To: Planning at Oxford City Council

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22nd February 2023

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**22/02954/OUT – Submission on Oxpens re-development proposals**

The Cowley Area Transport Group has commented previously on development throughout this area, and the City. Our general approach to this redevelopment/new development is that many opportunities are being missed and that many relevant considerations are in need of introducing, to modify implementation. These include:

1. Passivhaus standards for all new homes; Parker-Morris space standards for all new homes, bearing in mind recent action on this topic by UK Government; b) need for very low-cost housing not being met in Oxford at present as the highest social priority. Recommend 500 new housing units rather than the minimal 234, including sustainable retrofitting to empty buildings, all for the purpose of increasing very low-cost housing delivery (council/housing association/keyworker shared ownership homes with very long mortgage lengths for the latter to reduce monthly outgoings eg. 35-year mortgages). We strongly reject building on ANY Oxford greenspace outside existing industrial estates (the latter needing serious examination for high density, very low-cost housing development with essential facilities added). At present, the current plans would just displace housing elsewhere which we reject; c) Designation of area as car free zone with all new homes car free by covenant, radical reduction in existing car parking and no additions, cycle tracks fit for cargo bikes (at least 1.7m in one way sections) made into networks throughout the area to radically reduce delivery vehicle movements including by constraining road space available to vehicles[[1]](#footnote-1); d) Remote working strongly encouraged for whole area,[[2]](#footnote-2) and taken into account in space provided in new and retrofitted homes; e) all existing green space and trees conserved; new green spaces and tree planting to be added to combat 'urban heat island' effect and as part of flood resistance measures; f) related to previous point: fountains in the most formal parts of green open spaces; g) green walls and roofs to be a substantial feature of the area; barriers to pavement parking in the form of steel bollards, planters, stainless steel fencing, etc should be present to make the area a pavement parking free zone.

Lack of clarity about actual policies with regard to long-term sustainability, even in relation to existing City Local Plan and County policies. Apart from considerations stated above, the area needs better walking and cycling networks; pedestrianisation and pedestrian priority areas should be a substantial feature of the Plan; emphasis on employment addition to be via remote working in scale of homes provided as council housing; cooperatives; secure moorings additions (and see above); Heights of buildings may set new maximum levels in this area, bearing in mind conservation of key viewing cones. Identifying long-term empty industrial units as sites for adding to community facilities as well as increased emphasis on new very low-cost homes. The Oxpens area should have a new community centre and a new youth centre, using parts of existing built environment if practical.

The City, in cooperation with the County, should have a) clear policy commitment that this area is primarily to be characterised for walking and cycling movement with minimal access at periphery for buses/taxis; b) very strong emphasis on pedestrianisation throughout the whole area, retaining and improving/adding to cycle network. c) reduced emphasis on speculative commercial development, focusing on improving existing businesses rather than adding more offices in particular, to keep traffic levels to absolute minimum; d) protecting the public from community severance by heavily used roads through severe constraints on movement other than buses and taxis/emergency vehicles.

Also notable: a) public realm strategy is poor generally in England through under-funding, and due to utter failure to recognise the full implications of Climate and ecological emergencies. Funding for new or improved junctions is only applicable if substantial parts of such investment protect pedestrians and cyclists and discourage through journeys by vehicles; b) the public realm should be fundamentally changed in appearance by planting/allowing far more space for existing green areas - including for wildlife corridors.

Green spaces to be protected from intrusive use in this generally residential area as we propose it, and from damage.

To reiterate, there is too much emphasis on commercial development in this area. Remote working means more homes which are sustaining local jobs, including for people who will spend money in the locality-City Centre - which is in walking/cycling distance for the able-bodied. How people may move freely through the development in mobility scooters should be a consideration. Good, spacious, new and sustainable retrofitted homes means more remote workers can live in them. This is the wrong place for warehouses or other businesses requiring substantial delivery vehicles.

Regeneration is not primarily about speculative commercial development, especially post-Brexit and in the absence of a Rejoin strategy. There is a high risk of long-term empty commercial properties resulting from speculative development. Flood risk requires that surface level in new housing be for 'wet rooms', bike storage, tools and similar: main living spaces should not be at surface level.

Electronic Road Pricing for the Oxford City Region is essential for traffic reduction. See our report under REPORTS at [www.catg.org.uk](http://www.catg.org.uk) Far less car parking, as we propose, means fewer streets in any new build area to occupy space which could be for homes or greenspace. This would need to be done bearing in mind issues with deliveries, cargo bikes, emergency service vehicles and utility vehicles.

The reference to SUDS in all Council documentation we have seen so far neglects to mention that these are not maintained. So they are an 'environmental fiction,' or greenwash. The City needs to have a plan(SPD?) to ensure maintenance is implemented, or that impermeable surfaces are removed to allow soakaways in more places. Friends of Lye Valley has sent the Planning Dept. proposals for a Special Planning Guidance for the entire Lye Valley water catchment.[[3]](#footnote-3) We believe the City Council, in view of past flooding and in full awareness of rising flood risk in the future, needs an overall plan with specific planning policies to improve and not to worsen drainage conditions throughout the entire City. This is also the view of Friends of Lye Valley.[[4]](#footnote-4)

Prosperity without Growth, by Tim Jackson (available online and 2nd edition in print form), is one of many works indicating that wellbeing and sustainability are about what we retain or conserve, what we choose to invest in for social and environmental long-term reasons and how we re-purpose the existing built environment to favour quality of life rather than the abandonment of urban areas to excessive traffic movements, and over-emphasis on commercialisation – as the Westgate with no very low cost homes demonstrates all too well.

'Growth' is not compatible with support for ecologically and socially sustainable development; growth in a City with very high employment is questionable especially when we have had successive Governments leaving skills shortages primarily to miraculous and improbable interventions by market actors. Similarly, Kate Raworth’s Doughnut Economics and its call for a circular economy raises many questions about how planning will facilitate more recycling of specific types of material, meaning more collections, and how the City and County will – for the first time – consider how re-use may be scaled-up to reduce the amount of materials entering the waste stream or recycling.

A fundamental weakness of these proposals is that they do not sit within an ‘Adaptation to Climate Change’ framework as the City has not chosen to develop such a suite of policies to date. See our report, Adaptation to Climate Change in Oxford, which focuses on transport and green spaces particularly, as a starting point for the City to address this anomaly given their recognition of a Climate Emergency. Full report under REPORTS at [www.catg.org.uk](http://www.catg.org.uk) and see this extract particularly applicable to the City proposals at Oxpens:

“In June 2021, the Glasgow City Region launched its Climate Adaptation Strategy and Action Plan,[[5]](#footnote-5) offering Oxford a model in addition to the content of the current document. In fact, about 62% of UK cities have adaptation plans although with difficulties meeting the financial obligations involved.[[6]](#footnote-6) Some of these plans are very limited, unlike the Glasgow Plan. Some key points summarised from the Glasgow Plan are of particular relevance:

* Risks to transport infrastructure from extreme heat and flooding during periods of intense rainfall suggests needs to re-consider steps to improve resilience or face problems created by the failure to do so.[[7]](#footnote-7)
* Recognising the value of waterways and standing water in Adaptation policies,[[8]](#footnote-8) which could include an increased role for electric boats for transportation.[[9]](#footnote-9)
* ‘More of the same will not do. An effective response to climate change will require a revolutionary and systemic approach.’[[10]](#footnote-10) 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.[[11]](#footnote-11) 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 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. It is regrettable that the City Council’s Carbon reduction topic paper focuses heavily upon carbon reduction in new buildings. Most buildings present in Oxford, ten, twenty and more years from now have already been built and have to be the major concern in achieving large cuts in Oxford’s emissions.[[12]](#footnote-12) It may be that changed working patterns, with more people working at home, and a retail sector contracted by far more online purchasing, will free up more space for homes in Oxford. The immense employment potential of sustainable retrofitting of the built environment in Oxford must form a significant part of a Zero Carbon future.
* A sustainable welfare State is possible without Growth as conventionally measured. Since growth-dependent States are adding to the Climate Emergency, it is not surprising that 11,000 scientists have called for growth to be quickly curtailed on the grounds of maintaining long-term viability of the biosphere: this involves shifting from growth in GDP towards meeting the basic needs of people and reducing inequality.[[13]](#footnote-13) The basic needs of people can only be met by addressing the Climate and ecological emergencies with urgency.
* Even if the entire world meets its Paris Agreement targets, there will be costs and impacts from Climate Change that will require Adaptation in the long-term. The UN has already indicated, after the Paris Agreement, that even if countries reached their targets, a warming of 3 degrees C compared to pre-industrial times could be expected[[14]](#footnote-14) – emphasising the principle above of ‘a revolutionary and systemic approach.’ The Glasgow Plan indicates Adaptation measures will be needed even if Paris Agreement goals are achieved.[[15]](#footnote-15)
* The Plan emphasises that whilst an incremental approach may be appropriate for some constructive interventions in the Glasgow Plan, ‘transformational adaptation’ will be required. This will include changing current approaches and governance arrangements, addressing causal factors creating risks, and potentially rethinking the vision of a future City.[[16]](#footnote-16)
* Enabling adaptation will include engaging with public and private sector bodies, communities and organisations to encourage involvement in adaptation Policy and its financing.[[17]](#footnote-17)
* The cultural sector should not be neglected in Adaptation as each cultural organisation will have types of contributions it may make to the overall Adaptation effort.[[18]](#footnote-18)
* The Plan notes an initiative in Paris to ‘green’ 800 concrete schoolyards.
* The Plan is to deliver: green walls; more vegetation for shade; replacing concrete with surfaces that will actually drain. Greater access for the general public to the newly-greened spaces is envisaged.[[19]](#footnote-19)
* The Plan draws attention to the importance of peatlands as carbon sinks. Similarly, the City Council has noted the importance of peatlands for Greenhouse Gas Removal.[[20]](#footnote-20) In Oxford, the Lye Valley SSSI and nature reserve is part of over 11 hectares of peatland in variable condition in the same area which are capable of being re-wetted to improve their climate and ecological roles.[[21]](#footnote-21) But the City does not have a City-wide Supplementary Planning Document for the preservation and restoration of all peatlands within Oxford’s boundaries yet.[[22]](#footnote-22) The Committee on Climate Change has stressed the importance of peatland restoration.[[23]](#footnote-23) It should be noted that about 94% of the UK’s biogenic terrestrial carbon is stored in our soils, especially in peat,[[24]](#footnote-24) making its conservation a vital part of the Climate Emergency effort. Unfortunately, poor management of UK peatlands means they are currently emitting about 16 million tons of carbon dioxide equivalent each year,[[25]](#footnote-25) making their restoration a key objective for environmental policy.
* Climate Ready Clyde played a key role in the development of the Glasgow Plan, including in the creation of a theory of change, important for taking as many people into the process of adaptation as possible.[[26]](#footnote-26) In the Oxford context, *Climate Outreach* has done a considerable amount of work on persuasion and education about the Climate Emergency.[[27]](#footnote-27)

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1. Cyclox has pertinent comments on cycling issues and traffic in the re-development as suggested, although we think a very low costing housing development with very little commercial content would be better for this area. See: <https://public.oxford.gov.uk/online-applications/files/010AD7E47E68BB465419963DA94E181D/pdf/22_02954_OUT-THE_CYCLING_CAMPAIGN_FOR_OXFORD-2931405.pdf> [↑](#footnote-ref-1)
2. We suggest the City should be promoting remote working thoroughly as a contribution to traffic reduction. Similarly, strong advocacy of flexible working and 4-day week trials should be done. [↑](#footnote-ref-2)
3. See full document at: <http://www.friendsoflyevalley.org.uk/news/pdf/FoLV%20Supp%20Planning%20Guidance%20Lye%20Valley%20v11.pdf> [↑](#footnote-ref-3)
4. Both contributors to this submission are on the Friends of Lye Valley Committee. [↑](#footnote-ref-4)
5. <http://climatereadyclyde.org.uk/gcr-adaptation-strategy-and-action-plan/> Hereinafter referred to as ‘Glasgow Plan’ with page numbers. [↑](#footnote-ref-5)
6. CDP and ICLEI – *Working together to beat the Climate crisis: collaborative city, state and regional climate action: six country snapshots,* 2021: <https://6fefcbb86e61af1b2fc4-c70d8ead6ced550b4d987d7c03fcdd1d.ssl.cf3.rackcdn.com/cms/reports/documents/000/005/885/original/CDP_Collaborative_City_State_Regions_Report.pdf?1633362006> p.22-23. [↑](#footnote-ref-6)
7. Glasgow Plan, p.9 & p.27. [↑](#footnote-ref-7)
8. Glasgow Plan pp46-47. [↑](#footnote-ref-8)
9. See the Electric Boat Association’s website on this topic: <https://www.electricboatassociation.org/> [↑](#footnote-ref-9)
10. Glasgow Plan, p.12. This is the first principle of the vision and Theory of Change underlying the Glasgow Plan. The other principles are shown on this page. See also for applicable policies: p.20. [↑](#footnote-ref-10)
11. Lonsdale, K., Pringle, P. & Turner, B. 2015. UK Climate Impacts Programme, UKCIP – *Transformational adaptation: what it is, why it matters and what is needed,* 2015: <https://www.ukcip.org.uk/wp-content/PDFs/UKCIP-transformational-adaptation-final.pdf> pp.6-9. [↑](#footnote-ref-11)
12. Oxford City Council Carbon Reduction topic paper, undated p.1. <file:///C:/Users/Steve/AppData/Local/Temp/1_Carbon_reduction_topic_paper.pdf> [↑](#footnote-ref-12)
13. Koch, Max – *Social Policy without Growth: moving towards sustainable welfare states,* Social Policy and Society, October 2021: <https://www.cambridge.org/core/journals/social-policy-and-society/article/social-policy-without-growth-moving-towards-sustainable-welfare-states/635A7EC691A0A16E40B888AFF39FB56B> [↑](#footnote-ref-13)
14. See: <https://news.un.org/en/story/2019/11/1052171> [Now generally thought to be a current risk of 2.8 degrees C by 2100.] [↑](#footnote-ref-14)
15. Glasgow Plan p.13. [↑](#footnote-ref-15)
16. Glasgow Plan p.21. This would mean fundamental alterations to the existing City Plan, to Oxfordshire 2050 proposals and raises the need to transfer all OxLep funds to local councils in Oxfordshire to help them to meet their Adaptation needs. [↑](#footnote-ref-16)
17. Glasgow Plan pp28-29. [↑](#footnote-ref-17)
18. Glasgow Plan pp38-39. [↑](#footnote-ref-18)
19. Glasgow Plan p.51. [↑](#footnote-ref-19)
20. Zero Carbon Oxford, p.16. Other methods include adding to forest cover and hopefully biodiversity, which could mean far more TPOs in Oxford as well as an effort, perhaps with the County, to increase numbers of street trees. [↑](#footnote-ref-20)
21. See: <http://www.friendsoflyevalley.org.uk/news/index.html> [↑](#footnote-ref-21)
22. Talks on this topic have commenced between Friends of Lye Valley and senior officers at Oxford City Council. [↑](#footnote-ref-22)
23. CCC, 2021, p.111: <https://www.theccc.org.uk/publication/independent-assessment-of-uk-climate-risk/> [↑](#footnote-ref-23)
24. Brotherton et al, 2021, p.26. [↑](#footnote-ref-24)
25. Brotherton et al, 2021, p.33. [↑](#footnote-ref-25)
26. See: <http://climatereadyclyde.org.uk/theory-of-change/> [↑](#footnote-ref-26)
27. See in particular: <https://climateoutreach.org/reports/britain-talks-climate/> [↑](#footnote-ref-27)