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## **SUBMISSION TO OXFORD LOCAL PLAN 2040 CONSULTATION**

This is a submission to the Oxford Local Plan 2040 consultation. It contains comments and challenges to the main consultation document and to the associated Sustainability Appraisal. Prior CATG submissions, reports and other documentation can be seen on our website - [www.catg.org.uk](http://www.catg.org.uk)

### **Oxford Local Plan 2040 main consultation document**

Introduction: A basic problem with Local Plan documents which we have commented upon in consultations going back decades, not just in Oxford, is a fundamental failure to recognise that short-term policies cast a 'long shadow' over what is possible and desirable for the very long-term. This often has negative implications for people and the community they live in, due to problems caused by traffic increases, and the many ways in which environmental damage is allowed to occur without consideration for future generations and species. Our comments throughout this submission are made accordingly.

### **Commenting on the current Draft Oxford Local Plan 2040 consultation document**

p.8 With regard to Natural Environment, we believe the features listed below should be considered for expansion wherever possible in relation to the increasing population of the City. This means no new development on: playing pitches; allotments; locations with trees and canopy cover; SSSIs; parks and gardens.

Built environment: There is reference here to 'new bridges.' No new road bridge should be contemplated anywhere in the City. Additional bridges for pedestrians and cyclists should be considered and added. The model we think should be followed is the cyclist-pedestrian bridge at Cutteslowe Park. We note historical evidence of bridges connecting East Oxford to the western area of the City other than Magdalen Bridge in the past, and that these have been gradually removed. Cyclox has advocated a pedestrian/cycle bridge over the Thames linking Jackdaw Lane to the cycle route across the river. Investigation of how this and other similar bridges might in some cases be restored for Active Travel use would be welcome.

p.9 Under weaknesses, housing stock and potential in the City is greater than the City Council has accepted in the various iterations of the Local Plan. First, there is better use of the existing built environment: empty homes, long-term empty shops, persistently empty sites and buildings in industrial estate/science parks, Air B&Bs, long-term empty offices, etc. We think that the massive 'car park reserve' should be increasingly zoned for housing. By this we mean homes built above car parks mainly; car parks generating major traffic movements in the central area of Oxford should be

built over. These sites should all become council or keyworker part rent-part buy homes. We explicitly want both council-owned and privately-owned car parks to be built above, or over. We are concerned about the level of inspections of private rented properties: is the City Council confident in its capacity to identify over-crowding, dampness, energy inefficiency and poor internal services in rented accommodation? We doubt it. We see very low-cost home building above car parks as a long-term effort to reduce hyper-expensive private rental accommodation in Oxford. This also has considerable advantages over building on the periphery of the City, or outside, which would generate more traffic as research on urban extensions demonstrates. Also, new housing developments in England are frequently notorious for their lack of facilities, pushing people into their cars in search of facilities which should generally be within walking or cycling distance. The City Council should ensure that the principle of a '15 minute City' is not undermined by traffic increases or anything else.

The Transport Action Network has also written this on 'hidden emissions:'

"When people talk of road emissions they are usually only talking about the total fuel emissions used by all those who drive on a particular road. While at first glance this might seem reasonable, it excludes a lot of other emissions directly attributable to building a new road and therefore hides the true impact that building a new road has on carbon emissions.

Increasing road capacity increases CO2 emissions in five main ways:

1. during construction, notably land clearance and preparation, embodied carbon used in the production of concrete and other materials, and emissions from contractors' vehicles and other activities;
2. during operation from road maintenance, servicing, lighting etc;
3. from road users during the lifetime of the scheme particularly the tailpipe emissions of the traffic which has been generated or 'induced' by the presence of the road itself, including from changes in traffic speed\*;
4. consequential effects of the roads on settlement and activity patterns, notably when they enable developments that increase car-dependent lifestyles, increase car ownership (and increase the embedded carbon from vehicle manufacturing) and new patterns of warehousing and freight logistics; and
5. synergetic effects such that the impact of each single road improvement on its own may be small but the combined effects of many, in the context of prevailing transport policies, pricing and management, give a greater total than the sum of their parts.

\*Note: User emissions usually only covers fossil fuels burnt whilst driving on a stretch of road. They do not cover the emissions linked to electricity generation for electric vehicles.

There can also be issues of how accurate estimates are, given that National Highways / Department for Transport routinely overestimate traffic increases without a road expansion which allows them to then model a lower uplift due to a new or widened road. This has the effect of underestimating carbon emissions from induced traffic.”<sup>1</sup>

There is also the issue of the questionable nature of the City Council’s projections of housing demand. Ignoring the Government figure of 762 additional units of housing per annum for Oxford, the City Council clings to a figure almost 75% higher, at 1322.<sup>2</sup> Land allocated for employment, such as in Oxpens, should be used for high density very low-cost housing. No one needs over-priced market housing, or inflated private rents. Given that local councils may now refuse to accept ‘overspill housing’ from neighbouring local authorities, the fact that Oxford City Council wishes to exceed the Government headline figure for housing units does not help its case, allowing nearby local authorities to decline to accept Oxford’s exaggerated figures. We think the figures are essentially about urbanising the countryside as if the Climate and ecological emergency implications should be disregarded.

With regard to inequality, we think Oxford City Council should have the same level of Living Wage as London. This is due to exceptional and unacceptable housing costs. In short, the role of market housing and market rents should be progressively reduced in Oxford to allow more people with essential skills to live here, instead of moving away in search of cheaper places to live.

p.11 ‘Physical land constraints’ are created in part by the City Council not taking advantage of space occupied by car parks.

p.12 An uncritical approach to economic growth in a City plagued with too much growth of the wrong kinds is unhelpful. By this we mean issues such as: housing costs, business rents, increases in low paid employment, reduction in greenfield sites in the City by development over time, population growth in a water-stressed area. Serious and wasteful unquestioned duplications of types of businesses in some parts of the City - such as fast fashion with its Climate and environment impacts in the Westgate, or the proliferation of restaurants and takeaways on the Cowley Road requires zoning action. This ‘laissez faire’ approach to the use of these spaces does not offer diversity to the public and has led to more rapid turnover of enterprises. This is not ‘sustainable growth.’ It is certainly not a circular economy of the type likely to enhance local employment and decrease resource use including from avoidable imports.<sup>3</sup> To prepare for an economy which is actually sustainable into the next century requires that conventional economic growth must be set aside in favour of sustainable development which can realistically occur economically, socially, environmentally and with social justice far into the future.

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<sup>1</sup> <https://transportactionnetwork.org.uk/campaign/climate-change/hidden-road-emissions/>

<sup>2</sup> Letter by Suzanne McIvor in Oxford Times of 23<sup>rd</sup> November 2023.

<sup>3</sup> See: Kate Raworth – *Doughnut Economics: seven ways to think like a 21<sup>st</sup> Century economist*, 2017; Molly Scott Cato – *Green Economics*, 2009.

p.13 The principle of increasing biodiversity is welcome, but sites which could be used are not being considered enough. In particular, we favour substantial increases in the pedestrianised area of central Oxford with additional trees and fountains to fundamentally alter the City Centre, preparing it for a better resistance to the 'urban heat island effect' and encouraging those who visit the Centre to spend more time in it by connecting up the pedestrian access and cycle track access to a much wider range of facilities.

We are concerned that the Flood Alleviation Channel puts too much money into a temporary solution as far as flooding is concerned. Streams, tributaries etc to the west of Oxford should be part of nature recovery with the creation of new wetlands to manage far more water especially during extreme rainfall events. We note that the Lye Valley's 'leaky dams' can have a considerably wider application than just this particular SSSI/Nature reserve. We note, however, that very poor drainage management into the site and extreme rainfall has swept away the leaky dams on two occasions in the last 12 months, forcing volunteers to re-consider how much water they let through in future. This is not good news for the Campbell Road area downstream, which is prone to flooding and sewage outfall overspills. Investment is needed to decrease the amount of run-off going into the Valley. This is a snapshot indication of the problems impermeable surface additions create as they are increased by development including the concrete/tarmac treatment of many front gardens. We suggest rather than just looking just at the interests of homes highly prone to flooding, the City needs a general Special Planning Document to constrain development which creates impermeability, to push Thames Water to do a better job prior to its return to public ownership, and to ensure roads remain navigable during extreme rainfall events.

p.14 It is not the case that Oxford is ready for a 'net zero carbon future.' Since about 76% of the City's local emissions come from buildings, we cannot see a large-scale programme of sustainable retrofits occurring throughout the City. Whilst we appreciate Government policies are inadequate for this transition, and that the Government has been frequently challenged by the Committee on Climate Change for its lack of forward planning for Net Zero, we need to find means to accelerate transition in the built environment. New build which is neither energy or water efficient should struggle to get through planning processes.

We do not accept current measures are putting enough downward pressure on vehicle journeys in Oxford. We look forward to the implementation of the traffic filters destined for 6 major roads. We think, however, that traffic filters should also be applied to both the Botley and Abingdon roads to improve traffic reduction, whilst retaining access for residents. Location of bus gates on these roads would, of course, require consultation involving the relevant authorities/stakeholders/the communities.

p.16 Local area access to services, amenities and facilities is exceptionally varied in Oxford. The brand new Bullingdon Community Centre was prioritised not far from where we live on the grounds that community facilities in the two wards in its 'area of

benefit' – Churchill and Lye Valley - were very limited indeed. Community space in the form of rooms at public houses has been radically diminished as these have disappeared over a period of decades. There are serious limits in terms of staffing to schools 'picking up the slack' by opening in the evenings to the public. There is no easy way to change this. In general, we favour Land Value Taxation as an alternative to Council Tax and business rates. It can be constructed as a progressive tax paid according to the scale of land owned in Oxford and elsewhere, according to type of use.

p.20 'Sustainable growth' is a misleading term since the very long-term, including the interests of future generations, is not considered when new projects for 'growth' are initiated. Growth involving the use of more, and sometimes scarce, physical resources is inefficient and is probably not sustainable in the long-term. In short, we need a circular economy covering as many of the types of resources we wish to use as possible. This certainly implies far more re-use of goods than at present, and recycling of more types of goods through doorstep collections. Reductions in physical resource use by a City like Oxford means less scope for imports, less waste of finite forms of energy and resources, and more actual employment in ensuring a well-functioning circular economy. Anything the City Council can do to encourage the public to recognise the value of charity shops in helping people re-use goods and accessing goods at acceptable prices is welcome.

p.22 section 1.48 We commend the future opening of the Cowley branch line, and of East-West Rail in principle. However, given the very serious traffic levels in rush hour-school runs via Wolvercote/Cuttleslowe originating in West Oxfordshire, we strongly support the opening of a Carterton-Witney rail line into Oxford. We urge that Oxford City Council adopts a policy to support this initiative and develops a common approach with relevant stakeholders.

p.27 'Affordable housing' in Oxford is not cheap enough to tempt essential workers to stay working in the City. Nurses and teachers seem to often leave for cheaper places. Very low-cost housing is what is needed: primarily council homes or keyworker part rent-part buy. The 'housing market' in Oxford is a market failure and all available means should be used to ensure the maximum possible additions of council and keyworker homes primarily from the existing built environment, brownfield sites and over/above car parks. Employer-linked housing may be acceptable, but may not offer long-term security.

p.28 As a former Chair of the Bullingdon Community Association, Steve Dawe has put in numerous objections to reliance on HMOs. They are not affordable housing; internal inspections are needed to stop overcrowding; they create areas of transient population instead of community building; they encourage concreting over of frontages needed as soakaways. Further details of many objections made by the Association to HMOs can be seen courtesy of the Planning Department of the Council.

Concerning student accommodation, we note that postgraduate students are not being counted as part of the students deemed to be living in houses rather than

dedicated accommodation. This should not be the case. Also, dedicated accommodation for students is inflexible when there are fluctuations in student numbers on some courses from year to year; this particularly applies to Oxford Brookes. Student rooms are generally very small and not suitable for long-term accommodation for anyone. On this point, we think planning applications for additional accommodation for Brookes students should require full details of at least 5 years of previous student recruitment so that speculative student numbers are not influencing decisions. This should be part of an overall evidence base of adequate data concerning realistic needs for student accommodation, and less so the aspirations of developers who want to build it speculatively. We note planned closures and attenuation of courses in some subjects at Oxford Brookes, reported widely recently.

p.29 Not building above or over car parks in general is a major weakness in The Council's land use policies for housing. In consequence, the satellite communities the City Council has sought in other council areas could have been mitigated or stopped. If built, with employment concentrated in Oxford, the consequences of additional traffic movements from satellite communities will likely cause very serious increases in congestion. Since other local councils are no longer obliged to accept Oxford's would-be urban sprawl, it is essential that private and public sector car parks above 10 car parking spaces are zoned for potential high-density homes (over car parks or above), up to the maximum height permitted bearing in mind the sensitivity of view cones in Oxford.

p.30 We do not accept any use of greenfield sites for housing or other development in Oxford. Population increase, drainage issues, air quality, noise, amenity and other factors should make it obvious Oxford does not need 'packing' with homes on these sites when the 'car park reserve' is largely untouched.

p.32 A 40% target for 'truly affordable' homes in new developments in Oxford is inadequate. The City does not have anywhere near enough council or keyworker homes, given the alarming costs of market homes and private rents. The Council should consider any and all options to add to council or keyworker homes, including by buying homes for sale.

p.36 Section 2.27 This section emphasises the appropriateness of our assertion that more very low-cost homes are needed in Oxford. It mentions health, school teaching and universities which, with the full range of staff these services require, generate a substantial demand for very low-cost homes to stop commuting and unacceptable staff turnover which can lead to predominance of new entrants in some institutions.

p.37 The sites identified for employer-linked affordable housing need strict Environmental Assessment, particularly for their drainage value. We are concerned to see two schools in the list as if the school populations in these schools are not going to increase with increasing population in the City. What we have observed about Osney Mead and environs proposed developments is the very low priority given to very low-cost housing, albeit living spaces would need to be above ground level in much of this area to secure them against flood risk. Use of undeveloped land at the Churchill and

Nuffield hospitals will contribute to the area of impermeable surfaces in the Lye Valley water catchment and should not occur. We note the presence of existing single storey buildings in these sites, which could be replaced with taller structures – incorporating soakaways.

p.39 The City Council should examine the efforts Cornwall has made in restricting 2<sup>nd</sup> homes, holiday homes, Air B&B etc. Oxford's residents need these types of built environment use to be marginalised, penalised where appropriate through council tax banding, and CPO'd if funds are available for very low-cost use. The latter action should be used to address the existence of private rental properties in poor condition.

p.40 We would welcome downward pressure on HMOs in Oxford. Purpose-built HMOs will be too few to make a difference to the general cost disadvantages of this type of housing; quality improvements depend upon the City's capacity to staff external and internal inspections of HMOs. There is also the serious problem of high rents in all forms of private accommodation which remain a deterrent to many people with useful skills remaining in Oxford due to high housing costs.

p.42 Section 2.44 Undergraduates in normal housing are counted; postgraduates are not. The City Council will not know how many students in total are in normal housing unless this is done.

Section 2.45 There is some risk of Oxford Brookes projections of student growth being over-estimates, as they are in competition with many other HE institutions. Oxford University can afford to be more selective.

Section 2.47 Whilst we are in principle in favour of more dedicated student accommodation for PGs, we remain concerned it should not occur on any greenfield site.

p.47 Section 2.61 We urge the Council to maximise the number of secure moorings for the boat dwelling community. We also want the City Council to approach neighbouring local authorities to see if there is willingness on their part to increase secure moorings in their areas of jurisdiction, according to whatever demand may exist.

p.49 Section 2.70 We support community-led housing schemes as they may be able to offer very low-cost accommodation compared to very high home prices and private rents. With stakeholders/interested groups, we suggest a more ambitious strategy for this sector, including by the Council buying properties for this type of purpose and sharing adaptation costs with the user group and setting long-term low rents to pay back the City over decades.

p.56 Section 3.3 We have made it clear above that conventional economic growth raises many questions in terms of negative impact, and this is particularly the case if any area which is growing comparatively quickly – such as Oxford. Quality, sustainability and social justice have general application in terms of constraining high-impact growth.

Section 3.7 Whilst we recognise some sectors of employment do not offer remote working possibilities, nevertheless we think remote working should be strongly promoted by the City Council to maximise skills availability in Oxford while making it possible that people working for institutions here need not live in the City. We also believe that this, and strong encouragement of flexitime for more workers, can be part of addressing the atrocious and worsening traffic problems of the City. It is also part of improving quality of life.

p.68 Section 4.8 We reject the use of any Green Belt for housing or other development. All greenfield sites should be conserved for their various uses, for the very long-term. We are also concerned about the traffic implications of more housing where there are probably going to be limited facilities, as is common in new developments. We want full use of the existing built environment as well as dual use of car parks, and some car parks devoted solely to high-density housing.

Section 4.9 Allotment space demand is bound to grow with increasing population, and with factors driving up food prices whether in the UK or globally – to which specialists in the area of food policy periodically refer. Allotments should be conserved.

p.69 4.11 We reject hedgerow and tree loss to development in principle. In terms of biodiversity, shelter from heat and as assistance to drainage management, we need these features of this City not to be attenuated by the whims of careless developers or planners.

p.70 We reject new housing being sited on garden land. Rather than 'cramming', the City Council should be using car parks to support building up to the maximum that customary viewing cones permit. This allows planning to ensure good space in homes, including for home offices.

p.71 We do not agree with finding excuses to reduce tree cover.

p.74 We believe that a Special Planning Guidance should be applied to the City to prevent concrete/tarmac being applied to front gardens. Our reasoning is: this creates downward pressure on the number of vehicles domiciled in residential areas; it creates downward pressure on the creation of new HMOs which we believe are too expensive for public use; it helps to maintain soakaways that are essential in a City where rainfall so often results in huge puddles around road drains as capacity and quality of drainage systems have not been maintained.

p.77 10% biodiversity net gain is a 'mixed blessing.' New biodiversity may not survive, notably trees. Maintenance of new planting may not be guaranteed. The 'net gain' can cover a multitude of development-led obliterations of biodiversity which need not occur. Whilst we are aware of the Council's limited resources for enforcement, we do think this area requires monitoring.

p.80 Designated Sites: We want absolute protection of these sites, including where they may be influenced by proximate development. We want extensions of protected areas where this is possible. We want explicit protection of all sites with peat, given

its biodiversity value, capacity to be restored to ecological 'health', and also fully utilised for its carbon storage capacity.

p.83 Section 4.43 We think that the Council should adopt the principle of rewilding of sites for both biodiversity and drainage reasons within the City, where opportunities exist. In one of the most nature-depleted countries in Europe, the Council should be doing more – with interested groups – to make nature restoration an ever more active area of policy within the City.

p.84 Section 4.47 Great faith is expressed here in Sustainable Drainage Systems. However, there is a lack of evidence about how they are, if at all, being regularly maintained. Either a voluntary code of conduct needs development or a Special Planning Document requiring maintenance throughout the City is required.

p.85 Section 4.51 Extensions are, in volume, significant as a general feature of weekly planning applications. Requirements for these should include soakaways/French drains from roof gutters as compulsory. Given that extensions are part of the process of converting homes into HMOs, a general block on concrete-tarmac new frontages is needed. This will discourage car use, and may cause some HMO landlords to sell properties.

p.96 We strongly encourage measures to ensure faster deployment of heat pumps in the housing stock of Oxford. Communal and district heating systems which do not rely on fossil fuels or wood combustion are also very much welcomed. Partnerships involving the Council, community organisations, relevant campaigning groups and renewable energy companies need to be scaled up.

p.97 Section 5.14 There is a large and very critical literature on offsetting. We are very sceptical about reliable, maintained, secure offsetting as a means of resisting more human-created GHGs. We would rather the Council concentrated on cutting emissions at source: ensuring best possible insulation especially in council and keyworker homes, and insisting private landlords follow suit; any and all measures which can be used – in cooperation with the County Council and the community – to bring down traffic levels and particularly the number of short-distance car journeys in Oxford, especially in the rush hour-school run.

p.98 We believe new buildings should not be emitting any GHGs when in use. We believe that the construction and distribution processes for new build and retrofits need to be made entirely sustainable issue by issue, over as short a time as practically possible.

p.101 We strongly support sustainable retrofitting of buildings, with enforced higher standards to ensure quality of work. But can the City Council afford building control officers?

p.103 Air pollution sources in Oxford, including from buildings and vehicles, remain numerous and threatening to public health. Non-exhaust emissions from electric vehicles – such as tyre and road abrasion, brake pad erosion and the spreading of

dust on roads by vehicle movements – means that EVs only deal with the issue of tailpipe emissions and do not eliminate air pollution from the surface transport sector.<sup>4</sup>

In the City Centre, we believe pedestrianisation with marked cycle routes is an answer to this problem, and would help more people to spend longer in the Centre if it was far less trafficked. We want the City Council to set strategic goals for steps in pedestrianisation including: all of Broad Street; Magdalen Street; George Street after the coach station is moved to the Becket Street car park; much of St.Giles with bus turnaround and stops provision; the High Street and St.Aldates; and as much of the area between the Cornmarket and the rail station as possible, creating pedestrian and marked cycle track routes into the Centre. When combined with additional trees and other plants, and fountains in some locations, the City Centre could be considerably more attractive than it is at present. We accept the need to ensure there are allocated pick-up/put down arrangements for taxis outside a much-enlarged pedestrianised area.

p.109 R7b: 'unacceptable traffic impacts' are best achieved by reducing car parking spaces, continuing the roll out of CPZs, ensuring new housing developments are car-free and supporting the creation of more marked cycle tracks to serve the public and cargo bike companies.

p.133 New homes should have at least Parker-Morris size standards for rooms, provision for home offices, 'wet rooms' for washing machines/drying and consideration of having some developments with rooms higher than typical for the UK, allowing some residents the opportunity to have taller furniture, fittings, bookshelves etc.

p.143 More active promotion of street markets for more locations is highly desirable. As in the case of the Headington market on Saturdays, it has boosted footfall and, as far as we can judge, is encouraging spending in shops around Headington crossroads on market days.

p.144 Section 7.15 Whilst the conservation of shops in district centres with limited diversity is desirable, overall we feel empty shops – particularly in the City Centre – should be zoned for very low-cost housing use.

p.149 Sections 7.24 and 7.25 There is no ambition to increase pedestrianised areas on the part of the City Council. The minute area of pedestrianisation in Oxford is one of the worst aspects of the City Centre, and certainly very restrictive in its capacity to attract and absorb the attention of visitors and residents alike. Air pollution from vehicles, including non-exhaust emissions, is best cut by radically increasing the pedestrianised area with marked cycle tracks wherever possible.

p.150 Section 7.26 In relation to Vision Zero, concentrations of pedestrian, cyclist and car accidents should guide County and City to pursue measures to reduce traffic movement on the specific roads involved. This should include remodelling junctions.

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<sup>4</sup> See for example: Jim Robbins – *Road Hazard: evidence mounts on toxic pollution from tires* – September 2023: <https://e360.yale.edu/features/tire-pollution-toxic-chemicals>

Section 7.28 We want the coach station moved to the Becket Street car park, creating a transport hub including the rail station. Coupled with an ambitious expansion of pedestrianisation between the City Centre and the rail station, it should be possible for coach users to be dropped off at Becket Street and have better pedestrian routes allowing them to access the City Centre. This could be used to regenerate existing empty units aimed at tourists and others on such routes. The City Council, in cooperation with County, should look at the traffic reduction possibilities for Park End Street and Hythe Bridge Street, as regeneration measures where footfall could be increased.

Section 7.29 We urge that pursuing a re-opening of the rail line to Witney/Carterton be part of the Plan period objectives.

p.151 7.32 A 50% increase in cycle trips by 2031 is a good goal. It would be much easier to achieve if more dedicated cycle tracks across the City Centre area are added. We also need new bridge access across Oxford for walkers and cyclists providing alternative routes to Magdalen Bridge (see earlier comments). Whilst not opposed to scooters in principle, casual observation suggests that students who might have cycled before are using scooters on cycle tracks and elsewhere. This is not Active Travel and we think the Council should recognise that scooters are 'inert travel' with little health promotion value.

p.153 An overall goal of annual reductions in the number of vehicle movements within Oxford is needed. Therefore, transport assessment must consider how any given development contributes to this goal. It may help this process to consider what targets are desirable for different types of vehicles. For example, SUVs are entirely inappropriate for urban areas, occupying too much space, adding to road damage due to weight, and taking too much of what should be a shrinking amount of car parking; single person car journeys are very much to be discouraged.

p.154 Section 7.41 Bike parking is generally not secure in Oxford. Given the growth of higher value ebikes, including ecargo bikes, within the City, security of bike parking is needed in many areas, not just new developments. Both ebikes and ecargo bikes tend to be larger than their conventional counterparts, so bike parking needs to be more generous in space. This is particularly important at the rail station.

p.155 Section 7.47 We support stepped-up annual reductions in car parking in Oxford, to encourage a switch to other modes of accessing facilities both in the City Centre and other locations.

Section 7.49 We agree with the application of CPZs to the City as a whole.

Section 7.50 The assumption that car ownership will fall in general is not borne out by DfT projections. The 40 million vehicles in the UK today could rise by as much as 54% by 2060. Any idea that new satellite housing developments will magically not generate more vehicles accessing the City for employment and other purposes is not credible.

p.156 Section 7.55 New HMOs and HMOs where retrospective planning permission is under consideration should not have parking spaces. If the City is serious about traffic reduction, then permitting new housing to have parking spaces should be highly restricted e.g. it could exist where apartments are built above car parks, by giving new residents access to a car parking space in that area only, if required.

p.163 Map. A map showing the locations of new, almost exclusively greenfield, housing developments is a nightmare scenario for traffic movements. No development will have the employment or facilities centred within it that are likely to inhibit car movements in particular. Having seen Barton Park, we note it is remarkably bereft of facilities. If councils outside Oxford do allow these developments to go ahead, then comprehensive measures to radically restrain car use would be needed. Current constraints on local government spending will not help with this. We see little prospect of a change of Government meaning the re-funding and empowering of local government.



p.3 Section 1.2 This notes the removal of the 'duty to cooperate' previously placed on neighbouring authorities which allows them to refuse Oxford's overspill housing if they wish. We note that the general policy environment includes the Oxfordshire Strategic Economic Plan being "...likely to promote less population and jobs growth." However, this has not penetrated into the Local Plan draft in terms of housing projections or expectations about peripheral and satellite housing developments.

p.4 point 7 Since the Appraisal suggests 'more pressure' upon green spaces, a commitment from the City Council not to dump development on them would be appropriate.

Point 9 Water use has yet to be constrained. Neither new build nor sustainable retrofits include the re-use of water in a household from appliances, basins, baths and showers to flush toilets.

Point 10 10% biodiversity net gain is too low, in a nature-depleted country. Nor does the removal of mature trees mean that new tree planting is going to be equivalent in value to what was lost. We suggest a higher figure of 25% is set, with a collaborative approach by the City with stakeholders of all types to achieve this.

p.5 Table 1.2 We have no quarrel with the principle of points 1-11 in this list. However, the idea of growth of population and of the economy in Oxford is unlikely to be sustainable in all aspects because the regulatory and legislative environment is currently far too weak to ensure this. It is still possible to build homes that are very small, and lacking many features that would enhance sustainability. Growth that leads to more traffic, very likely if satellite communities are built, is a disaster in waiting. We do not need more air pollution from traffic, whether from tailpipes or from non-exhaust emissions; we do not need more congestion caused by yet more people trying to access facilities like schools and hospitals based in Oxford. Without dealing more

assertively with this problem in the relevant policy areas, further growth in Oxford will not be sustainable, or tolerable.

p.6 We object to suggestions A1 and A2. This is inappropriate for dealing with both Climate and ecological emergencies.

B1-3 are unacceptable. The empty built environment should be used for very low-cost housing wherever possible. The City Council must commit itself to build above car parks, private and public, in cooperation with owners where possible. It should build over car parks in the City Centre. It should press the County Council to add Abingdon Road and the Botley Road to the major roads with traffic filters.

C1 We agree with employer-linked housing using existing sites, or brownfield sites in locations such as industrial estates/science parks.

D1-4 are all unacceptable. HMOs just add to the units of very high private rented accommodation in Oxford. They do not address the need to ensure the addition of very low-cost housing, using the existing built environment as much as possible. We would prefer the City Council to freeze HMO licensing, including retrospective planning permissions. This would have the effect of pressing private landlords to consider other forms of investment, and hopefully to sell housing to the City Council for sustainable retrofitting as council or keyworker homes.

p.7 We agree with an emphasis on F1-2.

We favour G2 with a 25% goal for net gain.

H1 is to be preferred unless there are very pressing reasons why particular energy efficient improvements cannot be accommodated by existing buildings/sites.

I1 should be replaced by I3. It is the job of the City Council, working with other bodies, to ensure new developments are proximate to walking, cycling and public transport routes. The addition of facilities in particular areas is going to have to be considered in relation to the 'critical mass' of people being added into a particular area. I2 is acceptable. I4 should read 'Car free parking standards should apply to new homes, bearing in mind residents living in apartments above car parks could have single parking spaces in the car park below their residence.'

p.10 point 1 No carbon emitting new build should be permitted. The primary sources of additional homes should be a) the existing built environment; b) building over or above private and public car parks; c) allocating empty spaces in industrial and science park sites to high-density housing.

Point 2 - We cannot see how sustainable drainage systems are to be maintained where they already exist or where they might be created. Sites where flooding is a possibility need to ensure new living spaces are above ground level. Spaces below such living spaces can be allocated to uses such as: clothes drying; bike parking; baby buggy storage; other items at minimal risk should flooding occur.

Point 3 Use of greenfield sites is not 'efficient use of land'; it is simply a continuation of the decades of unimaginative failure to use other options. As a seriously nature-depleted country which may well wish to create more biodiversity and more food production to protect households against food price increases, we need our greenfield sites.

Point 4 Local housing need rests in part on inflated ideas of what the population might be in future; and upon the noted questionable willingness of neighbouring councils to compensate for Oxford's failure to use its existing built environment and brownfield sites. The City Council needs to re-visit its targets. It also needs to actively promote more remote working, to cut the need to commute into Oxford for work and potentially to allow people to live in cheaper housing elsewhere. We strongly support advocacy of flexitime to reduce onsite time of both those who can work remotely, and those whose roles do not permit it.

Point 7 Leisure and recreation, as this point notes, are hardly mentioned in the Plan consultation document. We suggest that the City's community centres are part of the leisure and recreation facilities of the City, and that the process of rebuilding the most venerable of them should be a higher priority than things which are perverse. The plan does envisage building on some greenfield sites of leisure value: this should not occur.

Point 9 Water: Local councils generally are expecting 'something to turn up' as far as water supplies are concerned. They should be far more concerned about how new and existing buildings may use water more efficiently, and how householders and tenants might play a role in this process. Specifically, low cost water butts for homes should be a Council service to promote using rainwater in gardens instead of tap water. The 3-bedroom semi-detached house where this is being written has SEVEN water butts. For those with growing plants, and with aspirations to have food from their gardens, single water butts really are of limited use.

p.12 Point 10: We reject building on 19 greenfield sites in principle.

p.13 Point 2 Environment Agency flood risk advice should be considered and may be too conservative for the long-term. Point 3: no applications seeking the use of protected green space should pass. Point 7: a City with a growing population should never sacrifice leisure/recreation sites. Point 9: The City should protect peatlands from development and have a general policy for the restoration to full health of peatlands with extensions of protective designations as quality is improved. There is no better 'offset' than the capacity of peat for storing carbon on a larger scale than equivalent areas of tropical rainforest.

p.15 The notion of Oxford having 'high future housing and economic growth' means a focus in investment in an existing settlement with significant past conventional economic growth. We do not agree with the extremely limited pockets of what is often polluting economic growth in cities like Oxford and Cambridge in this country. Development should not be centralised in this way, given many far more needy

communities. Government emphasis should move towards refunding local government and helping local authorities towards more diverse economies suited to addressing the Climate and ecological emergencies, and to the need for radically reducing inequalities.

p.23 Point 1 Per capita emissions in Oxford we assume do not include emissions serving Oxford but generated elsewhere. These include aviation, shipping and embedded GHG emissions from imports - which can all add to the real total of emissions created by Oxford. We cannot see emphasis on a 'circular economy' in the Local Plan, nor is the Sustainability Appraisal designed in such a way to examine the potential for re-use and recycling within the City.

Point 2 We are very sceptical about the use of a flood alleviation channel at great expense when turning streams feeding larger watercourses west of Oxford into new wetlands would be cheaper and offer longer-term adaptation to circumstances. We should not be committed to the most expensive ways of dealing with flooding if nature restoration can play a major role in flood management.

Point 3 There is no point agonising over greenfield site use for development; it simply should not occur, given the multiple other benefits of such land.

p. 24 Point 4 Unaffordable housing is Oxford's key social problem. We need a larger proportion of existing homes to become council housing and keyworker part-rent, part buy. We do not see any pressing need for market housing targets when the market has delivered excessive prices for homes throughout England, not just in Oxford.

Point 5 Inequality will not be tackled if market housing is allowed to grow even more in Oxford. The very high private rents and mortgages in Oxford deprive businesses of custom that they otherwise would have as housing costs eat up so much of household incomes.

p.25 Point 7 – There is no such thing as 'surplus' green space.

Point 8 Congestion relief requires that the City and County act to increase the removal car parking spaces each year and press Government to introduce a Pavement Parking Ban in England. A substantial increase to pedestrianised areas in central Oxford is essential to remove all vehicle movements, except emergency or otherwise exempt vehicles, from areas suggested above in this submission.

p.26 It is not in the interests of Oxford's residents to have urban extensions and satellite communities generating yet more traffic movements into Oxford. Given that all junctions in the City are at or over capacity use, since at least 2017, the City and County have to look at a wider area of traffic reduction than just Oxford City measures. We have made it clear that Electronic Road Pricing is needed for the Oxford City Region including key routes into the City.<sup>5</sup>

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<sup>5</sup> See for example Steve Dawe's recent article on ERP and Oxford:  
<https://westenglandbylines.co.uk/news/transport/electronic-road-pricing-a-case-study-for-oxford/>

Originally, predictions about water availability suggested capacity would be fully used by about 2023. Confident predictions about this eventuality facing Oxford being reached by 2040 may be optimistic in relation to the number of homes added to Oxford and environs by that date. We do not support the creation of a reservoir near Abingdon. We do support water conservation measures in existing homes, schools, hospitals, businesses etc.

Point 10 biodiversity is contradicted by the explicit willingness of the City Council to countenance building on peatlands (referred to above.) Peatlands are of high ecological value, as the Lye Valley SSSI demonstrates, can be restored and extended and do have exceptional carbon storage capacity as well as offering a way to mitigate water flows. This is important for flood protection of downstream residential areas. The City Council should not contemplate building on any peatlands, regardless of current condition; it should take steps with stakeholders to encourage peatland restoration.

p.27 If the City Council is willing to build homes on employment sites, which we welcome if they are very low-cost council and keyworker shared ownership units, then it must also consider how it builds over or above the City's vast area of car parks.

p.28 Point 2 Climate Change adaptation requires more pedestrianisation with trees and fountains to strongly resist the urban heat island effect.

Point 3 'under-utilised land' is not a technical term. We do not support building on greenfield sites, recreation grounds or allotments. The City Council should not be advocating any building on green belt land.

Point 4 Land available for housing in Oxford includes car parks. Realising the full potential of this land reserve over time could substantially add to Oxford's stock of very low-cost homes.

p.29 Point 5 Climate resilience requires questioning the quality of housing built in recent decades. Do homes have sufficient mass in their walls to resist periods of extreme heat? Pockets of under-insulated homes – including in the private rental sector – need identification, and remediation.

Point 6 The problem for many who work in retail and the wider service sector is that housing costs remain far too high. 'Working whilst in poverty' is afflicting the City's lower paid and even more so those dependent upon benefits/low pensions. The City should adopt the London level of the Living Wage and set out to increase the proportion of existing and new housing that is very low cost.

Point 8 The problem of too many car movements in the rush hour-school run periods both within the City and from elsewhere, requires a more rapid reduction in overall car parking.

p.30 Point 9 We are not optimistic about better water management in general whilst the 'market failure' of water privatisation is allowed to continue. Indebted water companies expect customers to bail them out through higher bills to do jobs that should have been addressed over the 30-plus years of privatization.

p.31 Point 12 Whether school sites can cope with some intensification of use is something needing further investigation.

p.34 SA Objective 3 – Goal must be to immediately stop use of greenfield land and Green Belt for development.

p.41 Point 5.1 S2A and S2B Delete. Substitute policy of no greenfield site use for development.

p.44 Top of page. We would suggest that well over 40% of homes being very high rent private landlord properties is a social injustice. Progressive reduction in such properties should include CPOs of the worst condition properties, for sustainable retrofits into council homes.

p.48 Point 5.9 DH7D Car free parking standards for new housing developments within Oxford should be applied. On some high-density sites, this should mean more land for housing rather than domiciling vehicles.

p.55 1<sup>st</sup> paragraph Oxford North should never have been permitted. It is ideally located to increase traffic into Oxford.

p.59 Point 4 It is very likely that some neighbouring authorities will decline to accept the burden of deliberate overspill housing from Oxford. The City Council will have to re-consider the extent of intensification of new homes, change the balance of types of housing by tenure away from appallingly high private rentals and above all build above or over car parks, both private and public.

p.60 Point 7 We disagree with building on school playing fields in a City with a growing population.

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