

FAO: Planning Policy Team

Our Ref: #9715

RE: Oxford Local Plan 2036 Main Modifications - Invitation to Join

Thank you for your email of 14 February 2020, formal notification of the above consultation.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the A34.

Overall, in accordance with national policy, we look to Oxford City Council to promote strategies, policies and land allocations which will support alternatives to the car and the operation of a safe and reliable transport network. We would be concerned if any material increase in traffic were to occur on the SRN as a result of planned growth within Oxford City without careful consideration of mitigation measures. It is important that the Local Plan provides the planning policy framework to ensure development cannot progress without the appropriate infrastructure in place.

Thank you for consulting us on the following consultation documents:

- Schedule of Main Modifications
- Addendum to the Sustainability Appraisal of the Proposed Submission Oxford Local Plan 2036 (Main Modifications)

We have reviewed these documents and have the following comments:

Schedule of Proposed Main Modifications

Chapter 3 Policy H1 The Scale of New Housing Provision MM6

We note that the minimum housing target has been revised from 8,620 to 10,884 dwellings to be delivered by 2036. The Local Plans for the other Oxfordshire districts are now proposed to deliver 14,300 dwellings as opposed to 13,100 dwellings in the Submission Local Plan in order to deliver Oxford's unmet housing need. This is associated with the rise in South Oxfordshire's Local Plan from 3,750 dwellings to 4,950.

Chapter 7 Policy M2: Assessing and managing development MM31

The proposed modification is clear in the specific sustainable transport requirements needed to support significant developments within a Transport Assessment and Travel Plan and as such in line with NPPF. The additional requirement for a

1842 -
36/1 -
MM6 H1

1843 -
36/2 -
MM31
M2

Construction Management Plan is noted, as construction related HGV trips and abnormal loads are likely to use the SRN we are supportive of the 'traffic management' modification.

Chapter 7 Policy M3: Motor Vehicle Parking MM32

The Submission Local Plan confirmed that Planning Permission for non-residential redevelopment would not permit any increase in parking. The proposed Main Modification 32 states that parking requirements will be assessed in light of the submitted Transport Assessment and Travel Plan and that the presumption will be that vehicle parking will be kept to the minimum necessary to ensure the successful functioning of the development. This is a significant change in policy and we previously were advised that no assessment of any increase in employment uses was justified in terms of transport evidence to support the Local Plan as no additional parking would be provided. It is understood that there has been no additional transport evidence to support the Main Modifications proposals which is essential to demonstrate the additional growth in employment traffic is deliverable in transport terms. We would be concerned if any material increase in traffic were to occur on the SRN because of planned growth within Oxford City, without careful consideration of mitigation measures. It is important that the Local Plan provide the planning policy framework to ensure development cannot progress without the appropriate infrastructure in place.

Although individual sites might not have a significant impact, cumulatively, developments could still have the potential to impact the SRN, in terms of both road safety and congestion. It is unclear what assessment has been done to date to demonstrate the additional level of employment growth that can be accommodated in transport terms within Oxford City, which would in turn inform the Council's Infrastructure Delivery Plan, setting out what infrastructure is necessary to facilitate growth. If any of this identified infrastructure directly or indirectly relates to the SRN, we recommend early dialogue with Highways England.

When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably possible. We will support proposals that consider sustainable measures which manage down demand and reduce the need to travel. Infrastructure improvements on the SRN should only be considered as a last resort. Proposed new growth will need to be considered in the context of the cumulative impact from already proposed development on the SRN. It is vital that the deliverability of any required infrastructure that proposed growth is reliant upon is fully assessed.

Addendum to the Sustainability Appraisal (SA) of the Proposed Submission Oxford Local Plan 2036 (Main Modifications)

Paragraph 9.2 of the Addendum to the SA relates to Policy M3 of the Proposed Submission Oxford Local Plan and states, "*The appraisal at Table 9.2 assumes that, as a result of the site modifications together with modifications to Policy M3, parking provision at the sites would stay the same or increase, rather than reducing or staying the same; and that overall in Oxford the modifications will lead to more parking provision – although not much more – in Oxford.*" As discussed above, in

1844 -
36/3
MM32
M3

1845 -
36/4 - SA

relation to MM32, there is no commentary in relation to any updated transport evidence base in light of this policy change.

However, within the Addendum SA the impact of this policy change is expected to lead to, *“Increased parking would discourage ‘smarter choices’ including public transport, walking and cycling; and worsen air quality... Increased parking at employment sites would facilitate car access to these sites. However they would not contribute to a low-carbon economy, would increase congestion in the city.”* We request that further consideration and clarification as to the transport impacts of this main modification is provided to ensure that the Local Plan is based on a robust transport evidence base.

I hope that this response is helpful and we look forward to working with you as you develop the Local Plan.

Kind regards,

Zoe Townend, [REDACTED]

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