TO: Oxford City Council

From: Steve Dawe

February 2020

**PERSONAL SUBMISSION: OXFORD CITY PLAN CONSULTATION**

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*This is a PERSONAL submission.*

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**PERSONAL SUBMISSION: OXFORD CITY PLAN CONSULTATION**

**Introduction:**

This is a 2nd edition of my submission to the Oxford City Plan since it remains unfit for purpose. Since both Oxford City Council on 28/1/2019 accepted that there is a Climate Emergency and the UK Parliament accepted that there is a Climate Emergency on 1/5/2019, the Oxford City Plan draft should have been modified in many respects to reflect this. In short, the City Plan remains inadequate in relation to the tests of soundness it must meet. Whilst Government policy suggests a carbon neutral UK by 2050, this is not consistent with the idea of a Climate Emergency so there is an apparent contradiction within Government, and between it and local government units aiming to be carbon neutral as councils or whole communities by a variety of dates.[[1]](#footnote-1)

The Scrutiny Committee of Oxford City Council examined the draft Oxford Local Plan 2036 at its meeting of 8th October 2018. See that draft, from page 27, at: <http://mycouncil.oxford.gov.uk/documents/g4532/Public%20reports%20pack%20Monday%2008-Oct-2018%2018.00%20Scrutiny%20Committee.pdf?T=10>

On the same day, the Intergovernmental Panel on Climate Change (IPCC) released its latest report. The effect of the latter upon the former is that the current draft Oxford Local Plan 2036 is significantly outdated in respect of the serious Climate Emergency which the IPCC has detailed in its 700pp report.[[2]](#footnote-2) In consequence, systematic and extensive revisions to the draft Oxford Local Plan are needed if it is to be relevant to the wide variety of intensifying Climate challenges in the period which the Plan is intended to cover. Essentially, this can be considered ‘future proofing’ throughout the Plan with references to how the Climate Emergency is to have policy effects in virtually all sections of the Plan. Current modifications, whilst subject to the limitations and contradictions in national policies, lack dates indicating particularly when the entire Oxford City area is to become carbon neutral. In addition, it is vital that Climate concerns are integrated into and are made explicit throughout the Plan so that the Climate Emergency is the over-arching policy priority for Oxford. Without this, there will be serious damage to the ecology, economy and society within Oxford.

Utilising the draft Oxford Local Plan as presented to councillors on 8th October 2018 (see reference above), I am re-affirming amendments needed so that the resulting Local Plan is not out of date when issued. These amendments go far beyond the current Modifications proposed. Each amendment can be considered to be challenge to the City Plan’s compliance with the ‘tests of soundness’ that are part of the NPPF, namely that the Plan and everything in it should be:

* Positively prepared: – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
* Justified: – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
* Effective: – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
* Consistent with national policy: – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.”

Page references used below refer to the draft Local Plan as paginated in the Scrutiny Committee papers. To assist amendment, policy revision or identified needs for policy research, this submission tries to make clear where the City Council could act or would need to take an advocacy role in respect of engaging all employers and more households and individuals in actions commensurate with achieving the goal of a carbon neutral City no later than 2030. As the IPCC report mentioned above suggests, actions taken up to 2030 are critical to averting dangerous Climate Change meaning worsening observable effects of human induced Climate Change compared to recent decades.

We may all note that Copenhagen plans to be carbon neutral by 2025, so there is no reason why Oxford should not move away from inadequate targets which are using 2050 as a time frame.[[3]](#footnote-3) US municipalities facing a Climate Change denying Administration are setting their own Climate goals: Oxford should do the same to ensure that its future development is actually sustainable rather than merely being the unsustainable Climate-ignoring economic growth of earlier times. This means considering and developing means for the City of Oxford becoming carbon neutral at the earliest possible date, and certainly no later than 2030 just as Bristol and Stroud have done – not just planning for the City Council to be carbon neutral in its activities alone by 2050 [now to be much earlier due to more recent decisions]. This means, in practice, dispensing with uncritical, unsustainable and generally unexamined notions of conventional economic growth. The latter is not consistent with achieving sustainable development in terms of resource use and it should be noted that a wide variety of national government documents insist sustainable development is national policy,[[4]](#footnote-4) ecological impacts and the Climate Emergency. This means a rewrite of policies implying growth in Oxford in any sense, bearing in mind what would be actually ecologically sustainable and therefore meet long-term economic, social and cultural needs. In other words, **the current draft plan does not meet the first and fourth tests of soundness listed above.**

At this point, I note some other concerning omissions from the draft Oxford City Plan:

The complete ecological footprint of Oxford has to be considered to determine its progress towards reducing greenhouse gas emissions. This is consistent with the national policy of pursuing sustainable development in the UK Sustainable Development Strategy, as well as a reasonable interpretation of Government Climate goals. Oxford’s footprint includes aviation use by people resident in or visiting Oxford, for any part of their journey to and from the City; this includes shipping and conventional road freight serving the City. Without good baseline information, no one can give adequate evidence about greenhouse gas emission reductions (or increases) resulting from Oxford in all relevant sectors.

The issue of resilience is missing from the Local Plan. Apart from the possible impacts of the Climate Change crisis upon food supplies, there are also long term issues about the water, food and other physical resources the City is using and intends to use in future. Resilience is primarily an ecological concept critical for achieving sustainable development and important for assessing how humans and other species can and do deal with extremes of Climate. But resilience can also be considered to be about the capacity to withstand economic shocks, like ‘hard Brexit’ scenarios. In practical terms, the City Plan needs to consider – in each policy area – what capacity the City Council and those it is in contact with, or in partnerships with, can contribute means and skills to assisting the City in carrying out both essential and desirable functions under conditions of crisis. Responses to the Hurricane of 1986 and 7/7 indicate how councils and services supported by the public can respond to extreme pressures. In short, this is an upgrade to conventional Emergency Planning which ought to feature in the draft Local Plan. In so far as this all has yet to be done, the draft plan is not ‘positively prepared’ in respect of the first test of soundness.

Related to the concept of resilience is the ‘urban heat island effect’ which is not mentioned in the draft Local Plan. In brief, this refers to urban areas being warmer than rural ones due to reflected heat. The areas where this is most significant are the same central locations in Oxford in most need of more trees, fountains and pedestrianisation to make them more liveable spaces eg Broad Street, Cornmarket and the High Street. Fundamental changes need to take place to reduce vehicle movements in central Oxford to make it a better place to live, work, visit and study. The absence of resilience means the current draft of the City Plan does not meet tests of soundness one and four concerning sustainable development.

We should all recognise that the type of Brexit deal that may be obtained has implications for the resilience of Oxford. Since each of the Government’s impact studies on Brexit indicate an economic contraction [except for the one on tourism], economic resilience is also a question. How robust is the economy of the City under recession and what are the implications for what appear to be largely unsustainable conventional economic growth aims? Plans concerning higher levels of infrastructure spending by Government may be set aside or delayed under Brexit recession conditions, bearing in mind that all [bar one of] the Government’s impact studies for Brexit suggested a level of impact on the economy meaning a recession will take place. For the Plan to have been ‘positively prepared’ it really needed to recognise the potential negative aspects of Brexit, so this does not meet a test of soundness.

Water supply as population rises is not addressed in the Draft Plan. I am concerned about the extent of water industry engagement with addressing rising population needs.[[5]](#footnote-5) I am concerned that new and refurbished development does not include grey water recycling, as part of a wider campaign to cut water wastage, just as there is no commitment to ensure all new homes are carbon neutral in construction, and in operation when occupied. This is, once again, represents a failure to consider sustainability adequately under the ‘tests of soundness.’

A foundation of this draft local plan is the expectation of a very considerable amount of construction work in the City from now to 2036. However, the UK construction industry is in a combined recruitment-retention-retirement crisis.[[6]](#footnote-6) Comments on the Oxford-Cambridge Expressway corridor already sent by me to many City councillors include the following:

“Skills shortages in the construction industry are at a record high this year.[[7]](#footnote-7) From 2013 onwards, the retirement estimate for UK construction workers aged over 55 is 400,000 people during the following 5-10 years; for those aged 45-54, the estimate was that a further 518,000 people would retire. For self employed construction workers, it was also estimated that about 182,000 would retire during the same period.[[8]](#footnote-8) The 16-21 age group is under 6% of our construction workforce and the industry needs about 400,000 new entrants each year, at a time when EU-origin construction workers are tending to return home.[[9]](#footnote-9) This replenishment by young entrants into construction is not happening at the needed scale, perhaps because financial support for students for doing apprenticeships and further education courses is too low. The industry allegedly ‘grows’ - as the Government has noted how 100,000 construction jobs were added in England in 2015 alone[[10]](#footnote-10) – but this does not accurately portray the actual current situation or compensate for losses to retirement and others leaving the industry, or the country. The Government is cutting back financial support for part-time students as well. The above figures also do not take into account shortages of civil engineers or planning officers in local government, both essential for implementing new housing and the provision of associated infrastructure. Our councils, like our Government, need to consider how best use may be made of the existing built environment in areas of high pressure demand for homes. We simply do not have, and are not likely to obtain in the foreseeable future, the much larger number of skilled construction workers needed to build many new homes.”

In short, we should all be exceptionally sceptical about construction delivery on the scale suggested throughout the draft City Plan. But we should also be sceptical about proposed modifications which do not, in themselves, guarantee a sustainable approach to construction.

Government hostility to migrants is currently prejudicial to meeting skills needs in construction and elsewhere; the Malthouse plan for an extra 300,000 homes in Oxfordshire, to double the County’s homes, is even more questionable and I note the bemused and less than compliant responses of Oxfordshire’s local authorities to this idea – which are entirely constructive given the utterly implausible housing delivery figures Mr Malthouse appears to believe he can wish into existence.

With regard to the GL Hearn update of the SHMA evidence for Oxford,[[11]](#footnote-11) I note the CPRE analysis from a recent newsletter:

“Oxford City – new SHMA update from GL Hearn appears to reduce Oxford’s need dramatically

“……………This includes proposals to take a number of sites out of the Green Belt, totalling approx. 800 dwellings, and CPRE will of course be challenging these.

“However, the more existential threat to the Green Belt is the City’s continuing expansionist tendency, with a failure to meet its housing need within its own boundaries, looking to its neighbours to pick up the slack (ideally through urban extensions).  CPRE’s case is that the City could meet this need if it prioritised land for housing, rather than employment, and built at a density appropriate for city living.

One of the most interesting documents to emerge is an [update to 2036 of the Oxfordshire Strategic Housing Market Assessment](https://www.oxford.gov.uk/downloads/file/5096/shma_update_to_2036) by its original authors GL Hearn.   This appears to bring Oxford’s objectively assessed need (OAN) down from 1,400 to 776 dwellings per annum.  We must obviously bear in mind that the OAN is a floor, not a ceiling – and their argument that the higher figure is required to support the Oxfordshire Housing & Growth Deal will no doubt be viewed as significant.  However, this is certainly a strong point to challenge as it is Oxford’s OAN that is driving the vast majority of the current Green Belt allocations.”

Since this is part of the evidence base for the draft City Plan, its accuracy is critical. However, the extent to which it stresses uncertainties is a major question about how it then becomes useful as guidance for policy. There is a general problem of consultants: evidence seen as ‘good’ from the client’s point of view is stressed; evidence ‘bad’ from the client’s point of view may not get the attention it deserves; deficiencies may occur if the consultant is not briefed – eg in this case on sustainability as a key factor and the need to take into account the implications of likely increases in targets for cutting carbon emissions. Or to put it another way, a sustainable Oxford is going to need system change in the attitudes of officers and councillors going far beyond both Sustainability Appraisal and proposed further studies.[[12]](#footnote-12) A Climate Emergency requires emergency responses for sustainability. As an example of how the housing evidence mentioned above is not necessarily a guide to policy for the City Council, bearing in mind both practicalities and Climate Emergency imperatives for action, here are some other points about this document:

Page 9: para 1.5

Refers to ‘housing market area’ and ‘scale of housing supply necessary’. However, there is no evidence in the report of how demand measurement caters for those with a need for very low cost housing who may not be captured by official measurements. *Crisis,* in recent research, has demonstrated a new estimate of 24,000 people sleeping rough in the UK which is twice the Government’s figure.[[13]](#footnote-13) *Shelter* puts the total of homeless in the UK at 320,000.[[14]](#footnote-14) This will include, in Oxford, those who cannot afford market home prices and struggle with Oxford private rents. In the absence of reliable and national systems of capturing this demand via very inclusive council house waiting lists, and in the absence of clarity about migration to and from Oxford in the long-term due to Brexit, and in the presence of the critique prepared by Alan Wenban-Smith of the 2014 SHMA for CPRE,[[15]](#footnote-15) projections of housing demand should always be treated with extreme scepticism. I cannot see how meeting the demand from landlords for more housing for them to purchase and then offer at exceptionally high Oxford rents helps resolve the local housing problems; I cannot see how the currently permitted purchase of homes by foreign-based property speculators helps with actual local housing needs either.

Para 1.7

‘Growth strategies’ depend upon two key things: one, the Government ignoring the needs of the poorest regions and district council areas to lavish funding on wealthy areas; two, an exceptional improvement in the currently very likely scenarios of a botched Brexit. The over-optimism of the report is not justified on either count. ‘Positive preparation’ requires a degree of realism about the real economic context since 2010 in particular.

Page 12: Para 1.17

Questions of methodology arise: demographic growth and changes in population composition are certainly present in Oxford. However, the idea that there is local ‘affordability’ is absurd: far too many income groups cannot afford to buy homes; private rents are crippling households and individuals and promoting losses of key workers such as nurses and teachers, causing shortages in the City. ‘Deliverability’ for whom? A very high income and/or wealthy group? Foreign property speculators? Private landlords? If the City Council is serious about meeting real demand from individuals and households, it must seek to provide very low cost housing by all available means – especially by the purchase of housing on sale for social housing.

Page 13: para 1.20

It is good to see any document under use by the City Council admit to a decline in household formation projections.

Para 1.25

I think we should all be concerned about housing projections which incorporate references to migration. Whilst it is certainly appropriate to consider students as being outside migration figures – unlike current Government policy – the current Government is committed to reducing net migration figures, and is consulting about its plans for a point-based system at present. Business organisations have been very quick to condemn these proposals on grounds of failures to address employment needs from abroad whenever necessary. The overall ‘hostile environment’ for migrants, no matter how well qualified, is clearly deterring some EU and non EU migrants from entering the UK, with implications for continuing skills shortages. The raised hate crime figures, highlighted by groups such as *Hope Not Hate* and *Tell Mama,* indicate continuing effects of the Brexit vote on enhancing outward and open expressions of various types of intolerance. Such figures contribute to the image of intolerance in this country which may be deterring migrants. The current conditions suggest the element of housing based upon inward migration for extended periods or long-term settlement, excluding students, should be prudently reduced. We should all, also, be very concerned about how Oxford will recruit and retain for the many types of workers it needs for the future, bearing in mind the turnover in the population annually.

Page 14: para 1.27

Jobs forecasts are not contractual obligations or Government policies which are implemented. And any jobs growth depends upon remaining in the EU since the Government’s Brexit impact studies suggest some economic contraction - of between 2-8% of GDP.[[16]](#footnote-16) So, this paragraph, like the economic references throughout this document is far, far too optimistic about economic growth as if current conditions very likely to influence growth can be ignored. And the report is woefully bereft of references to sustainability as a key factor in determining the worth of new development. Since sustainability is mentioned in two of the four tests of soundness, this makes any document informing the draft Plan which does not include a clear, reasonable and specific framework of policies related to achieving sustainability not appropriate as a basis for decision-making and not a ‘positive preparation’ in terms of the tests of soundness. Take, for example, the possibility of carbon neutral housing as a goal, requiring skills enhancements to ensure new build and refurbishments meet this target. Unless there is a surge in modular or system built homes incorporating required efficiency features and reducing the need for construction labour, combined with an exceptional rise in relevant skills, it is difficult to see how this scenario might not slow down housing completions during a transition period in the construction industry of currently unspecified length. But the report behaves as though houses were houses, no matter how low the standard of building or space per person – which is in conflict with the idea of meeting sustainable development criteria suggested in two of the tests of soundness.

Page 15: paras 1.30-1.32

Given actual social housing completions in the last 7 years or so in Oxford, it is difficult to see how 1029 actually affordable homes will be provided per year without both an end to national austerity and an extraordinary surge in the availability of construction labour and skills. Market housing at 80% of market value is not affordable, especially if sold to landlords for renting at extortionate typical Oxford rents. The idea that this is ‘affordable’ is quite meaningless. This document should have offered guidance on how very low cost housing units could be provided – such as direct purchase by the City, handing over industrial estate and car parks to dual use for housing etc. Sustainable development contains within it economic, political, environmental and social elements and some would argue cultural as well. Social sustainability implies social solidarity in the sense that the needs that many people in Oxford have for very low cost housing should be met, not least to retain their skills in the City. The tests of soundness referring to sustainable development are not met bearing the social aspect of this concept in mind, since housing costs are too much for many, and the loss of nurses and teachers to cheaper areas is a particularly damaging feature of local housing conditions and community sustainability.

Page 16: para 1.43

Nowhere does this document make clear how skills shortages which inhibit housing refurbishments and completions are going to be realistically addressed. Cutting inward migration as the current Government prefers will not help. Similarly, completions in market housing rely upon rising home prices so the discredited 100,000 homes by 2031 is hardly helped by declining home prices in the SE quadrant of the country as at present, which are bound to slow housing completions – illustrating the basic failure of market housing as a means of meeting actual housing demand from households at prices they can really afford.

Page 18: para 2.3-2.7

‘Market signals’ are not evidence of actual housing need, only of ability to pay by people with the necessary resources. As such, they do not meet the needs of most households – especially not in ‘over-heated’ Oxford. The fantastical figures of 300,000 homes being built per year by the mid-2020s in the UK, rather like the 1 million homes destined for the Cambridge-Oxford Arc as a kind of outlying M25 corridor of commuter housing, have no basis in skills availability either present or forecast. Anyone can play Monopoly, but conjuring skilled construction workers from the rest of the Planet for the UK has not worked to date to prevent skills shortages and seems even less likely to do so in future, with UK growth close to flatlining before the effects of actual Brexit.

Page 19: para 2.13-2.14

The extreme uncertainty about housing projections, when combined with Government housing projection figures apparently plucked out of the air, makes meeting realistic housing needs in Oxford a matter of setting aside such projections in search of the real housing needs of first, those who live here, particularly in lower income groups, and second, others who may arrive here with intent to remain. The report does not attempt to do this, making it less than useful.

Pp 25-26: para 3.18

The lower age groups of adults in the City, with a propensity to be transient, are also groups least likely to be able to afford to buy homes or to keep on paying excessive private rents. Without really fundamental changes in law, access to housing, overall resources for housing, etc these groups are highly likely to move away from Oxford taking their skills with them, under current conditions. Measurements of income offered in the report suggest capacities to pay for mortgages which appear not to take into account student loan liabilities and other debts incurred whilst studying, the unpredictable impacts of rising food and energy bills, and the need to consider jobs in other locations because of competition for many jobs in Oxford.

These are just a few critical comments on this report.

Finally, the Cambridge-Oxford Expressway and the potentially devastating environmental and traffic effects is not taken into account in the draft Plan. Casual mentions of this possible planning disaster are made, without assessment. Commuter traffic increases caused by the Expressway if ever built are in conflict with the County’s Local Transport Plan, as are major developments likely to add significantly to both air pollution and greenhouse gas emissions in the City. The draft Local Plan, to be consistent with other national, City and County policies, and indeed national ones, has to rule out the Expressway. Any modest notion of sustainability rules out trunk road development in principle, and such development cannot meet support from any of the tests of soundness either.

To be specific:

The Local Transport Plan for Oxfordshire emphasises goals such as:

**“**2. To reduce emissions, enhance air quality and support the transition to a low carbon economy.

3. To protect and enhance the environment and improve quality of life (including public health, safety and individual wellbeing)”

&

“Goal 2:

Reduce emissions, enhance air quality and support the transition to a low carbon economy

Minimise the need to travel;

Reduce the proportion of journeys made by private car by making the use of

public transport, walking and cycling more attractive;…”[[17]](#footnote-17)

There is no way that these goals or the rest of the Oxfordshire County Transport Plan can be reinterpreted to permit the Cambridge-Oxford Expressway. Support given by councils or any other body to the Expressway contravenes the Local Transport Plan and makes a nonsense of devolved decision making in the interests of the local communities which will suffer if this project goes ahead. There is no prospect whatsoever of the Expressway and associated corridor development being sustainable in all aspects, or carbon neutral in all aspects, despite the Climate Emergency.

The Expressway as a potential impact upon the Oxford transport system, air quality, land use and any possible notion of sustainable development is emphatically an attempt to breach all of the tests of soundness and cannot be contemplated as acceptable infrastructure for Oxford (or Oxfordshire) in future years.

With regard to national constraints, I refer to the recently amended National Planning Policy Framework (NPPF) released recently.[[18]](#footnote-18) Local Authorities must strive to achieve sustainable development. Details of how this is to be done include reference in the NPPF to resolution 42/187 of the United Nations detailing the responsibilities of Governments in relation to their associated agencies and other bodies.[[19]](#footnote-19) It specifically requires that growth is fundamentally changed towards actions consistent with the principle of sustainability. The draft City Plan refers to growth but in a manner reminiscent of documentation prior to the 1987 publication of *Our Common Future –* by the World Commission on Environment and Development,[[20]](#footnote-20) which promoted the concept of sustainable development into general use. In short, I reiterate, the draft Plan breaches the first and fourth tests of soundness.

In respect of the above comments, I feel amendments to language and content throughout the draft Plan are needed to ensure the draft Local Plan is up to date and effective for the period up to 2036. If this is not done, then the Draft will retain its out of date character and not be fit for purpose since it does not meet the tests of soundness overall.

**AMENDMENTS INDICATING SOME KEY ADDITIONS TO THE LOCAL PLAN:**

**This Oxford City Plan integrates policy measures integrating Climate Change as a major concern in all sectors, with a view to achieving a carbon neutral City by 2030.**

**“In plan-making, planning officers and Inspectors should be encouraged to consider the following questions: Has a greenhouse gas emission audit been completed to enable the progress of the plan against this commitment to be measured?”[[21]](#footnote-21)**

**An ecological footprint incorporating all processes and movements concerning the City will be established as baseline evidence. This evidence will be used to determine City progress towards reducing its overall ecological impact annually.**

**Ecological and economic resilience will be regarded as high priority considerations in City Council activity and in coordination with other actors.**

**The City Council recognises that numerous factors influence whether large scale construction takes places in or around the City. Specifically, the Council will seek Government assurances that more will be done to support the creation of a larger UK-based construction labour force with appropriate skills to meet existing skills shortages. The City Council recognises that the current levels of skills shortages make already problematic housing targets highly unlikely to be achieved. In addition, the City needs to establish what the water supply implications of additional housing in the City are going to be, since no Strategic Environmental Assessment of the capacity of water supplies to meet projected housing targets for the County has been done.**

**Oxford City Council recognises that the proposed Cambridge-Oxford Expressway is in conflict with the Oxfordshire Local Transport Plan and should therefore be abandoned.**

I note and commend the following:

**“**Friends of the Earth promotes the following sustainable development principles in land-use planning:

* **environmental justice:** putting people at the heart of decision making, reducing social inequality by upholding environmental justice in the outcomes of decisions; (*empowering people to shape their surroundings, para 17, NPPF*)
* **inter-generational equity:** ensuring current development does not prevent future generations from meeting their own needs; (Ministerial Foreword: *Sustainable means ensuring that better lives for ourselves don’t mean worse lives for future generations.*)
* **environmental limits:** ensuring that resources are not irrevocably exhausted or the environment irreversibly damaged. This means for example, supporting climate protection by reducing harmful emissions, protecting and enhancing biodiversity and promoting the sustainable use of natural resources; (*e.g. support the transition to a low carbon future in a changing climate, para 17, NPPF)*
* **resource conservation:** ensuring that planning decisions assist in the prudent and sustainable use of finite natural resources; (*e.g. use natural resources prudently, para 7, NPPF)”[[22]](#footnote-22)*

**Comments on the draft City plan**

***Page references as in papers of Scrutiny Cttee of OCC held 8.10.2018***

Para 5 p.29

The Employment Land Assessment 2018 suggests there is higher demand for employment land than the current supply. However, later in the draft Plan the low density of various types of existing employment sites is mentioned in several places including both hospital and other designated employment sites. This appears to be contradictory. The City Council’s first employment goal should be to make sure existing employment land has a higher density of employees by supporting, as is its stated intent in the Draft Plan, planning applications which achieve this. Following such a policy would mean brownfield employment sites can be designated for very low cost housing initiatives including social housing and keyworker housing which are amongst the Plan priorities. But we should all question why the City Council places such emphasis on employment land in the City rather than for social and keyworker housing needs that are nowhere near being met and are indeed barely being addressed in recent years, bearing in mind how few units or either are being built or acquired by the Council through purchase. With regard to the tests of soundness, the neglect of social and keyworker housing is not justified, not socially sustainable and nor is it an indicator of the Plan being ‘positively prepared.’ This is, other than neglect of the Climate Emergency, the most serious failure of any type in the draft City Plan.

**AMENDMENT:**

**The City Council will work with employers to ensure housing is added to local employment sites, including employer-linked developments, with an emphasis on very low cost homes.**

I note the point at the end of this paragraph about warehousing space that is not job intensive. I would add that it tends to be ‘land use intensive’ so existing locations with warehousing need to be far better used to encourage higher levels of employment per hectare.

**AMENDMENT:**

**The City Council will oppose planning applications for new warehousing in the City and look favourably upon new development proposals that intensify employment on existing warehouse-industrial estate-Science Park sites.**

Para 6 pp29-30

Reference to the discredited Strategic Market Housing Assessment (SHMA) undermines the evidence base of the draft Plan. Subsequent ONS evidence suggests lower levels of household formation that the SHMA envisaged and the City has yet to develop a policy which addresses the issue of under occupation at 73% in Oxfordshire’s homes which the SHMA identified in 2014. Reference to the SHMA is a sign that the draft plan has not been ‘positively prepared’ under the tests of soundness. I am keen to see the City taking every opportunity to use the existing homes and built environment for housing, retaining land for biodiversity, forestry and food amongst other uses. I am concerned that the Plan as written takes no account of the evident loss of EU citizens that is occurring as this is written, with both skills and housing need implications for the future.

**AMENDMENT**

**The City Council recognises that the Strategic Market Housing Assessment published in 2014 was not accurate as an assessment of actual housing demand. The City Council recognises that the home construction aspirations of the Government and other bodies such as the National Infrastructure Commission are unlikely to be met given construction skills shortages. In consequence, the City Council will concentrate its efforts in the housing sector to meet demands for very low cost housing on brownfield sites, using the existing built environment whenever possible.**

I cannot see how the capacity of land to meet housing needs can be found to be limited in the City until the full height potential of each brownfield site found suitable for housing is considered. Similarly:

Assessment of land available to meet housing need in the City is not complete until all private and public car parks are designated as potential dual use housing and car parking sites. At present, vast areas of the City are covered with these seriously under-used spaces that are in many cases empty at night. This is a basic inefficiency in the use of urban spaces. It is also a failure to be ‘positively prepared’ under the tests of soundness.

All of these considerations relate to higher density uses of existing urban spaces that councillors and councillor officers have yet to address effectively. This is not a ‘justified’ position with regard to the tests of soundness.

**AMENDMENT:**

**Assessment of potential housing delivery in the City will include establishing where tall apartment blocks of varying heights may be established, and how many homes of different sizes they may accommodate.**

**AMENDMENT:**

**The potential contribution of dual use private and public car parks as both parking and housing sites is very large over the Plan period. The Council will undertake such initiatives on sites it owns, including Park and Ride sites, and press owners of privately-owned car parks to take advantage of the economic benefits to them of housing construction – including employer-related homes for keyworkers.**

Para 9 p.30

Carbon emissions from new homes and retrofitted homes should be such that each home can be shown to be carbon neutral, or at least Passivhaus standard, by the earliest possible date and no later than 2030. The suggested target of emitting 40% less carbon dioxide is far less than technologically possible and should be abandoned. This is an indication that the draft City Plan has not been positively prepared as part of the tests of soundness.

**AMENDMENT:**

**New and refurbished homes should be carbon neutral or specifically *Passivhaus* standard in Oxford from 2020.**

p.31

The fusion of green and blue infrastructure is welcome in principle, provided there is year on year evidence of policy delivery. This involves ensuring major landholders are committed to the local plan.

Para 15 p.31

All people with the slightest environmental inclination reject the allocation of any Green Belt site to another purpose. Building on Green Belt is unnecessary and is in direct conflict with the stated approach of the NPPF to the Green Belt and in consequence cannot be seen as meeting tests of soundness mentioning sustainable development. As indicated above, Oxford’s car parks have yet to be allocated to dual use to include housing and long term empty employment sites should be reconsidered for housing use also. More generally, I regard the use of greenfield sites as unacceptable until the full potential of all brownfield sites, including car parks, is realised over the coming decades along with full implementation of development in areas where no pressing objections to increases in height of buildings seems apposite. Failure to do this raises questions of what meeting the tests of soundness mean in terms of achieving sustainability, as two tests in the list of four suggest.

**AMENDMENT:**

**Oxford City Council recognises that the need for retaining greenfield sites and Green Belt is even greater under conditions of potential population increase in Oxford than ever before. The City Council recognises the multiplicity of uses of greenfield sites and Green Belt land other than using it for development, and will conduct its planning processes accordingly.**

**AMENDMENT: [BOLD TEXT ONLY]**

I commend the following:

“Friends of the Earth recommends the following DRAFT policy for inclusion in core strategies:

**When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development and the definition of Sustainable Development set out in the UK Strategy, Securing the Future as living within the planet’s environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly.**

**The Council will always work proactively with applicants and the community jointly to find solutions which mean that proposals can be approved wherever possible, in order to secure development that as a whole, improves together the economic, social and environmental conditions in the area, and in particular tackles climate change.**

**Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) and with the principles of sustainable development, and which have benefited from meaningful public participation, will be approved without delay, unless material considerations indicate otherwise.**

**Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will take into account: a) sustainable development; b) specific policies in that Framework indicate that development should be restricted; and c) local considerations indicate that the development should be restricted.”[[23]](#footnote-23)**

**AMENDMENT:**

**“To ensure that the sustainable development objectives are met and that consequently the most sustainable mix of locations within, adjoining and outside of urban areas is selected within any development plan area, the Local Plan should use the following criteria in establishing the suitability of individual sites:**

* **The accessibility of development sites by non-car modes, and the potential to improve such accessibility. (*Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised -* para 34, NPPF)**
* **The capacity of existing infrastructure, including public transport, utilities and social infrastructure (such as schools and hospitals) to absorb further development.**
* **Physical constraints on the development of land, including for example, the level of contamination, stability and flood risk. (*To prevent unacceptable risks from pollution and land instability, planning policies and decisions should ensure that new development is appropriate for its location.* para 120, NPPF)**
* **The impact that the development of sites will have on the area's environmental carrying capacity and in particular their implications for resource conservation, natural resources and biodiversity: (…*minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;* para 109, NPPF)**
* **The impact that the development of sites will have on the area’s cultural resources. Local authorities should recognise the contribution of heritage assets (e.g. listed buildings, scheduled monuments) to the social and economic regeneration of an area: (…*recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance.* para 126, NPPF)**
* **The impact of the development on general pollution levels. Local authorities should recognise the existing problems of poor air, water and soil quality in many areas and acknowledge the potential negative cumulative impact of further development on these areas: (…*preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability;* para 109, NPPF)**
* **The suitability of sites for mixed use development and the contribution that development might make to the social, economic and environmental fabric of local communities.**

**This can be described as a general policy, described in the core strategy of the Local Plan. It should also be seen to be applied in the issues and options stage of the Local Plan preparation process. Finally, it should also be part of the policy for development management.”[[24]](#footnote-24)**

Para 19 p.32

The end of this paragraph suggests there is limited scope to change the draft Local Plan. I fundamentally disagree if there is an overall intention to conform to the tests of soundness. The IPPC report of 8/10/2018 requires community, national and international level responses which ensure Climate policy integration into all policy areas. Without this, the use of the term ‘sustainable development’ is meaningless, and in consequence Climate policy integration can be asserted to be a requirement so that the draft Plan meets tests of soundness 1 and 4. Such integrating initiatives must consider means of achieving goals for carbon neutral societies and communities by 2030, in line with the IPCC report and recent scientific evidence that suggests that the rise in both greenhouse gas emissions and in temperatures will continue unless there are radical and rapid changes of policy to avert the Climate problems this will unleash. This includes suggestions that sea level rise by 2100 could well reach 2 metres, altering the UK coastline and estuaries markedly[[25]](#footnote-25) and that UK flood defence plans are clearly inadequate.[[26]](#footnote-26) The IPCC report places considerable emphasis upon achieving carbon reduction targets as early as possible, to avert the impacts which will occur as a result of failing to do so.

**AMENDMENT:**

**Oxford needs to become a carbon neutral City no later than 2030, with the engagement of local councils, voluntary bodies, households and all employers. Policies to give effect to this objective are outlined throughout this Local Plan and will be augmented throughout the Plan period, informed by similar initiatives in other UK towns and cities.**

p.36 Travel

Health promotion in Oxford, within a range of partnerships between different bodies, requires a more committed approach to walking, cycling and exercise in general. The Gilligan report suggesting £150 million for cycling improvements in Oxford is welcome. But active travel is strongly discouraged by rush hour road congestion, and minimal pedestrianisation and pedestrian priority in the City Centre. I note with concern the problem of bus companies opposing pedestrianisation and even challenging the speed of implementation of the very small Zero Emissions Zone.[[27]](#footnote-27) I suggest the City Council favours pedestrians and cyclists rather more strongly, for the sake of public health. The Clean Air Charter the City has signed up to is a modest start, not the end of implementation targets on this subject that could be attained.

Since the draft City Plan lacks a coherent, clear and comprehensive health strategy, it cannot be considered to be socially sustainable. Each level of Government needs health policies consistent with maintaining well being throughout life, with consequent implications for productivity in the workplace, engagement with voluntary groups and reducing avoidable impacts on local health services. In short, the City Plan failed to be ‘positively prepared’ under the tests of soundness with regard to health.

**AMENDMENT:**

**The City Council will attempt to secure the £150 million for cycling in the City suggested by the Gilligan report.[[28]](#footnote-28)**

**AMENDMENT:**

**“The Local Plan recognises the potential for a significant modal shift to cycling for short and medium journeys and aims, as a minimum, to quadruple the frequency of journeys made by bike by the end of the plan period. This will be achieved by providing a network of cycle-friendly streets, multi-use paths and cycle routes in both urban and rural areas.”[[29]](#footnote-29)**

**AMENDMENT:**

**Extensions to pedestrianised and pedestrian priority areas in Oxford will be a major priority for the urban environment during the Plan period. Such extensions shall include extending existing cycling networks and improving walking networks.**

**AMENDMENT:**

**“The Council recognises the potential for significant modal shift to walking for short journeys and will aim by the end of the plan period to increase substantially the frequency of journeys under one mile long made on foot. This will be achieved by:**

* **providing direct, well-maintained and well-lit walking routes, including to and from schools;**
* **providing quality footways in towns and cities and Quiet Lanes in rural areas;**
* **slowing down traffic through the use of 20mph zones and Home Zones.**
* **Improving walking related infrastructures;**
* **Consideration of groups with disabilities or ageing members of the population when designing infrastructures (e.g. increasing pedestrian crossing timeframes)”[[30]](#footnote-30)**

**AMENDMENT:**

**The Clean Air Charter is a start towards the air quality we would all like to experience in Oxford. The City Council will seek to introduce and extend its Zero Emissions Zone more rapidly than it originally forecast and will seek employer by employer reductions in polluting vehicles throughout the City during the Plan period.**

p.37 Environmental Responsibility

Suggesting that the City Council will only use wholly renewable energy for its energy needs by 2050 is a very unambitious target [since revised and improved].

As the local authority, the City Council should be actively and repeatedly encouraging all employers and households to move towards solely using renewable energy by 2030, supporting sources of advice (low carbon hubs etc) and appropriate enterprises to make this so. It should also implement a renewable only target in Council properties by 2030, bearing in mind the low cost of solar PV and wind turbines, as well as the benefits of increased insulation. Doing this is required so that tests of soundness mentioning sustainable development can be met.

**AMENDMENT:**

**A carbon neutral City by 2030 will require the engagement of the whole community, its employers and its households. The energy efficiency, air quality and greenhouse gas emissions of the City as a whole will need attention to secure improvements over the period to 2030 consistent with the goal of a carbon neutral City by 2030.**

Cost and supply of housing

Once again, the utterly discredited SHMA housing figures do not provide reliable evidence. As the critical report done for CPRE has demonstrated,[[31]](#footnote-31) actual housing need is considerably smaller than suggested; as the ONS surveys have indicated, household formation is going to be slower than originally thought. The City Council should not put outdated information in its Local Plan. There is no evidence in the draft Local Plan of the extent to which existing homes and other buildings may absorb population increase, or the extent to which the City Council will be buying homes for social housing and keyworker housing from those on sale. This is a failure to be ‘effective’ or ‘positively prepared’ under the tests of soundness. I note the current slowdown in homes coming available for sale, and in buy to let activity also, which may well indicate that low and declining economic growth is being reflected in the housing market, with implications for market housing delivery dates. The City’s approach to housing appears to actually be in conflict with all tests of soundness and needs fundamental revision.

I recommend the City Council look at the Green Party manifestos eg 2016/2018 for the City Council elections which offer a superior approach to housing than what gives the appearance of neglect, pushing housing on to our countryside and other local authorities, rather than taking adequate responsibility in the City. Solutions offered by local and national housing groups, especially concerning refurbishments, need examination also. However, there is a dirth of thinking and research, as far as I have been able to discover, about whether market housing need be built at all, given excessive prices and a failure to apply Land Value Taxation.

**AMENDMENT:**

**Very low cost for rent, Zero Carbon or at minimum *Passivhaus*** **standard housing with grey water recycling should result from new build and refurbishment of homes in the City. Such standards shall also be applied where existing buildings not previously used for housing are being converted into dwellings.**

Traffic congestion and air quality

Limited progress so far means a more assertive approach is needed, such as target dates for electric-only buses and electric-only taxis to be exclusively used in these sectors in Oxford, and before 2030 for all buses and taxis. I am concerned about the failure to mention particular matter below 2.5mm in size. PM2.5 means the mass per cubic metre of air of particles with a size (diameter) generally less than 2.5 micrometres (µm). Also known as fine particulate matter, PM2.5 is one 400th of a millimetre. Such matter is highly toxic, including carcinogenic effects. It arises from road abrasion by tyres, residue from tyres and brake pads, and the disturbance of such particulates on roads and other surfaces by the movement of vehicles and people. Whilst many steps may be and are very, very slowly being taken to reduce vehicle emissions, these ‘fine particulates’ are a neglected area of concern to public health. I submit that a) such particulates would be a problem even if all vehicles were electric; b) that no obvious technical solution currently exists; and c) that only pedestrianisation and pedestrian priority areas can currently begin address this problem in the absence of technological answers. I note that each London Borough has PM2.5s above levels considered to be injurious to human health…………….

**AMENDMENT:**

**Exceptional efforts will be made to substitute electric vehicles for those with polluting emissions. This will include designating some car parks as being for electric vehicles only; working with employers to encourage conversion of fleet and employee vehicles currently in use to electric vehicles as quickly as possible. The City Council’s commitment to pedestrianisation and pedestrian priority areas being extended throughout the City’s central area will be accompanied by cutting off residential road routes currently experiencing heavy through traffic in rush hours, either by making such roads one way, or by bollarding them to make access a matter for residents and vehicles serving the community concerned.**

Need Shift to Sustainable Travel

I agree with this title, but this must be facilitated by joined up walking and cycling routes and a dramatic increase of the pedestrianised area in central Oxford. This should include Queen Street, Broad Street, St Giles in part, and then locations such as the High Street, St Aldates, the St Georges Street area abutting St Giles and Broad Street etc etc. Local centres within the City away from the Centre should be considered for partial pedestrianisation efforts to reduce traffic congestion.

I question the overall growth emphasis of the draft Plan, since it is not informed by either ecological or economic sustainability constraints, especially with regard to transport policies. Getting other local authorities to accept Oxford’s ‘overspill’ of housing, much of which appears to be to meet landlord, foreign ownership and developer pressures NOT the need for very low cost housing, means more car commuting into Oxford in conflict with the Local Transport Plan mentioned above. This indicates that the draft City Plan has not been ‘positively prepared’ in relation to the tests of soundness.

I do not agree that employment has to be concentrated or added to specifically in Oxford when this results in increasing commuting to Oxford. People should have work nearer to where they live, and spatial planning for the County should encourage this, for example in the future JSSP. The types of brownfield sites referenced throughout this submission have relevance for local planning in Oxfordshire’s other local council areas to avoid sprawl, dormitory settlements, and what may be called a ‘conspicuous consumption’ of the landscape.

**AMENDMENT:**

**The City Council recognises that conventional economic growth is highly polluting in its present forms, uses too many finite physical resources and cannot be sustained indefinitely. In consequence, the City will use indicators other than economic growth to measure progress towards a more sustainable City. Indicators will include showing how far above the United Nations Sustainable Development Goals (SDGs)[[32]](#footnote-32) Oxford has attained during the 2015-2030 period; measuring and reporting cuts in specific types of greenhouse gas emissions from all relevant sectors in the complete ecological footprint of Oxford.**

p.38

I suggest bringing forward these targets to 2030, with an additional emphasis upon employment growth outside the City to reduce existing and future transport pressures.

p. 41 2nd paragraph

Sustainability and not conventional economic growth should be a core priority and value in this draft Local Plan, in order to meet references to sustainable development in the tests of soundness. Quality of life will suffer if growth is pursued as if it were the only indicator worthy of significance. I suggest that, as well as the Sustainable Development Goals, many other indicators are of more value. Here are some suggestions:

* Longevity in all social classes improving year on year
* Air quality improvements year on year in all parts of the City
* Increased proportion of journeys made by bicycle
* Area increases for pedestrianisation, pedestrian priority, allotments, the Oxford Green Belt and in areas within Oxfordshire providing food to Oxford
* Educational attainments improving in all social classes by age 18
* Increased area of biodiverse land in Oxford, linked to areas outside the City cordon
* Decrease in disused brownfield sites because of conversion to housing

p.42 City Centre

The City Centre is a through route for some traffic, making it a rather unpleasant place especially in rush hour for pedestrians and cyclists, including the many visiting tourists, guided walking groups and language [school] groups. Compared to Canterbury, Norwich or York, there is far too much traffic access for too large a part of each day. Doubling the formally pedestrianised and pedestrian priority areas is a possible target for which a date could be set; doubling that again with another date (also before 2030) is also desirable to improve the overall City Centre environment for users. The City Council must work with the County Council and other partners to ensure a City central area that is larger, and sharply defined by pedestrian and cyclist dominance over any vehicle movements. Since there is strong evidence that pedestrianised areas tend to have higher footfall than trafficked streets, preserving shopping areas – including those showing empty slots partly attributable to the new Westgate shopping centre - pedestrianisation is actually an economic imperative the City Council has yet to grasp since it has not ‘positively prepared’ its draft plan to meet a test of soundness.

**AMENDMENT:**

**The pedestrianised and pedestrian priority areas of the City Centre will be doubled in area during the period from now until 2023 and doubled again up to 2030, as a result of City Council cooperation with the County Council and other appropriate bodies. These areas will include cycle routes. Pedestrian priority roads which provide space for two way traffic may have bus and taxi access. Removing through traffic from the Queen Street-High Street-St.Aldates area and through the St.Giles-Broad Street-St.Georges Street-Cornmarket junction is an early goal for the pedestrianisation process to improve walking, cycling and air quality in Oxford City Centre. This is required for consistency with the idea of an enlarging Zero Emissions Zone.**

p.43 Cowley Centre

The shrinkage in retail chains specifically in recent months indicates that expansion based upon retail may fail to be implemented, or be delayed for extended periods. My particular concern that a folly of the Cambridge-Oxford Expressway could include a Corridor B road route into the Eastern ring road, meaning cars and other vehicles accessing eastern Oxford through Horspath Driftway or the Garsington Road area, involves more traffic at the Hollow Way-Garsington Road-Oxford Road-Between Towns Road staggered junction. It is bad enough in rush hours already. Centres of this type need traffic reduction measures to make their use by pedestrians and cyclists easier at all times. This is wholly unsustainable, and cannot be justified or made to be compliant with tests of soundness 1 and 4.

**AMENDMENT**

**Through traffic in roads near the Cowley Centre shall be reduced by the use of bollards to prevent access, or one way systems, speed restrictions to deter non-essential traffic and enlarged pavements to slow down or deter through traffic. The Council will consider and adopt similar measures in other District Centres to decrease traffic in these areas.**

p.44 Cowley Branch line

I support opening this line to passenger operations. However, current plans are unambitious and do not take into account the need to reduce traffic by providing rail alternatives of the proper scale needed. Specifically, I want this line to be part of a Witney/Carterton route to Oxford then Cowley and on to connect to existing line(s) in the Wheatley area. I urge the City Council to support re-opening rail lines as a general principle in Oxfordshire, as part of giving commuters alternatives to accessing Oxford by car or bus from as many locations as possible.

**AMENDMENT:**

**Rail line re-opening is a general policy supported by the City Council. Apart from the Cowley to Oxford line being re-opened to passengers, early priority should be given to the Witney-Carterton route to Oxford and connecting Cowley to existing rail lines in the Wheatley area.**

p.45 Oxford North

This is an inappropriate development encroaching on Green Belt and adding to traffic in an area already suffering from excessive traffic levels. It is the duty of the City Council to make better use of its brownfield sites, including dual use of car parks for housing. Oxford North cannot be made into sustainable development as it will generate traffic movements in an area already suffering from extreme traffic congestion.

**AMENDMENT:**

**Oxford North (the former Northern Gateway) is an inappropriate environment damaging and traffic generating potential site. The City Council will block further proposals for the development of this area. For the same reasons, development of housing in the Grenoble Road area will be abandoned as an idea.**

p.49 Student accommodation

Constraints upon student accommodation are not in evidence in some parts of Oxford. Construction recently finished on Hollow Way, and on Between Towns Road, with more to follow in this part of Oxford, shows priority for space being given to students when social housing completions are nil or negligible in several recent years in the City. Whilst the physical resource use and greenhouse gas emissions implications of new housing make the City Council buying homes for use for social and keyworker housing of paramount importance, how students are being housed should be a matter of consideration too. There are currently no plans to put solar PV on the massive student accommodation on Hollow Way; the neighbouring Paul Kent Hall does not have solar PV either. Renewable energy is clearly not an overarching issue in the City planning processes so far, and the Local Plan should reflect a change to ensure new build is Zero Carbon or passivhaus standard, has water recycling, is insulated to the highest conceivable standards etc. I also note with concern the dramatic rise in student rents, as part of the general problem of high rents for all types of tenants, in the absence of rent controls for which the City Council should campaign.[[33]](#footnote-33) Nothing about this can be considered sustainable, and therefore once again the tests of soundness are not being met.

**AMENDMENT:**

**Student accommodation being sought through planning applications shall be required to be supplied with 100% renewable energy for all purposes. The City Council will lobby for all existing student accommodation to be retrofitted with solar PV, solar thermal and other means of dispensing with the use of fossil fuels in the operation of such sites.**

p.50 Efficient use of land

I accept the principle of an increased number of taller buildings in the City on brownfield sites. Sites that are under-used include existing sites allocated to employment and we look forward to seeing high density housing on parts of such sites, where vacancies exist.

Managing flood risk

Sustainable Urban Drainage Systems require maintenance and renewal. Permeable pavers and similar put down across driveways or as roads in new developments quickly fill up with dust and cease to be a permeable surface. I know of no overall scheme SUDS maintenance scheme for businesses or privately rented properties or owner-occupied homes in areas which are either flood prone or susceptible to surface flooding in times of heavy rainfall. Water re-use in new buildings is essential. Higher quality drainage arrangements are needed for roadside drains that overspill frequently all over the City due to poor maintenance. The City should push a programme of Water conservation and management in cooperation with appropriate partners in a new City-wide partnership, including addressing how SUDSs are to be maintained. Management of floor risk and water movements in urban areas, exacerbated by poorly maintained drainage on roads, is not meeting tests of soundness regarding sustainable development now, nor seem likely to do so in future.

**AMENDMENT:**

**The City will push a programme of Water conservation and management in cooperation with appropriate partners in a new City-wide partnership, including addressing how SUDSs are to be maintained.**

p.51 Taking Air Quality Seriously

Polluting traffic should progressively be removed from a steadily enlarging zero emissions zone, from areas around schools and by substantial increases in pedestrian and pedestrian priority areas. The 64,000 people who die prematurely each year in this country from air pollutants are accompanied by thousands more needing medical attention. This figure is often given as 40,000 and is out of date.[[34]](#footnote-34) The Government approach to this seems to be to protect the motor industry, and £10 bn in fossil fuel industry subsidies, in its failure to provide emissions free vehicles more quickly. I welcome improved walking and cycling networks (not just routes), but this is only addressing part of the public health problems of obesity and air pollution. Dealing with greenhouse gas emissions and taking public health seriously needs a far more ambitious approach than the City Council (or bus companies) is offering at present. [electric buses and better vehicles are promised, but this does nothing about PM 2.5 emissions which can only be removed currently by pedestrianisation] Specifically, emissions targets need bringing forward to 2030. This would meet tests of soundness concerning sustainable development, unlike the current draft Plan.

**AMENDMENT:**

**By 2030, Oxford will be a carbon neutral City in order to help protect the global Climate and to cut air pollution. By 2030, Oxford as a whole will be a Zero Emissions Zone.**

p.52

I reject the suggestion that there is justification for building on Green Belt or greenfield sites. The City Council has access to under-utilised brownfield employment sites, can make dual use of private and public car parks for housing, and should seek to reduce the over-emphasis on conventional polluting economic growth in Oxford, in favour of basing more employment in other communities in the County. Building on greenfield and Green Belt sites is a breach of all tests of soundness.

**AMENDMENT:**

**Oxford will adopt a City-wide planning guidance for all planning applications that no development is permitted on greenfield or Green Belt sites.**

p.53

I support the principles of increasing walking and cycling in Oxford as a whole. The issue of ‘missing links’ in walking and cycling routes throughout the City must be addressed, in consultation with appropriate local groups. Pedestrianisation is needed to reduce through traffic in areas of pollution and significant traffic movement, accompanied by new cycling routes through such areas. Walking and cycling, as low impact transport, should receive planning priority and this should be a material consideration in how new developments or refurbishments take place through the City planning system.

I support car free developments as a step to reducing traffic in the City’s central and peripheral areas, to help in traffic reduction. These measures, rather than the existing draft City Plan approach, would meet the tests of soundness.

**AMENDMENT:**

**The City Council will require that refurbished homes may have reduced or no parking provided, as part of dealing with traffic congestion, noise, air pollution and specific locality problems arising from excessive numbers of cars in some parts of the City.**

p.54 Reducing emissions

I want the Zero Emissions Zone introduced more quickly, and for it to be spread over a much larger area with the aim of covering as much of the City as possible by 2030. It should in fact be an Ultra Low Emissions Zone as in London. If this means seeking extra funds from Government as a special case or trial, then this should be done. Air pollution has been the preferred policy choice of Governments up to now: it should be stopped as quickly as possible. It is also a matter of achieving the tests of soundness requirements for sustainable development.

p.55 Promoting sustainable tourism

It is clear that extending pedestrian and pedestrian priority areas will help to spread tourism, guided walk groups and language student groups throughout a larger area of the City. Currently, many barriers exist to this in the form of limited pedestrianised and pedestrian priority areas, Colleges having very restricted opening periods, and there is limited promotion of the Cowley Road as a leisure/multi-cultural cuisine area etc.

To avoid what the New Economics Foundation has described as ‘clone town’ status, more varied and unique uses of retail space need to be considered wherever the City Council has influence. Sole trader enterprises should get City Council support in developing ‘virtual City’ maps online to help people find these businesses easily, and so help to preserve them. The blight of the ‘Westgate effect’ is evident in terms of increased vacant slots in shopping areas from Gloucester Green over to Broad Street, down the Cornmarket and elsewhere. The really remarkable reductions in the number of outlets being operated nationally by many chain stores reflects the continuing impact of the under-taxed online shopping sector, making economic growth based heavily upon consumption highly vulnerable under the current very uncertain economic prospects. Since this has been a known effect of online shopping, it should have been reflected in ‘positively preparation’ for the City Plan, but this is not the case and the massive Westgate Shopping Centre needed to be considered as a use of space against other needs, such as very low cost homes. Again, this problem in recognising retail challenges is a failure of the tests of soundness in terms of what is effective, and what has been ‘positively prepared’, in relation to evidence in the retail sector.

**AMENDMENT:**

**Promotion of the Cowley Road as a multi-cultural cuisine, music and leisure axis will be emphasised by the City Council to increase footfall, including in the form of guided walks, along the Cowley Road. This will be part of encouraging longer stays in Oxford, and relieving pressures on areas in the Centre currently very crowded each summer.**

**AMENDMENT:**

**Colleges need to be open to the public more often, as part of realising the full sustainable tourism potential of the City. The Council will press the University and Colleges to increase access periods through the year.**

**AMENDMENT:**

**The Council recognises that the effects of the new Westgate Shopping Centre include vacant slots in shops in other parts of the City Centre. The Council will promote lower rents outside the Westgate Centre, and more sole trader businesses, charity shops and social enterprises wherever possible, to increase the diversity and attractiveness of the City to all users.**

Balancing housing with other needs

There has been an extended period of emphasis on land use for employment, student accommodation and market housing in Oxford. Housing quality is an environmental need and not purely a social one. Building standards in the UK remain low both as carbon neutral homes are very rare, and because re-use of existing buildings and good carbon neutral retrofitting is far too limited. The City Council should make maximum use of the existing built environment to obtain homes particularly. Employment is NOT a pressing need in a City with many people working from home, using existing employment sites and where full employment is a normal condition. The City Council should buy homes on sale for social housing, and cooperate with the City’s network of very low cost housing groups to do so as well. Green spaces and allotments must be protected from development as the population of the City continues to grow and with it the importance of such sites. This overall approach to land use which has eluded the City Council up to now means that the City is in conflict with all tests of soundness with regard to its current land use planning.

**AMENDMENT:**

**The City Council recognises that Oxford’s long-term full employment means that employment growth is not a pressing local need. Employment growth in many sectors occurs without the allocation of land for the purpose. Employment land, especially where employment density on it is low, shall be allocated to social and keyworker housing to help meet the demand in the City for very low cost housing.**

p.57

Oxford’s Economy

Overemphasis on economic growth is polluting the City, filling it with traffic and undermining quality of life. Growth needs constraints. Using the existing built environment for housing makes sense in environmental terms, and specifically in terms of reducing the greenhouse gas emissions of the City where ‘climate proofed’, carbon neutral homes are created.

p.58

Employment Land Assessment

Since the UK economy has lost about 2.1% of GDP due to the effects of the Brexit decision already,[[35]](#footnote-35) I fail to see how an Employment Land Assessment published in 2018 can expect additional employment land needs. The Government’s Impact Assessments of Brexit suggested a loss of 2-8% of GDP from the range of Brexit options from lowest impact to hard Brexit. Under these conditions, consolidation, sustainability, efficient use of land, and trying to meet needs – such as for food – from local sources where possible - all seem far more likely to be appropriate than a conventional growth strategy. Currently, the UK car industry is at risk from an end to the Single Market and customs union arrangements. Possible failure in negotiations could means losing car industry and supply chain jobs in Oxford, leading to a new source of brownfield land for homes in particular. The City approach in the draft City Plan in the light of the above considerations is not ‘justified’ or ‘positively prepared.’

Other options for approaching employment and land use creatively do exist, including recognising how many people – such as many construction workers – do not require employment land. The draft Plan writes of low density use of employment land but still proposes to add more in total as if this were desirable or necessary. The possibility of making some employment land into high housing density ‘live work’ units has not been looked at with sufficient seriousness. A possible site for this is the former Post Office site at the bottom of Hollow Way, currently allocated to ‘predict and provide’ business units.

**AMENDMENT:**

**‘Live work’ units will be amongst high density housing options in such locations as car parks, to help meet need within the City.**

**AMENDMENT:**

**The City Council recognises that a Brexit deal reducing trade appreciably, including in services, or a ‘hard Brexit’ causing a serious drop in trade for an indeterminate period, could have serious effects upon economic performance and skills availability in Oxford. In consequence, subject to any deal achieved or the absence of one in the coming period, the City Council will prepare a contingency strategy for the City against a variety of ‘testing’ scenarios resulting from Brexit. This strategy will incorporate the achievement of basic goals including food for all; resilience; sustainability; skills retention; promotion of short-distance tourism; cutting carbon emissions.**

p.59

Warehousing is notoriously a low employment density form of land use coupled to the tendency of many enterprises using HGVs as ‘warehouses on wheels’ and adding to the burden of polluting road traffic. I agree with the implied preference against warehousing in the City, and to any pressures the City wishes to bring to bear upon employers to use rail and perhaps even canals for freight, with cargo bikes as a last delivery stage whenever practical. I think this is consistent with reducing greenhouse gas emissions in the forthcoming period during which rail and HGVs become fully electrified.

p.61

On student numbers, I have concerns about the capacity available and accuracy used in the counting of students in accommodation not dedicated for their use. Students in ordinary housing drive up prices for homes and rents and contribute to a demand for land use for additional homes. Whilst I have no doubt of the importance of our universities to the local economy, the effect of students in normal housing is negative and requires more assertive action to reduce home prices and rents and relieve pressures for new homes. I do not accept the City’s position that it declines to count postgraduate students since their numbers in normal housing have the same effects as undergraduates upon the availability and prices of homes and rents. I would like to see the Local Plan set a date within the Plan period by which ALL undergraduate and postgraduate students are in dedicated accommodation. We [should all] note the currently under-utilised campuses of Oxford Brookes at Harcourt Hill and at Wheatley as prime targets for such additional student accommodation rather than adding to such accommodation within the City. These steps are essential to meeting any test of soundness which can be related to housing, as the current City Council posture on student counting and accommodation is worsening housing problems in a City with very high rents and the worst relationship between incomes and home prices in the entire country. Such failures are not ‘justified’ and represent failure in ‘positive preparation’ in terms of information sources used for the draft Plan.

**AMENDMENT:**

**Postgraduate students living in ordinary housing will be added to the ‘overspill’ figures of students not living in dedicated student accommodation in the City. The City Council will prepare a detailed plan for year on year reductions in all students living in normal housing stock.**

**AMENDMENT:**

**Oxford Brookes will be encouraged to expedite student accommodation and other activities on its Harcourt Hill and Wheatley campuses, in order to relieve pressures on ordinary housing from students in Oxford. Further student accommodation in Oxford on new sites will not be preferred in the planning process, for either University.**

p.62

Teaching and research

I strongly support the intensification of use of sites occupied by both Universities in the City.

At the bottom of this page, I note an alleged ‘severe shortage of land in Oxford’ is mentioned. There is rather a **shortage of imagination**: as indicated, all private and public car parks can be considered for dual use with housing; the Council must commit to buying more homes for social and keyworker housing which are on sale in the City; space above the City is abundant and – with sensitivity – may be brought into use with taller structures; empty retail and office, industrial and other sites exist and are not considered for meeting housing use enough up to this point. This is all consistent with protecting biodiversity, forestry and food production at the fringes of the City cordon and outside. It is also true to say that failing to do the latter also fails the tests of soundness with regard to sustainable development as well.

p.66

First paragraph: the construction skills base does not exist in the UK at present to meet the kinds of housing target figures suggested by the Government, or agreed by local authorities. This is an area of fantasy. I submit that it is consistent with resource and climate change constraints to use the existing built environment, including under-utilised industrial estates-science parks, to provide homes. I submit that new build, such as in the case of dual use development around, above or over car parks, should be using system-building techniques to minimise the labour force required in view of scarcity. I note the continuing commitment of the current Government to reduce inward migration to ‘tens of thousands’ which will inevitably cut off supplies of construction workers, including engineers. This means that the draft City Plan fails to meet tests of soundness as it simply has not been ‘positively prepared’ or ‘justified’ with these considerations in mind.

**AMENDMENT:**

**System or modular building techniques will be part of the City’s effort to ensure high quality *Passivhaus* standards in new build.**

I note that the main housing demand is for very low cost housing and that this is not being met by current City Council housing policies.

Final paragraph:

I note the imprudent reliance on the Strategic Market Housing Assessment of 2014, despite its being discredited and undermined by diminishing ONS forecasts for household formation.[[36]](#footnote-36) It will be critical for the City Plan to have a ‘health check’ as the results of the 2021 census are released – including details of how employment is distributed in the County, and how needs for it in places other than Oxford might be facilitated by the City Council to rein back apparent ‘over-heating’ and excessive development pressures in Oxford.

p.67

2nd paragraph:

The term ‘affordable housing’ has no value in Oxfordshire due to very high house prices and rents.

The attempted defence of the SHMA does not stand up, and serves developers who wish to build on Green Belt and greenfield sites rather than the interests of the environment, biodiversity and Climate Change constraints. Equally problematic is the implicit suggestion in this paragraph that the Cambridge-Oxford Expressway is a ‘done deal’ when the following conditions apply:

* Neither the County nor the City can legitimately accept the Expressway in a vote as it conflicts with the desire of both in the Local Transport Plan to reduce car commuting into Oxford. The wording in this paragraph suggests otherwise and is illegitimate and must be changed.
* Regardless of need alleged for housing, no Strategic Environmental Assessment or Strategic Economic Evaluation has been done for the Expressway or associated corridor development.
* The construction labour force to deliver 1 million new homes does not exist at present. Policies to alter the recruitment-retention-retirement crisis in construction have yet to be funded by Government.[[37]](#footnote-37)
* No consideration has been made of the impact of Brexit upon the principle of the Expressway, nor for HS2 similarly.
* Housing does not arise from planning. Most housing completions are for market housing, in locations preferred by developers. This generally means with access to commuter rail services to London as the country’s top employment centre. In short, the idea that housing will form a corridor of development around the Expressway’s rural and devastating potential routes is highly questionable. Market housing did not emerge all the way along the Channel Tunnel Rail Link corridor in Kent, despite suggestions that it would. Not one single letter in the Oxford Mail or Oxford Times has indicated any support for the Expressway. Many letters have mentioned opposition to the Expressway in principle. Prominent local opponents of the Expressway include Professor Danny Dorling and the former County Planning Officer, David Young.

p.68 first paragraph:

Capacity and availability of sites for housing in Oxford has yet to be adequately estimated. The key omissions are:

* Dual use of private and public car parks for housing
* The full potential of taller structures for housing
* The transfer of employment land to housing in areas of low density employment and vacant slots

I submit that the potential of land for housing has NOT been investigated thoroughly by the City Council and that this is essential to prevent greenfield, Green Belt, biodiversity, food growing and forest/forestry losses due to urban sprawl and dormitory settlement development. Efficient use of land begins by using developed land first, and the City has not committed itself to do this by ensuring it takes full account of the potential suggested in these three points above. This is a failure to ‘positively prepare’ under the tests of soundness and cannot be ‘justified’ either.

**AMENDMENT:**

**A comprehensive study of the location and amount of homes that may be sited within the City shall be undertaken which would include dual use of private and public car parks for housing, which shall be zoned accordingly; the potential of taller structures for housing; the transfer of employment land to housing, including both on large plots and by the acquisition of long-term empty shops or office units for this overriding social goal.**

p.70 largest paragraph

The housing campaign and charity groups strive to provide very low cost housing in Oxford, alongside the improbable idea that affordable homes or rents are being provided by other means. I believe the environmental and social imperatives to use existing homes means the City must assemble, as best it can, financial resources to buy homes to meet social and keyworker needs. It is not inconceivable that part of the burden might be borne by larger employers with concerns about staffing due to the barrier of housing costs.

p.71

Whilst I welcome the notion of contributions to ‘affordable housing’ from student accommodation development, I believe that accommodating students on existing sites in use by the Universities is the main way both Universities can expand in the future. If postgraduates are included, then this process can do much to alleviate and ultimately eradicate student use of private rented properties in Oxford.

p.75 Houses in Multiple Occupation

The value of active local communities within Oxford, with multiple community organisations serving the differing needs of diverse populations, is apparent in contributions to amenity and the local environment in particular. In essence, active citizens will include those who help to conserve and enhance the local community and its environment. However, experience of Houses in Multiple Occupation and privately-rented properties is that their occupants – being transient – do not generally engage with the local community and so do not tend to appear in the activities of local amenity or environmental or indeed other groups. I am also concerned about the physical quality of all privately-rented properties which appear low from external appearance alone, and often lack the gardens that are vital lifelines to a wide variety of species and for residents to enjoy and even grown food within. I suggest, therefore, that 20% of Oxford’s housing being HMOs - plus unregistered HMOs and privately-rented properties that are not HMOs - is already too much. From a community point of view, people living in communities who appear to have a stake in them and do participate in local groups are generally drawn from such groups as council tenants, those living in boats at secure mooring sites, housing association and housing co-op tenants, and owner occupiers. I invite the City Council to raise its game to progressively reduce all forms of private renting by buying homes for social housing and keyworker housing, working with other organisations to help provide funding. I also suggest the Council should place greater restrictions on the registration of any property as a new HMO: higher standards should be applied, and gradually be required of all such properties over time.

Social sustainability requires, as suggested above, that homes give people roots in the community, helping to give keyworkers and others reason to stay in Oxford and contribute to it. Without this consideration embedded and implemented throughout relevant parts of the Plan, it cannot be said to meet any of the tests of soundness.

**AMENDMENT:**

**The City Council will endeavour to increase the proportion of local homes which give people a stake in the community, including social housing, keyworker housing, housing association homes and secure moorings.**

p.76 Community-led and self-build housing

Dual use of private and public car parks could be one source of land for this type of initiative. To reduce the emphasis the City Council has placed upon employment land, I suggest ‘live-work’ units are favoured in such developments.

p.78

The growth of student accommodation on University sites outside Oxford is essential to freeing homes in Oxford for social and keyworker housing, purchased by Oxford City Council.

Final full paragraph

I do not agree with treating student teachers, medical students and post-graduate research students as if they did not impact upon housing availability for the long-term resident population. They too should be in dedicated student accommodation. This serves the broad environmental goal of keeping the countryside for a wide range of essential uses other than housing, consistent with two tests of soundness regarding sustainable development.

p.80 Provision of new student accommodation

Clearly, student accommodation along Hollow Way and on Between Towns Road is not adjacent to existing University facilities. It is contradictory to suggest that placing new accommodation of this type in district centres means it is adjacent to existing University facilities which are not present in these locations. Given bus and rail services, there is no reason why students should not be domiciled outside Oxford.

**AMENDMENT: The Universities shall be encouraged strongly to place student accommodation growth on brownfield sites outside Oxford.**

Policies need to be added to this part of the draft Local Plan concerning what should occur if student demand drops and accommodation ceases to be needed by students. A presumption of adapting this accommodation into very low cost housing should be in the Plan. This can be either City or housing organisation-led, or a partnership of both.

p.81 Accessible and adaptable homes

3rd paragraph of section: Residents remaining in their own homes suggests a number of initiatives the City Council can promote, or provide in council housing. This should include a Guide to splitting owner occupied properties to allow elderly residents to turn their home, typically, into maisonettes. Also, taking in lodgers who occupy the part of homes the elderly find most difficult to access is worth advocating. If done successfully, this would help relieve pressure on the brownfield housing reserve.

**AMENDMENT:**

**Under-occupation of housing will be addressed by encouraging residents to take in lodgers, and to consider the option of dividing properties and selling part of their home off, with council advice on this process.**

p.82 Final paragraph

Given the large numbers of vacancies for care work in the County (c700 at any given time) and high turnover of this very low paid work force, I am not sure that the allocation of more space to residential homes is a desirable policy. An enforced Living Wage designed to attract and retain staff in care homes might well shut homes claimed to be existing at the margins of profitability – if ever enacted by Government. I would prefer a vigorous effort (see above) to keep people in their own homes as far as is possible, allowing some land currently occupied by residential homes to be moved into other uses such as adaptation for social housing in the future.

p.83 2nd paragraph

Suggesting Oxford has no need for Traveller sites appears to turn a blind eye to the frequent arrival of Travellers on Park and Ride sites, and even on the small car park of the Bullingdon Community Centre on Peat Moors in the Lye Valley estate recently. I would not support a Traveller site on Green Belt, thinking instead that the traffic reduction measures Oxford and Oxfordshire need very badly should allow the allocation of some Park and Ride land to Travellers. Thornhill Park and Ride, with its existing facilities, offers a starting point for policy innovation to meet this need.

p.84

I strongly support more secure moorings for boat dwellers. I recognise the importance of this very low cost housing option and believe it should be extended during the Plan period beyond the 41 additional moorings suggested. This will save greenfield and Green Belt land from housing.

p.86

Adequate internal space standards are naturally a sensitive issue when the UK has the smallest new homes of any country in Europe. Rental properties often lack adequate space per person, including useful communal space. I urge that the City Council support a return to the Parker-Morris space standards which applied in the UK 1961-80, fighting for this through its planning process. A larger proportion of larger and family homes can also be provided in apartments, if the full potential of dual use of car parks is realised.

**AMENDMENT:**

**New homes and space per person after refurbishment must conform to the Parker-Morris space standards which applied in the UK 1961-1980. The Council will use all possible options within the planning process to achieve this.**

p.90 first paragraph

Given the seriousness of the IPCC report issued on 8th October 2018, making an 80% cut in total carbon dioxide emissions produced by the City Council by 2050 not sufficient. Firstly, sector by sector carbon neutrality should be pursued with the engagement of all employers and as many households as possible by 2030. Secondly, what the City causes in terms of greenhouse gas emissions includes the aviation movements – both passenger and freight – serving the City and recognising all airports which do so. In addition, ferry use and shipping, rail freight and HGV and delivery vehicle emissions outside Oxford by vehicles serving Oxford are all part of the overall carbon footprint of the City. To take responsibility for carbon emissions means to recognise the totality of Oxford’s real contribution to the Climate Emergency as a guide to policy implementation. This would meet the sustainable development references in the tests of soundness, unlike the current draft City Plan in which Climate Change barely features.

Carbon neutral new construction and retrofitting can be demanded through the planning system, with Passivhaus standards as a guide and Zero Emission housing as the goal.

**AMENDMENT:**

**New and refurbished housing will meet Zero Emission or at least *Passivhaus* standards.**

p.91 First paragraph

Water efficiency is obstructed by water companies which have yet to repair long-standing leaks. But water efficiency that pushes people towards lower water consumption per person in households is of little value if the total number of households is rising such that total water consumption goes up to the real limits of available supply anyway. In cooperation with all employers, grey water recycling should become a normal feature of Oxford in public and private enterprises and increasingly in homes – especially new and retrofitted ones. I see little evidence of water availability as a constraint upon grandiose housing targets – as if the water supply had a grid like electricity. Consequently, water as a sustainable development issue is not being addressed in the Plan, which in its current draft does not meet the tests of soundness.

**AMENDMENT:**

**New and refurbished homes and other buildings will have grey water recycling to reduce overall water consumption in the City. Water butts will be supplied to residents at cost price to help this effort.**

Sustainable design and construction

I feel the principles suggested should apply to all refurbishments of homes and businesses, not just new build.

Carbon reduction in new build

Planning permission should only be given for new or retrofitted homes that will be carbon neutral in operation, and as far as is possible during construction and refurbishment too. There is no need to wait until 2030 to start doing this.

**AMENDMENT:**

**Carbon neutral building shall be required for all new build and refurbishment.**

p.93 first paragraph

Whether previously developed land can meet a larger proportion or even all of Oxford’s real housing demand, especially for very low cost housing, depends upon following my range of suggestions above for making more efficient use of land to protect greenfield and Green Belt sites. The City Council is not committed to this because of its failure to make car parks dual use, or to reduce its over-generous allocation of land to employment uses which leaves vacancies – some very long term. In addition to previous points, the City should enact compulsory purchase on selected long-term empty retail and office properties since they would be better as housing than decaying structures.

**AMENDMENT:**

**The City Council shall use compulsory purchase to bring long-term empty shops and other buildings into use for housing.**

Bottom of page

Flood risk includes the effects of poorly maintained SUDS, for which the City Council needs to develop policies in cooperation with relevant stakeholders.

p.94

Action against flooding will have to be reviewed due to the effects of a ‘business as usual’ real life history and trajectory into the future, as far as greenhouse gas emissions are concerned. We cannot expect extreme weather conditions to be reined in until we get back to a stable 350ppm of carbon dioxide in the atmosphere. From 1992 to the present, carbon dioxide emissions have risen by 50%;[[38]](#footnote-38) “According to an ongoing temperature analysis conducted by scientists at NASA’s Goddard Institute for Space Studies (GISS), the average global temperature on Earth has increased by about 0.8° Celsius (1.4° Fahrenheit) since 1880. Two-thirds of the warming has occurred since 1975, at a rate of roughly 0.15-0.20°C per decade.”[[39]](#footnote-39) In brief, mitigation efforts to reduce greenhouse gas emissions and temperatures globally have yet to result in decreases in global emissions or temperatures. Nor has the carbon footprint of the UK appreciably changed.[[40]](#footnote-40) Consequently, it is not likely that planned flood alleviation measures will be sufficient to protect communities for the periods in which they are considered to be effective into the future.

Planning for more extreme conditions in flooding would not be over-engineering, in the absence of evidence of radically increased global and national efforts. These need to be more than declarations or policy, but are actually seen to be implemented. The City should look at this with realistic long-term scenarios and take action accordingly.

p.95 Sustainable Drainage Systems

As noted above, SUDs are only as good as the maintenance regimes which keep them in working order. I suggest that the City Council needs to orchestrate a partnership which is able to monitor and secure effective SUDS throughout the City. It would be best if this involved representation of landlords, whose properties are so often adorned with concrete front gardens and minimal drainage if any. Major employers should also be involved and supplemented by scientific and engineering expertise to improve practice.

p.96 [box] Sustainable Urban Drainage etc.

This box and section beg the question of who will conduct long-term enforcement. Policies are not for paper, nor are they mere tick boxes: they require implementation.

Pp96-97 Health

There is no mention of the ‘urban heat island effect’ in this draft local plan. People die in this country due to heat. As noted above, we currently have an operating ‘business as usual’ scenario with regard to the Climate Emergency so an increasing number of even hotter and drier summers may be expected. Apart from air pollution, a known killer of local residents, proofing the City against excessive heat is as much an issue for the City Plan as the eradication of fuel poverty and protection against the cold. Tree planting, fountains and pedestrianisation which makes more of these possible are vital contributions to public health in the Plan period. But major amendments to the draft are needed to show the City Council’s awareness and concern on this subject.

**AMENDMENT:**

**The ‘urban heat island’ effect is a serious problem in part of Oxford, particularly in the Centre. The City Council will take advantage of increasing pedestrianised areas to plant trees for shade, and to install water features of various times to reduce temperatures in hot spells. Over the Plan period, the City Council will identify other parts of Oxford with significant ‘urban heat island’ problems and take action to alleviate them.**

p.97 Air Quality

A larger than planned Zero Emissions Zone, implemented more quickly than proposed, is a valuable contribution to air quality and dealing with greenhouse gas emissions. Substantial tree planting can provide additional improvement to air quality, as will a greater commitment to protecting trees with Tree Preservation Orders. Existing Green Spaces may be considered as potential sites for more trees of appropriate species to add to biodiversity, provide food to birds and add to habitats in general.

p.98 Air Quality

General estimates of school run traffic suggest at least 14 in every 100 cars moving in the rush hour does so in a journey to a school. Oxford’s concentration of schools makes this highly-impacting in some localities. Whilst schools sometimes make vigorous attempts to curb this activity, it remains a major feature of rush hour traffic, adding to air pollution and congestion. I suggest that ‘Walking Bus’ promotion be stepped up with the City Council pressing for greater school and parental involvement, especially where traffic problems are greatest.

**AMENDMENT:**

**The City Council shall, in cooperation with other relevant bodies, promote the introduction of ‘walking bus’ arrangements for primary schools, to reduce rush hour traffic.**

p.102 Green and Blue Infrastructure Network

I welcome this feature of the Local Plan. I particularly appreciate the ‘Network’ aspect of this policy area for its potential contribution to creating and maintaining wildlife and biodiversity corridors, walking and cycling networks and areas of the City free of traffic noise. Protection of sites within these networks is not complete or consistent given willingness of this local authority and others to build on greenfield and Green Belt sites, looking at specific sites later in this Draft and bearing in mind the hypothetical housing targets of neighbouring local authorities.

p.103

I welcome the consistent protection of designated sites, and the possible extension of such sites, where appropriate, to increase protected areas.

Biodiversity Impact Assessment

I am very, very sceptical about ‘biodiversity compensation’ in terms of providing ‘like for like’. I also think that the basic principle of biodiversity restoration should be part of the Draft Plan given the appalling species and habitat losses in the UK since 1945.[[41]](#footnote-41) I recognise the health values of a greener urban environment, the contribution such an environment can make to the tourist offer of the City, and attractiveness to would-be students, and the critical role of the local authority in making sure development is confined to brownfield sites, and directed to making better use of existing developed sites. In terms of sustainability, biodiversity protection must mean increasing protected areas and ending fragmentation of habitats wherever practically possible, to be consistent with sustainable development in the tests of soundness.

**AMENDMENTS:**

**Biodiversity conservation and restoration shall be a feature of City planning and environmental policies, including appropriate forms of special planning guidance.**

**Biodiversity “**Policies should include the following:

* set out an ambition for a net gain for biodiversity (to establish coherent ecological networks that are more resilient to current and future pressures)
* require the creation of biodiversity spaces and features in and around new developments appropriate to the scale of the development (alongside the requirements for good design in the NPPF). For example, this could include new green spaces or green roofs or

roosting or nesting provision on built structures.

* require the creation of biodiversity spaces and features in and around new developments protect existing sites of biodiversity importance (designated and undesignated)
* appropriate to the scale of the development (alongside the requirements for good design in the NPPF). For example, this could include new green spaces or green roofs or roosting or nesting provision on built structures.
* set out local standards for accessible green space provision at least equivalent to the Natural England Accessible Natural Greenspace Standards[[42]](#footnote-42)
* recognise the benefits of urban habitats and their role in supporting large, diverse communities of bees and other insects that plan an important role in pollinating urban crops, especially gardens and allotments and requiring new building and infrastructure developments, as well as conservation strategies, take this into account.”[[43]](#footnote-43)

Protection of biodiversity etc

I do not accept the ideas of development being permitted in notionally exceptional circumstances. The City should, in cooperation with landowners, press for extended areas of biodiversity and hold back the rapacious demands of developers for the extension of concrete and tarmac – both unsustainable materials in their present typical forms.

p.104 Green Belt

I reject the idea of any development in the Green Belt. I want the City Council to explore increasing the size of the Green Belt with neighbouring local authorities, and to investigate increasing the number and area of additional designations within the Green Belt to protect against both urban sprawl and greenfield site development. The City has yet to implement a policy of dual use with housing on, around or above private and public car parks; employment land has yet to be adequately considered for transfer of use to housing, where vacancies and very low density of jobs are present.

**AMENDMENT:**

**The Oxford Green Belt is too small. Oxford City Council shall investigate all possible options to expand it significantly with other local authorities and appropriate bodies.**

Allotments

Whilst the City Council notes waiting lists for some allotments in this part of the Draft Plan, it also plans building on what it describes as ‘disused allotments’ elsewhere in the City. With a growing City population, this is both inconsistent and inappropriate. Given the environmental impact of ‘food miles’ upon the global Climate, and local air pollution, it is vital the City seeks to encourage local food production – in the City, and in the County wherever possible. Localisation is a necessary but neglected aspect of food production for a world with a rising population and a Climate Emergency. It has been suggested that the proportion of greenhouse gas emissions related to the total food system is over 50%, so emissions reductions include where we get our food from.[[44]](#footnote-44) This is essential for meeting references to sustainability in the tests of soundness.

The City Council should promote allotment use for public health and as part of a route to Food Security, and in the longer-term to food sovereignty. Food Banks and other schemes feeding people in Oxford indicate we do not have Food Security for all. It is abundantly clear that the implementation of Universal Credit is driving households into foodbank use and extreme poverty.[[45]](#footnote-45) The potential of Brexit to push up food prices due to substantial food imports costing more if our currency sinks further is just one illustration of how impoverished sections of our community can be pushed away from having enough meals of the right quality each day. Add to this the cuts in the real value of benefits and pensions, the lack of a mandatory Living Wage and the City’s poorest face a grim future indeed. I suggest:

* The City Council consult with Good Food Oxford and other bodies to develop a Food Policy for the City designed to raise quality and access to food for all;
* That the City Council promote the creation of Farmers’ and Community Markets in parts of the City where they are not currently present, with the intention of providing more organic foods to the public, when in season;
* That the City Council adopt a policy of matching its preferred Living Wage to that of London, in recognition of high housing costs in Oxford;
* That the City Council should take steps to ensure full utilisation of allotments in the City and develop policies to add to the area of allotments at the fringes of the City where this seems practical.

These suggestions are consistent with ensuring societal or social sustainability, access to local food to cut greenhouse gas emissions and other aspects of a sustainable development agenda which fits with the tests of soundness. They are also necessary to ensure Oxford stays in line with the Sustainable Development Goal targets, as agreed by the Government in line with the UN programme for them 2015-2030.

p.105 first paragraph

The notion of a ‘disused allotment’ is in itself questionable. The City Council should retain these allotments, attempt to secure the support of an existing allotment association to manage and take a role in promotion of the use of such sites. A City with a growing population cannot conceivably sacrifice allotment land for development when all available brownfield sites are NOT being considered for potential housing or other development uses. This is a failure of ‘positive preparation’ in the tests of soundness.

**AMENDMENT:**

**Allotment land in Oxford shall be conserved in this use. Means of increasing allotments in the City will be considered and enacted during the Plan period. Allotment sites with low or nil usage at the present time will be offered to proximate Allotment Associations for their management and the City Council shall promote their use in recognition of the food needs of the City with a growing population.**

p.106 Residential garden land

Whether residential garden land is retained in its many varied and valuable uses is a function of whether or not property is privately rented, as a rule. I object to further planning agreement for HMOs, or extensions with very large footprints to owner occupied properties that substantially decrease garden spaces. I object to the paving over of front gardens that appears to be a side effect of the extension of Controlled Parking Zones across the City. I am very concerned about the drainage effects of these long-term activities; I do not believe the long-term needs of existing and future residents for the cultivation of food or local drainage are served by such activities. I believe that health promotion depends upon supporting the retention of land as gardens both for amenity and food production since both contribute to the physical activity an obese population needs. I also recognise that quality of life in old age is strongly related to continuing physical activity and retaining mobility, which a garden can provide.

Unused gardens can become part of a scheme to rent out such gardens for allotment creation in the City, to add to local food production, in cooperation with owner occupiers, council tenants and landlords who will benefit by additional income. No permission for development on gardens with biodiversity value should be permitted and such sites should be designated, protected and be subject to associated enforcement action to help maintain the ecological qualities of the City, its drainage and its capacity to grow food. The City should substantially increase its Tree Preservation Orders, to retain an attractive City with good control of drainage as part of the motivation for doing this.

All of these references are consistent with the idea of sustainable development, meaning the City Plan draft needs adjustment to be in conformity with the tests of soundness.

**AMENDMENT:**

**Residential garden space is to be the subject of a suite of policies designed primarily to keep gardens as gardens, retain drainage, protect biodiversity and potentially add to allotment spaces in the City. A full policy on this topic will be developed, implemented, monitored and reported upon by the City Council.**

p.107 Green and open spaces

There is no case for developing on Green or open spaces in a City with a rapidly growing population. No exceptional circumstances exist which can justify such development. Such development cannot be ‘justified’ under the tests of soundness. There is a lot of unused space above the City to be claimed for development above existing brownfield sites, subject to respect for viewing cones, overshadowing and other potential local impacts. That this has yet to be measured properly, giving for example maximum heights in specific areas, is indicative of a lack of ‘positive preparation’ in this City Plan draft.

**AMENDMENT:**

**The City will retain green spaces in perpetuity, for their many contributions to existing and future generations.**

Protection of existing Green Infrastructure features

Once again, protection is not absolute. In terms of intergenerational responsibility – something this Plan needs to reflect repeatedly section by section to make the idea of sustainable development meaningful in line with the tests of soundness – there cannot be a case for removing Green spaces or ecologically valuable features within them. In fact, the opposite is a duty to future generations: the enhancement of Green Spaces with sensitively chosen increases in appropriate species to provide more habitats, more shade, more water retention and more places people will want to be.

p.108 top of page

The destruction of Ancient Woodlands on any pretext is an exemplary failure in our planning system. You cannot replace trees that are hundreds of years old, or their associated habitat, ‘like for like.’ It is the job of the local authority, with appropriate support from bodies such as the Woodland Trust, to protect Ancient Woodlands and veteran trees through all means available to them. There is absolutely no way such destruction can be fitted with any interpretation of the tests of soundness as to do so would negate the sustainable development aspects in these tests.

**AMENDMENT:**

**Trees, both veteran and ancient, should be subject to Tree Preservation Orders throughout the City as a result of Council survey work in conjunction with appropriate local groups.**

Biodiversity enhancement

Conservation target areas require rather more than physical conservation and protection at surface level. All of these areas are subject to the environmental stress of a changing Climate. This is likely to mean longer periods of drought and rainfall than we have already experienced in the UK; greater prevalence of invasive and destructive species of all kinds. In short, this justifies the City bringing forward a general target of a carbon neutral Oxford to 2030, in cooperation with the community, its employers and landowners.

With reference to the Shotover Country Park Conservation Target Area, we note that the Friends of Shotover Country Park and the Bullingdon Community Association which runs the Bullingdon Community Centre in Peat Moors are both very concerned about any attempt to connect the unwanted and environmentally disastrous Cambridge-Oxford Expressway to the Ring Road by using land for road construction which forms part of the Shotover Country Park, or the Garsington interchange or anywhere in this vicinity. Clearly the traffic implications for neighbouring areas of the City would be terrible if the Expressway was connected to any part of the Ring Road. Routes off the Ring Road inside Oxford offer many ‘pinch points’ to make traffic congestion, air pollution and noise even worse than it is already. I urge the City Council to commit itself to oppose the Expressway on these grounds and many others.

**AMENDMENT:**

**Oxford City Council rejects the principle of a Cambridge-Oxford Expressway. The Council places value upon the East West Rail link, and the re-opening of disused rail lines in Oxford and in Oxfordshire as contributions to dealing with current and future traffic problems. The City Council urges central Government to fully fund East West Rail, including full electrification and the Bedford-Cambridge section.**

Pp108-109 Green and brown roofs

I recognise the importance of Green and Brown roofs, and Green walls, in combating the ‘urban heat island effect’ by reducing heat-reflecting surfaces, absorbing water and contributing to its management in the urban environment and making roof top locations that are attractive for a variety of uses by residents and/or the public. This is a matter of sufficient value that a partnership between the City Council, major employers and landowners, local environmental organisation and the public might be able to promote a series of such projects in a programme to alter the local environment of some parts of the City for the better. The public health value of keeping temperatures down has already been noted; the appearance and attractiveness of these types of initiatives to tourists and conference attendees is also worth considering.

**AMENDMENT:**

**Green and Brown roofs are supported features of the urban environment in Oxford City Council’s planning system. The City will construct a partnership including major employers and environmental organisations to identify sites for such enhancements of the City.**

p.114 Secure by design

The extent to which spaces are made secure and safe can become, in high crime areas, or simply in areas of intense public use, oppressive, visually intrusive and problematic for walking and cycling network development. Bearing in mind the critique by Minton of such approaches to urban design[[46]](#footnote-46), I suggest the City Council consider the possibility of ‘environmentally secure by design’. By this I mean using trees, vegetation and the presence of natural barriers, such as waterways, to provide the security that is desired instead of disfiguring the urban landscape with bars, barbed wire and concentrations of CCTV cameras reminiscent of US prisons which feature in many films and TV series. How practical this is depends upon location, and the effects of what has been done in the past. The City might want to consider this in terms of planning guidance. For example, planting roses may seem a token measure in terms of security but a thicket of them is impassable……….

**AMENDMENT:**

**Liaison between the Police, public services and businesses is needed to identify where natural barriers in Oxford can be improved to assist in security in locations where it is an issue needing addressing. The City Council will pursue this approach with appropriate local bodies indefinitely.**

Pp114-115 Views and building heights

I strongly support taller building heights, particularly where this is for social and keyworker housing to meet the local demand for very low cost homes. I recognise that quality of construction, sustainability and security are paramount as well as ensuring that viewing cones are not removed. Colour is important to help such building blend into the environment, unlike the very unfortunate misplaced tower on the Said Business School. However, I do not extend the same support to hotels, offices or student accommodation since the comparatively restricted area of sites suitable – in my view – for taller buildings means the use of such space must be reserved to the highest possible priority uses. Very low cost housing is one such use; expanding hospital facilities including accommodation for keyworkers on NHS sites would be another.

p.123 Storage of bikes, waste and recycling bins

The right of landlords and owner occupiers to have and use bikes and waste and recycling bins is reasonably linked in the public mind with the responsibility to take care of them in a matter consistent with the public interest. This includes indicating to landlords that they must place details of waste and recycling bin collections inside their properties in prominent locations and ensure that these are intact when inspecting their properties; ensuring landlords respond promptly to complaints about wandering bins in any location; stronger promotion through contacts with landlords and by direct emails of recycling and re-use options (eg. for furniture being removed during refurbishment of a property). Covered bike stands should be a norm throughout the City, wherever these are needed. It is most unfortunate that this was not done as part of the re-development of the Westgate Shopping Centre, when appropriately located bike racks on Queen Street were replaced by a fragmented distribution of fewer bike racks as far away from Queen Street as the developers of Westgate could manage. This was highly incompetent of all those responsible and a City with a growing population needs better planning decisions and enforcement than this.

In the management of bicycles, dockless bikes represent a new challenge. Unfortunately, they are to be found all over the place and expecting the public to report in whenever they see one badly located is rather like asking them to ring in every time they see a teenager going to school, since so many dockless bikes are dumped (sometimes vandalised) throughout the City. In terms of resource use, they are a poor choice for the City for this reason. They have become part of the ‘litter stream.’ They are an impediment to free movement of pedestrians in many locations on any given day. Whilst I appreciate that the City Council has limited powers to deal with dockless bikes as a problem, I ask that it lobbies Government to push for such bikes to be ‘docked.’

**AMENDMENT:**

**The City Council believes that dockless bikes have become another form of litter in our City. The Council will use all means in its power to press Government to give Councils the capacity to insist dockless bikes are ‘docked.’ The City will argue this is better for the companies involved, the users and the general interest of all in the absence of dockless bikes becoming part of the ‘litter stream’ in Oxford.**

p. 126 Promoting sustainable travel

I strongly support the Gilligan report which recommends that £150 million be spent on cycling infrastructure in Oxford.[[47]](#footnote-47) A failure to reduce traffic moving into Oxford will cause damage to the local economy, the environment and the Climate. Whilst reducing inward commuting is an Oxfordshire Local Transport Plan goal for the City, the threat of the Cambridge-Oxford Expressway and the failure to re-open disused rail lines generally means that ‘joined up’ thinking on transport is very far from being achieved locally, County-wide or nationally.

Apart from the Gilligan proposals, I welcome initiatives which reduce traffic and road capacity. In terms of reducing traffic, congestion charging has been suggested for the City but Electronic Road Pricing – as operating in Singapore for the last 20 years – would offer a wider range of charges, ease of enforcement and a surplus of funds for a variety of sustainable transport uses.

After examining the principle of applying Electronic Road Pricing to Oxford, I have sent a document on how this might be applied to the City to selected key County Councillors. This may at some point reach a County working group on reducing congestion, formed recently. A copy of this report can be obtained from me.

I note the serious failure to follow up and generalise the benefits of the ‘Sustainable Travel Towns’ initiative which attempted to focus resources and staffing on means of encouraging sustainable travel use in a number of communities.[[48]](#footnote-48) I urge the City Council to consider its findings as part of making transport in and around Oxford more sustainable, including reductions in all types of road traffic. This should have been part of the ‘positive preparation’ of the City Plan under the tests of soundness, but does not appear to have been considered.

**AMENDMENT:**

**The City Council shall examine the results of the Government’s Sustainable Travel Towns initiative and develop policies to implement changes in Oxford likely to reduce car journeys as a priority and other vehicles movements as far as is possible throughout the whole Plan period.**

Road capacity reduction could take a variety of forms: more bus lanes; more cycle routes on existing roads; blocking off some roads to prevent ‘rat running’ through residential areas; dramatically increasing pedestrianised and pedestrian priority areas both in the City Centre and in district centres or other locations where this will help to cut through traffic, promote traffic calming and improve quality of life. I note the unhelpful and unconstructive hostility of the bus companies to pedestrianisation (both existing and prospective) and even to the Zero Emissions Zone – as reported in the local press. I feel the City Council should downgrade the stakeholder status of the bus companies, being guided instead far more by walking and cycling groups and environmental and amenity organisations in the reclamation of Oxford from excessive amounts of use of vehicles in too many congested locations. The possibility of superior bus companies committed to rapid introduction of all electric buses should be considered.

**AMENDMENT:**

**The City Council recognises that long-term projected growth of vehicles means Oxford needs protection from increased numbers of vehicles entering the City. The City Council supports the principle of road traffic reduction including reducing road capacity, preventing through traffic in residential areas worse affected by traffic and increasing pedestrianisation, pedestrian priority areas as well as enhancing walking and cycling networks.**

p.127

Delivering a ‘step change’ in travel choices means dispensing with the idea of present levels of access for vehicles to a larger part of the central area of the City. Pedestrianisation should include the High Street-Cornmarket-St Aldates junction where pedestrians are restricted severely by the accommodation of vehicles – especially buses and taxis. It should also include stopping through traffic at the junction of St Georges Street-Cornmarket-Broad Street for the same reason.

**AMENDMENT:**

**Pedestrianisation will be extended in the City, including provision for improved cycling networks. Pedestrianisation will include the High Street-Cornmarket-St Aldates junction where pedestrians are restricted severely by the accommodation of vehicles – especially buses and taxis. It will also include stopping through traffic at the junction of St Georges Street-Cornmarket-Broad Street for the same reason.**

I am sceptical about the capacity of the County Council to deliver more Park and Ride sites given extreme public spending cuts and the imminent deletion of the Revenue Support Grant, and am concerned about the allocation of greenfield sites to this purpose. This also prevents a rapid move towards a complete coverage of Controlled Parking Zones in the City, since this involves County Council officers and their increasingly limited funds.

**AMENDMENT:**

**The City Council recognises that building more Park and Ride sites or increasing capacity at such sites means car journeys will occur to and from such sites even when walking, cycling, bus and rail options may exist. The City Council therefore supports a moratorium on any increase in Park and Ride capacity within or outside Oxford. Instead, the City should support re-opening Oxfordshire’s disused rail lines and restoring bus subsidies.**

**AMENDMENT:**

**The City Council supports the principle of Electronic Road Pricing in preference to a congestion charge system for Oxford.**

p.128

I ask that the City Council promote a Witney to Wheatley rail line[[49]](#footnote-49) as a substantial contribution to helping reduce traffic moving through these areas.

Pp 128-129 Prioritising walking, cycling and public transport

I support the principles outlined in this box, but believe the City Council must take a more pro-active role in in reducing road capacity to reduce car use in the City.[[50]](#footnote-50) As indicated before, pedestrianisation, pedestrian priority areas, and connecting up walking and cycling networks are essential.

p.130

The principle of reducing the impact of delivery vehicles needs some specific targets. An extended Zero Emissions Zone will force technological change on freight companies, but their vehicles still occupy road space and contribute to congestion. This section needed to mention cargo bikes, already in use in the City. The principle of freight consolidation centres is acceptable, provided this means the use of existing brownfield sites and not even more greenfield site development.

p.131

I support Controlled Parking Zones for the entire City and a substantial extension of car free developments. Both these measures will help to reduce emissions from traffic, by reducing car movements.

p.132

I ask that the City Council re-consider its parking rules for HMOs. The removal of front gardens and consequent issues for drainage when HMOs are created with new parking spaces on site is not a prudent use of urban space. I would prefer the City Council looked at insisting new HMOs are registered only if they become car free developments.

p.133

I welcome the spread of electric charging points, and insistence of such points in new developments. I would like to see an overall drop in public car parking spaces in Oxford, as a contribution to reducing traffic congestion, air pollution and noise. This should be done year on year over time, to push people towards more sustainable transport modes. Since about one third of households in Oxford already do not have access to a car, this is well within the realms of possibility.

**AMENDMENT:**

**Sustainable transport and active lifestyles to promote health mean more walking and cycling is needed within Oxford. Bearing this in mind, the City Council, as part of a policy for dual use of private and public car parks with housing, will slowly reduce public car parking spaces in Oxford.**

p.134

I think that the City should aim for a faster introduction of a Zero Emissions Zone over a larger area. District Centres should be central points for new Zero Emissions Zones as well.

I agree with points made about improving Cycle parking, with the additional point that dockless bikes should be docked.

p.140

I note the absence of references to localisation, local supply chains and the importance of reducing ‘freight miles’ as part of the City’s response to the Climate Emergency. Sector by sector policies are needed for this, with dates and specific targets. Current wording of the draft City Plan does not act upon the Climate Emergency and air pollution aspects of the failure to localise as above as far as is practically possible. In consequence, this failure to recognise the importance of localisation is also a failure to meet all 4 tests of soundness.

The City Council needs to develop an emphasis on encouraging those responsible for private and public procurement to make use of Oxfordshire-based businesses as far as is possible. I encourage any and all reasonable measures to have independent businesses in the City Centre and district centres, rather than adding to the ‘clone town’ image created by chain stores. I note announcements being made almost daily about the reductions being made in the number of branches of the various chains, in part perhaps due to internet shopping. I think a more independent, specialist retailer-favouring approach would be a good response to this challenge.

**AMENDMENT:**

**Localisation of supply is an important contribution to reducing ‘freight miles’ created in servicing the needs of Oxford. The City Council will develop and implement a detailed policy aimed at localising supply for Oxford, its homes, its public and private enterprises and the City Council itself as far as it is practically possible to do so, and throughout the Plan period.**

pp.141-142

I strongly support ecologically-sustainable tourism for the City. I recognise the need for preferential parking for electric coaches in the medium term to force coach operators away from diesel vehicles. I recognise that the ecological footprint of the City includes all of the journeys made to it and from it by surface transport, civil aviation and ferries. Similarly, freight from any location is part of the City’s ecological footprint and its greenhouse gas contributions. Achieving a carbon neutral City by the earliest possible date and no later than 2030 must take all of these movements into account. Using the term ‘sustainable development’ without considering the ecological footprint of the City properly is to make the term meaningless, and breach the tests of soundness at the same time.

**AMENDMENT:**

**Ecologically-responsible tourism, conference trade and studying in Oxford should include using the most sustainable transport modes available to get to the City. The Council website and influence in the local Tourism sector will be used to emphasise the maximum reasonable use of sustainable modes of transport.**

p.145 Utilities

A carbon neutral City means that all utilities must be carbon free in operation and in the content of the services they provide, by 2030 if the report of the IPCC mentioned above is being taken seriously. At present, just 16 countries of the 157 committed to the Paris Agreement on Climate Change have adequate policy means in place to reach their Climate goals.[[51]](#footnote-51) In consequence, as has been seen in the USA under the climate change-denying Trump Administration, localities like Oxford must step up their efforts to fight the Climate Emergency. What will this involve?

All utility vehicles should be electric no later than 2030. Switching the City to renewable sources of electricity is a matter for promotion by the City and in cooperation with the Low Carbon Hub and other groups. All employers must be strongly encouraged to be part of this process. However, the critical goal of achieving space heating without using fossil fuels is going to require innovative ways of adapting existing homes and public and private enterprises. Against a 2030 target date, the City needs to consider how best practice in the UK and other countries may be replicated here. I note the absence of solid wall insulation grants and the very high costs of external or internal solid wall insulation as one area needing Council leadership, and preferably changes in national policy.

p.151

I favour this area for high density residential development with space at ground level for car parking/bins/cycles/storage rather than living space. This is to protect against flood risks. The provision of public open space is welcomed, especially where this extends existing areas of habitats, increases the number of trees, water fountains etc.

p.152 Cowley District Centre

This Centre suffers from high levels of through traffic and has neighbouring roads with ‘rat run’ problems such as Beauchamp Lane and Rymers Lane. Whilst a lot of people do access the Centre on foot and by bike, this is mainly from the Barns Road area and environs and the catchment of the Centre is much larger as people both drive to it from elsewhere and bus in from other locations. The Cowley Area Transport Strategy 2nd edition offers some suggestions about dealing with traffic in this location.[[52]](#footnote-52)

p.153

I am very sceptical about expanding retail provision or adding a hotel at the Cowley Centre. I favour high density homes instead, possibly an additional residential block providing social and keyworker housing. I recognise the general challenge of water supply in this area, and others. Whilst water conservation measures are certainly promoted by the privatized water industry, eg Thames Water, the leakage from this industry in general indicates a regulatory failure. I feel the City Council should involve itself in water conservation promotion, directly and through an appropriate partnership.

p.178

I do not support the use of Green Belt or greenfield sites for development. Densification of development on existing, developed sites should be sufficient for the City’s future actual needs.

p.191 Cowley Marsh Depot

I support the views of the Temple Cowley Residents’ Association and campaigning group New Temple Cowley Pools that the Cowley Marsh Depot, when vacated, should provide a new sports centre incorporating a swimming pool and housing on this site. The primary housing need would be for social and keyworker housing in this area.

**AMENDMENT:**

**The Cowley Marsh Depot site, subject to the restoration of its original area and the removal of car parking which obstructs its gate facing on to Oxford Road, should become the site of a new leisure/sports centre including swimming pool provision plus housing. In view of the exceptional need for very low cost housing in Oxford, housing on this site will be social and keyworker high density units.**

p.192

I reject the principle of development on so-called ‘disused’ allotment sites. These should be offered to neighbouring Allotment Associations for management, and should be promoted by the City Council as part of a policy to increase food production within the City.

p.194

I reject development of playing field sites. The City population is growing and this is extremely short-sighted.

p.217

I reject the use of the William Morris Sports Ground for housing. The City Council has repeatedly and correctly refused such development in the past. There are two options: one, to zone it as public open space in perpetuity and fund compulsory purchase to remove from the current owner; two, to add it to the land of the neighbouring school.[[53]](#footnote-53)

**AMENDMENT:**

**The City Council recognises the importance of retaining playing fields, including the William Morris Sports Ground, in their current usage. The growing population of the City makes the retention of such sites of great importance to current and even more future generations.**

p.225 Category 1 employment sites

I favour employment linked housing on these sites to compensate for the lack of genuinely affordable housing in Oxford. The City should encourage this, and support proposals through the planning process for high quality, high density tall structures.

p.233 HMOs

I think the need for varied accommodation in the City, and actual community development associated with a population that is not transient, favours very low cost housing options above giving permission for any more HMOs. The City should be buying homes on sale for social and keyworker housing as its contribution to changing the housing mix in the City to meet low cost housing needs. The possibility of doing this in cooperation with the City’s network of housing groups needs implementation, particularly where partnerships for funding and loans may be possible.

p.241 Green and Blue Infrastructure

I welcome the principle of using Green and Blue Infrastructure as a form of planning guidance. I look forward to seeing the areas classified in this way increased, rather than being encroached upon by inappropriate developments. I would like to see a commitment from the City to ensure such infrastructure links with efforts made by neighbouring local authorities, creating wider networks of Green and Blue Infrastructure in the County, and beyond.

p.246

I look forward to seeing the number and area of conservation areas in the City increased.

p.251 Travel Plans

Downward pressure needs to be applied to minimise car commuting into the City, in line with the Local Transport Plan. As car free developments may arise from new build and rebuilding, and student accommodation can generally be classed as car free, so may new businesses be pressed to minimise on site car parking and require staff to find other means of coming to work.

p.256 Cycle Parking Standards

I would like to see the proposed allocations moved upwards in the case of major employers, with corresponding reductions in car parking spaces. This may well allow residential and other uses in some locations, such as at the vast Unipart car park in the Horspath area.

\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*

1. See: <https://www.climateemergency.uk/blog/list-of-councils/> [↑](#footnote-ref-1)
2. See the following. This link gives access to both the full report and a summary for policymakers: <http://ipcc.ch/report/sr15/> [↑](#footnote-ref-2)
3. See: <https://www.theguardian.com/environment/2013/apr/12/copenhagen-push-carbon-neutral-2025> and for access to the detail of planning in Copenhagen, see documentation accessible via: <https://stateofgreen.com/en/partners/city-of-copenhagen/solutions/copenhagen-carbon-neutral-by-2025/> [↑](#footnote-ref-3)
4. UK Sustainable Development Strategy, initiated 2005, eg: <https://www.sustainable-environment.org.uk/Action/UK_Strategy.php> ; [↑](#footnote-ref-4)
5. The Oxford and Swindon water catchments reach capacity use of water during 2020. [↑](#footnote-ref-5)
6. And the industry is very concerned about the current (22/2/2020) Govt’s proposals for immigration in future. [↑](#footnote-ref-6)
7. <https://www.independent.co.uk/news/business/news/uk-construction-worker-shortage-recruitment-brexit-eu-nationals-citizens-europe-trade-association-a8172466.html> [↑](#footnote-ref-7)
8. <https://www.citb.co.uk/news-events/uk-construction-skills-time-bomb/> [↑](#footnote-ref-8)
9. <https://www.constructionproducts.org.uk/news-media-events/blog/2017/september/the-underlying-challenges-of-the-construction-industry/> [↑](#footnote-ref-9)
10. See: <https://www.gov.uk/government/news/ministers-call-on-construction-industry-to-invest-and-build-home-grown-talent> [↑](#footnote-ref-10)
11. GL Hearn et al – *Oxford City – Objectively assessed need update –* October 2018. [↑](#footnote-ref-11)
12. See: <https://www.oxford.gov.uk/downloads/file/7076/addendum_to_the_sustainability_appraisal_of_the_proposed_submission_oxford_local_plan_2036_main_modifications> [↑](#footnote-ref-12)
13. <https://crisis.org.uk/about-us/latest-news/more-than-24-000-people-facing-christmas-sleeping-rough-or-in-cars-trains-buses-and-tents/> [↑](#footnote-ref-13)
14. <https://www.theguardian.com/society/2018/nov/22/at-least-320000-homeless-people-in-britain-says-shelter> [↑](#footnote-ref-14)
15. Unsound & unsustainable– why the SHMA will increase greenfield use but not meet housing needs - A critique of GL Hearn’s April 2014 Oxfordshire Strategic Housing Market Assessment (SHMA)

    Final Report To CPRE Oxfordshire 21 May 2014

    [↑](#footnote-ref-15)
16. A more recent figure of 4-5% off GDP has been suggested, depending upon what type of Brexit deal, if any, is obtained – 22/2/20. [↑](#footnote-ref-16)
17. See p.16: <http://mycouncil.oxfordshire.gov.uk/documents/s33704/Background%20CA_JUN2816R07%20Connecting%20Oxfordshire%20vol%201%20-%20Policy%20and%20Overall%20Strategy.pdf> [↑](#footnote-ref-17)
18. See page 5 and especially footnote 4: <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf> [↑](#footnote-ref-18)
19. See: <http://www.un.org/documents/ga/res/42/ares42-187.htm> [↑](#footnote-ref-19)
20. See: <https://sustainabledevelopment.un.org/content/documents/5987our-common-future.pdf> [↑](#footnote-ref-20)
21. Friends of the Earth: Local Plans: Campaigner’s Guide, October 2016. p.19 NOTE: NPPF references hereinafter from this document refer to the previous version of the NPPF, not the one issued summer 2018. [↑](#footnote-ref-21)
22. Local Plans Guide, ibid, p.14 . [↑](#footnote-ref-22)
23. Local Plans guide, ibid, p.15. [↑](#footnote-ref-23)
24. Local Plans guide, ibid, pp16-17. [↑](#footnote-ref-24)
25. See for example: <https://www.thetimes.co.uk/article/think-the-flooding-is-bad-now-britain-faces-6ft-rise-in-sea-level-warns-dutch-expert-gl6mlvvqq?fbclid=IwAR0fOaL3U7nT70IRzDoU7SoKF410-Z2M1qFLXAR7NHXqTQO3_8lH7TBwZGk> [↑](#footnote-ref-25)
26. See: <https://www.theguardian.com/environment/2020/feb/23/uk-flood-defence-plans-inadequate-warn-scientists?CMP=share_btn_fb&fbclid=IwAR1O8rZp-9jHHALtDymyvK3PlT4vFtZzdV6IA_XQIdS_zJtyTubWaWH6Tio> [↑](#footnote-ref-26)
27. Oxford Mail, 15th October 2018. [↑](#footnote-ref-27)
28. <https://www.nic.org.uk/wp-content/uploads/Running-out-of-Road-June-2018.pdf> [↑](#footnote-ref-28)
29. Local Plans Guide, p.26. [↑](#footnote-ref-29)
30. Local Plans Guide, ibid, p.26. [↑](#footnote-ref-30)
31. Unsound & unsustainable– why the SHMA will increase greenfield use but not meet housing needs - A critique of GL Hearn’s April 2014 Oxfordshire Strategic Housing Market Assessment (SHMA)

    Final Report To CPRE Oxfordshire 21 May 2014

    [↑](#footnote-ref-31)
32. For the general Sustainable Development Goals set by the UN, to which its member States are committed, see: <https://sustainabledevelopment.un.org/sdgs> Tap on each of the 17 SDGs to search for targets and indicators which show the sub-Goals under each of the SDGs. [↑](#footnote-ref-32)
33. See for example: <https://www.bbc.co.uk/news/business-46459694?SThisFB&fbclid=IwAR0QKh6D-jxFExzP5nZpeLfgYCcxl18epGEApbdQziZdo5uzfGnQWrEx82M> [↑](#footnote-ref-33)
34. See for example: World Health Organisation updating: <https://inews.co.uk/news/health/air-pollution-kills-64000-people-in-the-uk-every-year-80393> [↑](#footnote-ref-34)
35. <https://www.bloomberg.com/news/articles/2018-09-03/brexit-has-already-cost-u-k-more-than-2-of-gdp-ubs-estimates> [↑](#footnote-ref-35)
36. See: concentrated critique: <http://www.cpreoxon.org.uk/news/current-news/item/2693-oxfordshire-housing-growth-plan-based-on-fictional-figures> [↑](#footnote-ref-36)
37. One million homes by 2050 Cambridge-Oxford is accompanied by 1 million homes in the ‘Thames Gateway’ area of Kent, Essex and East London. These aspirational figures take no account of water implications; areas prone to flooding; realism about available skills; the Climate implications of construction with inferior building standards and poor enforcement of standards, as well as other physical resource implications. [↑](#footnote-ref-37)
38. *What Lies Beneath: the understatement of existential Climate risk –* David Spratt and Ian Dunlop, August 2018, Published by Breakthrough: National Centre for Climate Restoration, Melbourne, Australia, p.4. Kevin Anderson has recently indicated(2020) that the 1990-2018 increase in carbon dioxide in the atmosphere is about 67%. [↑](#footnote-ref-38)
39. <https://earthobservatory.nasa.gov/WorldOfChange/decadaltemp.php> [↑](#footnote-ref-39)
40. <http://www.airportwatch.org.uk/2018/10/prof-kevin-anderson-blog-callous-or-calamitous-the-uk-climate-minister-pulls-the-rug-from-under-1-5c/> [↑](#footnote-ref-40)
41. See for example: <http://uknea.unep-wcmc.org/LinkClick.aspx?fileticket=lfVaZJDoV8c%3d&tabid=82> pp.2-4 & for forests, woods and trees specifically, see: <https://www.woodlandtrust.org.uk/mediafile/100229275/stake-of-uk-forest-report.pdf?cb=58d97f320c> [↑](#footnote-ref-41)
42. [http://webarchive.nationalarchives.gov.uk/20140605090108/http:/www.naturalengland.org.uk/regions/east\_of\_england](http://webarchive.nationalarchives.gov.uk/20140605090108/http:/www.naturalengland.org.uk/regions/east_of_england/ourwork/gi/accessiblenaturalgreenspacestandardangst.aspx)

    [/ourwork/gi/accessiblenaturalgreenspacestandardangst.aspx](http://webarchive.nationalarchives.gov.uk/20140605090108/http:/www.naturalengland.org.uk/regions/east_of_england/ourwork/gi/accessiblenaturalgreenspacestandardangst.aspx)

    [↑](#footnote-ref-42)
43. Local Plan Guide, ibid, p.28. [↑](#footnote-ref-43)
44. GRAIN – *The Great Climate Robbery: how the food system drives Climate Change and what we can do about it,* 2016. [↑](#footnote-ref-44)
45. See for evidence: <https://www.trusselltrust.org/2018/11/06/action-still-needed-universal-credit-wait/> & <https://www.churchtimes.co.uk/articles/2018/19-october/news/uk/bishops-urge-government-to-fix-problems-with-universal-credit> [↑](#footnote-ref-45)
46. Anna Minton – *Ground Control: fear and happiness in the twenty first century City,* 2009. [↑](#footnote-ref-46)
47. National Infrastructure Commission – *Running out of road: investing in cycling in Cambridge, Milton Keynes and Oxford* [↑](#footnote-ref-47)
48. “This is the full independent report that was commissioned to evaluate the results from the designation of Sustainable Travel Towns - Darlington, Peterborough and Worcester. These towns implemented packages of ‘Smarter Choice’ measures, which resulted in increases in cycling, walking and bus use, and decreases in car use. The evaluation was led by Transport for Quality of Life Ltd, with a team involving TRL, University of Aberdeen, AEA and the University of the West of England.” <https://www.gov.uk/government/publications/the-effects-of-smarter-choice-programmes-in-the-sustainable-travel-towns-full-report> [↑](#footnote-ref-48)
49. From Carterton/Witney to Oxford incorporating the Cowley branch line and re-connecting the latter to the Wheatley area. [↑](#footnote-ref-49)
50. It is not impossible that the *Connecting Oxford* proposals for bus gates might contribute to this. However, preventing traffic diversion away from such bus gates into residential areas is a major concern. The Bullingdon Community Association, covering the Churchill and Lye Valley council wards, has rejected a bus gate at the top of Hollow Way since traffic may seek to use Dene Road and Bulan Road to avoid the bus gate. Dene Road is of variable width with quite a lot of local vehicle parking in this CPZ area. Bulan Road has speed bumps placed there many years ago to discourage excessive traffic movements. What is likely in this area could occur in other parts of the City with new bus gates. [↑](#footnote-ref-50)
51. See for details: <https://www.independent.co.uk/environment/climate-change-greenhouse-gas-emissions-targets-paris-agreement-a8603456.html?fbclid=IwAR0RCuByyVVnpFv9o5nZzajoHpUyOKq-lUU-K8BdM8UPSn0b20DOcV-ikOw> [↑](#footnote-ref-51)
52. Available from [stevedawe@gn.apc.org](mailto:stevedawe@gn.apc.org) as a publication of the recently formed Cowley Area Transport Group. [↑](#footnote-ref-52)
53. It is a matter of great regret that the City Council has now permitted housing on this green space (2020). [↑](#footnote-ref-53)