



Oxfordshire Green Party

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Sites and Housing DPD

This is Oxfordshire Green Party's response to the City Council consultation on The Sites and Policies DPD. The first part deals with our detailed comments at this stage on the Housing Policies Options. The second part deals with our comments on individual sites. The third part makes some important general comments that arise out of our analysis, including some on Sustainability considerations.

1. Housing Policies

We have concerns about using your questionnaire as a vehicle for this consultation. We consider that the options offered are not always what we would like to see in the way of planning policies. In our consideration below we have tried to engage by suggesting how these policies can be reworded when we are not entirely happy with the options given by the Council. Our comments below are ordered in the sequence the different policies appear in your document.

Design Character and Content

In general we object to proposals that water down the policies of the Oxford Local Plan. For this reason we object to deleting policies HS 22 and HS 23 unless their requirements are incorporated into an amended Option A policy. We would suggest at the end of bullet point 7 – "open space".... "which in general should incorporate proposals for children's play. On smaller sites the Council will require a contribution towards public open space and children's play in place of on-site provision"

We are highly concerned about the present lack of consideration in this document and indeed in the Core Strategy about the growing need to allow people to grow their own food,

in particular fruit and vegetables. These plans must not only protect suitable existing resources for this use. They must also allocate more land for this use. Food prices are already on the rise year by year and this will be exacerbated by increased world population and changes in eating habits in the developing world, pressure on agriculture from climate change and demands on agricultural land for non-food crops like biofuels. The years of cheap food are now over and plans to be realistic must take this on board. We therefore would want bullet point two amended to add after “heritage assets “..... and allow sufficient garden space to accommodate for some cultivation and growing of food.”

We welcome bullet point 4 mentioning sustainable drainage but would like to see “potentially” removed.

We reject entirely option B

Residential Garden Land

We would like to see option A incorporate a sixth bullet point:

- “proposals should avoid the loss of garden space that can be used beneficially for food production.”

We re-iterate our request to remove “potentially” from bullet point 5.

We reject options B, C and D

Accessible and Adaptable Dwellings

Although we favour Option A, we are concerned that 5% wheelchair access is on the low side, given it is half that of London. We feel tending towards a higher level of provision is sensible, as if there were any overprovision it would raise the level of accessibility of dwellings in general to wheelchair users who have a real problem visiting friends and relatives.

Energy Efficiency and Natural Resources

We consider that the NRIA SPD should be reworked and updated and remain as your document states it has been a successful tool in promoting and measuring the sustainability of new developments across Oxford. This would in no way negate any statutory requirements that would come into force in the plan period.

We would therefore find Option C acceptable besides an update NRIA SPD

Car and Cycle Parking

Car Parking

In general we accept an approach as set out in Option A which gives maximum parking standards. However, we oppose levels that allow for a growth in car ownership. We consider that there is a need to stand for the principle that Oxford has lower levels of car ownership. We think Oxford's parking and transport problems, the need to lower carbon emissions, pollution and congestion mean that parking provision should not allow for any growth in car ownership.

We welcome the encouragement of car-clubs and car free housing but consider "in suitable locations" should be omitted.

We think the policy should include a statement to say that the policy will be a flexible one and the Council will generally look for lower levels than the maximum.

Cycle Parking

We welcome minimum standards for cycle parking as set out in Option A

We think the policy should include a statement to say that the policy is a flexible one and the Council will generally look for higher standards than the minimum.

Affordable Housing from Residential Development

We consider Oxford's need for affordable housing to be of such high priority that we do not accept that a reduction on the 50% should be sanctioned through a cascade approach. We consider that policy CS24 is clear that generally a minimum of 50% is provided and presumably this means generally in numerical terms. We feel that if there are really strong reasons for non viability it is an occasion to revisit the Core Strategy rather than allow individual developers to find this particular sanctioned loop-hole.

Options for Calculating a Financial Contribution to Affordable Housing

At this stage we have no views on the options. We would support whichever yields as much or more than the existing affordable Housing SPD. It would have helped if examples of the actual amounts for a few different sites under the different options had been shown. This could be done before final version of the Sites and Housing DDP is produced.

Affordable Housing from Student Accommodation

In general we welcome Option A. Examples of what it might mean financially would be useful.

Houses and Flats

Protecting Existing Housing

We were unclear which option to support but were inclined towards option A. We would not support Option C.

Dwelling Space

We are pleased both Options A and B would seem more generous than existing provisions in the Local Plan. We consider the best provision could be gained by combining parts of the two options. We would take Option B adding:

-the space provided in each room allows for reasonable furnishing, circulation and use of domestic facilities' for the occupation intended, including for desk-based home-working.

-space for adequate clothes drying

-adequate ceiling height, natural lighting and outlook to allow proper use and enjoyment of the floorspace.

Outdoor Space

As pointed out in our comments on Design, Character and Content and Residential Garden Land, we think that people must be given the opportunity to grow some of their own food in their outdoor amenity areas.

We oppose the reductions in garden space in Options A and B. Previous Local plan policy would have resulted in around at least about 60 sq. Metres of garden space. Option A sets no minimum requirement and option B reduces this to 22 square metres. Options A and B also water down the requirement for two or more bedroom family dwelling to have exclusive use of private open space.

We can see that the City Council's Development Management Team, given the last few decades of cheap food and shrinking private garden space might arrive at an even smaller garden's objective but as we have argued we consider this very short-sighted.

We would tend to support some sort of continuation at least of Local Plan policy as in Option C.

However we would translate that into a minimum of at least 60 square metres of private garden for two or more family houses.

Requirements for flats are more difficult to proscribe because the size of the shared garden would depend on the number of flats. An absolute minimum would be 60 square metres and would usually be required to be larger to accommodate multiple units. The shared

garden would be subject to appropriate management controls. In addition the requirements for balconies in Option A could stand.

Higher standards than the minimum could be required depending on:

- the orientation of the outdoor area in relation to the sun
- the degree to which enclosure and overlooking impact on the proposed new dwelling and any neighbouring dwellings
- the overall shape access to and usability of the whole space to be provided.

The explanations in the last two paragraphs of Option A regarding private gardens and private shared gardens should stand and the requirement that adequate space(outside the required garden area) should be made in respect of safe discreet and conveniently accessible storage of refuse, recycling, secure cycle storage and where appropriate a motorcycle or scooter.

Privacy and Daylight

We suggest the policy should contain the requirements in Option A but that these should operate largely in accordance with a detailed technical design guide as set out in option B, allowing some degree of flexibility in order to achieve the best configuration of requirements.

Student Accommodation

At this stage we are unable to fully support Option A. We are concerned that student accommodation may have been overprovided on allocated sites. We feel that an assessment is needed as to the likely amount of student accommodation that will be provided if all the allocated sites are taken up, together with some sort of assessment of the likely amount of student accommodation to come forward on the other areas mentioned in Option A. The requirement for general housing and particularly affordable housing is so great that student housing sites should not be overprovided. It may be that Option C is the best way forward (perhaps with a reduced number of site allocations).

Houses in Multiple Occupation

At this stage we are inclined to support Option A.

Key Worker Housing

We do not support the widening of the definition of key worker housing (to potentially bring in higher income groups) when there is so much demand from low income households for

housing. We would therefore be inclined towards supporting carrying forward the old Local Plan policy in Option B.

Residential Moorings

We would support the removal of the reference to the Isis channel in Option A. We are keen to see more residential moorings but realise that there have to be some restrictive requirements as in Option A.

2. Sites

We have looked at the sites and quite often come to the conclusion that our preferred option was not necessarily the same as any of the alternatives offered. We think the opportunities for informed public consultation may have been prejudiced by a questionnaire and general consultation exercise which would limit wider comment by implying that consultation was limited to a matter of choice between options selected by the Council.

We do however think the way the individual sites were presented was very informative and would congratulate officers on their presentation in this respect.

Our comments on the sites follow below:-

2a. Allotments Abingdon Road

We support the Preferred Option at this stage. We would like to see this site either as a Community Orchard or revert to allotments.

5. Allotments at East Minchery Farm

We would draw attention to our statement in our comments on policies about the end of the period of cheap food and rising food prices. We consider the site should be brought back as allotments or community gardens. We do not think this would necessarily require large resources from the Council with community involvement. Although it may not seem an option this year the plan could run to 2026 and in our view the proper role of planning is to safeguard land for peoples' needs as they arise in the plan period. As owner the City Council is uniquely placed to do this. We therefore take the view that this site should not be allocated and the SR8 designation be retained.

7. Ambulance Resource Centre

We support the Preferred Option at this stage.

10. Avis Site

We support the Preferred Option at this stage

13. Banbury Road Bevington Road

We consider any proposal for development on this sensitive site in the conservation area is best considered at planning application stage. This would allow for full public discussion of any proposals. We therefore consider this site should not be allocated.

14. Banbury Road (7-19)

We hold similar views to those on Site 13 above. We consider this site should not be allocated.

16. Bertie Place Recreation Ground

We do not think this site should be allocated as a school site. Our representatives sat through the Examination in Public where in our view an overwhelming case was put forward for any new school required by the West End residential redevelopment needed to be located in the West End. We also consider that the existing playground is extensively used and meets a real need. We consider the area to the West should be allocated as an extension to the camping site or a site for mobile homes. We would therefore conclude the playground should not be allocated and some provision should be made to safeguard the western part of the site for our suggested use.

17. Between Towns Road

We support the Preferred Option at the Stage.

19. Binsey Lane Disused Allotments

We consider this site should be brought back as allotments (for the reasons given in relation to site 5 about opportunities for people to grow their own produce). We therefore would support the Preferred Option.

21. Blackbird Leys Road

We support the Preferred Option at this stage.

22. Bradmore Road

As with site 13 we consider this site should not be allocated.

28. BT Site Hollow Way

We do not accept any of the options put forward. We consider there is a need to improve access to public open space and we are aware of development in Headington giving rise to flooding problems and hydrological contamination where water drains off (not least into the Boundary brook SSI). We consider that there are a lot of allocations being made for student accommodation and consider more detailed study of the need for the amount allocated needs to be brought forward before that use is justified on this site, We consider 50% of the site should be developed as residential and 50% as open space.

31. Canalside Land Jericho

We support the Preferred Option at this stage.

34. Churchill Hospital Site

We support the Preferred Option only with rigorous requirements. Principle amongst these is the need to ensure further development does not lead to an increase in traffic in Headington. We also consider rigorous hydrological studies are required on the effect of any redevelopment on flooding in areas below and on the effect proposals will have on the water quality of the Boundary brook and the effect on the SSI and other open space and natural areas.

40. Court Place Gardens

We consider this is an important site which requires sensitive and beneficial treatment. We do not feel that any of the options proposed achieve this. We feel the western riverside area should be allowed as wild open space. Graduate accommodation could be allowed in the east with the remaining developed as eco-homes. There should be public access through the grounds. It should be allocated accordingly.

41. Cowley Centre

At this stage we support the Preferred Option.

42. Cowley Community Centre

At this stage we support the Preferred Option.

43. Cowley Marsh Depot.

We consider this should be allocated for park and leisure uses. We consider the Council as Local Planning Authority has the powers to make this allocation which as landowner it would have to respect.

44. Crescent Hall

At this stage we support the Preferred Option

46. Cripsey Road (Roger Dudman Way)

We are unhappy at any development on the site. Its importance as a wildlife area and the possible effect on increasing flooding nearby. We think it is best for it to remain unallocated and for any future development to be subject to in depth scrutiny on loss of biodiversity and impact on flooding.

49 Diamond Place and Ewert House

At this stage we are inclined to support the Preferred Option. However we have reservations about loss of parking when the Summertown shopping centre which is also particularly important for its independent traders who are dependent on a good level of local parking. We are particularly concerned about the provision during redevelopment. There should be no significant loss of parking at that time. We would oppose this site being allocated unless all this has been properly considered and allowed for. We do not want to see a repeat of the fiasco that is occurring with the proposals in St Clements.

52. Dorset House, 42 and 44 London Road and 1A Latimer Road

We support the Preferred Option at this stage though as previously stated before we believe an assessment of the amount of student accommodation provide on these sites needs to be provided to ascertain, if the number allocated are all necessary.

54. East Oxford Bowls Club

We consider this gap in the frontage as an important feature of this part of Oxford and providing wider context to the small Bartlemas Conservation area. We consider the policies of the Core Strategy must be upheld. We consider the site is too small to provide both public open space and housing with adequate garden space for growing anything. We therefore consider at the minimum it should not be allocated and there should be investigation into how it might meet the open space needs of the community for growing their own produce or for their recreational needs.

56. Elsfield Hall

We are inclined to support the Preferred Option at this stage. Although we view housing as probably the more important need, this area is low on local employment opportunities which would therefore be good to retain.

59. Faculty of Music

We are unsure at this stage whether the site should be allocated or not. We would be unhappy at seeing the existing building demolished or development occurring at the front. Being in a Conservation Area we consider it may be given wider and proper consideration at application stage and therefore there is a virtue in not allocating it.

59A. Five Mile Drive Recreation Ground

As said before it is important to uphold Core Strategy policy. We think there are other sites possible for cemetery use. We therefore are inclined to the view at this stage that the site should not be allocated.

61. Former Bartlemas Nursery

We consider this site important to the openness of the setting of Bartlemas Conservation area. We think a very small scale community use would be appropriate. We do not think this should be rejected because the landowner has not suggested it. It was in a community-type use and the pressure on development in Oxford has resulted in a lack of sites for small scale community uses. We think this a site where planning can allocate this use for the benefit of the community.

62. Former Barton Road Cricket Ground

We consider this site should be allocated for allotments. For the reasons given previously about the growing need for local food production over the plan period.

63. Former Government Buildings.

We are inclined to support the Preferred Options subject to our views about a need to assess how much student accommodation is brought forward by these sites.

67. Fox and Hounds Pub and Former Petrol Station

We consider this should be allocated for car free housing or possibly a small hotel if this is acceptable in terms of vehicular access.

69. Garages and Land East of Warren Crescent

We would oppose the development of this site. We are of the view that it will indeed affect the SS1 in terms of water catchment and its quality and it should remain as undeveloped open space and be allocated as public open space. This is a case where we consider the City Council requires placing the maintenance of a high quality of environment at the forefront of its objectives.

72. Gipsy Lane Campus

We are inclined to the view that this site should not be allocated. We think it unlikely that Brookes will vacate the site. We consider the site is already intensely developed and we think any more redevelopment would be better considered as a planning application if development comes forward, and when the public will be better equipped to engage in a consultation process.

74. Harcourt House

We are inclined to think this should be allocated solely for residential use unless an assessment can be produced showing a need for this as student accommodation.

75. Headington Car Park

We would urge the Council to consider if they can protect this car park in planning terms and as landowner. We consider this car park as an ongoing concern vital to the functioning of Headington shopping centre. It cannot be lost during any redevelopment. We are not sure this site should be allocated.

76. Headington Preparatory School

At this stage we support the Preferred Option that this site should not be allocated.

78. Headington School

We are inclined to the view that this site should be allocated if public access to the sports facilities are required as part of any development.

80. Herbert Close

We do not consider this site should be allocated. The policies of the Core Strategy should be upheld and we would hope it would remain as outdoor sports/open space.

80A. Hill View Farm

We think this site should remain in agricultural use and do not support a cemetery.

81A. Horspath Road Offices and Depot

At this stage we would support the Preferred Option.

82. Horspath Site

We do not support any of the options given. We think it should remain as allotments(for our usual reasons) and also accommodate wind turbines.

84. Iffley Road Sports Centre

We support the Preferred Option at this stage.

90. John Radcliffe Hospital

We are inclined to support the Preferred Option but not without strong requirements with regard to traffic and flooding. We do not think any more development should be allowed which increases traffic to the site. We are also aware that there are flooding and surface water drainage problems below in Marston. There must be a proper study conducted to ensure development does not aggravate the situation.

92. Kassam Stadium Surrounding Area Including Car Park to the Rear of Cinema Complex

We support at this stage some mixed use development as put forward in the Preferred Option. However we have sympathy for the view that there is a need to preserve and provide green spaces, nature parks and allotments in socially disadvantaged areas. We would therefore look to the designation of a nature park and the provision of allotments.

93. Keble Road Triangle and Science Area

We support the Preferred Option at this stage.

94. King Edward Street and High Street

We do not think this site should be allocated. Proposals for development are best considered at the planning application stage in this sensitive conservation area.

100b. Land at Wolvercote Viaduct

We support the Preferred Option at this stage.

103. Land off Marston Ferry Road (North)

We support the Preferred Option. This site must remain Green Belt.

104. Land off Marston ferry Road (South)

We support the Preferred Option which we assume is in the Green belt.

105. Land off Osney Land

Not only do we think this site should not be specifically allocated for development. We think it should be considered for allotments use.

106. Land Rear of Oxford Retail Park

We think this site should be allocated for employment use. We do not think further car driven retail development is desirable as it would be against Core Strategy policy and it would provide a poor environment in terms of residential development. To not allocate it could encourage these unsuitable uses. We can see no planning objections on the other hand to employment use.

107. Land Rear of Reliance Way

The creation of this area was an integral part of the original planning application and should remain as open space with ecological management. We would be opposed to residential development.

112. Leiden Road (Marywood House)

We would support the Preferred Option at this stage. However we would want to see that this could be achieved acceptably and would look for hydrological studies of the effect on the nearby SSI and the implications on biodiversity.

113. Lincoln College Sports Ground

We do not support the Preferred Option. We would like this to remain open space with the possibility, as times change, to become allotments or community gardens. It would be therefore preferable to leave it unallocated under the protection of Core Strategy policy.

114. Littlemore Health Centre

We support the Preferred Option at this stage.

115. Littlemore Health Centre – Field at Rear

We support the Preferred Option at this stage. We are strongly opposed to any retail development which would be car borne and in our view would not comply with shopping policies including that in the Core Strategy.

118. Littlemore Park

At the Examination in Public to the Core Strategy were heard the Council time and time again saying how important Oxford was for Science based development and that the pressures employment growth would put on Oxford were justified because of its unique attractiveness to this use. If this case if the Council are right this land will be required at some time in the plan period up to 2026 for science research and development and as such is vital to Oxford and the national economy. We therefore consider that the current restrictions on the site should be retained and it is only allocated for employment use of this type. We see the retention of the playing field as important as is study of the importance of this site in terms of biodiversity. As such we do not support the widening of the employment definition in the Preferred Option.

119. Longlands

We support the Preferred Option at this stage

123. Manor Ground

We support the Preferred Option at this stage.

124. Marston Court

We support the Preferred Option at this stage.

126. Nielsons.

We support the Preferred Option at this stage.

127. Northfield Hostel

We support the Preferred Option at this stage.

128. Northfield School Site

We support the Preferred Option at this stage.

129. Northway Centre

We support the Preferred Option at this stage.

130. Nuffield Orthopaedic Centre

We support the Preferred Option at this stage subject to there being no increase in traffic in the area and the effect on water run-off caused by any major work is evaluated in terms of its effects lower down on flooding and water quality .

140. Old Road Campus

We support the Preferred Option at this stage subject to there being no increase in traffic and the effect on water runoff and drainage is evaluated in terms of it effects lower down on flooding and water quality.

134. Osney Mead

We support the Preferred Option at this stage.

137. Oxford Business Park

We are inclined to support the Preferred Option at this stage. However, it has taken so long to develop this land and there is such a need for housing we think it could be considered as a possibility if any of this land can produce an adequate residential environment.

138. Oxford Retail Park

We support the Preferred Option at this stage.

139 Oxford Science Park

We would refer back to our comments about science related research and development in relation 118 Littlemore Park. This was the prime inspiration for the Park and we see no reason for changing it.

140. Oxford Science Park (Minchery Farm)

Given the great need for residential and the substantial employment land allocations in the area we think residential use might be worth considering on this site. However, we attach a great deal of importance to the biodiversity considerations and consider a wildlife corridor adjacent to the brook essential.

141. Oxford Greyhound Stadium

We support the Preferred Option at this stage.

141A. Oxford University Press Sports Ground

We consider this as a strong site for the expansion of the cemetery. We consider that the Core Strategy designation limits its possible development. We think it should be put forward as a cemetery site but otherwise not allocated.

142. Park Hospital Site.

We would be inclined to support the Preferred Option at this stage but only if the development has no impact on water quality in the Boundary brook system and does not increase the likelihood of flooding lower down. Also it should not lead to any increased traffic.

143. Paul Kent Hall

We have no strong objections to the Preferred Option at this stage. Attention would need to be given to its effect on the Lye Valley SSI in terms of water quality and its impact on flooding around and below Headington.

146. Radcliffe Infirmary/Radcliffe Observatory Quarter

We support the Preferred Option at this stage.

147. Railway Lane

We do not support the Preferred Option at this stage. We would support Option 3 allocating for residential with a recreation area.

147A. Redbridge Recycling Centre

We would strongly support the current use. The Preferred Option is therefore supported at this stage.

150. Rover Sports Club Field

We do not support the Preferred Option. We believe the open air sports facilities' require the protection of the Core Strategy policy.

154. Ruskin College (Main Academic Site), Dunstan Road

We support the Preferred Option at this stage.

160. Slade Hospital

We do not support the Preferred Option. We consider the site should be allocated for healthcare related uses but if the Ridgeway Partnership relocates, the site should be developed residentially.

163. South Parks Depot

We do not support the Preferred Option. We consider this site should revert to public open space with the retention of the listed barn for ancillary parks or community use. Its siting in a designated wildlife corridor, public open space and conservation area also add teeth to this option (5).

164. St. Clements Car Park (Part)

We do not support the Preferred Option. Development in our view would interfere with continued car parking provision which is essential to the continued operation of traders in the area especially independent traders who require all the support they can get if they are to flourish. We think the DPD should make provision for the protection of vital local car parks such as this at least during redevelopment.

165. St. Cross College Annex

We do not support the Preferred Option. We think this site adjacent to the SSI SAC is an important wildlife corridor and connection to the SSI. We think if the site became an extension to the cemetery it would help safeguard the openness and biodiversity of this area (Option 3). It would also ensure the continued enhancement of the setting of the listed buildings in the conservation area. We would question whether the frequency and amount of funeral traffic would be such as to cause insurmountable traffic difficulties with regard to access. If there were difficulties measures such as traffic lights could reduce the extent of any problem.

169. Summertown House

We do not support the Preferred Option. We are of the view this site should remain unallocated and its development could be better evaluated at planning application stage particularly in the light of the Listed building status (Option 1).

171. Temple Cowley Swimming Pool

We do not support the Preferred Option. We consider the present use should be retained . This is an important community leisure facility.

177. Townsend House

We support the Preferred Option at this stage.

178. Travis Perkins

We support the Preferred Option at this stage.

179. Union Street Car Park

We do not support the Preferred Option. Our comments are the same as for 164 St. Clements Car Park.

182. Warneford Hospital Site

We do not support the Preferred Option. We consider that the future of this Listed building and its surroundings are best considered at the planning application stage when there can be full public comment and should not be allocated(Option 1). The Preferred Option includes such a wide variety uses it is tantamount to not allocating in any case.

186. Wellington Square (West)

We do not support the Preferred Option. We consider this site should not be allocated (Option 1).

188. Westlands Drive and Redland Road Square

We support the Preferred Option. We consider the site should remain as public open space and we think the City Council as planning authority and landowner should take the necessary steps to ensure this.

190. Windale House.

At this stage we support the Preferred Option.

193. Wolvercote Paper Mill

We have concerns about the allocation of this site. Flooding seems to be a problem and its development could aggravate flooding problems elsewhere. We note too the difficulties surrounding the pressure on first schools in the area which family housing would increase. We do not think the ball can just be thrown into the County's court and needs to be resolved before any family housing were to be provided. In terms of traffic generation any major employment use is not welcome. Given these problems the proximity of the site to the Green Belt and SSI and its own possible wildlife propensity, we are very wary at this stage of any of the development proposals. We certainly think that it may be wise to consider some uses more compatible with its flooding propensity which could include open space, a nature park, and a boatyard.

3. General Remarks on the DPD

1. In both the policies and the sites section we have commented on how cheap food will be a thing of the past and that food prices are already on the up. During the plan period there will be an increasing need for people to grow their own produce. This was overlooked in the Core Strategy. We think that the Council needs to update its allotments policy, protect existing allotments and look to allocate and safeguard future land for this purpose. Flood plain land is not suitable as a general rule for allotments. Garden land also needs to be safeguarded and increased. We have sought to influence this in the policies section. The Sustainability Appraisal needs to include in it the growing importance of people having access to land and gardens where they can grow their own food.
2. The Council should not be in conflict as landowner and planning authority. It needs in our view to look more to its duty to ensure that the quality of the wider environment is safeguarded especially valuable open space but also the amenity needs of the wider community. Upholding Core Strategy Policy on open space is essential.
3. We are not happy at this stage with any of the options put forward for cemeteries. Within Oxford we would like to see 141A Oxford University Press Sports Ground and 165 St Cross College Annex pursued as good possibilities.
4. We think local car parks at St. Clements, Headington and Union Street need to be safeguarded at least during redevelopment. As they are owned by the Council this should be possible. We think extreme care will need to be taken in redevelopment at Summertown with regard to ensuring that no vital car parking is lost at any time especially during development. We do not necessarily oppose reductions in the amount of car parking in the

longer term but this must be done within a programme of providing adequate public transport and other alternatives for people to reach the District centres.

5. At this stage we support the Preferred Option on just under 50 sites though we have additional requirements we would like to see on some of these. We are acting on the information we have to date. Our opinions may change at final submission date and that includes the possibility we may refine our views on the sites as more information emerges.

6. We are concerned about the whole matter of drainage on large sites in Headington. We are concerned about water quality affecting nature sites like Lye valley. We are also concerned that the potential of these sites to aggravate flooding and in lower lying Eastern Oxford and Marston be properly examined. We think that consideration of flooding should be extended beyond riverine flood risk and surface water flooding to look at the whole process of how water collects in different parts of Oxford, later to cause flooding elsewhere. The quality of the water run-off also needs to be examined and its effect on areas important for their nature and ecology. We understand from Oxford Urban Wildlife that pollution has occurred in the Lye Valley SSI on recent occasions. This and the whole question of the provision of Sustainable Urban Drainage needs to be examined in background papers and in the Sustainability Appraisal.

7. We are concerned about more traffic generation from development on large sites in Headington. We consider no increase in traffic should be permitted and opportunities to reduce existing levels be taken.

8. We are concerned that when ordinary and its affordable housing component are so vital, the amount of sites allocated for student housing should be limited to only that necessary to meet planning requirements. We consider an assessment is necessary of the likely amount of student accommodation that will be provided on each site. Until then it is difficult for us to make a judgement whether the site allocation is necessary or not.