To: consultation Oxford City Centre Action Plan 2021-2030

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**SUBMISSION TO CONSULTATION: Oxford City Centre Action Plan 2021-2030**

This submission answers questions in the Consultation document, as accessed 29 11 2021: <https://consultation.oxford.gov.uk/regeneration-economy/oxford-city-centre-action-plan/supporting_documents/211115_Oxford_CCAP_Report_FINAL_CONSULTATION%20DRAFT_LR.pdf>

Introduction:

Our objective for the City Centre is that it should be sustainable and resilient with far more very low-cost housing to create a consumer base for businesses in this area, and to meet social need for energy efficient homes. The area should include a mixed economy of private businesses, public sector and far more third sector bodies with less emphasis on shops – many of which, if vacant, should become very low-cost housing.

**First question p.20:** *Is there anything in the strengths, weaknesses, opportunities and threats presented on pages 14-17 that you would change?*

This is a City for people and not exclusively for business. There is far, far too much emphasis on speculative commercial development throughout these proposals, creating the high risk of market failure and financial losses. Hotels and ‘more overnight accommodation’ are speculative and may well fail. We should not ‘deliver’ more new housing as a priority. We should obtain more housing by making use of the existing built environment to minimise greenhouse gas emissions and the use of physical resources. In relation to connectivity, we reject the continuation of cross-town bus services through the City Centre as an impediment to a radical expansion of pedestrianised areas with cycle tracks in the City Centre and between it and the rail station. We want far more very low-cost housing to be created in this area from existing buildings and empty retail outlets: the area should include a mixed economy of private businesses, public sector and far more third sector bodies with less emphasis on shops – many of which should become very low-cost housing (p.5). It is far from clear how the City will ‘promote distinctive development.’ Claims of a lack of commercial space are not justified in terms of evidence, and reference is not made to vacant commercial premises throughout the City.

‘Existing green spaces’ include Colleges where access is variable, which should be changed to far more public access year-round. Resilience should include accepting that working from home should be the norm for all those who want it; and that online shopping will continue to erode aspects of the City Centre retail offer. Retaining small, independent businesses is desirable although the often empty units in the Golden Cross area should be adapted for very low cost housing (p.12). We agree that “A definition of resilience which values local networks as integral to the success of the place is more likely to build wealth that stays within the community, and build capacity locally(p.13).” Since research shows walkers and cyclists spend far more on average than car drivers, improved walking and cycling networks crossing the City Centre are vital.

**Second question p.20:** *Are there any strengths, weaknesses, opportunities, or threat that you would add?*

Strengths in the form of green spaces are constantly being eroded by City Council planning decisions, making more protection necessary(p.14). Reduction in bus and taxi movements in the central area is essential for pedestrianisation, removal of air pollution and reducing non-exhaust emissions from vehicles (PM 2.5s included) such as from road and tyre abrasion, brake pad erosion and vehicle movement of dust on roads. The Rail station should be part of an extended City Centre with improved pedestrian and cycle routes, and pedestrianised areas from west of the Cornmarket etc all the way to the station (p.15).

Opportunities should include adaptation to Climate Change as an overall goal with more trees and other vegetation, and fountains, in more pedestrianised areas, to combat heat, provide shade and improve the overall quality of the central area. This is part of fully recognising the Climate and ecological emergencies as factors in planning – as well as creating a radical expansion of pedestrianised areas. There is no particular reason for offices to occupy the central area if cheaper premises in industrial estates or science parks are available but we prefer to see very strong emphasis on promoting working from home to resist traffic movements and pollution(p.16).

Inadequate street space and narrow pavements reflect past failures to pedestrianise, and a failure to follow models offered by places including Norwich, Canterbury or York. Vacant units are not a ‘threat’, they are an opportunity to create very low-cost housing and an enlarged central area community (p.17). The opportunity to move the bus station to the Becket Street car park and fully pedestrianise George Street (bearing in mind Gloucester Green market access at specified hours) should be taken.

**question p.40:** *Are the projects identified under each workstream appropriate?*

There are severe limitations. Traffic congestion is best eradicated by pedestrianisation and the conversion of some City Centre car parking to new high-density very low-cost housing, including in a vacated bus station. The idea of ‘faster’ journeys through the City Centre is, frankly, absurd - unless the desire is to radically cut footfall. We want to see a ‘hard periphery’ of a very large pedestrianised and pedestrian priority area, outside which are bus termini, taxi pick-up and drop-off points, and through networks in the City Centre only for: walkers, cyclists, mobility scooters, emergency service vehicles and refuse vehicles via lockable gates and fully-maintained rising bollards. Deliveries should be by cargo bike or e-cargo bike. We strongly support better waterside access and access to the grounds of more Colleges, more frequently. All University and College car parking should go, with some disability bays or mobility scooter parking retained where actually needed by staff (p.26). ‘Getting the mix right’ should mean dramatically increasing the resident population in an expanded City Centre who would then sustain many types of existing enterprises.

Project improvement should be related to pedestrianisation and pedestrian priority throughout an expanded City Centre area. Greening of spaces should include planting of trees and permanent planters in existing road space (p.35).

The Covered Market should be extended – an option being a complete re-thinking of the Golden Cross space, although we think this should be primarily very low-cost housing. We are concerned, in terms of traffic, including taxis, and noise, if the night-time economy is expanded in the Centre. First, this conflicts with the very low-cost housing the City needs; second, we are concerned about the impact of night work upon those who work in this economy since prolonged night work is known to cause psychological problems.

**question p.40:** *Please tell us if we should include any other delivery partners under any project?*

Cohsat and constituent groups to assess transport/traffic implications of these proposals in appropriate detail, and propose upgrades in ambition – especially of pedestrianisation. The Council’s own Housing company, housing association and local housing campaign groups should form a partnership for long-term very low-cost housing in the existing built environment as far as possible, throughout the existing central area and towards the rail station, Oxpens, Osney Mead and environs.

**question p.41:** *Please tell us if there are additional progress and actions that should be included in any project.*

Projects must not be allowed to compromise walking and cycling networks. Mobility scooter parking should be favoured in place of car parking bays, with provision of such scooters at some points on the ‘hard periphery’ of the pedestrianised areas to allow a seamless transition from bus or blue-badge holder car to mobility scooter. Projects must, as a top priority, provide a substantial amount of very low-cost high density homes with the highest attainable energy efficiency/renewable energy use standards – using the existing built environment primarily. Developer contributions to infrastructure should be used to add trees, planting, fountains and to ensure easily negotiable surfaces. Cycle tracks should have durable coloured surfaces.

**First question p.68:** *Please tell us if we should include any other delivery partners under any project under Workstream 1:*

Cohsat and constituent groups to assess transport/traffic implications of these proposals in appropriate detail, and propose upgrades in ambition.

**Second question p.68:** *Are there any additional actions you would suggest under any of the projects under Workstream 1:*

It is essential to stop through traffic crossing the re-defined central area we are suggesting, as part of ensuring a large expansion of pedestrianisation over time. A Strategy for this, with a long-term time horizon, is necessary. The Workplace Parking Levy could be lower per parking space if applied to all workplace parking above 6 spaces in the City. We are amenable to the idea that a higher charge be applied inside an expanded central area in time, when the central area incorporates the space between locations like Queen Street and George Street and the railway station. PM 2.5s from non-exhaust emissions of vehicles (brake pad erosion, tyre abrasion, road abrasion and movement of dust resulting from vehicle movements) can only be eliminated over time in pedestrianised areas. If the City Council is serious about air quality, then this pervasive form of air pollution must be tackled expeditiously(p.55).

There is no proposal for an actual Zero Emission Zone, given non-exhaust emissions of vehicles, so the London term ‘Ultra Low Emissions Zone’ would be appropriate and accurate. We note reference to the ZEZ sidesteps PM2.5s, as elsewhere in the document (p.57).

Freight trips should be conditioned by a large increase in cargo bike and e-cargo bike usage. NO greenfield site should be allocated anywhere to accommodating freight interchange: dispersal of such activities to lay-bys is applicable – at the fringes of the City and beyond, and temporarily to unused sites in industrial estates or science parks until such locations have very low cost housing and associated facilities built upon them. Takeaways should be pressed to stop using mopeds in favour of e-bikes. There is an issue of the cost of such bikes at present, so the possibility of collective purchasing to push down unit costs should be pursued by the council with these businesses(pp62-63).

We want the bus station moved to the Becket Street car park and a strong pressure applied to coach operators to drop-off and pick-up at that location, as a major feature of the use of this site. This should be part of pushing coaches outside the ‘hard periphery’ of an expanding pedestrianised area, and off pedestrian priority streets too. Therefore, new drop off locations in the existing central area, such as Speedwell Street, should not happen – and St.Giles should be a bus terminus area, with space for buses to turn around, with coaches excluded (pp64-65).

Park and ride expansion should not occur. We favour building apartments above such surface level parking at P&R sites and adding such facilities as concentrations of high density very low-cost homes will need. Walking and cycling networks need improving through Park and Ride sites and should connect up with improved rural links, in cooperation with neighbouring local authorities (p.67).

**question p.69:** *Would you suggest any additional projects under this workstream? If so, outline your idea, its rationale, actions and delivery partners.*

Electronic Road Pricing for the Oxford City Region: the City and the complete access roads serving it which start outside the City Cordon. See our report on this under REPORTS at [www.catg.org.uk](http://www.catg.org.uk) This is a key means, following the Singapore model in use since 1998, of reducing City traffic and strongly encouraging walking, cycling, bus and rail. This should be a national demonstration project, funded by central Government, recognising growing support for this means of replacing lost revenue as electric vehicles increase and fuel duties tend to diminish, including in academia and from the RAC.

**First question p.76:** *Please tell us if we should include any other delivery partners under any project under Workstream 2?*

Trees are essential for more shade and permanent planters are more sustainable than wooden ones. We emphasise the need for fountains to cool the ‘canyons’ of heat reflecting buildings in the central area.

**Second question p. 76:** *Are there any additional actions you would suggest under any of the project under Workstream 2?*

No.

**question p.77:** *Would you suggest any additional projects under this workstream? If so, please outline your idea, its rationale, actions and delivery partners.*

No.

**First question p.96:** *Please tell us if we should include any other delivery partners under any project under Workstream 3?*

The low level of homes envisaged in the revamped West End is dismal, and homes should be predominating in this area. The existing built environment should be favoured to supply very low-cost housing in high density, as part of a sustainable-retrofitted regeneration. Existing businesses are likely to expand with population growth, so the emphasis on new employment here is misplaced and may make radical traffic reduction more difficult. We very much agree that the rail station must be re-developed (p.78).

**Second question p.96:** *Are there any additional actions you would suggest under any of the projects under Workstream 3:*

Vacant properties offer a resource for very low-cost, high density housing – with sustainable retrofitting. Increasing the number of the same types of businesses elsewhere in the City does not address this social need, and by-passes the consideration that a rising population will mean existing businesses tend to benefit(pp86-87). Recognition that businesses, especially duplicates of ones elsewhere in the City, may fail and that some units – eg in the Westgate, or Golden Cross – do not attract takers – emphasises that the ‘predict and provide’ approach to providing more commercial space is speculative, poor risk and takes no account of having more people working at home. Housing, with an increased population in the West End, will generate expansion in existing businesses and is much more reliable for this purpose than providing more units to go dusty (p.91). Expanding the night-time economy conflicts with very low-cost housing expansion in the West End and should be ruled out, as it should be - on grounds of pedestrianisation as this area should be primarily for car free homes, and not taxi pick up or drop off locations at new night time venues.

**question p.97:** *Would you suggest any additional projects under this workstream? If so, please outline your idea, its rationale, actions and delivery partners.*

Alcohol-free venues for the night-time economy and the hospitality sector should be increased as part of reducing pressure on the emergency services since they should not be having to deal with the consequences of concentrations of people who have been drinking heavily in any part of the City. We suggest that this can be a burden for taxi drivers and public transport too, so the City could consider this with all these actors and promote this as a new selling point for the hospitality sector that has been impacted by Covid 19. The likelihood of more families eating together in alcohol-free venues is worth exploring.

**Fifteenth question p.108:** *Are there any additional actions you would suggest under any of the projects under Workstream 4:*

Street scene management should ensure that cycle paths are marked by coloured surfacing and that walking routes are clear and clutter-free. Existing lay outs of seating do not do this, and construction and delivery vehicles entering the Cornmarket and being parked for varying periods are to be prevented by rising bollards and lockable gates, since such areas should be cargo bike accessible, or only permit deliveries in by trolleys except by arrangement in the case of bulkier items(p.100). Another unattractive aspect of the central area is the lack of public toilets, especially some to be accessible 24/7. Re-use and not just recycling should be a consistent City Council message to enterprises throughout the central area, and indeed enterprises and households throughout the City. This is consistent with the idea of a ‘circular economy’, which this consultation does not mention.

Abandon excessive emphasis on ‘predict and provide’ new hotel planning permissions. The chances of new hotels all sustaining themselves are limited. It is quite likely they will end up being converted to student accommodation or very low cost housing, so planning permissions should favour housing – especially given the immense expansion of student accommodation in Hollow Way and Between Towns Road in recent years, and the correctable failure of Oxford Brookes to take full advantage of its Wheatley and Cumnor sites up to the present (p.103).

Concerning bike theft, and writing from personal experience, the City and Police should promote a ‘two locks’ principle for securing bikes, and emphasise the value of having more expensive, stronger locks to deter theft. Rental properties do not always have secure bike sheds accessible only behind locked side-gates – an issue to take up with landlords (p.105).

**question, p 109:** *Would you suggest any additional projects under this workstream? If so, please outline your idea, its rationale, actions and delivery partners.*

No.

**First question, p. 134:** *Are there additional areas of the City Centre you consider should be included?*

If the University and Colleges accept that a predominantly pedestrianised central area of Oxford makes their 4000 car parking spaces redundant, something which should be done in view of their own overall Sustainability strategies, then they have a development opportunity to make use of such spaces for a variety of purposes: departmental expansion; student and/or staff accommodation to protect both from predatory-level private rents; additional facilities serving staff and students not entailing noticeable traffic movements. If so, then a masterplan for the central area should include how such development works with: far more opening of University and College grounds to the public; permanent walking and cycling routes that make use of University and College grounds, in some cases 24/7 and 365 days of the year.

**Second question, p.134:** *For those currently included would you identify any additional context, opportunities or challenges to delivery?*

Street by street considerations must include how pedestrianisation and pedestrian priority will be applied, and enforced, and how walking and cycling networks are enhanced, created and above all made uninterrupted (p.112). Cornmarket Street and environs: crowded at times due to lack of pedestrianisation elsewhere. Trees and fountains need adding as part of keeping traffic out, and making this a more hospitable space. Market Street and Golden Cross are problematic spaces: the former is a delivery bay for the Covered Market; the latter is notoriously full of empty slots. We suggest paving Market Street down to the Covered Market to restrict vehicle movements; a new emphasis on cargo bike deliveries for the Market. We suggest very low-cost housing units in Golden Cross to occupy the persistently empty slots. Construction worker vans and delivery vehicles should be prevented from entering the Cornmarket by lockable gates and/or rising bollards(p.114). We welcome music and busking in the Cornmarket as part of the street experience. We may expect such activities to spread a bit – for example when vehicles are removed from Queen Street (pp115-116). Pedestrianisation with colour-marked cycle tracks should be present throughout this connected area.

St.Aldates, Speedwell Street and environs are bus- and taxi-congested with narrow pavements and are exceptionally unpleasant for walkers. Rush hours, with more buses and taxis, are very bad for cyclists too. We have made it clear we do not support through bus routes crossing the City Centre, and favour pedestrianisation with colour marked cycle tracks in this whole area. Suggestions of more coaches and a coach hub is really not based on the pedestrian and tourist experience of this area. Making more of the south side of the Westgate for bus services is highly desirable, and a coach hub there may be considered. Mobility scooters should be available for use at the ‘hard periphery’ of a much-enlarged pedestrianised centre (pp118-119).

The High Street is full of buses and taxis regularly and is a heat-reflecting polluted ‘canyon’ between buildings. Buses and other vehicles should use Longwall and not enter the High Street from Magdalen Bridge. Instead, subject to emergency vehicle requirements, trees, permanent planters and fountains should be used to transform the High Street, increasing footfall for local businesses in the process. As research demonstrates higher spending by pedestrians and bicycle users, this will be better for businesses on the High Street. Far more cycle parking and wider pavements will be needed (p.120).

Broad Street should have been fully pedestrianised decades ago. Aside from bays for mobility scooters, and more cycle parking, carefully located trees, permanent planters and fountains should be used to markedly improve this area (pp122-123). Access for vehicles to Turl and Market streets should be systematically curtailed to allow enterprises there to adapt how they receive their deliveries.

George Street can be fully pedestrianised once the bus station re-locates to the Becket Street car park, bearing in mind access issues for the Gloucester Green Market. A car free very low-cost high-density housing development should occupy the vacated bus station, creating a new customer base for the market along with our other suggestions for such housing throughout the central area. With increased population and footfall, George Street with wider pavements and a cycle track marked in colour will be a much more attractive retail location than at present (p.124).

Gloucester Green will benefit as an area from an increased resident population in its vicinity. Delivery mopeds should be displaced by electric bicycles, in cooperation with businesses providing door to door deliveries (p.126).

St.Giles and Beaumont Street pose different issues. St.Giles should be a terminus for buses and a turning point for bus services, with the released space being allocated to pedestrians and upgraded cycle tracks. Car parking should be removed, with delivery bays and space for mobility scooters where absolutely necessary. A Taxi pick up and drop off point should be in this area, after consideration of how this should be located. The Beaumont Street-St.Giles junction should be gated, with its lockable gates accessible only to the emergency services. The Shopmobility addition to this area needs, like a taxi rank, to be very carefully located to favour bus use to access this service, with car use access of Shopmobility located, after investigation, further north than St.Giles. Coaches should be kept out of this area (pp128-129).

Park End Street-Hythe Bridge Street-Frideswide Square-New Road-Castle Quarter offers a challenging environment in which pedestrian priority and pedestrianisation should both be increased. Given the complexities of this area, we think it needs investigation of existing traffic movements and origins, conversion of commercial premises to very low-cost high density housing and – as suggested in the consultation document – maximising the use of the waterside and waterways (p.130).

Oxpens Road: Oxpens and Osney Mead should be a very low-cost high density housing area provided living spaces are located above ground floor level due to the potential and actual experience of flooding in the area. Permeable surfaces should be added – preferably in new permanent planters, under new tree planting and making grassed areas where tarmac, concrete and unmaintained paving stones are present – to deal with dispersal of water. We reject the idea that many brick paved or similar SUDS remain permeable for long, or are even maintained: they are a bit of an ‘urban myth.’ (p.132).

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