

Response ID ANON-H8SA-RCNH-Y

Submitted to (Full in-depth questions) Oxford Local Plan 2040 Preferred Options Consultation
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Introduction

What is your name?

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What is your organisation? (If applicable)

Organisation:
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Data Protection

Do you agree to us using your data to analyse responses (we will not publish any personal data)?

Yes

Do you agree to us using your data to contact you about future engagement events relating to the Local Plan 2040?

Yes

1. Vision and Strategy

1.1 Do you have any comments on Strategic Policy Option Set S1?

Not Answered

Comments:

This is not a YES or NO question. How things are done - for example in terms of transport or environmental effects - could and probably will vary from location to location and cannot be just referred to in principle. For example, 15 minute City ideas may be acceptable, but delivery of new infrastructure to apply them to the whole City could be unacceptable according to circumstances. Similarly, when all empty homes, offices, shops, industrial or science buildings have been converted to housing as far as practically possible, with sustainable retrofitting, then, and only then, should new housing be prioritised. Apart from the council buying homes for council housing and shared ownership keyworker use, car parks and empty brownfield sites in industrial estates should be given dual use - whether public or private owned - for housing. This would create a new infrastructure imperative of ensuring each location had a range of facilities within a 15 minute walk/cycle - some of which could be located on reclaimed industrial estate/science park land.

Both these comments illustrate why this question should not have been in the questionnaire.

In addition, the Council should do everything it can to minimise market housing creation as it is too expensive and far too prone to become private rental property at extortionate prices. Only very low cost housing will do since neither market prices nor private rents are reasonable in Oxford. This situation is reinforced and made worse by the current cost of living crisis.

We are also concerned by the failure to strongly emphasise remote working throughout the whole plan: this is an essential part of addressing some local skills shortages as it allows people to work from where they live - in Oxfordshire, or elsewhere.

With regard to the City Climate goal of net Zero by 2040, Oxford's entire carbon budget for 2020-2100 will be exhausted within 7 years from 2020. [Reference: Anderson, Kevin et al, 2021: Dr Jaise Kuriakose, Dr Chris Jones, Prof Kevin Anderson, Dr John Broderick & Prof Carly McLachlan – Setting Climate Commitments for Oxford: Quantifying the implications of the United Nations Paris Agreement for Oxford: <https://carbonbudget.manchester.ac.uk/reports/E07000178/>] We look forward to seeing measures to bring forward the 2040 date to one much earlier.

1.2 Do you have any comments on Strategic Policy Option Set S2?

No

Comments:

We believe greenfield sites have many values, and a City with a growing population needs all of them. Absolute protection is required for biodiversity, recreation, resisting the urban heat island effect etc. Taking sites away inevitably impacts upon the increasing population and should not be considered. Car parks can be built over, around and above surface level for homes and the entire car parking stock should be considered carefully with only a low ceiling of car parking sites of 8 places or less being excluded.

To note, building housing on land at Warren Crescent will very likely impact upon the Lye Valley SSSI and should not have been considered. Building housing on the William Morris Recreation Ground in an area - Temple Cowley - with high housing density in apartment areas should never have happened. It should be noted that growth in new housing at the fringes of Oxford and outside is bound to lead to increased traffic, contradicting the City Council's stated policies about encouraging more active travel and use of public transport. This makes full use of the existing built environment in Oxford, its car parks and retail-industrial-science park space a key housing principle the City Council should adopt.

1.3 Do you have any comments on Strategic Policy Option Set S3?

Yes

Comments:

Provisos: Development that cannot be supported by additional infrastructure deliverable within 5 year periods should not receive planning permission. Existing infrastructure enhancement should be preferred over new infrastructure as far as practically possible. Empty shops should be put into use for very low cost housing, but non-retail uses could add to local infrastructure variety at ground level.

How areas with comparatively limited infrastructure in relation to population should gain new or refurbished infrastructure should be constrained by no development of greenfield sites.

1.4 Do you have any comments on Strategic Policy Option Set S4?

No

Comments:

There is no affordable housing in Oxford. Very low cost homes include council housing, housing cooperatives, boats in secure moorings, housing association homes. The term 'affordable housing' has no planning or social equity value whatsoever. Any new homes, eg on car parks, should be in the very low cost housing category only - including finding a site for co-housing.

New homes should all be car free; refurbished homes should be the same. Since the Council is committed to more homes and has plans to obtain more satellite homes just outside the City, traffic conditions will worsen appreciably. On Climate Emergency and air pollution grounds, far more downward pressure on vehicle numbers and movements within Oxford and from outside Oxfordshire into the City needs applying. We are unimpressed that a massive Park and Ride is to be sited at Eynsham instead of a restored rail line at least as far as Witney. As with Thornhill, car drivers can freely drive past a Park and Ride and add to Oxford's rush hour/school run problems - illustrating the need for Electronic Road Pricing.

Only ultra low carbon housing should be added to existing built environment options. The idea that excuses may be made to avoid it contradicts Council Climate policy.

1.5 Do you have any comments on Strategic Policy Option Set S5?

Yes

Comments:

Requires major qualification to implement in practice. First, since Oxford exhausts its carbon allowance hold below 1.5 degree C in the long term (although it has already exceeded this threshold) by about 2027, then sustainable development has to be put on a proper Climate Emergency footing with earlier dates than 2040 for each greenhouse gas generating sector. The related ecological emergency, addressed for example by stopping all greenfield site development in the City, requires contributions in terms of actions by institutions on their land: schools, hospital and universities as well as industrial estates and Science Parks.

The NPPF offers principles primarily, not policies. This makes a nonsense of the idea of sustainable development which then can become anything anyone may wish. Oxford City Council and the organisations and people of this City can, and in some cases already are, do better than poorly defined and inordinately flexible planning hiding behind a wholly inadequate idea of sustainability.

2. A healthy, inclusive city to live in

2.1 Do you have any comments on Policy Option Set H1?

No

Comments:

The material on this subject in Council documentation is misleading. You allege the 'capacity of Oxford to accommodate housing is lower even than the lowest possible housing need.' You cannot justify this against any credible evidence base. Where is the evidence showing how many homes can be built over, above and around private and public car parks in Oxford? Where is the evidence about how many additional secure moorings above the Council's current aspirations can be accommodated? Where is the evidence about how many homes could be added to industrial estates and science parks on

empty sites and using disused buildings? Where is the evidence concerning how many homes can be added above shops, or in place of empty shops, in Oxford? Where is the evidence of the 'planning gain' of homes that can be obtained by heavily emphasising remote working and adding to the existing range of empty offices in the City that should be considered for housing? Only when a full range of studies has been done can you determine how many units of what size may be obtainable, in addition to the empty homes, 2nd homes, Air B&Bs and poor quality rented properties which may yield more usable very low cost housing units.

2.2 Do you have any comments on Policy Option Set H2?

No

Comments:

Housing need should be based on evidence of incomes of different groups in the City, to determine how much very low cost housing is needed. Most incomes, given private rental costs, do not permit savings for home purchase, seems a likely judgement - especially since exceptional rises in food and energy prices are fundamentally altering the household finances of a very wide group of City dwellers.

Economic growth is a poor and non-specific indicator, with no clear inbuilt constraints to prevent it worsening the Climate and ecological emergencies. A more fundamental approach has been referred to as 'transformational adaptation', addressing both the current adaptation deficit and the idea that incremental measures will be enough. System change and not simply minor reforms is clearly necessary for both actual emissions mitigation and adaptation to the Climate Emergency. This principle challenges ideas of economic growth which fail to reduce consumption and therefore transport of goods from around the world to Oxford, which is making a nonsense of City Climate goals. The notion of a circular economy needs to be made operational in the conduct of Oxford's mixed economy.

Transformational adaptation implies that the embedded carbon of new buildings needs to be addressed by using the existing built environment first to meet new needs. More generally, Growth is not acceptable where any aspect of it is causing additions to greenhouse gas emissions, or raising consumption of finite resources, or generating more polluting traffic, or recklessly consuming greenfield sites. There is also a question of national and local needs outside Oxford and Oxfordshire where there is need for employment growth, skills additions and better policies for sustainability. Not everything can or should happen in Oxford.

2.3 Do you have any comments on Policy Option Set H3?

No

Comments:

Move to 100% very low cost housing via council purchase of housing on sale, use of empty homes and other acquisitions from the lower end of quality in the rental sector. Car park based apartment blocks could be cooperative efforts between the Council and other stakeholders eg. housing cooperatives; co-housing groups; housing associations; specialist charities assisting vulnerable groups in our society. Not all resources deployed need come from Council or State.

2.4 Do you have any comments on Policy Option Set H4?

No

Comments:

The Wheatley campus is not being utilised to provide lower cost student accommodation proximate to the City despite its bus service and ease of cycle route into Oxford. This should be a key council policy.

Assessment of student demand needs investigation. Based on past recruitment, how much additional accommodation is needed for undergraduate and postgraduate students? Shrinkage of EU entry students is notable, but some other countries have provided more students to both Universities. However, whilst Oxford feels free to cap student entry - at least for undergrads - Oxford Brookes has a variable experience with its departments over the last few years, with obvious staff shrinkage in some areas. Setting out a policy assuming student growth is optimistic and could mean that the student accommodation building boom, for example down Hollow Way, could create accommodation left empty.

Hospital construction of more accommodation should be supported. Much of the existing hospital campuses south of the London Road are single storey and replacement is overdue, allowing more accommodation construction overtime. Similarly, Oxford University, we agree, could provide more accommodation.

2.5 Do you have any comments on Policy Option Set H5?

Yes

Comments:

Comments on H4 address this issue. The principle of no car parking provided should be applied in such sites.

2.6 Do you have any comments on Policy Option Set H6?

No

Comments:

We emphasise the need for 100% very low cost housing, including shared ownership for keyworkers. We note that the UK has the smallest spaces in new homes of any country in Europe, and that the 2015 space standards applied by Government do not apply to students and adapted buildings may present considerable space challenges. If the Council buys homes for council housing, it can select those fitting the needs of those on the housing list. Similarly, 100% very low cost housing - ideally with other stakeholders on car parks and reclaimed industrial sites - can follow highest possible space standards and have a mix of units based on actual rather than hypothetical demand.

2.7 Do you have any comments on Policy Option Set H7?

Yes

Comments:

The Council is permitting more HMOs all the time; subdivision of homes into smaller units is also being permitted. Evidence of resistance has yet to be established as a public, visible and successful policy. The estate the authors live in has been targetted for both more HMOs and subdivision of properties by private landlords. The Planning department and local councillors will be aware that the Bullingdon Community Association, which runs the Bullingdon Community Centre (currently nearing completion of reconstruction), has a general policy of rejecting new HMOs due to community impacts including very high turnover of people in such high rent properties. This rejection of HMOs is applied to planning applications of the Lye Valley and Churchill wards. Loss of family dwellings has occurred regularly throughout the Lye Valley estate over many years. We look forward to seeing an end to such permissions generally, and ensuring all rented accommodation is fit to live in. Are the keyworkers this City needs leaving Oxford to escape the rents inflicted upon them in private rental accommodation? HMOs are not 'affordable' only tolerable for periods until people find something better/move in with someone else/leave the area. Leaving identification of HMOs to the public is not an adequate policy, so the Council needs to revisit its resources for Planning enforcement and especially checking the interior of HMOs.

2.8 Do you have any comments on Policy Option Set H8?

No

Comments:

Stop giving permission for HMOs. We suggest 49% plus private accommodation in Oxford has added to making it unaffordable for many to stay in for long. We are very concerned that current cost of living crisis pressures, combined with private landlords raising rents to meet their own costs, could lead to more serious skills shortages in Oxford. Promoting remote working vigorously is one response; promoting flexitime would also be useful to add to decreasing pressure for office space to be retained in this form of use rather than housing; private landlords should also be supported to become registered social landlords with more restrictive conditions on rental property conditions, and better access to grants ideally.

2.9 Do you have any comments on Policy Option Set H9?

Yes

Comments:

Agree with restricting student accommodation locations as stated preferred option, but to include full use of the Wheatley campus to prevent this resource being under-utilised.

2.10 Do you have any comments on Policy Option Set H10?

Yes

Comments:

We agree with preferred option. As stated before, we have doubts about long term student demand - especially at Oxford Brookes. If expansion of academic facilities is for researchers, it is quite possible many may not live in Oxford and the geography of existing postgraduates/staff at Universities is worth examining/assessing.

2.11 Do you have any comments on Policy Option Set H11?

Yes

Comments:

Agree with preferred option

2.12 Do you have any comments on Policy Option Set H12?

Yes

Comments:

Prefer second option and reject preferred option.

2.13 Do you have any comments on Policy Option Set H13?

No

Comments:

Reject preferred option, accept 2nd option. The City Council should cooperate with neighbouring authorities to increase the number of secure moorings on waterways, bearing in mind the need for some short term moorings for those travelling distances.

2.14 Do you have any comments on Policy Option Set H14?

Yes

Comments:

Agree with preferred option. Bear in mind the possibility of adapted apartments - eg at ground level or at higher levels - which could be specifically allocated to elderly individuals or households as part of a number of types of stakeholder housing within the same structures/site eg car parks. 100% very low costing needed, not market homes.

2.15 Do you have any comments on Policy Option Set H15?

No

Comments:

Needs re-consideration. If self build means lowering the density of homes in practice, in an area on a non-greenfield site, then we do not support this. Rather than self-build, we could envisage two options: apartments specially adapted to meet preference of very low cost users/shared ownership households. This has comparable advantages to self-build without the horrendous costs. Alternatively, self build for remote workers could be encouraged in locations outside Oxford which could be hundreds of miles away or even overseas. This has advantages in addressing skills needs in Oxford, keeping traffic levels down and diverts housing development to locations much cheaper for households than Oxford.

2.16 Do you have any comments on Policy Option Set H16?

No

Comments:

100% very low cost housing could include community led sections of apartment blocks, or planning permission for buying large properties - eg in North Oxford - for co-housing/housing cooperatives with permission to make adaptations over a set period of time.

3. A prosperous city with a globally important role in learning, knowledge and innovation

3.1 Do you have any comments on Policy Option Set E1?

No

Comments:

Employment needs can be met via better promotion of remote working, using less land in Oxford in practice. Employment growth, business and public sector development from within Oxford should occur slowly, using existing built environment and facilities, with no impact on greenfield sites and increasing barriers to private car use and parking.

3.2 Do you have any comments on Policy Option Set E2?

Yes

Comments:

Only the preferred option subject to: 100% move towards renewables use incl solar PV, air and ground source heat pumps, solar thermal and highest standards of insulation and energy efficiency. Private car parking should be phased out on such sites, allowing more sharing of company/public sector vehicles; increased bus services incl restoration of Pick Up buses; and far, far better walking and cycling routes.

3.3 Do you have any comments on Policy Option Set E3?

Yes

Comments:

We agree with the preferred option, subject to quality comments made above.

3.4 Do you have any comments on Policy Option Set E4?

Yes

Comments:

Support preferred option subject to completion of walking and cycling networks and progressive reduction in private car parking to blue badge holders only, or those with clear disabilities as supported by their GPs.

3.5 Do you have any comments on Policy Option Set E5?

No

Comments:

Third option: Progressive reduction in B8 sites preferable. Combine with recognising up to 50% of freight can be carried on cargo and ecargo bikes, according to recent research. Allocation of B8 sites overtime to housing, and perhaps some employment uses. Ensure walking and cycling networks serve such sites and that car parking is reduced in stages, alongside adjustment to bus services.

3.6 Do you have any comments on Policy Option Set E6?

Yes

Comments:

Agree with preferred option.

3.7 Do you have any comments on Policy Option Set E7?

Yes

Comments:

Preferred option but not on greenfield sites; live work space to be part of new apartment style development on car parks, industrial/science area land: this can apply to floors within an apartment block with other floors meeting other needs, 100% very low cost housing options only.

3.8 Do you have any comments on Policy Option Set E8?

Yes

Comments:

First two options only, but end the hotel 'rush' and adopt new policy to phase out Air B&Bs in our residential areas. No greenfield site use.

3.9 Do you have any comments on Policy Option Set E9?

Yes

Comments:

Alternative option preferred.

4. A green, biodiverse city that is resilient to climate change

4.1 Do you have any comments on Policy Option Set G1?

Yes

Comments:

Preferred options but not c). Enact a City wide Tree Preservation SP Guidance for all trees over 6 feet in height. Strong constraint on avoidable cutting back of such trees, with consent required from the Council when specific conditions are met eg any actual risk to the public; actual existing blocking of footpath or road; only outside the nesting season unless conditions are considered to be exceptional; fines for any evidence of deliberate tree damage to secure removal, which should be substantial to deter others, etc.

PLUS

Do define all green spaces - including sites specified above - and demonstrate how they may be linked up into wildlife biodiversity corridors, bearing in mind the importance of gardens. There are no unwanted green spaces in Oxford and there will never be eg Council plans for Bertie Park should be abandoned.

4.2 Do you have any comments on Policy Option Set G2?

Yes

Comments:

Preferred option, using green space around existing car parks being transformed for housing, adding to green space where necessary to provide recreational space and additions to green corridors wherever possible.

4.3 Do you have any comments on Policy Option Set G3?

Yes

Comments:

Very important to reduce heat levels due to reflected heat in City Central area. Best achieved by substantial area of pedestrianisation with marked cycle tracks, addition of trees and fountains, other vegetation to reduce ambient temperatures. Select desired sites for greenwalls and roofs to be added to existing buildings.

4.4 Do you have any comments on Policy Option Set G4?

Yes

Comments:

Both preferred option and Alternative option. First alone does not include biodiversity addition to existing sites such as schools, hospitals, industrial estates. All of these sites require more shade, better surface water management and can add to biodiversity corridors.

4.5 Do you have any comments on Policy Option Set G5?

Yes

Comments:

Preferred option with a) and b). Further task required: adding to existing biodiversity in sites to maximise wildlife/biodiversity corridor benefits eg in gardens.

4.6 Do you have any comments on Policy Option Set G6?

Yes

Comments:

The Lye Valley SSSI has not been protected from development, depending as it does on water percolation through limestone to create unusual conditions suited to rare fenland plants, also insects, amphibians etc. The Warren Crescent development is very likely to reduce water flow through limestone into this area. Attempts by Friends of Lye Valley to have a Special Planning Guidance for the entire water catchment have yet to yield results, despite preparation of a relevant document and discussion with council officers. Permeable frontages on homes are needed to manage water flows more effectively; this approach may well be valuable in many parts of the City given low quality maintenance of drainage by the water industry, and the 75% cut in Environment Agency funding since 2010. However, we need to look forward to 2040 with more restoration of valuable sites including Oxford's distressed peatlands, forming a rewilding approach which requires a Special Planning Guidance for the City to engage with all relevant bodies and the public.

4.7 Do you have any comments on Policy Option Set G7?

Yes

Comments:

Options a) to f) acceptable. Absence of SUDs maintenance is surprising in this section. This requires a City wide approach with a SPG to ensure actual maintenance does occur. With more extreme rainfall events and poor work by the privatised water industry and financially crippled and under-funded Environment Agency, the City should aim to do more, working with landowners and stipulating the retention of permeable surfaces and denying planning permission without them.

4.8 Do you have any comments on Policy Option Set G8? Sustainable Drainage Systems (SuDS)

Yes

Comments:

Preferred options a) and b) plus SPG to ensure compliance is achieved wherever possible when planning applications come in - for example insisting upon SUDs as part of sustainable retrofitting of properties.

4.9 Do you have any comments on Policy Option Set G9?

Yes

Comments:

Options a) and b) - plus application of resultant arrangements for Lye Valley to the rest of the City's sensitive sites - all of which have value in both Climate and ecological emergencies.

4.10 Do you have any comments on Policy Option Set G10?

Yes

Comments:

Preferred option a) with amended b) - Passivhaus standard or better as a baseline for requirements in new build.

5. A city that utilises its resources with care, protects the air, water and soil, and aims for net zero carbon

5.1 Do you have any comments on Policy Option Set R1?

Yes

Comments:

Third option only.

5.2 Do you have any comments on Policy Option Set R2?

Yes

Comments:

Support a) and b)

5.3 Do you have any comments on Policy Option Set R3?

Yes

Comments:

a) and b) but raises question of how enforcement will occur when properties are being fully refurbished. Ideally, this should require planning permission and clear guidance to those involved about standards and requirements. If not, makeovers will continue to suit the owner rather than addressing Climate, ecological or indeed human needs for the long term. If the Council still has just 2 planning enforcement officers, how is this going to be done?

5.4 Do you have any comments on Policy Option Set R4?

Yes

Comments:

Efficient use of land must include zoning of car parks for conversion to housing - either completely, or building around/above such sites. The area of surface car parks in Oxford is immense - see for example BMW and Unipart - and offers space for employer related homes - and as part of conversion of industrial areas to meeting the primary social need of people in Oxford for housing they can actually afford.

5.5 Do you have any comments on Policy Option Set R5?

No

Comments:

Revision required. Air pollution incl the 23% of carbon emissions from surface transport, plus other air pollutants from transport. This is not purely a problem about new development, but one of reducing traffic in general, since - as noted - traffic also has non exhaust emissions so electric vehicles remain a problem. Not considered in Council documentation is that electric vehicles are heavier than conventional ones and will do more damage to road surfaces, including potentially creating more road abrasion and increased need for road repair. Mitigation of air pollution therefore requires large scale pedestrianisation in the central areas of the City.

5.6 Do you have any comments on Policy Option Set R6?

No

Comments:

Revision required: water re-use from baths, showers and basins for flushing toilets should be a planning requirement in new build and sustainable retrofitting. Also, each new house should have at least one water butt fitted with the advice to new residents about using the water for plants, and bike and car cleaning.

5.7 Do you have any comments on Policy Option Set R7?

Yes

Comments:

Preferred option OK

5.8 Do you have any comments on Policy Option Set R8?

Yes

Comments:

Preferred option OK

6. A city of culture that respects its heritage and fosters design of the highest quality

6.1 Do you have any comments on Policy Option Set DH1?

Yes

Comments:

But exclude 3rd paragraph. In order to achieve Climate goals, houses being rebuilt internally should be required to follow a detailed checklist of measures for sustainable retrofitting. This may require a SPG to ensure this is part of the planning system. Since the Council says 76% of carbon emissions are from buildings, then it should behave as though it intends to reach its own goals for the City. However, 2040 is too long away.

6.2 Do you have any comments on Policy Option Set DH2?

Yes

Comments:

Agree to Pref Option

6.3 Do you have any comments on Policy Option Set DH3?

Yes

Comments:

agreed a-c

6.4 Do you have any comments on Policy Option Set DH4?

Yes

Comments:

Pref option

6.5 Do you have any comments on Policy Option Set DH5?

Yes

Comments:

Agree to Preferred Option but find ways to encourage bin workers to return bins to optimal locations when bins have been emptied, to clear pavement space particularly.

6.6 Do you have any comments on Policy Option Set DH6?

Yes

Comments:

a) and b)

6.7 Do you have any comments on Policy Option Set DH7?

Yes

Comments:

a) and b). Plus recognition that the rise in SUV use has added to greenhouse gas emissions, parking spaces needed and the protrusion of vehicles from frontages into pavements throughout the City. Car parking standards should not accommodate SUVs or indeed Vans. They should be in multi storey car parks, on properties with existing adequate space and in marked parking bays at a premium rate of payment compared to existing CPZ charges. Such bays can only exist where road space permits, requiring planning permission. Similarly, car parking charges for SUVs and Vans should be far, far more than for normal sized cars.

6.8 Do you have any comments on Policy Option set DH8?

Yes

Comments:

first and second paragraphs fine

6.9 Do you have any comments on Policy Option Set DH9?

Yes

Comments:

Pref option or apply better/larger space standards in a)live work units; b) houses with specific social needs for one or more of their residents.

6.10 Do you have any comments on Policy Option Set DH10?

Yes

Comments:

Pref option. Plus: Retain greenfield sites as part of amenity for all, with biodiversity additions where physically possible. Re-create greenfield from industrial wastelands, to ensure amenity for new homes.

6.11 Do you have any comments on Policy Option Set DH11?

Yes

Comments:

Pref options but exclude market requirement as City needs 100% very low cost homes.

6.12 Do you have any comments on Policy Option Set DH12?

Yes

Comments:

Merge Pref option with 2nd paragraph. Suggest area by area HIA for existing communities based on poorer health conditions in some parts of Oxford, needing interventions.

6.13 Do you have any comments on Policy Option Set DH13?

No

Comments:

Develop a policy which goes beyond and is far more specific than the NPPF.

6.14 Do you have any comments on Policy Option Set DH14?

Yes

Comments:

Pref option

6.15 Do you have any comments on Policy Option Set DH15?

Yes

Comments:

a-d plus first alternative option

7. A more equal city with strong communities and opportunities for all

7.1 Do you have any comments on Policy Option Set C1?

No

Comments:

Problems with all of these options. Option a) First, a general reduction in car parking in each area, in recognition of use by walkers and cyclists and consistent with the Council's preference for a 15 minute City, is needed: car parking induces traffic movements; increases in delivery vehicles, cargo and e-cargo bikes mean more space is needed from them and this should be achieved by reducing short distance car movements. We take a general view that hotels are traffic generation hubs and should not be sited in district centres at all. We prefer encouragement, through planning decisions, for more bed and breakfasts - in preference to Air B&Bs - to increase quality stays in Oxford; hotels - from our experience - vary far too much.

Charity shops are an essential lifeline for the low income households in this City and should be preferred tenants in these locations. Also, persistently empty shops/restaurants'office do exist and should be sustainably retrofitted for housing in these centres.

Option b) - pedestrianisation, colour marked cycle paths wide enough for cargo bikes and additional pedestrian crossings should be added in each of these areas. People should feel they are able to walk around easily in each area, without, for example, the competition they will have with taxis and buses in a City Centre blighted by too little pedestrianisation and too much traffic movement.

Option c) should contain more apparent criteria to restrict duplication of the same sort of facilities. The Cowley road has a considerable concentration of restaurants and takeaways as if the local community had little other needs - like the very poor cycling conditions on this road, this is a failure and should not be duplicated elsewhere.

References to work spaces should be conditioned by City and County promotion of remote working to allow skills shortages in the City of many types to be met by people living at a distance.

7.2 Do you have any comments on Policy Option Set C2?

Yes

Comments:

a)and b) plus using persistently empty units for sustainably retrofitted housing to make these locations more part of the community than before.

7.3 Do you have any comments on Policy Option Set C3?

Yes

Comments:

Community assets include allotments which should not be built on; people, who should be able to have security of tenure in their home through the Council buying more homes on sale, building council and keyworker shared ownership homes on, above or around car parks - private and public. We reject the idea that high-turnover, very high rent HMOs are a community asset; they are in fact the antithesis of community creation and council policy should be generally directed to reduce the proportion of private rental property in Oxford. HMOs can sometimes generate more traffic than conventional households too. We reject the part of option b) suggesting that units being 'lost to housing' is a problem; there are a lot of duplications of certain types of businesses such as restaurants, cafes and a lot of empty shops and homes in need of sustainable retrofits for housing.

7.4 Do you have any comments on Policy Option Set C4?

Yes

Comments:

a) and b)

7.5 Do you have any comments on Policy Option Set C5?

Yes

Comments:

The Council should commend the managed collective use of some locations by different religious congregations, such as those on Hollow Way and at the Cowley Road end of Magdalen Road. The dispersal of religious meeting places is good for encouraging low levels of private car use, and should be maintained. We note the apparent effort of the Manzil Way mosque to ensure minimum traffic movements to the Mosque on Fridays, which are clearly highly effective. We note that a low point for bookings in Community Centres is Sunday mornings, so some small religious groups or spin-off study groups might well find these locations throughout the City useful for their needs.

We commend to the City/County careful multi-use management of Libraries with other stakeholders to ensure the long-term viability of these institutions serving their local communities.

7.6 Do you have any comments on Policy Option Set C6?

No

Comments:

The first preference when capacity increases are required for schools etc should be use of their existing space, including taller buildings. There should be stronger downward pressure on parking in such refurbished locations so that surrounding communities do not suffer.

7.7 Do you have any comments on Policy Option Set C7?

Yes

Comments:

happy with preferred option

7.8 Do you have any comments on Policy Option Set C8?

Yes

Comments:

Preferred option subject to no additional car parking, no development of greenfield sites and a preference for taller structures where new build or sustainable refurbishment is being contemplated. New research suggests demolition is a highly polluting activity and that preventing it will be a considerable contribution to reducing local air pollution. Given the frequency of this activity, and messy refurbishments, in Oxford, this requires some creative policy development.

7.9 Do you have any comments on Policy Option Set C9?

No

Comments:

Cafes have become the equivalent of the pubs of the past - socially. This is to be welcomed in health terms. If pubs are to survive, and the many that have disappeared in our part of Oxford during the 9 years we have lived in Lye Valley make this idea exceptionally optimistic, it will be by adaptation into good restaurants combined with a degree of 'cafe culture' in how they present themselves to the community. Cooperation between different businesses to run pubs over longer hours may work in some locations, and may be something the City Council could encourage. Some pubs, like the former Crown and Thistle in Wood Farm, would be far better used for council housing/keyworker housing.

7.10 Do you have any comments on Policy Option Set C10?

No

Comments:

Transport assessments and travel plans should be required for all existing, expanding and new developments - public or private - by use of local by-laws, special planning guidance and whatever pressures the City and County can exert. If not, then the mistaken enthusiasm of the City Council for periphery and nearby rural housing developments will flood the City with more traffic. We need Electronic Road Pricing for the Oxford City Region, as we suggested in our Electronic Road Pricing for Oxford report, under Reports at www.catg.org.uk

8. Development Sites, Areas of Focus and Infrastructure

8.1 Do you have any comments on the Policy Option Set for the North Area (Northern Edge of Oxford) Area of Focus?

No

Comments:

Do not designate this area for new housing or employment initiatives. The traffic implications will be negative, adding for example to the unconstrained problems in the Witney to Oxford corridor, and at the roundabouts such as Cutteslowe. Park and Ride at Eynsham and massive housing expansion, plus Oxford North, demonstrate planning for a 1950s-scale expansion of traffic generating locations under the much higher traffic conditions of the 2020s.

Alternatives:

- a) rail line re-opening Witney-Oxford, and then to Carterton with exploration of options for further extension to help reduce traffic within West Oxfordshire;
- b) Electronic Road Pricing to be applied to the A40 and alternative routes servicing Oxford to create downward pressure on car movements permanently;
- c) substantial upgrades for cycle tracks including colour marking and width large enough for cargo and e-cargo bikes;
- d) look at options for bus lanes, use ERP funds for electric buses and ensure bus lanes, advance stop areas for bicycles and more pedestrian crossings in current high traffic areas are all implemented.

8.2 Do you have any comments on the Policy Option Set for the South Area (Cowley Branch Line, Littlemore and the Leys Area) Area of Focus?

Yes

Comments:

We support the re-opening of the Cowley branch line to passenger use. We support a north-east re-opening of the line to allow it to connect to the existing rail line near Wheatley as part of reducing traffic heading for the utterly appalling Green Road roundabout, Windmill Road-Old Road junction and the non-roundabout roundabout sloppily permitted at the Corner House at the top of Hollow Way. Please note a traffic filter on Hollow Way, which we support, will cause more traffic to move to and from the Slade and Horspath Driftway, making vehicle and traffic movements north on Hollow Way more problematic than they are already.

Do not allocate any greenfield site to housing

Site comments: (bearing in mind traffic generation problems and loss of green space):

DO NOT ALLOCATE for housing: Bertie Park HELAA 8; Redbridge Paddock HELAA 113;

Iffley Mead Playing Fields HELAA 104; Unipart HELAA 120 - not for housing or employment; Knights Road HELAA 593.

8.3 Do you have any comments on the Policy Option Set for the East Oxford (Marston Road and Old Road) Area of Focus?

No

Comments:

The Old Road is heavily congested in rush hours and school run, acting as a parallel line of movement to the London Road/Headington crossroads axis. Investigation of who is moving on both these axes should prompt policy initiatives to reduce traffic movements, until such time as Electronic Road Pricing can act as a deterrent for some drivers. Alternative routes - eg. Horspath Driftway-the Slade - would need to have deterrent levels of ERP charging to stop big increases in vehicle movements if they were tempted to avoid using Headington or the Old Road by moving into this part of Oxford on the already disturbingly congested Horspath Driftway from the Eastern ring road.

DO NOT ALLOCATE THESE SITES FOR HOUSING, ON GROUNDS OF TRAFFIC GENERATION AND/OR GREENFIELD SITE USE:

Hill View Farm HELAA 112a1; Land west of Mill Lane HELAA 112b1; Marston Paddock HELAA 114d; Ruskin Field HELAA 463; Park Farm HELAA 462;

Carpenters Yard HELAA 446 - option A DO allocate for residential; Valentia Road HELAA 329; Jesus Coll. Sports Grd HELAA 26.

8.4 Do you have any comments on the Policy Option Set for the Central and West Oxford Area?

Yes

Comments:

Pedestrianisation of area should be priority. To include: Queen Street; most of St Giles; George Street up to Gloucester Green; Little Clarendon Street; New Inn Hall Street; High Street-St. Aldates and Magdalen Bridge with buses turning around on the Plain, and in St. Giles. This is partly contingent on moving the existing bus-coach station to the Beckett Street car park and making it a major bus-coach terminus/turnaround area. It would no longer be necessary to have as many buses starting/terminating at the rail station as a result of major upgrade of station including expansion of cycle parking, radical improvements to colour marked cycle and walking routes from the rail station, including to the Beckett Street car park. ERP charging should be used to discourage car use on the Botley Road and especially from Botley Road to the Abingdon Road to be a major nuisance queueing for the Westgate Shopping Centre low priced and badly planned car parking.

8.5 Do you have any comments on the Policy Option Set for the West End and Botley Road Area Of Focus?

Yes

Comments:

Refurbishment existing built environment for passivhaus standard new homes; not building on greenfield; car free developments throughout the area with pedestrianisation adding to colour marked walking and cycling routes; live work units in this area rather than adding to conventional employment usage of existing or new buildings. ERP to reduce use of the Botley Road by traffic, with very limited exceptions.

8.6 Do you have any comments on the Policy Option Set DS1?

Yes

Comments:

2nd paragraph, with adaptation that existing areas do not necessarily have high speed internet and with more people working at home, as the City Council should promote, better infrastructure is needed.

9. Other (Infrastructure, Sustainability Appraisal, Health Impact Assessment and Background Papers)

9.1 Do you have any additional infrastructure needs we should add?

Yes

Comments:

Walking and cycling networks are not created within the scope of this plan. An example: there is a new cycle crossing on the Oxford Road-Cowley Road meeting point close to the junction with Marsh Lane. Its connection to the car park to the north is poor, with cyclists being dumped back on to Marsh Lane rather than beside the proximate car park gates, currently designated as a pedestrian route, and without ramps. This should be changed without delay to add a cycle link through this car park, leading directly to the aforementioned cycle-pedestrian crossing. Not content with this failure, the roughly north-south route being used in practice as a shared cycle-walking route is not signed at either end. Worse, there is no direct easy route from the Barracks Lane to this axis. You have to cycle either on grass, where a cycle track is needed, or cycle along Barracks Lane to find a connecting hard path which joins the north-south path, around the back of the Cowley Marsh ODC site in a zig-zag. This is just one example of the failure to approach cycling as a network issue, equally applicable to many walking routes - especially at roundabouts, for example:

The Corner House roundabout is hazardous to cyclists in its present form with increasing east-west traffic Horspath Driftway-the Slade very reluctant to allow movement by cyclists and drivers north from Hollow Way turning right (East). We suggest this has to be dealt with before the Hollow Way traffic filter is added, causing more traffic to avoid going down Hollow Way and proceed instead towards the over capacity used Old Road-Windmill Road junction. (see earlier comments)

9.2 Do you have any comments on the Sustainability Appraisal?

Yes

Comments:

The fundamental bases for such an appraisal at the current juncture should be the existence of the Climate and ecological emergencies prompting an emphasis on constraining forms of development which add significantly to emissions and to physical resource use in the form of new buildings. There is no aspect of the many-faceted ecological emergency which permits greenfield site development, nor is it acceptable when the City population is growing, and with it the need for greenfield spaces in all their usages is increasing. The Appraisal and the City Council do not seem to recognise this.

Just as seriously, the conventional economic growth envisaged by the City does not include the possibility of more of its workforce telecommuting rather than needing housing in Oxford or nearby. The City must promote remote working, helping to reduce the need for office space in order to allow building conversions to housing.

Very important is that the Appraisal does not even have a section on Adaptation to Climate Change. Mitigation measures must continue, but we face a need to adapt today's Oxford to more extremes of weather in the future as the Climate Emergency intensifies. DEFRA has suggested that adaptation is the only way to cope with change of climate and extreme weather in the future. They have also pointed out that early and effective action for mitigation will reduce adaptation costs in the future. [Essex County Council – Managing the risks from weather extremes – Adaptation in action, summary, 2016, p.3.] The Environment Agency has said:

“Climate adaptation is integral to everything the Environment Agency does.” [Environment Agency – Living better with a changing climate: Report to Ministers under the Climate Change Act, 2021. – report as part of Adaptation Plan process – p. 7] But since the Agency has experienced a 75% cut in funding since 2010 and has powers severely limited by successive Governments for a much longer period, it falls to local government to seek means and stakeholders to achieve local level detailed policy development and implementation for adaptation to Climate Change.

Bearing these exceptionally serious challenges in mind, the Environment Agency has an eight-part approach to adaptation, which has to 'dove-tail' with whatever Oxford City Council and the County Council may succeed in doing:

- Thinking differently as 'business as usual' is not an option
- Creating partnerships for adaptation
- Private and public finance for adaptation
- Working with nature by addressing biodiversity and climate crises simultaneously
- Designing low carbon futures and a low carbon economy
- Strengthening community resilience
- Helping businesses adapt through regulation and advice
- Demonstrate what it takes to live better when the climate continues to change

[Environment Agency, Living Better, pp9-11]

For more detail, see our Report - Adapting to Climate Change in Oxford, previously submitted to the City Council with little or no effect so far, at this location: <https://www.catg.org.uk/reports/>

9.3 Do you have any comments on the Health impact Assessment Screening Report?

No

Comments:

9.4 Do you have any comments on the Local Plan 2040 Background Papers?

No

Comments:

9.5 Do you have any comments on the Evidence base studies?

No

Comments:

9.6 Do you have any comments on the HIA Screening Report?

No

Comments :