollow Way, and the narrow section of Hollow Way below where parking spaces serve local shops; the Old Street-Windmill Road junction; the Garsington Road-Hollow Way-Between Towns Road-Oxford Road staggered junction. We agree with the No Expressway Alliance that there is no acceptable route environmentally or in transport terms for the Expressway, or indeed any new trunk road which will lead to induced traffic: more journeys of greater length on new road infrastructure. The additional traffic along Hollow Way would considerably reduce the ability of cars to exit from Barracks Lane.

**THREE: Risk to cyclists making use of the shared-space sections of Barracks Lane, with pedestrians:** Barracks Lane is a major cycling route and cyclists already share road space with cars at the Eastern end of Barracks Lane.Walking and cycling in the area will be enhanced by keeping traffic to the lowest conceivable level, serving the interests of local residents as a high priority when they wish to use cars. We regard ANY increase in vehicles in this area at any time of day to be unacceptable, and a ground for refusing this planning application.

**FOUR: Junction capacity at Hollow Way:** This does not, curiously, seem to have been tested and the slightly staggered nature of the junction with Horspath Road and Barracks Lane should have been a major consideration in ruling out traffic generating new development at the William Morris Recreation Ground. In addition, the junction is already not coping well with the school run traffic. In terms of considering overall impacts, junction capacity in nearby areas should have been a consideration including the at-capacity Old Road-Windmill Road junction, the Corner House roundabout at the top of Hollow Way, and conditions in school run times in the southern part of Hollow Way; similarly, the hugely problematic Garsington Road-Oxford Road-Hollow Way-Between Towns Road should have been considered. The failure to look at traffic conditions over a large enough area, or over a long term time span are serious weaknesses in putting forward this planning application.

**FIVE: The Climate Emergency:** All planning applications should take into account the current UK legislation and goals on Climate Change. Both the UK Government and the Committee on Climate Change are looking at new, and we may assume more challenging, national targets at present. Also, local authorities and minor councils are adopting carbon neutral target dates for their whole area such as 2030. This means any application for any new development should be assessed, as part of climate impacts, for how transport-related emissions can be reduced as part of local and national strategies. This planning application mentions sustainable transport modes, but this does not ensure emissions reductions which are essential. Consequently, we judge that this is a planning ground of objection and a justifiable basis for delay to any development being agreed until carbon neutral transport implications are as much guaranteed for this area as they should be for any new housing built anywhere.

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