

Introduction

The proposed Old Road development is to be welcomed as an important contribution to the development of the city, and it is not unreasonable for the applicant, a major provider of investment and quality employment, to expect some pain from the community in relation to the gain.

The proposal in its present form is, however, wholly unacceptable for traffic, environmental and social reasons, further it would be unsound as it conflicts directly with the Inspector's Report for the Sites and Housing DPD as well as other reasons outlined below.

The applicant has been very poorly advised and is not acting, in my view, in its best interest.

Transport Issues

The provision of an extra 148 parking places of a total 459 is absolutely unacceptable and contrary to the revised Site and housing site policy SP39 requiring a reduction in destination parking places.

Sites and Housing DPD Planning Inspector's Report

The key paragraph from the final Sites and Housing Inspector's Report (Jan 2nd 2013) is:

*"S 90 ... Furthermore, with regards to traffic related concerns, both the individual and cumulative traffic impacts of the Plan's allocations have been taken into account by the City and County Councils in City-wide traffic modelling for the Plan and the LTP [6.12]. These indicate that the following sites, which include the hospital sites, could exacerbate traffic related congestion; SP8, SP23, SP38, **SP39 (Old Road)**, SP42, SP43, SP44, SP48, SP51, SP56, SP58, SP60 and SP61.91. **For mitigation, their respective policies require a reduction in on-site car parking provision.***

But to effectively minimise additional traffic congestion that could result from the proposed development, this general requirement should Oxford City Council Sites and Housing Local Plan, Inspector's Report January 2013- 21 -be amended by (MM17). This main modification would require development at these sites to reduce on-site car parking **and** to improve pedestrian, cyclist and public transport access. It would soundly address the potential adverse development impacts for Headington."

[my italics, bold, colour]

Not only does this require a reduction, not an increase, but the word "**and**" does not mean "or" via S106 contributions such as a new CPZ.

It is also of note that the Inspector specifically requested this main modification based on evidence submitted to her in the very recent enquiry, which in turn relied both on LTP3 and other evidence. (see appendix below)

Contrary LTP3 Policy

The Oxfordshire Local Transport Plan (April 2012) specifically draws attention to congestion in Headington, the need to reduce car parking and that the network is approaching saturation.

*13.40 **Significantly, journeys to Eastern Arc employment from outside Oxford cause congestion problems on the northern and southern approaches to the city in particular, but also on parts of the B4495, which links Summertown and Abingdon Road, via Headington, Cowley and Rose Hill.***

*13.42 **Our strategy for the Eastern Arc focuses on:... working with employers to develop travel plans and reduce the availability of car parking for staff;***

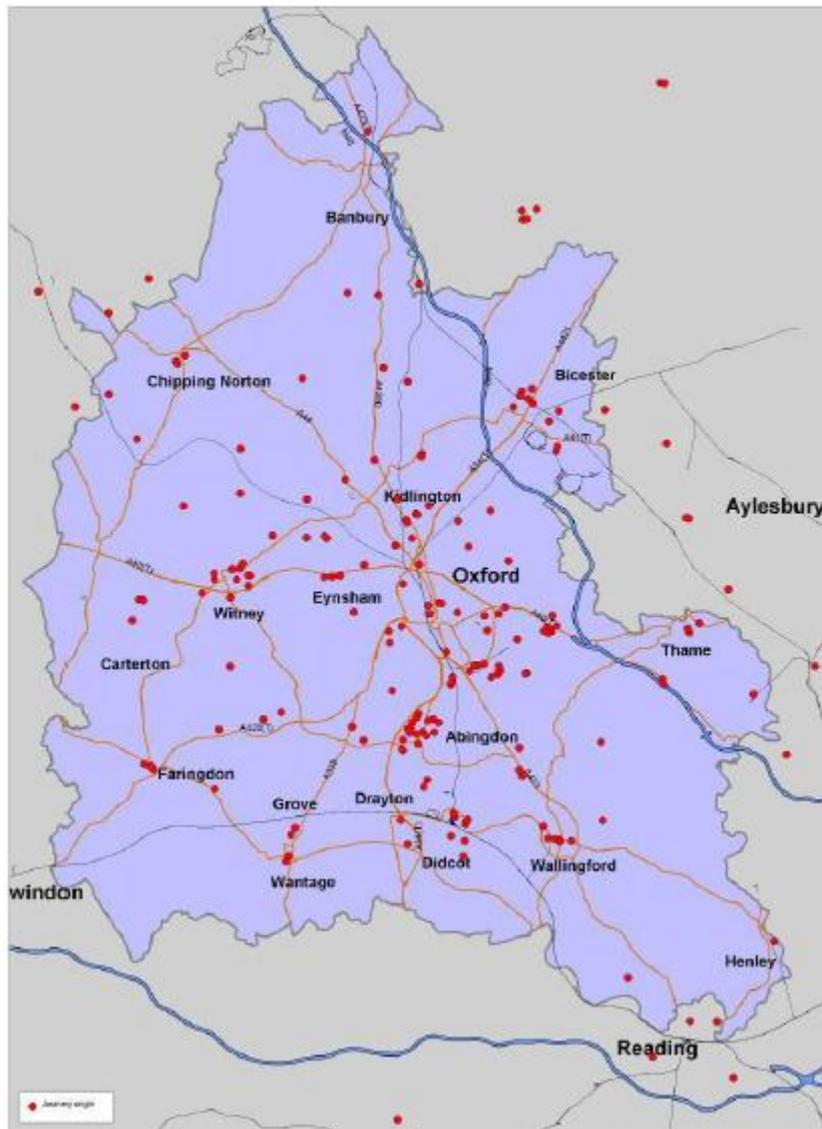
*“13.52 **In the Eastern Arc, to support improvements to public transport aimed at reducing the number of car trips to the area, traffic management will focus on reducing the availability of commuter parking;***

*13.53 **...However, there are limits to how much traffic can be accommodated on the road network and there will therefore be an investigation into more stringent demand management measures, including high occupancy vehicle lanes and road user charging.***

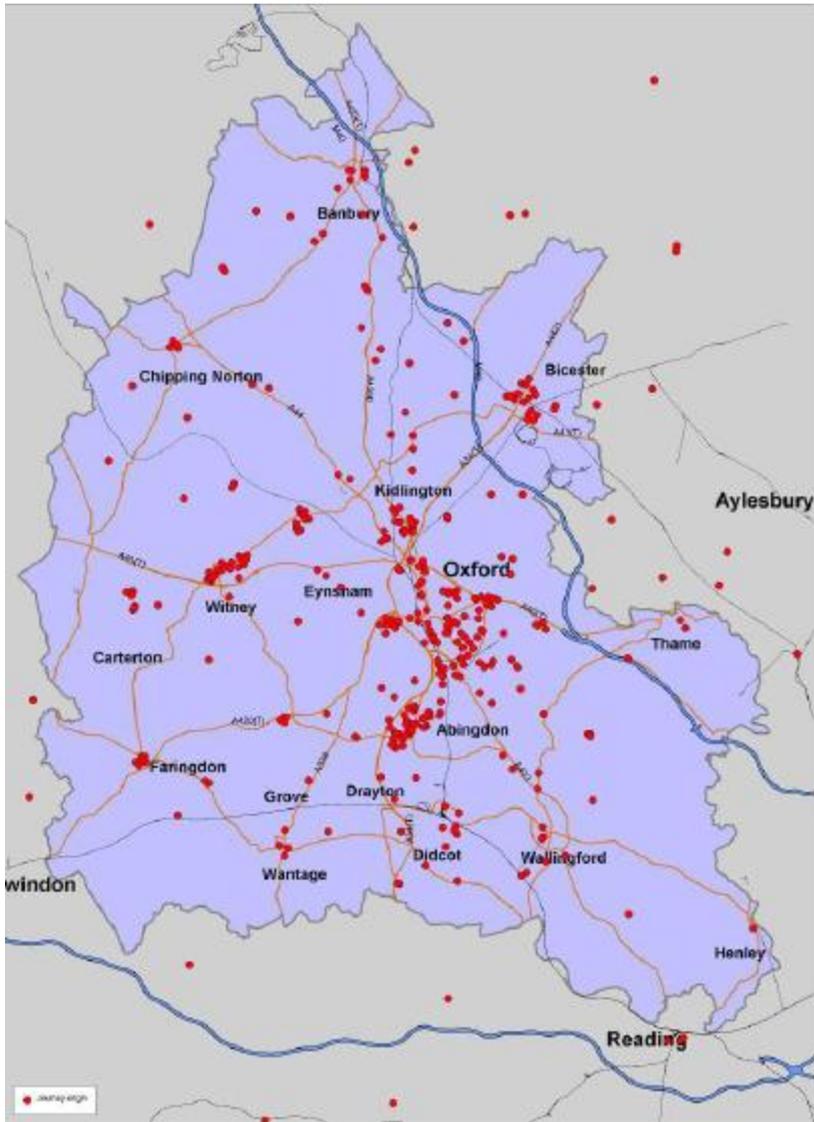
Local Transport Policy April 2012 (LTP)

Pollution and Traffic Analysis

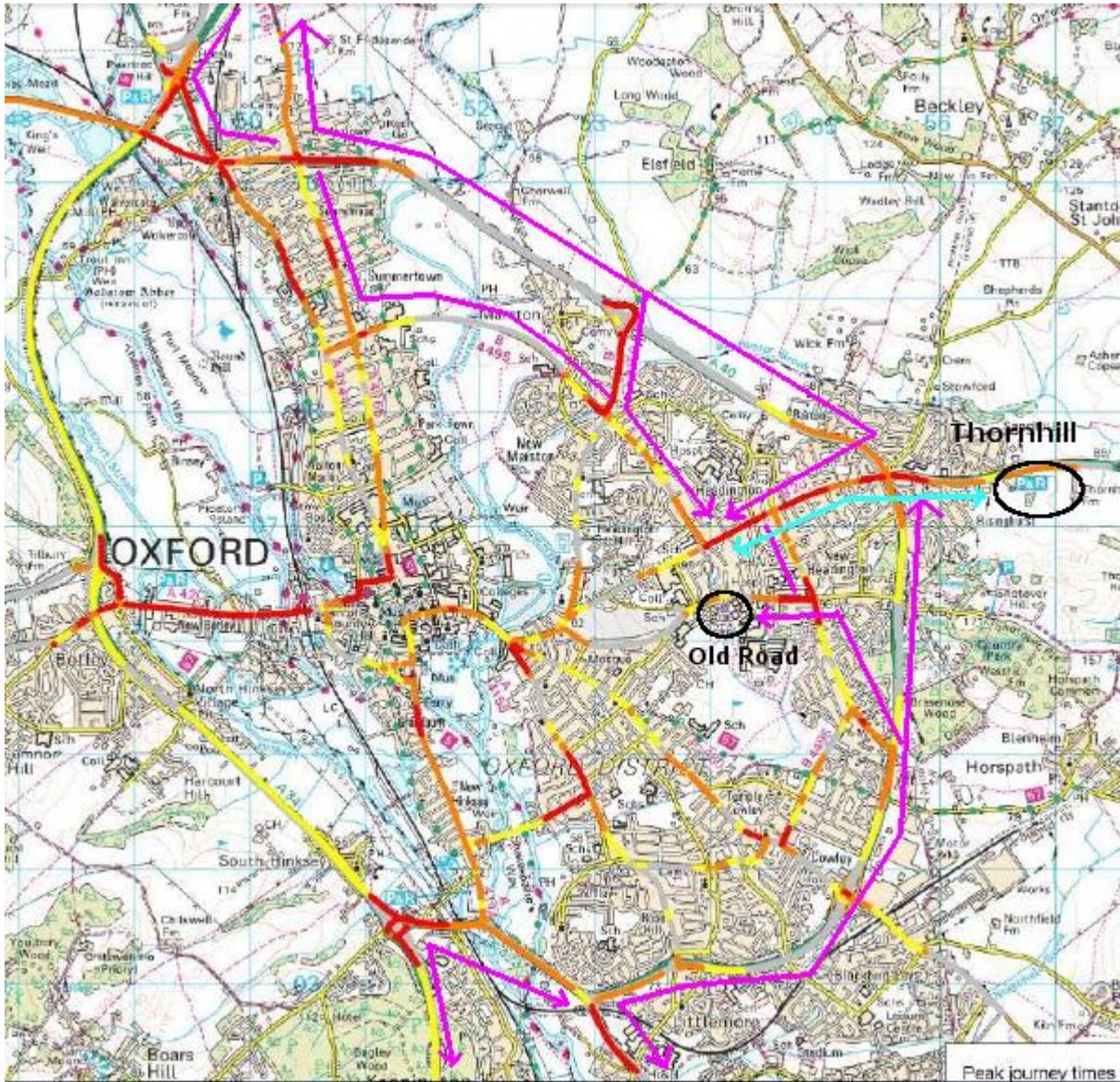
LTP3 and the applicant's traffic report (Part 4 of 6 p24-26) broadly concur that car based journeys originate from areas north and south of Oxford such as Witney, Bicester and Abingdon.



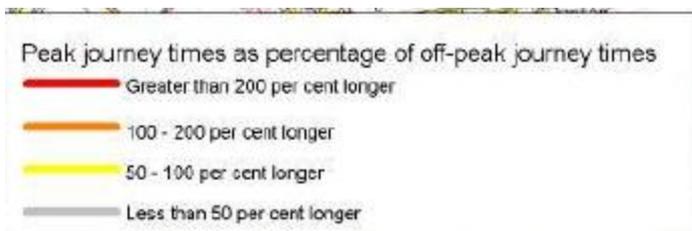
LTP3 - Figure 13.7 Origins of people driving to the Headington area (OX3) for work or study



LTP 3 - Figure 13.8 Air pollution hotspots in Oxford



LTP3 – Annotated : Oxford average congestion 07.00 – 10.00 September 2008 to August 2009



Annotations

- Purple Car Routes to Thornhill and/or Old Road
- Light Blue Park and Ride route

The 459 cars using the places in the proposal will of course travel the entire length of the journey (**Purple** above) (permits are allocated by distance from workplace, ie to the worst emitters), the current (1583) and new (+1117) staff without allocated permits will use the P&R where necessary.

The location of Thornhill P&R is to the east, therefore car users from these areas will traverse considerable sections of urban road (**Purple** above) (eg: The Ring road, Marston Ferry, Headley Way, Windmill Road, The Slade, London Road) with known current and future congestion and emission problems as shown in **red** above including Barton West. (see LTP extract below)

Old Road is in the centre of the pollution hot spots above.

London Road and central Oxford now have traffic jams comprising of mostly public transport, indicating severe pressure.

A small increase in traffic or change in conditions can have totally disproportionate effects on congestion and emissions as school starts, rainy days and events indicate. The total pollution effect is that generated by all cars in traffic, not just the extra component causing it.

The Park and Ride is an important contributor in reducing emissions and traffic, only for the very last part of the journey – this is shown above where the purple lines show routes from Whitney, Bicester and Abingdon to Thornhill and/or Old Road Campus, and light blue representing the shorter Park and Ride trip.

There are no major centres of population to the east of Thornhill Park and Ride, indicating that either users either use the roads above, and/or commute to London from Oxford.

This means that the only effective way to reduce the combined increase in emissions as required is to reduce provision of destination car parking places.

The application is in effect using all the future parking capacity in Headington to justify its own use of private parking.

Future Pressures

The new CPZ proposed will in any case be required, due to increasing pressure on the Headington area therefore it is not a planning gain:

- The Core Strategy commits Oxford to 8000 new houses or 32,000 extra residents at 2 bedrooms each, (a conservative estimate) of which 38% or 2111 homes will be in the Headington area, of which approximately 800 will be in the Barton West development.
- Student Halls – car free is not zero transport effect
- House extensions leading to extra cars
- Intensification of use of all Headington hospital, institutional sites and BMW, which combined currently have 12,000 destination parking places in the NE area (LTP3)

Social Impact

The extra 1117 employees leads to increased demand for housing and associated infrastructure (schools etc) for, most of which will be highly specialised and recruited worldwide, or will lead to increased in-commuting.

1117 extra employees with 0.75 partners each and 1.5 children each is:

$(1117 \text{ employees} + (1117 * 0.75) \text{ partners}) + (1117 * 1.5 \text{ children})$

$1117 + 838 + 1675 = 3630 \text{ persons} = \text{or } 726 \text{ } 2.5 \text{ bedroom houses at } 5 \text{ persons each.}$

This is slightly less than the entire Barton West development.

It is not reasonable or fair to the community that no on site housing is provided to mitigate the environmental and social impacts.

It is particularly objectionable that land is used negatively for destination car parking rather than positively for resolving the housing crisis. This would also improve competitiveness for employers by reducing the cost of housing, and potentially provide an income stream for the employer and a worker incentive. It is ironic that employers frequently complain that the housing crisis is rendering them uncompetitive due to high house prices.

Economic Impact

Oxford's business competitiveness is declining due to the increasing housing and congestion problems. Substantial anecdotal evidence suggests employees and contractors find other employment due to journey times to Oxford.

The economic or "employment" attractiveness for one employer of destination car parking cannot be allowed to negatively impact on all the rest of the Oxford's competitiveness, or even other divisions of the same entity.

The funding provided by the applicant for the CPZ and the P&R is minor in compared to the additional infrastructure and economic costs.

Green Space

Loss of green space has not been assessed in a suburb with only 3.0 H.A per 1000 persons where the city wide level is 5.75 H.A. Population pressures and infill will destroy still more. The Green Space survey did not take account of institutional land, but recommended its opening for public use to offset deficiencies in public open space:

"New Open Space Provision

*The current Quantity standard of open space in Headington Urban Village is below the Oxford City Standard, and significant deficiency areas have been identified. The potential to create new open space, especially in the centre of the Urban Village, should be investigated. **This could include exploring whether public access can be arranged to previously restricted sites, including the open space associated with the institutional land uses.***

it may be possible to provide better access across the open space associated with the hospitals to act as green-links across the Urban Village and promote connectivity.”

Precedent

If this proposal is accepted as it stands, it will be impossible to stop future proposals of this type.

Conclusion

- Whether an employee uses the car only to Thornhill or to one of the 459 car parks, there is substantial congestion and environmental damage, which can only be mitigated by reduction in car parking AND S106 contributions
- The new CPZ will not affect journeys to Thornhill and in any case will be required by land use intensification as above therefore is not a planning gain – it may also impact negatively on other businesses
- The social cost of using land for parking rather than housing is unacceptable
- The economic gain or attractiveness for one entity will have a negative greater economic loss for the city as a whole (including other divisions of the applicant)
- The Councils’ assessments are based on a tactical review of local area parking which is wholly inappropriate as demonstrated above
- This proposal must be rejected as it stands for the benefit of both the applicant and the city, and replaced with a modern proposal with reduced car parking provision, more housing and public access to institutional green space
- As recent events attest, the planet is no longer warning us of climate change

Appendix – Extracts from S&H DPD From Inspector

.”88... However, there is the perception by some that considerable development is proposed in the Headington area, in addition to that which has recently taken place, which is thought will result in detriment to residents’ living conditions in ***terms of traffic and parking congestion, provision for open space***, and design and privacy standards. ..

.89. .. Nevertheless, **it is clear from the written and oral evidence, and my site visits, that there is significant traffic and parking congestion in this area, which could be exacerbated by further development.** Thus residents’ concerns are understandable.

S 90 ... ***Furthermore, with regards to traffic related concerns, both the individual and cumulative traffic impacts of the Plan’s allocations have been taken into account by the City and County Councils in City-wide traffic modelling for the Plan and the LTP [6.12]. These indicate that the following sites, which include the hospital sites, could exacerbate traffic related congestion; SP8, SP23, SP38, SP39, SP42, SP43, SP44, SP48, SP51, SP56,SP58, SP60 and SP61.91. For mitigation, their respective policies require a reduction in on-site car parking provision.***

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Report to Oxford City Council by Shelagh Bussey MA DipTP DipEM PhD MRTPI Jan 2nd 2013