To: planning at Oxford City Council

From: Steve Dawe, Cowley Area Transport Group – [www.catg.org.uk](http://www.catg.org.uk)

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OBJECTION:

21/01347/FUL Construction of 4552 square metres of office, research and teaching space (F.1 Use Class) for the Institute for Global Health. Provision of an outbuilding to provide cycle parking, bin storage and associated sprinkler system with associated hard and soft landscaping works. | University Of Oxford Old Road Campus Roosevelt Drive Oxford OX3 7FY

The Cowley Area Transport Group is an informal network of those involved in and concerned about a variety of sustainable transport issues in Oxford.

We are concerned about the scale of this proposal and its implications for all types of traffic movements associated with this site. At present, traffic levels in Oxford are above pre-lockdown levels almost exclusively due to Government Covid 19 advice to avoid public transport. Air pollution will inevitably rise. To be specific: By March 2021, traffic levels in some regions of UK, including the South East in which Oxford is located, had gone above pre-lockdown figures.[[1]](#footnote-1)

Car use in the City is currently noticeably much higher than pre-lockdown with both residents and those entering Oxford from elsewhere avoiding buses and trains. Consequently, until the City obtains pre-lockdown levels of bus and train use, it is likely that any development adding to traffic in Oxford will add more journeys than previously expected. We therefore want a much more restrictive approach to vehicle movements from the whole of this site as they will make traffic in our area even worse than at present. We note with concern exceptionally heavy traffic at the Old Road, Windmill Road, the Slade junction with really large tailbacks during 2021.

We note the work of the Friends of Lye Valley in seeking better protection of the Lye Valley in Headington from polluted water run off and a variety of inadequate forms of drainage.[[2]](#footnote-2) We support their proposals for a Supplementary Planning document covering the whole Lye Valley water catchment, to help protect the Lye Valley SSSI and retain the possibility of re-wetting the approximately 11.7 hectares of peatland in various conditions in the neighbouring area. The implication for this development is that the total amount of impermeable surfaces should not be increased. We note that SUDS do not have any statutory enforcement to ensure that good drainage occurs over time, so asserting the use of SUDS in any development is a tick-box exercise. We also urge the applicant to take these issues on board as drainage within the City is poor, causing very rapid spread of water from the margins of roads when heavy rainfall occurs.

On the Travel Plan associated with this application:

Page 3: The overview of the Travel Plan offers to ‘manage trips to/from the site, promote walking and cycling as healthy and sustainable modes of travel and encouraging the use of public transport where walking and cycling are not possible.” To ‘manage’ is not sufficient. This site should have vehicle parking only for the disabled and mobility impaired, and bays for deliveries. CPZs in the surrounding area may need introduction beyond the current area of CPZ coverage to deter non-residential parking.

Page 6: Staff parking spaces should be withdrawn, allowing the use of this space to other needs – for example, homes for nurses so they can avoid very high local rents in private rented accommodation. The site has good walking, bus (p.7) and fair cycle access so car use should not be supported. We cannot see staff parking getting the use it might once have had, given the relatively new propensity of many to work from home when possible. Current parking provision on site is usable for other purposes in consequence of this consideration. This will benefit the local residential community when traffic is being reduced.

Page 8: We note and commend the location of the no 400 Park and Ride bus stops. This service goes between Seacourt and Thornhill P&R sites and can provide walking access to hospital sites north and south of the Headington-London Road axis. Rail services are bus-connected to the area, and the 280 bus running from Oxford Rail station to Aylesbury via the London Road is also of use for commuters. Further bus lanes should be considered to speed up bus movements and deter avoidable car use within Oxford.

Page 9: We regret the term and use of ‘advisory cycle lanes’ as not equal to the challenge of promoting public health through achieving more safe cycling. Cycle routes on the road should, as far as practically possible, be supported by solid white lines to give stronger discouragement to their use by drivers.[[3]](#footnote-3) This means ensuring double yellow lines to deter the problem of parking and pavement parking across cycle tracks – very evident on Barns Road, for example.

Pp9-10: We commend, in principle, proposed pedestrian and cycle access to the site. Similarly, we support the suggestions of more cycle routes in the area – subject to ensuring that cycle tracks are wide enough to accommodate cargo bikes; that making some roads one way is implemented to allow 1.7m cycle tracks to be installed; and that both cycling and walking networks are joined up and preferably durably marked.

p.12: On Internal Vehicle Movements, we commend the concentration of deliveries to the Amenities building allowing low impact deliveries within the site.

p.15: We regret the general failures of the Oxford Local Plan 2036. Specifically, suppression of traffic movements is not given enough emphasis; building homes around the edges of or above private and public car parks has not been done. This could have led to more people being able to live closer to where they work eg. In the case of the massive BMW and Unipart car parks. See our critique of the this Plan under *Other Relevant Submissions* at [www.catg.org.uk](http://www.catg.org.uk)

p.16: We look forward to a radical revision of the University of Oxford Transport Strategy including the removal of 4000 car parking spaces in the University and Colleges in the City Centre save for those serving the disabled or mobility impaired. The University needs to recognise that transport, including aviation, shipping and imports, is the largest single sector for carbon dioxide emissions and it is not doing enough to reduce University and University-related emissions in general.

p.19: We commend that the Institute of Global Health application does not include any additional car parking other than 2 disabled parking bays.

Pp19-20: ‘Hard’ and ‘soft’ measures summarise here raise the question of enforcement and improvement over time. The City goal of a Net Zero Carbon Oxford by 2040 is going to require a lot from the University as the source of 8% of Oxford’s emissions. Transport, like emissions from heating buildings, requires year on year assertive measures to pursue both emissions reductions and cheaper sources of electricity and means of space heating. This should include engaging cargo bike companies for a proportion of deliveries to this site.

p.21: We commend the adoption of a Sustainable Travel Officer. Authority, staff and resources will be needed to make this role effective over time.

Pp22-23: We support the principle of reviews of policy effectiveness over a period of many years.

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1. iNews 25th March 2021: <https://inews.co.uk/news/environment/traffic-car-communte-london-up-30-per-cent-since-before-covid-pandemic-929784> [↑](#footnote-ref-1)
2. <http://www.friendsoflyevalley.org.uk/> The Friends of Lye Valley will also be commenting on this application. [↑](#footnote-ref-2)
3. Old Road has some solid line cycle track marking already. [↑](#footnote-ref-3)