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**Oxford City Council response  
to Inspectors initial questions  
and comments**

*Question 8*

July 2019

## **Question 8: Car parking**

**A number of the policies seek a reduction in, or minimisation of, on-site parking on existing sites in order to allow further development to be permitted. However, this approach affects existing site operations and circumstances rather than being related to the impact of the proposed development and it appears not to have proper regard to the current needs of the site occupier. It therefore does not seem to be fairly and reasonably related to the proposed development, contrary to the requirements for planning obligations set out in the CIL Regulations. In addition the policy could have significant implications for parking in the surrounding area and it is not clear whether these have been taken into account. We are therefore minded to recommend deletion of this clause from the relevant policies. The Council are invited to comment.**

- 8.1. The purpose of the planning system is to contribute to the achievement of sustainable development and the consideration of movement and transportation plays a key role in achieving that goal. The National Planning Policy Framework (2019) (NPPF) sets out that plans should seek to minimise the need to travel for employment, shopping, leisure, education and other activities. It stresses the importance of land-use planning and strategic location of services and functions in order to maximise use of sustainable transport modes (i.e. walking and cycling).
- 8.2. Section 9, Promoting Sustainable Transport, paragraphs 102-111 of the NPPF (2019) set out how to promote sustainable transport. In particular, paragraph 105 (points a-e) list the consideration for setting local parking standards. The approach to parking standards as drafted in the Oxford Local Plan 2036 (the Plan) is a key element of the wider Oxford Transport Strategy (OTS), which sits within Oxfordshire County Council's fourth Local Transport Plan (LTP4). OTS is aimed at improving access and making Oxford a better place to live, work and visit by reducing congestion, improving public transport and making Oxford more cycle and pedestrian friendly. Further information on the OTS and LTP4 can be found in the Movement and Transportation Background Paper (BGP.18) submitted as part of the evidence base supporting the Plan.

### **Setting local car parking standards within Oxford**

- 8.3. The Plan has set out an ambitious approach to car parking during the plan period. Policy M3: Motor Vehicle parking states that 'planning permission for non-residential developments will only be granted if it is demonstrated that there will be no net increase in parking provision'. The approach to parking, as set out in the Local Plan policies, will be supported by travel plans including specific operational need requiring a particular approach to implementation. On larger sites the important issue is that this is

managed comprehensively as part of a transport strategy, without this the risk is continual increases in car parking with no active measures to encourage modal shift. Sites within the city and district centre should be seeking to minimise car parking over the plan period and this is reflected in the specific site allocation policies. These sites have good access to public transport, cycling and walking routes, which provide realistic, convenient alternatives from using the private car. The city's ambitious approaches to parking and traffic congestion management (TCM) are outlined in more detail in the following paragraph.

- 8.4. Within Oxford, different approaches to parking are required depending upon the specific characteristics of the site: its accessibility, land use and connectivity to a range of travel modes other than the private car. As such, the policies in the Plan, (M1, M2, M3, M5 and site allocation policies) have been drafted in recognition of these issues yet ensuring that the overarching approach is one of promoting sustainable transport. Parking by its very nature, uses large areas of land and in a compact city such as Oxford, where land is so constrained and subject to so many competing demands, the quantum of land given over to parking needs to be carefully managed. This is also important from an air quality perspective, which is a significant issue in the city. A downward pressure on car parking helps to reduce car use which in turn can reduce air pollution and congestion and encourage a shift towards more sustainable forms of transport. Oxford has always been ambitious in its approach to traffic management and car parking; being the first city to introduce park and rides and excluding cars from the city centre as streets have been pedestrianised and bus gates introduced. These ambitious and successful traffic management interventions include improved cycling infrastructure, and new and improved bus services. This will include 'rapid transit' services on some routes which will facilitate a large increase in bus accessibility from both home (origin) and the planned expansion of the park and ride facilities including the introduction of remote park and rides, whereby users can switch the bus at an earlier stage of their journey.
- 8.5. The City Council, to combat issues around air quality, has introduced a low emission zone and is planning the introduction of a zero emission zone starting in the City Centre in 2020 and expanding up till 2035 so that the whole city is covered. Approval has already been provided for a plan which will see the introduction of electric taxis in the city and a new Low Emission Zone for buses to ensure they operate with cleaner engines. As well as plans for a zero emission zone, the County and City Council are working in partnership to develop further proposals for TCM which would aim to reduce the amount of traffic in the city overall. This approach is supported by the transport policies in Oxfordshire County Council's fourth Local Transport Plan (LTP4) and the Oxford Transport Strategy (OTS). Plan policies approach has always sought to support

this approach and this is continuing into the next phase of transport strategy. The Plan continues this approach to ensure that the strategies are aligned and effective.

- 8.6. Although Oxford's population has increased over recent years, traffic flows on key roads have not increased. Traffic flows into Oxford city centre are some 25% lower today than in the 1990s. This has been achieved through a combination of measures including restrictive car parking policies. In terms of mode share of commuting journeys, Oxford residents are significantly less reliant on the car for journeys to work, with 63% of journeys being made by sustainable modes. As such, employment sites within the city's ring road already operate with reduced parking levels as alternative travel modes (public transport, cycle/walking) are available. In terms of those commuting into the city, while the mode share for public transport trips has increased, the majority of commuters travelling into Oxford from elsewhere travel by car. Travel by car remains the dominant form of transport to most destinations beyond the ring road, in particular to the employment sites in the Eastern Arc. We consider it is justified for the plan to seek to address this issue as it is relevant to ensuring sustainable development.

#### **Justification of policy approach to car parking and suggested modifications**

- 8.7. A number of the site allocation policies in Chapter 9 of the Plan make a direct reference to parking. In addition to the bespoke parking policies and specific site allocation policies there are a number of other policies that need to be considered alongside the site allocation policies. Of most relevance are:
- Policy E1: Employment Sites that sets out the approach to supporting existing employment sites to ensure appropriate levels of protection and intensification; and
  - Policy RE2: Efficient Use of Land that sets out the approach to making the most efficient use of land, especially previously developed land.
- 8.8. It is acknowledged that the current wording for parking in some of the site allocation policies for sites is inconsistent with policy M3, and as such, the Inspector is asked to consider the following main modification:

#### **M3: Motor Vehicle Parking**

##### Paragraph 4

Planning permission for non-residential developments will only be granted if it is demonstrated that there will be no net increase in parking provision. Where site specific policies identify a different or phased approach is needed, this will be agreed and kept under review as part of a comprehensive travel plan in accordance with Policy M2.

8.9 If the Inspector is minded to accept this main modification then the only site allocation policies that require a reference to parking would be sites that fall into the following categories as set out in Table 1 below. Any sites not listed in the table below would be covered by the suggested modification within Policy M3. This will require modifications to policies in order to remove references to car parking where they would no longer be required<sup>1</sup>.

*Table 1: Site allocations policies where reference parking should be retained, and in some cases modified:*

<b><u>Categories</u></b>	<b><u>Site policies affected</u></b>
<b><u>Employment sites beyond the ring road:</u></b> these sites generate significant amounts of movement and as such, any future development proposals should be required to provide a long term management strategy that seeks to deliver sustainable transport objectives. Therefore the no net increase in car parking requirement from Policy M3 in the short term is acknowledged to be a challenge and will need to be managed through comprehensive travel plans. Modifications suggested see section below.	<ul style="list-style-type: none"> <li>• SP8:Unipart</li> <li>• SP9: Mini Plant Oxford (BMW)</li> <li>• SP10:The Science Park</li> </ul>
<b><u>Sites which include existing public car parks:</u></b> sufficient parking to serve the district centres should be retained. No modifications suggested.	<ul style="list-style-type: none"> <li>• SP6 Diamond Place and Ewert House</li> <li>• SP60 Union Street Car Park</li> </ul>
<b><u>Sites within the city centre:</u></b> it is expected that a reduction in parking can be achieved as these sites are well located with access to a full range of alternative travel modes. No modifications suggested.	<ul style="list-style-type: none"> <li>• SP55 ROQ</li> <li>• SP61 University of Oxford Science Area and Keble Road Triangle</li> <li>• SP63 West Wellington Square</li> </ul>
<b><u>Sites allocated for comprehensive redevelopment with existing uses that have a large amount of car parking:</u></b> there sites are in accessible locations and are to be wholly redeveloped for new uses, providing an opportunity to reduce parking compared to the existing uses. No modifications suggested.	<ul style="list-style-type: none"> <li>• SP1 Sites in the West End – Oxpens</li> <li>• SP2 Osney Mead</li> </ul>

### **Employment sites beyond the ring road - suggested modifications**

8.10 The City Council recognises that, operationally at the current time, the large employment sites outside the ring road may struggle to achieve a reduction in parking, particularly given that the Cowley Branch Line has yet to be delivered, that there is still uncertainty about the delivery and future route of bus services, and that TCM is still in

<sup>1</sup> SP11, SP15, SP18, SP20, SP21, SP22, SP23, SP42, SP52, SP56

an early stage. However, they are also significant travel generators, so it is important that their transport impacts are managed over time and that parking levels respond to expected improvements to sustainable travel options to this area over the plan period.

#### *BMW*

- 8.11 The City Council has reached a Statement of Common Ground (Policy SP9 proposed main modification MM17) that the wording 'a reduction in car parking provision on site' should be changed to 'no net gain in car parking provision *on site will be permitted ~~required~~ and opportunities will be sought to enhance and promote more sustainable travel modes to the Oxford BMW MINI Mini Plant*'.
- 8.12 This main modification to the policy is proposed to ensure effectiveness of the policy, by acknowledging that BMW's site specific requirements may not always result in increase of jobs, as referred to in Policy E1. The change to the parking requirement is suggested in recognition that until there is improved connectivity to the Eastern Arc by public transport, achieving the aims to reduce parking is not realistic. The Statement of Common Ground reached agreement, and recommended that the policy should be modified to state there should be no net gain in parking on the site rather than reduction, to make the policy sound.
- 8.13 BMW has agreed to the change of wording to say 'no net gain' in parking. However, given the scale of change proposed at the large employment sites outside of the ring road and the current unimproved sustainable travel options to this area, the modifications to the Unipart and Oxford Science Park policies, as put forward below, allow for possible divergence from Policy M3 (which allows no net increase in parking). If the Inspector is minded to ensure consistency across these three sites, and if BMW is satisfied that alternative wording as proposed to SP10 and SP8 below would be acceptable, Policy SP9 could also be modified in the same way.

#### *The Science Park*

- 8.14 We would like to suggest a modification to Policy SP10 to reflect the fact that a reduction in car parking may be difficult to achieve at the current time. We propose a modification to the second paragraph:

A reduction in car parking provision ~~An approach to parking that differs to the requirement set out in Policy M3 will be considered as part of a comprehensive travel plan that demonstrates that~~ opportunities will be sought to enhance and promote more sustainable travel to and from the park. The travel plan will be kept under review to ensure that future opportunities to reduce parking resulting from improved sustainable travel connections are taken.

## *Unipart*

- 8.15 We would like to suggest a modification to Policy SP8 to reflect the fact that a reduction in car parking may be difficult to achieve at the current time. We propose a modification to the second paragraph:

A reduction in car parking provision—An approach to parking that differs to the requirement set out in Policy M3 will be considered as part of a comprehensive travel plan that demonstrates that opportunities will be sought to enhance and promote more sustainable travel to and from the Unipart site. The travel plan will be kept under review to ensure that future opportunities to reduce parking resulting from improved sustainable travel connections are taken.

### **Parking in the areas surrounding employment sites**

- 8.16 The Inspector has raised concerns that the proposed approach to parking in the Plan could have significant implications for parking in the surrounding area. A number of these sites are either situated within or adjacent to existing Controlled Parking Zones (CPZs) which aim to address the issue of commuter parking in adjacent residential streets. A number of streets also have on-street parking controls in place to further deter long stay commuter parking. The adopted OTS states that in the context of controlled parking zones that the majority of streets in the city will be covered by parking restrictions.
- 8.17 The County Council in consultation with the City Council is already in the process of developing and implementing more Controlled Parking Zones and the aspiration is that the majority of the city will be covered by a CPZ during the Plan period. Further information on both existing and proposed CPZs in the city, including the timetables for new zones is available at the following web links:

<https://www.oxfordshire.gov.uk/residents/roads-and-transport/parking/parking-permits/controlled-parking-zones#new%20plans>

<https://www2.oxfordshire.gov.uk/cms/sites/default/files/folders/documents/roadsandtransport/majorprojects/ExistingandproposedzonesapprovedJune2018.pdf>

- 8.18 Paragraph 5 of the following report outlines the County Council's proposed roll out of the CPZ. The zones close to BMW are the Hollow Way and Cowley zones, all of which are likely to be progressed within 2- 5 years - category (b) - and some of them immediately – category (a).

[http://mycouncil.oxfordshire.gov.uk/documents/s45387/CMDE\\_APR2519R05%20-%20Oxforc%20CPZ.pdf](http://mycouncil.oxfordshire.gov.uk/documents/s45387/CMDE_APR2519R05%20-%20Oxforc%20CPZ.pdf)

- 8.19 In addition to the roll out of CPZs during the plan period, the County Council is also considering the introduction of a range of 'Transport Congestion Management' (TCM) measures. These could include a work place parking levy, traffic restrictions and/or congestion charging. These schemes would be implemented alongside public transport, walking and cycling improvements and would complement the existing package of measures already operating in the city.

### **Conclusion**

- 8.20 The approach to car parking in the Plan is a key contribution towards the delivery of a sustainable transport system in Oxford. The City Council is satisfied that the approach has had due regard to paragraph 105 of the NPPF (2019). The proactive approach set out in the Plan has been positively prepared to support Oxfordshire County Council in meeting the additional transport demands associated with Oxford's growth. Furthermore the approach complements many of the Plan's overall strategic objectives, particularly relating to health, climate change and air pollution.