

Response to consultation

on

Oxford City Council's

Preferred Options

for the

Local Plan Review

by

Oxfordshire Green Party

August 2017



Oxfordshire Green Party

for the common good

Green Party response to Local Plan Review, August 2017

We would like to commend the huge amount of work by our planning officers that is represented here, much of which we are in agreement with; also its legibility and clarity. We are pleased to be able to submit a response at this stage and look forward to working with them as the final plan is formulated.

The format takes the form of general responses to the different sections of the Preferred Options document, followed by a table of responses to the specific options in that section, which are reproduced, with the Green Party's response in the right hand column. The left hand column gives the reference : for example, 5A 2/23 means Option 5A, which is on page 23 of the second pdf file provided on the City Council's download page.

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1. Local Plan Objectives & Strategy

- a. There is an assumption here that Oxford City must inevitably grow. The objective at para 1.13 is for the city to “remain at the heart of the Oxfordshire economy” and allow the city to “grow and function sustainably”. The strategy (para 1.14) is to “support Oxford’s role as a fast-growing city”.
- b. In the years to 2036 it is clear that growth on the present trajectory is unsustainable. The city cannot “grow AND function sustainably”. Clearly, as technology advances some economic activity will dry up and will need to be replaced by new types of industry, so new growth in this sense is essential in order to maintain full employment. However, the scope for twenty years of growth in the sense of ‘expansion’ at the present rate is impossible within Oxford’s physical constraints, and the Objectives as stated therefore unattainable. In the absence of any effective central government policy to divert economic expansion to regions that would benefit from it, the focus for expansion – assuming that expansion of population and economic activity will be impossible to hold back through planning policies alone – must be in Oxfordshire and the Thames Valley bioregion *as a whole*. Therefore, rather than being Oxford-centric, policies (and particularly transport policies) will have to reflect the need for the whole region to function in a fully connected-up, networked way.
- c. This is the central problem that must be faced. What is being considered here is a plan for the city alone, of course, and to be responsible the city should have policies that provide it with the tools to control the problem – but in planning terms growth/expansion must be recognised as a *problem* which can only be solved by proper regional spatial (rather than economic) planning, which we lack. Expansion of the city *cannot be a desired spatial planning objective*.
- d. The county and region is beginning to face up to the pressures of growth/expansion that the City Council has been living with – indeed, continues to be actively promoting and encouraging – for years, but appropriate governmental spatial planning structures are not in place to handle it, whilst central government (through the NPPF) declares a presumption in favour of development, which is driven by a Local Enterprise Partnership committed to economic growth but with no responsibility for the spatial planning (and consequent social) problems it creates.
- e. We recognise and welcome the fact that the Preferred Options do attempt to tackle the problem that growth/expansion presents for Oxford on many fronts. The actual proposals seem to recognise the problem and seek to address it. But as a result these ‘pro-growth’ statements in the opening section of the document stand out as anomalies, contradicting the overall thrust. *There is a fundamental contradiction at the heart of the document* :
 - the strategy is to “support Oxford’s role as a fast-growing city”, yet
 - the strategy that forms the *actual content* of the document is all about trying to cope with the increasingly insoluble problems (such as increased social inequality fuelled by an overheating housing market) that such growth will inevitably create – problems which, unless addressed, will inevitably worsen to 2036 (unless the doomsayers about the impact of Brexit prove right and Oxford’s economy suffers).
- f. The whole tenor of the document needs to emphasise that the city has *already become* “unsustainable”, can *no longer deliberately plan to grow/expand*, and that any expansion that the city council does not have the power to constrain will have to be accommodated either elsewhere in the region – as, indeed, it already is being – or (as many in the surrounding districts might prefer) elsewhere in the country.
- g. Certainly we support the objective of working for a ‘mixed and balanced community’ in a city which, because of unaffordable housing, is under threat of being ‘hollowed out’, increasingly relying on the people who make the city work moving out to join the existing 46,000 daily commuters.

- h. ‘Growth’, as the word is used in this document, implies an increase in economic activity. There is a distinction between increasing economic activity and prosperity; in fact an increase in the former often leads to a drop in shared prosperity. The Plan’s focus on increasing economic activity rather than shared prosperity and social growth risks perpetuating Oxford’s social divide between homeowners and renters, between those with careers and those in low paid sectors such as catering and hospitality, and between those able to afford private education and those stuck in Oxford’s struggling state schools. Without radical policy changes, the Plan’s focus on economic ‘growth’ (meaning ‘more activity’ and ‘more moneymaking’) will simply compound the city’s already shameful levels of inequality.

2. Employment-based land use

We need to free up more land for affordable housing

1A	Protect Category 1 sites, promoting modernisation and intensification to allow growth of these businesses and sectors on existing sites. Allow no other uses on these sites, except when they are directly linked to and are necessary to support the main use and there is no loss of employment. Provide a site specific policy framework for each site through an allocation in the Local Plan.	Qualified support, with the proviso that “allow growth . . . on existing sites” means no net spatial expansion beyond existing sites.
1B	B) Alternative Option: Allow residential and other uses to be introduced on Category 1 sites, as long as no net loss of employment floor space results.	Support
2A	Protect Category 2 employment sites from loss to other uses, promoting modernisation and intensification. Allow other uses on site only where a set of strict criteria are met. For example, where an employment use is retained with the same or greater number of employees as the previous active employment use. Other criteria could include provision of marketing evidence etc.	Support with a proviso. Osney Mead is a Category 2 site which is suitable for housing. The density of employment on the site as it stands is fairly low, so it could be that it could meet the sort of criterion suggested.
3A	A) Preferred option: Allow the loss of other (Category 3) employment sites to alternative uses subject to some basic criteria. This would apply to all employment sites that are not identified under Category 1 or 2; or those that comprise low density B8 use (see separate option below). (Relates closely to option on low density B8 uses below.)	B8 definition may not be specific enough. Oxford will need suppliers of materials and resources to its businesses near enough at hand that those businesses can in future be supplied with a reduced need for powered delivery vehicles. In general, however, support.
3B	Rejected Option: Protect all Category 3 sites (i.e. all sites currently in employment use excluding Category 1 and	

	2 sites) for their employment uses on the same basis as described above for Category 2 sites.	
4A 2/22	A) Preferred option: Allow the loss of B8 to other B1, B2, Sui Generis employment uses and other nonresidential uses that support the local economy or are of benefit to the local community. If there is no demand for alternative employment or community uses, consider loss to residential in suitable locations. Protect and allow new B8 uses only where they relate directly to or support existing or proposed Category 1 or 2 employment sites, e.g. warehousing supporting BMW-Mini plant.	Support
5A 2/23	A) Preferred option: Hospitals: Continue to protect existing hospital sites for hospital related uses, allowing some diversification.	It is not clear what “diversification” means here. Diversification away from the provision of health care and medical research? Diversification into private enterprise? Perhaps it means the suggested ‘diversification’ into providing accommodation for staff. Without a clearer definition this phrase could prove an ‘Achilles heel’ in the policy.
5C	C) Preferred option: University of Oxford: Continue to locate academic core activities in central Oxford. Allocate new sites for further academic activities such as teaching research, administration and ancillary activities. (Does not include Marston Rd campus)	<p>Whilst the importance of the universities to the local economy is recognised there is considerable feeling that their growth – despite existing policy (which has had some effect) – has been unsustainable, and a significant contributor to the housing crisis in Oxford. And that the City Council has not been assertive enough in protecting the interest of the city as a whole, particularly with regard to university expansion. If expansion is to be controlled and sustainable, then firm and clear policies are needed to</p> <ol style="list-style-type: none"> promote intensification not additional land use, an end to speculative accommodation building, and robust process for ensuring that the universities take full responsibility for their impact on the housing supply. <p>Many comments have been received about the unhelpful and often opaque way in which university expansion has taken place in surrounding districts, the lack of a regional planning policy to control this, and the negative impact of the Local Enterprise Partnership (in which the universities are major players) in</p>

		sponsoring expansion without accepting responsibility for the social and environmental consequences.
5D 2/23	Preferred option: Oxford Brookes University: Support the growth of Oxford Brookes University through the redevelopment and intensification of academic and administrative floorspace on their existing sites at Headington Hill and Gipsy Lane.	Reject. Supporting the expansion of Oxford Brookes – however important and valuable the university is to the local economy – should not be a policy <i>in itself</i> , since this criterion will always tend to override other considerations. Expansion of the university would not just lead to an increase in numbers of short-term resident students, but of lower-paid support staff, who will also need to be housed.
5E 2/23	E) Alternative Option: Universities. Do not have a specific policy for the universities but rely on other policies of the plan; for example on student accommodation. Deal with site-specific details through site allocations	Support. University expansion should continue to be constrained by impact on housing supply for permanent residents. Redevelopment and intensification of existing sites is the logical consequence if expansion is to take place. A specific policy of supporting expansion <i>per se</i> would be a mistake.
6A 2/24	A) Preferred option (Combination of A + B): Support the development of start-up and small businesses on all Category 2 employment sites but not on Category 1 sites.	Support
6B 2/24	B) Preferred option (Combination of A + B): Support the development of start-up and small businesses in city and district centres.	There may well be areas that are not designated as District Centres which would nonetheless be appropriate for small business development, e.g. East Oxford (traditionally a very mixed-use area, benefitting from the diversity of activity).
6C	C) Alternative Option: Support startup and small businesses in any location if the policy requirements (e.g. access) are met.	see above.
7A 2/25	A) Preferred option: Restrict the expansion of existing language schools, summer schools and independent colleges for over 16s by only permitting further development up to a certain percentage increase, and only subject to clear demonstration of the positive benefits to the local economy. Limit such development to a point that it discourages new entrants to the sector.	Strong Support, but with a qualifier. Ruskin College is an example of an institution offering higher education that is not linked to either of the two universities, but does not fit the definition of 'language school'. We will be in difficulties unless we define more precisely which type of educational institution is to be restricted, and which allowed to expand. Simply defining it in relationship to Oxford University or Oxford Brookes may (looking ahead to 2036) be unhelpfully exclusive, and changes in the educational sector may render it problematic.

8A 2/26	A) Preferred option (Combination of A + B): Require larger construction projects to ensure that opportunities are given to local firms to realistically bid for work.	support
8B 2/26	B) Preferred option (Combination of A + B): Require larger construction projects to provide training and employment opportunities for local people through a Community Employment Plan.	support
9A 3/31	A) Preferred option: Set a capacity-based target aimed at meeting as much of the OAN as possible by boosting housing supply balanced with appropriate consideration of other policy aims. Continue to work with adjoining authorities to deliver sustainable urban extensions to meet housing need that cannot be met within Oxford's administrative boundary	<p>There is a strong feeling within the Green Party (particularly from surrounding districts) that before urban extensions are considered much more needs to be done in tackling the high rate of under-occupancy in the city, the under-use of much commercial property (addressed in these Preferred Options particularly Option 2 & 3) and the considerable land area of the city allocated to parked vehicles.</p> <p>Further work is needed on the Sites & Housing Plan to identify possibilities, including building above car parks.</p> <p>At this point, the Green Party is not able to support further urban extensions, particularly on Green Belt land.</p>
9B 3/32	Alternative Option: Continue current level of provision (400 per year, 8,000 total) (current Core Strategy policy, and average annual provision)	
9C 3/32	Rejected Option: Aim to meet the full Objectively Assessed Housing Need for Oxford within Oxford by significantly boosting housing supply and prioritising housing over other policy aims.	Agree that this should be rejected owing to its undeliverability. A policy doomed to fail has the possibility of making matters worse, not better, through unintended consequences.

3. Housing

we need a new approach to fix our broken housing market

- a. The phrase “projected housing need” is used, but there are different assessments of what that housing need actually is, and considerable scepticism within the Green Party and amongst the public generally about the figures in the Strategic Housing Market Assessment and the objectively assessed need (OAN) figure of 32,000 new homes in Oxford. Whilst it may be better to ‘play safe’, we note that “there are also indications that Government is looking to change the methodology for calculating OAN (Housing White Paper 2017).” (para 3.8)
- b. The figure of 73% under-occupancy of properties (a figure which is probably getting worse owing to speculative house-buying) needs to be addressed.

The most relevant planning powers for dealing with under-occupancy may be permitting the internal splitting of large under-occupied properties.

The welcome shift towards independent living for the elderly, with care provided at home, may nonetheless account for the high level of under-occupancy. An adequate supply of suitable accommodation for older people downsizing will be increasingly important. Every small flat in a supported residential complex is likely to mean a family home being freed up, but greater imagination may be needed as regards the sort of accommodation that will entice older people to sell up.

In former days, much student accommodation was in 'digs' i.e. in private, otherwise underoccupied, homes. The universities could help by doing more to promote this sort of house sharing, which, though not attractive to many, can work very well for students comfortable in a world beyond student life. AgeUK promote a live-in carer. Policy would need to address any potential conflict between our HMO rules and any policy that sought to increase the occupancy of properties.

Compulsory purchase remains as a back-stop, but the City could also purchase suitable properties for adaptation for social housing.

Other incentives for freeing up empty properties need to be explored.

- c. We could not find any specific reference to homelessness in the document, though it is an increasingly important issue. The provision of housing is of course part of the solution to this, but by no means the only solution since many on the streets are deemed to fail the test of 'local connection' and so require hostel or similar provision. Whilst hostels could possibly be considered 'community facilities' we think that it is unlikely they would be considered as such unless there is specific requirement for homeless facilities in our Local Plan.
- d. Housing delivered by large developers is manifestly failing to deliver the affordable housing the city needs. The central-government-imposed viability test, with its guaranteed short-term profits for already-wealthy big developers based on net present land values, is a major hindrance, and is undermining the local economy (since these developments are usually built by large out-of-town subcontractors, often with poorer build quality). It is failing to deliver the social housing we need and in the process is driving up market house prices (because the profit on the market housing has to pay for the construction of the required social housing units). We need as a priority to get away from big developer-led schemes that depend on central government-imposed net present value viability assessments. They will never address the housing crisis.
- e. We would also challenge the assumption that housing for social rent is only for the poor ("in greatest housing need" – commentary on Option 10A). That was not the original vision of council housing. There is no reason why the majority of rented properties in the city could not theoretically be council-owned, with a much-reduced private rented sector. At least, the city's Housing Company could aim to increase market share. There will always be private rented housing, of course, but municipal housing is financially viable and can work well with appropriately tenant-centred management. Certainly, we should not be considering reducing the social rent housing quota, but asking how we can better deliver and expand it.
- f. Priority for social housing should be on prudential borrowing to build our own and on council purchase of properties (especially under-occupied properties) for social rent; and for other affordable housing, encouragement of housing cooperatives, co-housing initiatives.
- g. The proposed purpose-built HMOs could indeed be part of the solution, and we see no reason why they could not continue to be run by the city's Housing Company, as well as other, smaller and local, housing organisations with a proven record of managing such properties and committed to maintaining affordability. We need to be getting away from big developer-led schemes (and indeed the document recognises that, increasingly, future housing developments likely to take place on smaller sites).
- h. Co-housing, in which a number of separate housing units share common space, offers intensification of use without loss of quality space. The Council should engage with the

co-housing movement to find development opportunities. Future student accommodation should be required to be adaptable to similar use.

- i. Garages and front forecourts are likely to become increasingly redundant with the demise of the privately-owned car, and policy needs to be prepared for the development uses that this brings.
- j. We agree that the city does indeed need to be more imaginative and flexible with regard to housing solutions, investigating the creation of Community Land Trusts within Oxford to take on specific brownfield sites for housing; considering what brownfield sites might be allocated to people wishing to self-build homes in the city. The City should look outside our area for housing associations or other groups who might want to buy property for low cost housing. This is a welcome addition but it is not given nearly enough weight. Keep the big developers out of it!
- k. Para 1.38 reads, "Developments should be . . . capable of adaptation for alternative uses". There is support from our members for this idea. We suspect that purpose-built student accommodation is popular with developers because it brings greater financial returns – people are accommodated at higher density. Such units are not built for permanent living. However, education is changing. The rise of online and distance learning, and the increasing number of students who are permanently resident because they are also working, suggests that any new purpose-built student accommodation should be designed to be convertible to small flats or "purpose uilt HMOs" as a planning condition. (The latter would suggest, for example, conditions regarding the proportion of shared space within a unit, and the layout of water and especially drainage services to allow for later adaptation.) At present we have no power to condition design for future adaptability on future development. Without such power we may find we are having to grant permission to ‘white elephants’ of the future.

10A 3/33	Preferred option (Combination of A + B): Continue to prioritise delivery of social rented affordable housing, to ensure that the needs of those who can least afford housing in Oxford are prioritised. For example continue the current 80/20 split of affordable housing.	There remains support within the Green Party for retaining the priority of delivering social rented affordable housing for all. The current practice of working with large developers has failed, however, and the future must see the different strategies (see elsewhere in this response).
10B 3/33	Preferred option (Combination of A + B): In certain circumstances (when meeting employment sector specific needs, delivering a affordable housing in perpetuity and linked to incomes) prioritise the total number of affordable housing units by readdressing the balance between social rent and intermediate forms of affordable housing (which might include affordable homes to rent at no more than 80% of market rates). (This option relates directly to the “Meeting intermediate housing or employment sector specific needs based on local affordability approaches” option a below.)	Whilst the principle is recognised, likewise the problem of middle-income earners being squeezed out of the market, the present strategy of working with large developers according to free market principles is manifestly failing and we do not believe that it will work. We do not believe that introducing such flexibility will work either : it will backfire, and only serve to introduce a policy weakness that developers can exploit – especially when viability tests are based on net present value and imposed by central government in such a way as to support big developers. They council must take responsibility for building its own social housing.
11A 3/34	Preferred option: Continue with current approach to prioritise delivery of affordable housing, requiring a proportion	This is the policy the Green Party would prefer, except that present government-imposed viability tests

	<p>of affordable housing. A robust % target will be set, based on viability testing. Currently, 50% affordable housing is required.</p>	<p>undermine it. The City Council needs therefore to bypass present viability testing rules, which are based on short-term market value thinking and guarantee large profits to developers. The Council must take responsibility directly for the building of social housing.</p> <p>It is recognised that there may be political comeback if the Council fails to enforce these targets, but by retaining this policy, central government's undermining of local government and its favouring of large developers and the free market, with the consequent failure to deliver the housing we need stands exposed. The target must remain.</p>
<p>11B 3/34</p>	<p>Alternative Option: Consider a reduced affordable housing percentage requirement from developers on a site by site basis if the affordable dwellings were of a size in greatest need in Oxford (i.e. 2+ bedrooms or 3/4 + bedspaces).</p>	<p>To introduce such flexibility into policy is to introduce a weakness that will be exploited to the city's loss. Other methods of encouraging the building of larger dwellings need to be found.</p>
<p>12A 3/36</p>	<p>A) Preferred option (Combination of A + B+ C): On specified sites, allow schemes that are up to 100% intermediate housing, with reduced or no element of social rent housing required. This could apply to University and Hospital Trust sites to support key staff; school campus sites, or other staff accommodation schemes.</p>	<p>This would only be acceptable if robust means can be found of ensuring affordability in perpetuity. There are housing models that tackle this.</p> <p>Tied housing : this finds general agreement within the local Green Party.</p> <p>Having accommodation tied to your job introduces vulnerability – lose your job and you lose your home – and this is why many people who live in tied accommodation try to own a property somewhere. It would be important that staff would be <i>required</i> to live in tied accommodation by virtue of their job, because that would enable them to buy property elsewhere and nominate it as their Principal Private Residence. (If living in tied accommodation is not a requirement of the job that may be difficult, and they may find themselves liable for capital gains tax on capital appreciation of their own property when they come to sell). Even though they may not be able to afford to buy in Oxford, unless they can have a stake in the property market somewhere outside of Oxford they may feel they will be disadvantaged in the long term and consequently it may not solve the recruitment difficulties.</p>

		<p>The revised Local Plan could usefully develop the possibility of requiring permanent living-in accommodation as a <i>condition</i> of planning approval for certain types of build : for instance, care homes (live-in wardens), schools (caretakers), hotel staff – anyone likely to be lower-paid but who needs to have ready access to the site. We welcome the emphasis (Option 16) on 'balanced and mixed' communities, because the 'hollowing-out' of Oxford and 'gentrification' of certain districts can otherwise set off a vicious circle of house prices, fuelling further house price inflation and speculative second-property purchase by extremely wealthy people.</p>
12B 3/36	<p>B) Preferred option (Combination of A + B+ C): For intermediate forms of affordable housing, prioritise homes for rent, such as affordable rent.</p>	<p>Strong support within the Green Party for this.</p>
12C 3/36	<p>C) Preferred option (Combination of A + B+ C): Have a specific local affordability policy pegged to local incomes and house prices, rather than occupations or employment sectors.</p>	<p>Support. Unless related to incomes, the notion of “affordability” is worse than meaningless. We should introduce and monitor an affordability ‘salary to housing cost indicator’ to guide policy in this area.</p>
12D 3/37	<p>D) Alternative Option: Take a policy approach that tries to balance affordable homes for rent and affordable homes for sale (such as starter homes, or shared ownership) to give people more choice about intermediate affordable housing options.</p>	<p>Starter homes for sale are seen as a means of using public money to prop up viable property prices caused by failed free market, developer-influenced, government policy. There is little support within the Green Party for this, as it only makes the problem worse in the long term.</p>
13A 3/37	<p>A) Preferred option: Continue to require provision of onsite affordable housing for developments of 10 units or more, or on sites of 0.25ha or greater. <i>[Consequences of approach/discussion :]</i> This approach follows current policy and experience has demonstrated that this option is likely most likely to be deliverable and to achieve sustainable development. Further viability testing will be required to help establish the</p> <p style="text-align: center;">38</p> <p>www.oxford.gov.uk/localplan</p>	<p>Support, but see (in addition) Option 13C.</p>
13B 3/38	<p>B) Alternative Option: Do not have a fixed threshold for on-site provision, have a sliding scale, which varies for different site sizes or number of units, so that smaller sites do not require the full provision. For example sites 10-20 units require a lower on-site % provision than sites of 20+ units.</p>	<p>Reject.</p>

13C 3/38	C) Alternative Option: Reduce the threshold from 10 dwellings/0.25ha for onsite provision of affordable housing (for example for developments of 8 units or more/0.2ha).	Support. In an overheating market, any opportunity to hold back inflating land values and property prices must be seized.
14A 3/39	Preferred option: Require an off-site financial contribution towards affordable housing from sites with a capacity for 2-9 dwellings.	Financial contributions to the building of affordable properties elsewhere are increasingly going to fail as it becomes more difficult to identify places where those properties can be built.
14B 3/40	Alternative Option: Continue to require an off-site financial contribution towards affordable housing from sites with a capacity for 4-9 dwellings.	However, it is important that the city has the power to require this as a backstop where developers are not proposing to build affordable properties, to ensure that they cannot avoid their share of responsibility.
14C 3/40	Preferred option: Adjust the mechanism of calculating contribution (currently calculated on number of dwellings or site area). Alternatives could be a flat rate tariff per unit, or to calculate the contribution based on floorspace of the development (similar to CIL process).	The alternatives suggested may have different unintended (or perhaps intended) consequences. e.g. incentives to build larger units in order to minimise the contribution.
14D 3/40	Alternative Option: Increase the financial contribution in light of the fact that more small developments are now CIL exempt (starter homes and prior approvals) and so those developments have lower development costs if they are not paying CIL.	Support.
15A	A) Preferred Option (Combination of A + C + E + G): Continue to require financial contributions towards affordable housing from student accommodation developments.	Support.
15C 3/41	C) Preferred Option (Combination of A + C + E + G): Continue to require affordable housing contributions from any self-contained units of accommodation within C2 care home/ residential institution developments (e.g. staff accommodation), (either financial contributions or onsite affordable housing provision where appropriate).	In the present situation there should be incentives for employers to provide accommodation for staff (according to other Preferred Options) and therefore this proposal would undermine that incentive. The loss of live-in wardens in sheltered accommodation has been a significant social loss.
15E 3/41	E) Preferred Option (Combination of A + C + E + G): Continue to require affordable housing contributions from commercial developments (either financial contributions or onsite affordable housing provision where appropriate).	Support. In the interest of balanced communities priority should be on on-site provision where feasible. However, this policy should not be used to justify commercial development on land where housing could be sited.
15G 3/42	G) Preferred Option (Combination of A + C + E + G): Require affordable housing contributions from purposebuilt HMO or non-self-contained C4 developments (either financial contributions or onsite	We should be encouraging the development of higher density shared/co-housing as part of the solution.

	affordable housing provision where appropriate). Would not apply to C3 to C4 conversions.	We support contributions from purpose built HMOs if they are private 'for profit' but our preference is that they should be Oxford Housing Co or Housing Coops (as in 19A below), in which case no contributions would be necessary as they would be affordable anyway.
16A 3/44	Preferred option: Continue to require the mix of dwelling sizes to meet need and prioritise larger units (3+ beds) in key areas.	Support.
16B 3/44	Alternative Option: Do not specify a mix for market homes but specify a mix for affordable homes/the affordable element of mixed developments.	
17A 3/44	A) Preferred option: Raise the threshold at which the policy applies; specifying a housing mix only for larger strategic scale developments (e.g. 25+ units – currently >10).	Reject. The threshold should remain at >10 to encourage mixed developments.
18A 3/45	A) Preferred option: Include a criteria based policy that would be used in determining whether development proposals that would result in the net loss of existing homes would be acceptable.	<p>It is difficult to respond to this without some indication of what sort of criteria are envisaged. The suggested principle of 'reversibility' of use (i.e. the ability to convert back to residential) is good, likewise the suggested prioritisation (new residential, alternative residential, community use). There would be little or no support within the Green Party for the loss of residential properties to student accommodation unless (at the very least) that 'reverse adaptability' in design and construction was conditioned and enforced at the outset, and that there was a good chance that a reverse adaptation could be required and enforced if necessary.</p> <p>It is not clear what the impact on land value of existing properties would be if approval were granted. It could go up if the proposal were for student accommodation, but equally it could go down if it were for community use – so the effective priority (unless policy were rewritten to de-prioritise student accommodation) would be to prioritise student accommodation over community use. That would be unacceptable.</p> <p>Whilst clarity would be helpful, there is a danger of unintended consequences. Landowners are likely to anticipate potential loss of value through alternative use by taking steps to ensure the criteria enabling this are not met.</p>

18B	B) Alternative Option: Include a policy to prevent the loss of self-contained homes to any other use unless at least 75m ² residential accommodation remains.	
19A 3/46	Preferred option (Combination of A + B): Allow new purpose-built HMOs in appropriate locations, including employer-provided or staff accommodation.	<p>Very support within the Green Party for this proposal.</p> <p>HMO living is not suitable for all, and the management of such properties needs to be appropriate. Planning approval for such construction should depend on the aims and objectives of the organisation proposing such development, and conditional on them. Mere financial investment would not on its own be adequate. Therefore it is essential that Option 19A is linked with Option 19B. This is the sort of housing that might be best delivered by housing cooperatives.</p>
19B	Preferred option (Combination of A + B): Control how and where new HMOs are allowed by setting criteria to control how they are provided and managed and by restricting HMO numbers where there is already a high concentration of existing HMOs.	Support. See comment about management above.
20A 3/49	Preferred option: Linking new or redeveloped university academic accommodation to the delivery of associated residential accommodation will support those institutions in meeting their own accommodation needs by demonstrating that they have fewer than a set number of full-time taught degree students living outside of university provided accommodation (excluding students studying and working on placements, such as teaching and nursing students and postgraduates on research-based courses). Set the threshold based on existing numbers, potentially reducing across the Plan period and varying between each university.	<p>This is a significant departure from the previous local plan/core strategy, and whilst we recognise the thinking behind it we cannot support it, given the ambition to allow the universities to expand.</p> <p>By proposing to remove 5,000 students in employment or on placements and postgraduate researchers from the count, and allowing Brookes a further 500, this policy greatly increases by about 1200 properties the number of students 'living out', and supports a large expansion, to the detriment of the permanent resident population. If these 'non-student' students are to be removed from the threshold number, the threshold needs to be scaled down accordingly, from the beginning of the plan. Potentially it requires the threshold to be reduced to zero.</p> <p>The figures provided by the universities may be very difficult to authenticate. We already have a problem with council tax relief on 'student-occupied' properties that are no longer student-occupied, but clarity might be brought into the matter if eligibility criteria for council tax exemption were used so that the two assessments of student numbers</p>

		<p>harmonise. (The criteria are at least 21 hours study per week and a course of one year or more.)</p> <p>It is recognised that the use of the 21-hour study criterion could lead to an abuse of the policy by universities if they reduce the designated hours of study to, say, 20 hours per week in order to expand without exceeding the threshold.</p>
20B 3/49	Alternative Option: Continue to restrict new or redeveloped university academic accommodation unless the university in question can demonstrate that it has fewer than 3000 full-time students living outside of University provided accommodation.	We support a fixed threshold in principle, with the proviso that the threshold is reduced to compensate for the removal of newly-designated ‘non-student students’ from the assessed number. This may in fact entail reducing the threshold to zero.
21A 3/50	Preferred option (Combination of A + E): Focus development of new student accommodation only on allocated sites, existing campuses, in district centres and the city centre. (Sites will only be allocated for this use if they are considered to be in locations as listed, or on radial routes).	
21B	Alternative Option: Continue with existing policy to allow new student accommodation only on allocated sites, existing campuses, radial routes, in district centres and the city centre.	
21E 3/50	E) Preferred option (Combination of A + E): Ensure new speculatively built student accommodation is tied to students of the University of Oxford and Oxford Brookes University only.	<p>Restricting the building of purpose-built student accommodation to the two universities was originally proposed for our Core Strategy but was broadened by the Inspector. That broadening has led to considerable expansion of purpose-built accommodation by language schools and the like, on land that could have been housing residents – it has been a failure. We support this narrowing.</p> <p>We do not support any further <i>speculative</i> development of accommodation that is only of use for student accommodation and has no potential alternative use. Hard evidence should be required that a proposed development has been commissioned directly by the university in question in response to assessed need, verifiable evidence of which should be required.</p> <p>Approval for any new student accommodation should be conditional on the buildings being ‘reverse adaptable’ for family living apartments or suchlike (see previous comments). Future</p>

		uncertainty to 2036 is such that maximum flexibility in the built infrastructure will be needed.
29A 4/60	A) Preferred option: Restrict development on previously developed land (with a special focus on developing higher density schemes around transport hubs such as the district centres and the railway station) and specific greenfield sites that have been identified as suitable for allocation.	
	B) Rejected Option: Focus all new development just on previously developed land.	
30A 4/60	Preferred option: Have a policy requiring that development proposals make the best use of site capacity, in a way that is compatible with both the site itself and the surrounding area, with building heights and massing at least equivalent to the surrounding area, and bearing in mind that larger-scale proposals will be suitable in many situations.	<p>Reject.</p> <p>This would have the effect of concentrating new development in the more densely populated parts of the city and preventing the intensification of land use in the more affluent parts (where the replacement of single large double-plot properties with two new-build properties has already been taking place successfully), and encouraging the growth of large investment properties. It would be socially divisive and militate against balanced communities. In design terms the heights and massing should, anyway, be taken into consideration; but in terms of density, “best use” means setting a minimum density.</p> <p>Higher densities can be achieved without altering the character of the built environment through the promotion of (for instance) co-housing schemes where private space is linked to shared common space.</p> <p>In future, the possible demise of the privately-owned car is likely to make garages redundant and the space they occupy suitable for redevelopment : this should be taken into consideration when setting minimum density requirements in an area.</p>
30B 4/61	Alternative Option: Have minimum housing density requirements in all locations.	Support. (see above) There is support for a minimum housing density within the party.
31A 4/61	Preferred option: Review the Green Belt boundaries and be predisposed to allocate Green Belt sites within the city for housing (taking into account other relevant considerations) that are rated as having a ‘moderate’ and ‘low’ impact on	<p>Reject.</p> <p>Much is made within the option paper of the small percentage of Green Belt proposed for removal. However most of the Green Belt within Oxford City is in</p>

the Green Belt, as determined by the Green Belt Study 2016, undertaken by LUC. Do not review the Green Belt boundary or allocate sites where the impact would be 'high'.

flood zones that preclude development. Hence LUC were only able to assess 127.89ha in their study. In fact that included 37.25ha next to Seacourt Park and Ride that is all in flood zone 3. That means that the 17.98ha proposed for removal represent about 20% of the 90.64ha that could conceivably be built on. We do not feel that exceptional circumstances have been demonstrated for removal of these sites from the green belt.

There exist large areas of un-used and under-used land currently allocated for economic development that would make a much larger impact on the housing supply problem.

The LUC study does not adequately perform the function of a Green Belt review and looks more like a means to justify decisions already taken. Paras 3.14 and 3.15 essentially rule out consideration of Purpose 5 of the Green Belt, to promote the use of derelict and other urban land, on the basis that it cannot be related to individual parcels of land. That seems to completely miss the point. We argue that it is critical to encourage use of sites such as :

site 586, Osney Mead Industrial Estate, (which should be considered for a mix of uses).

the empty sites on both site 587, (Oxford Business Park), and site 588, (Oxford Science Park). This negates the need for Office/ Science Park developments on site 586.

We are happy for sites 587 and 588 to remain as employment sites.

The need for housing far outweighs the need for the alternative uses.

LUC's assessment of individual sites is also poor. Both site 107 and site 590 are assessed as making little impact on the separation of Oxford from Kidlington. This merely emphasises how inappropriate it is for individual districts to conduct discrete reviews. Any assessment of separation has to be made in conjunction with the Cherwell District plans at the other end of the gap. The assessment of site 113 underestimates its impact on the already

		<p>wafer thin separation of Kennington from Oxford. Their only comment on potential contamination is that “current use suggests it is unlikely”. It is highly unlikely that current use of green belt land will be a source of contamination. A proper examination of historical use would find that this site was previously used as landfill, at a time when such matters were much less well regulated. It also dismisses biodiversity considerations on the basis that no area has been designated.</p> <p>A full ecological survey should be carried out.</p>
31B 4/61	Alternative Option: Review the Green Belt boundaries and be predisposed to allocate Green Belt sites for housing (taking into account other relevant considerations) that are rated as having a ‘low’ impact on the Green Belt, as determined by the Green Belt Study.	Reject
31C 4/61	Rejected Option: Review the Green Belt boundaries and be predisposed to allocate Green Belt sites for housing (taking into account other relevant considerations) that are rated as having a ‘high’, ‘moderate’ and ‘low’ impact on the Green Belt, as determined by the Green Belt Study.	Reject
31D 4/62	Rejected Option: Do not allocate Green Belt sites for housing.	Support. We have proposed other policy changes which will provide increased and affordable housing.

4. Green Belt & Green Spaces *don't rip the green heart out of the city*

We are generally concerned with the focus on “quality” green spaces as the danger is that landowners seeking development permission will be able to exploit this by claiming that their green space is poor, or worse, by taking actions to ensure that it *becomes* ‘poor’ as defined. Paras 5.11 and 5.12 look at responses to the earlier consultation. 454 respondents agreed that protecting green spaces was important and 348 wanted the City to work to increase access. Only 122 favoured development of “less sensitive” sites. These numbers do not seem to be reflected in all the preferred options.

49A 5/79	Preferred option: Focus on protecting green spaces that are important Green Infrastructure and improving the quality of green spaces. Do not set an overall target for the total quantity of public open space across the city.	<p>Reject.</p> <p>Not having an overall target for green spaces in the local plan will inevitably lead to erosion of provision.</p>
49B 5/79	Rejected Option: Aim to maintain the existing ratio of accessible green space per 1,000 population.	We would support maintaining the Core Strategy target of 5.75ha per 1000 of population

49C 5/79	Rejected Option: Adopt the standard in the Green Space Strategy of maintaining or increasing the existing amount of accessible green space in Oxford.	We support the objective of maintaining 785ha in total while seeking opportunities to increase this, which comes from the City's own Green Spaces Strategy. It is contradictory, and will lead to confusion, to propose keeping the latter target in the city's Green Spaces Strategy whilst not incorporating it into the local plan.
50A 5/80	Preferred option (Combination of A + B): Use the Green Infrastructure Study to identify the green spaces that are worthy of protection for their social, environmental and economic function and create a new 'Green Infrastructure Network' designation. Include a policy which protects these spaces.	We support the Green Infrastructure designation provided it is backed by an overall target. If not, a lack of clarity relating to the criteria for designation would open up too many green spaces to development.
50B 5/80	Preferred option (Combination of A + B): Continue to have separate policies and protections for some specific types of green infrastructure, for example playing pitches, biodiversity sites, allotments.	Support, but see above.
51A 5/80	Preferred option (Combination of A + B): Require larger developments (likely to be sites of 1ha or more) to provide public green space on-site that is at least of a size suitable to be a 'Small Park'. Require financial contributions from smaller developments towards the improvement of existing green spaces or the creation of new parks in identified locations.	Support.
51B 5/80	Preferred option (Combination of A + B): Create new public open space by allowing development on parts of some private green spaces (those which have been assessed to have a minimal contribution to the green infrastructure network) to facilitate public access and improve the quality of the remaining open space.	We are slightly concerned that this suggests allowing development on some green space in exchange for better access to others without clearly explaining how such "agreements" would be enforced.
51C 5/80	Alternative Option: Continue to require on-site green space for residential development of 20 dwellings or more.	We would prefer to incorporate this option C which continues to require on-site green space for developments of 20 or more dwellings.
52A 5/81	A) Preferred option (Combination of A + B): Require developers to demonstrate (for example in the Design and Access Statement) how new or improved green infrastructure features will contribute to (for example): • Public access • Biodiversity • Soil protection • Climate change (including flood risk) • Sustainable drainage • Health and wellbeing • Recreation and play • Character/sense of place • Connectivity of walking and cycling routes • Creating	Support

	linkages with the wider green infrastructure network (and the countryside) • Food growing	
52B 5/81	Preferred option (Combination of A + B): Require developers to demonstrate how existing green infrastructure features not formally protected as green infrastructure through the Local Plan have been incorporated within the design of new development.	Support
53A 5/81	Preferred option (Combination of A + B): Protect a hierarchy of international, national and locally designated sites of importance for biodiversity, including connecting wildlife corridors.	Support
53B 5/81	Preferred option (Combination of A + B): Protect other sites with biodiversity interest. The use of a biodiversity calculator will be required to demonstrate net gain for biodiversity. The principle of the 'avoid, mitigate, compensate' hierarchy will be expected, and where damage is unavoidable, offsetting may be considered as long as overall net gain is demonstrated.	Support
54A 5/82	Preferred option: Have a criteria based policy to protect playing pitches, allowing loss under certain limited circumstances which are clearly set out in the policy. These might include replacement nearby or improvement to nearby facilities, or demonstration they are surplus to requirements.	This appears to only allow development of playing pitches when "assessments show they are unlikely to be used during the plan period". However, the site assessment document shows at least six sites, 125, 170, 203, 289, 309 and 341 where pitches are proposed for development so we suggest that the policy needs tightening whilst possibly not going as far as the blanket protection of rejected option C.
54C 5/82	Rejected Option: Have a policy of blanket protection of all playing pitches.	(see above)
55A 5/82	Preferred option: Have a criteria based policy to protect allotments, considering the loss of allotments or parts of allotments only under certain very exceptional circumstances such as them being disused or having substantial areas unused for a long time suggesting they are too large for demand in the area, replacement nearby and improvement to nearby facilities.	We have the same concerns over this preferred option A as above for the playing fields, though since allotments have much stronger legal protection it is perhaps less of a concern.
56, 57, 58, 59, 60 5/83 - 85	Watercourses, species enhancement, trees, green/brown roofs & walls, walking and cycling.	Support.

5. Heritage, Design, Quality Development *our city must be future-proof*

- a. Between now and 2036 there are likely to be enormous changes in the requirements for public space.
- b. Modes of transport are already changing as we see the arrival of battery buggies for disabled people, electric bikes, cargo bikes. We are already seeing the arrival of dockless bike sharing, and conflicts are regularly arising over the use of public space by these different modes of transport and pedestrians. The need for ‘Sheffield stand’ cycle parking may decrease with the roll-out of GPS tracking – but the space for cycle parking will continue to increase. Driverless (autonomous) cars are clearly being seriously considered. They might bring a considerable reduction in the use of private cars within the city, and consequently the need for car parking space. They will also have an unpredictable impact on the nature of public transport (and on our taxi fleet).
- c. The nature of retail will continue to change, and the need for many retail outlets may disappear completely. With increasing density of housing, people-friendly public space will become increasingly important, but retail units may not be the means of funding it.
- d. ‘Smart cities’ will operate differently : the upcoming generations will have different needs – they will find their way around, gather together, shop, study and work differently. There will be constant monitoring of air quality, traffic flows, energy use etc which people use to steer their behaviour (as in some respects they already are).
- e. Increasing use of solar power, windpower, Combined Heat & Power (CHP) installations will change the urban landscape and raise design issues. Ground- and air-source heat pumps will become a standard requirement, the former potentially requiring more disruptive construction; likewise direct heat transfer systems. Extreme weather events are likely to require attention to surfaces in order to minimise run-off, and increasingly necessary means of cooling without excessive use of powered air conditioning may also alter the design of buildings, as will the drive for more environmentally sustainable building materials and construction methods. Buildings will need to integrate energy, water and waste management in a way that they currently do not.
- f. The future will require greatly increased emphasis on integrated, whole-system (or whole-district) planning for energy, transport and waste management. Our current planning systems are extremely poorly configured to permit this, but this may not always be the case in future, and the City Council’s policies will need to be ‘ahead of the game’ for that time when central government eventually decides to act, and enable proper local planning to take place.

Considerable thought, research, education and consultation will need to be given to the policies proposed here.

61, 62 6/89	successful places, character & context	Support
63A 6/90	Preferred option (Combination of A + B + C): Include a policy setting out requirements for the design of streets, including hierarchies, proportion, wayfinding, relationship of buildings to the street, opportunities for play, car parking design, and cycle parking and storage design.	Support in principle, but see introductory paragraphs for qualification.
65A 6/91	Preferred option: Include a policy on the design of new buildings requiring that they are of high quality design.	Support. The commentary reads : “The policy could include information on aspects of design such as ... adaptability,

		<p>biodiversity and treatment of services). ... They could also encourage developers to consider the integration of services and utilities infrastructure from an early stage in the design.”</p> <p>This would be essential (see introduction to this section)</p>
66A 6/91 <i>also</i> 70A 6/94	<p>Preferred option: Include a policy setting out requirements for taller buildings, including appropriate location/height; expectations for intensification of sites in district centres and on arterial roads; massing; orientation; the relation of the building to the street; the potential impact of taller buildings on important views including both in to the historic skyline and out towards Oxford’s green setting; and exceptional design supported by a Technical Advice Note.</p>	<p>Support.</p> <p>There is support within the local Green Party for building higher than the current 18m limit, subject to protection of Oxford’s view cones and good design commended by the Independent Design Panel.</p> <p>The comment is noted that the highest building does not necessarily achieve the greatest housing density. It was noted in the former Heritage Officer’s report that higher buildings with slab-like horizontal rooflines are incongruous in the Oxford context, and this should be borne in mind when ‘mansion blocks’ and the like are being proposed.</p> <p>We also need a policy on building below ground subject to proper consideration of drainage and water courses.</p>
67A 6/91	<p>Preferred option: Include a policy on the extension of existing buildings to ensure they respond appropriately to the existing form, materials and architectural detailing; retain the legibility and hierarchy of the built environment and do not have an adverse impact on the existing building or on neighbouring buildings.</p>	<p>Support, with a proviso. Many older buildings in Oxford have very poor thermal performance, and will increasingly require external insulation. In many cases this will affect the external appearance and street view. Present policy (especially in conservation areas) is a constraint on this, but any new policy needs to find a way of supporting genuine external thermal cladding (i.e. not cosmetic).</p> <p>Likewise, policy needs to embrace a transition to solar energy with its consequent impact on street view.</p>
69A 6/92	<p>Preferred option: Include a policy setting out requirements for bike storage and bin storage inside and outside dwellings, including space requirements, location, access and design. Require details to be submitted with applications.</p>	<p>Support. This is particularly important for any property where the occupant/s do not have control or ownership of the publicly-accessible areas, for instance any properties that may in future be rented, flats and apartments, purpose-built HMOs.</p> <p>The policy needs to take into account the changing face of transport. ‘Sheffield’ cycle stands should not be assumed to be the solution for all cycle parking to 2036, with the rise of cargo bikes, bike trailers etc. Battery buggies for disabled people</p>

		may need to be parked outside properties that cannot accommodate them. They, with electric bikes, may need access to charging points.
70A 6/94	see response to 66A above	
Options 71 (6/94) through 78 (6/97)		General support

6. Travel & Transport

the preferred options already look dated

- a. For anyone familiar with cycling in the Netherlands, Denmark and much of Germany, cycling rates in Oxford are not high, and in some more outlying parts of the city they are poor. There is much to be done to complete and improve the network. It is important to plan, not for existing levels of cycling and walking but for these modes of transport to have become, by 2036, the primary mode of transport other than public transport (and, possibly, autonomous electric cars). The city must plan, not for those who currently cycle, but those who could.
- b. A number of these preferred options require developers to offer Transport Assessments and Travel Plans, and to demonstrate how connectivity with walking and cycling networks is supported and enhanced by their development. This is welcome, but it is essential that TAs and TPs are presented in developed form *at the application stage*. Especially in the case of applications determined by planning committee they should not be delegated to officers as agreements to be worked out following an application's approval, as one of the conditions. The committee (and the public) should have the opportunity to see and comment on the detail of travel plans and infrastructure proposals of applications before they are determined.
- c. The options here already have a dated feel, suggesting a hierarchy of "walking, cycling, then public transport, then electric vehicles and car share then car share/car clubs over private car use". Good as this is, developments in transportation are already complicating matters. Cycle networks are frequently also used by battery buggies designed for disabled people (some of which are capable of speeds of 8mph/13km/hr). These are twice the width of a bicycle. Electric bikes typically run at 15mph/24km/hr, and these are likely to become a primary mode of transport during the plan period, as they are on the continent. Before this Plan is finalised Oxford will have a delivery company using electric cargo bikes carrying payloads of 150kg (it already exists, but the bikes do not yet have electric-assist). Public charging points for bikes, buggies and cars may become an issue. The arrival of dockless bike sharing suggests that GPS tracking of bikes could become standard, radically altering the type of bike parking required in public space. Autonomous vehicles will require specialised wireless infrastructure and potentially change the nature of junctions. Issues of public safety in the light of potential terrorist threat (following the use of powered vehicles as weapons) have arisen, with implications for the design of public space.
- d. LTP4 proposes Bus Rapid Transit, and floats the possibility of trams/light rail. We are sceptical about the ability of Oxford's roads to sustain the punishment that Bus Rapid Transit is likely to inflict without complete rebuilding on proper foundations, and believe that the extra cost of a light rail system may consequently not be as great as some suggest. We think that with imaginative central government support, trams from Witney to Wheatley, Abingdon to Kidlington and beyond are a serious contender, since next to heavy rail nothing is better at moving very large numbers of people along a limited number of key routes in a short space of time. Although trams of the future are unlikely to require overhead powerlines (at least over the whole route) they will need to be planned for in the urban landscape.

We welcome the proposal to protect the land that may be required for the Cowley branch line, but urge that conversations be begun with the County about potential tram routes should this become a possibility, so that they too can be protected. Although the main arterial routes are the most obvious ones, and are to a large extent already feasible for a tram system, access to the hospital sites is more difficult.

79A 7/101	Preferred option (Combination of A + B): Require TAs and TPs to review transport impacts and show transport measures proposed to mitigate them for all development that is likely to have significant transport implications.	Support.
79B 7/101	Preferred option (Combination of A + B): Require transport assessments to also include servicing and delivery plans where relevant.	Support, but see comment in introduction.
Options 80 (7/102), Map 3 (7/103), & 81 (7/104)		Support. The map of cycle routes is appreciated, but does not coincide with the Oxford cycling map that is published and available. Before the revised Plan is finalised, further consultation with the City Cycling Forum and (through it) its constituent groups should be conducted.
82A 7/104	Preferred option: Provide facilities just outside the city centre to the North/South for tourist coach drop off and pick up, with tourist coach parking provided at Park and Ride sites or other suitable locations that can be identified, likely to be on the edges of the city.	Support.
83A 7/105	Preferred option: Assess whether there could be a change to where the scheduled coaches stop and circulate around the city centre, with the particular aim of avoiding the High Street.	Support, but see comment below
83B 7/105	Alternative Option: Terminate scheduled coaches (those to London and potentially also those to the airports) at Thornhill Park and Ride to reduce number of vehicles in the city centre. Use other bus services to provide the link to the terminus. This option could allow coaches access into the city centre at night when normal services from the park and ride site and traffic levels in the city centre are both reduced.	Support. In the long term the Local Transport Plan envisages Bus Rapid Transit or trams/light rail. We believe that BRT will require such an expensive upgrading of the city's roads that despite the high capital cost trams/light rail should be considered. In the long term (but within the plan period) we would therefore envisage scheduled coaches terminating at edge-of-city transfer points.
84A 7/105	Preferred option: Safeguard land that would be required to deliver the potential expansion of the Cowley branch line into a passenger railway line and the potential new stations.	Support.
85 to	Car parking standards - residential,	Support. Policy should allow approval of

90 7/107- 110	non-residential, CPZs, Cycle Parking standards - residential, non-residential, off-street public car parking	applications for car-free developments to be conditional on the existence/creation of a CPZ and/or car club in the area.
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7. District Centres (8/111 - 120) *more localisation of facilities is needed*

The Green Party would support the proposals in this section generally. We welcome the broadening of facilities and services beyond the retail offer, and would prefer that it went further. All centres should contain within them a wide enough range of facilities and services that, theoretically, a person could find that they never needed to leave their local area, be it for employment, leisure or essential retail needs.

Map 6 (8/119) seems to have truncated the shopping area of Cowley Road, which in fact extends to The Plain.

We have no strong view about short-stay accommodation for visitors (Options 98 & 99)

8. Facilities & Services (8/123 - 128) *when the Council says 'nearby' it should mean something*

105A 8/127	Preferred option (Combination of A + C): Have a criteria based policy to protect community facilities, allowing loss under only certain exceptional circumstances, such as replacement nearby, or significant improvement to nearby facilities, or demonstration they are surplus to requirements and that opportunities have been explored for multi-use or other community uses.	Support. As officers will be aware in the light of the furore over the closure of Temple Cowley Pools & Leisure Centre, the interpretation of what constitutes "nearby" is of considerable importance. Before this plan is presented to the inspector, "nearby" will need to be clearly defined. Community facilities are in high demand – a demand that is not being met – and are often used by many different groups for many different purposes. "Significant improvement to nearby facilities" is unlikely to be a good enough reason for allowing the loss of a community facility, and would be impossible to quantify.
105C 8/128	Preferred option (Combination of A + C): Require a community use agreement for all new community facilities. (Comment : This would apply to community facilities that are not public facilities. This will maximise the accessibility of facilities to local communities.)	"Community use" needs closer definition. As an example : many Christian churches have allowed other religious groups – often Christian groups of other ethnicities and cultures – to use their premises. Some church buildings are home to three or four churches. It is not clear whether this constitutes "community use". Other organisations may want to set conditions to what sort of activity they would allow in their buildings and which they would not. Before supporting this proposal we would want to have a clearer picture of what a 'community use

		agreement' might look like. The principle is good, but 'the devil may be in the detail'.
106A 8/128	Preferred option: Have a policy to protect pubs, using a criteria based approach. This would include evidence of diversification to establish a wider customer base; lack of viability; with marketing a key component. There should also be demonstration of a lack of need for a pub, for example because of the availability of other pubs in the area and an assessment of the community value of the pub and the importance of its design character and heritage to the wider streetscape and local area.	Support. We would commend the viability tests developed by the Campaign for Real Ale (CAMRA).

9. Sites

107A 9/129	Preferred option: Continue to use the existing Area Action Plans as the basis for decisions on appropriate uses in those areas, rather than including detailed new site allocation policies.	Reject
107B 9/129	Alternative Option: Include new site allocation policies for the Area Action Plan areas and any individual sites within them.	Support, particularly with regard to the West End AAP. We opposed the original AAP on the grounds of the loss of housing units – particularly social housing units – and do not believe that what is being planned is delivering even what the 2008 AAP promised in this regard. It needs revisiting urgently.