

Supporting Documents and General/Other Responses

Contents:

Supporting Documents and General/Other Responses.....	1
Headlines:	1
Supporting Documents.....	2
Sustainability Appraisal	2
All Public Responses	2
Statutory Consultee Responses.....	3
Health Impact Assessment	6
All Public Responses	6
Statutory Consultee Responses.....	7
Background Papers	8
All Public Responses	8
Statutory Consultee Responses.....	9
Evidence Base	9
All Public Responses	11
Statutory Body Responses.....	14
General/Other Responses	22

Headlines:

- General responses look at the overall consultation process
- Other general responses mentioned various transport issues
- There are sections looking at general comments about supporting documents for the Local Plan, such as the Sustainability Appraisal, Health Impact Assessment, Background Papers, and Evidence Base.

Supporting Documents

Sustainability Appraisal

All Public Responses

Topic	Summary	Response
Don't deter housing development	Care needed not to make things too bureaucratic when it comes to housing development. The crisis is acute and builders should not be deterred from delivering.	The Sustainability Appraisal process is a tool that helps to inform the development of the Local Plan. It does not, in of itself, create any additional burden for developers when they come to making an application.
General	It seems quite thorough	Comment noted.
More focus on environmental improvements	Needs more focus on Oxford to be green, blue, clean air, low car, big on public transport, litter free, with penalties for cars parked on curbs. Other similar comments including need for more community gardens with edible plants and food forests, as well as even greener developments (more trees for shade) and more solar panels on buildings.	The Sustainability Appraisal framework addresses these various considerations across several of its objectives (e.g. Objective 7 Green Infrastructure; Objective 8 Traffic and Air Pollution). As set out above, the SA's role is to help inform the development of the Local Plan, which in of itself has various policies across Chapter 4 and 7 which address different aspects of this comment where appropriate.
More focus on educational inputs	The sustainability appraisal has taken consideration on environmental conservation and health but is lacking educational inputs. These should cover diversity and inclusion, British culture, political systems, institutions, laws, community concepts, religions, ethnicities and local history regardless of where residents are from.	We will look to draw these considerations into the relevant underlying background papers where they are not already mentioned and where this would be of relevance to the Local Plan.
Public transport	Sustainability appraisal is lacking proposals for making public transport viable and attractive.	The Sustainability Appraisal helps to inform the development of the Local Plan. The Local Plan includes a range of policies intended to support access to public transport.

Sustainability issues not taken seriously	A couple of comments flagging concern that report does not take sustainability seriously and that there is too much focus on growth without due concern for climate change, protecting environment, the health/needs of local residents.	A key role of the Local Plan, which the Sustainability Appraisal helps inform, is about guiding growth to happen in the right way for the city. Nevertheless, the Sustainability Appraisal framework which is used throughout the report includes objectives that address all three pillars of sustainability (the environmental, social and economic).
Site specific scoring	Comments on sustainability appraisal scores for particular sites in their interim site assessment forms.	The Council will be reviewing the sustainability appraisal scores for all the sites being taken forward to Regulation 19 and updated forms will be published alongside this report. Scores will be updated where appropriate.

Statutory Consultee Responses

South Oxfordshire District Council and Vale of White Horse District Council

Topic	Summary	Response	Outcome
SA	While the Sustainability Appraisal (SA) purports to test three housing options, the assigned SA scores, especially for the City Council's preferred Option B, lack clear and transparent justification. It is not evident why Option B consistently receives more positive scores than Options A or C in numerous instances. This appears to be based on an incomplete assessment. The SA commentary itself indicates that judgements are made without considering the full sustainability impacts of unmet housing need being accommodated outside the City's administrative boundary. Crucially, the sustainability impacts of cross-boundary housing provision do not disappear at the border; they are displaced. These distributed impacts,	While the assessment of cross boundary impacts does represent a part of the SA/ SEA process, when assessing the sustainability impacts of the plan, it is important that the core assessment focuses on the impacts of the strategy within the local authority administrative area. Any assessment of the cross-boundary	We will take steps to ensure that the SA is legally compliant

Topic	Summary	Response	Outcome
	<p>particularly those associated with Option B's reliance on external provision, could be worse than those of Options A or C. For example, accommodating development across more dispersed areas, potentially distant from Oxford's public transport routes, is highly likely to lead to increased car dependency and significantly higher carbon emissions due to longer commuting distances.</p> <p>SA Objective 3: The testing under SA Objective 3 focuses primarily on judgements related to densities and the loss of green space. However, it fails to explicitly evaluate the impact of the options on the Green Belt, despite the Green Belt being directly mentioned within the scope of SA Objective 3 itself. This is a significant omission.</p> <p>SA Objective 7: SA Objective 7's conclusions are based on the identical impacts of density and green spaces already assessed under SA Objective 3. This is unnecessary duplication of testing and analysis, which raises questions about the thoroughness and efficiency of the SA process. A robust and unbiased re-evaluation of the housing options should be undertaken.</p> <p>Oxford Wastewater Treatment Work is mentioned in the Sustainability Appraisal as important infrastructure to upgrade to enable growth in and around Oxford (page 47). This is located within South Oxfordshire and facilitated by the adopted and emerging Plans of South Oxfordshire, but South Oxfordshire District Council isn't mentioned as a partner to work with on the delivery of the necessary upgrades.</p>	<p>implications of delivering homes outside of Oxford's administrative boundary would depend on where these homes would be delivered – this is not something that is within the City Council's procedural jurisdiction. The location of the new homes delivered outside city boundary (including those to meet Oxford's unmet housing need), is a matter for each partner authority to engage with in the production of their own plans. The City Council is aware that homes previously allocated in neighbouring districts Local Plans to meet Oxford's unmet housing need were done so as close to the city as possible.</p> <p>SA Objective 3: we will look to ensure that the findings of the Green Belt assessment are</p>	

Topic	Summary	Response	Outcome
		<p>incorporated into the SA report for transparency.</p> <p>SA Objective 7: the SA Framework provides the key SA indicators that are considered for each SA objective.</p> <p>Noted – Thames Water are leading on this project and they will be involving partners as appropriate.</p>	

Health Impact Assessment

All Public Responses

Topic	Summary of Comments
Future health implications	The HIA should ensure future health of Oxford and provide estimated cost for any damaging scenario to avoid future implications.
Physical and mental wellbeing benefits of open spaces	More emphasis should be given to the benefits of all open spaces and closed spaces should be open to everyone.
HIA should go further	The HIA and plan should go further to address the major known issues in Oxford.

Statutory Consultee Responses

Oxfordshire County Council

Topic	Summary	Response	Outcome
Evidence Base – HIA Screening Report	<p>Public Health</p> <p>This document provides a useful guide and includes some of the essential criteria for measuring the health of a population, such as life expectancy. However, it also needs to include reference to 'healthy life expectancy', which is a crucial indicator of local health inequalities and helps the assessor to uncover potential mitigative action to promote healthier lives and reduced pressure on health services. The document makes reference to Oxfordshire's HIA toolkit but with no clear link or indication of where the user can access this guidance.</p> <p>Please include a link to the Oxfordshire Leader's Joint Committee website where appropriate. It is useful that the document signposts the user to the JSNA, however this has now been replaced by the Oxfordshire Data Hub – Welcome to the Oxfordshire Data Hub. There needs to be a reference to this as a key data source, along with others such as Census and ONS.</p>	Noted. Thank you for the update. We will seek to review and ensure that correct references are included.	No Action Required Oxford City Action Consider including reference to OLJC Website and note that the JSNA has been replaced by the Oxfordshire Data Hub

Background Papers

All Public Responses

Topic	Summary of Comments
Background Paper 001	<ul style="list-style-type: none">• Urges to set a housing requirement above the Standard Methodology• Criticises the lack of reference to the PPG• Prefers option C
Permanent Residential Moorings	<ul style="list-style-type: none">• Very few suitable sites for mooring but strong demand• Include better power hook-ups, conservation areas must have no moorings.

Statutory Consultee Responses

Oxfordshire County Council

Topic	Summary	Response	Outcome
009 BGP Natural Resources	<p>Minerals & Waste</p> <p>Delete reference that states “Work is underway on a new Minerals & Waste Plan which would cover the period to 2042.”</p> <p>It should be included that Oxfordshire County Council are the Waste Planning Authority and responsible for planning for the management and disposal of Wastewater and Sewage sludge (Policy W10)</p>	<p>We can delete this reference to reflect the information on the County website when we update the Background Papers.</p> <p>Will consider which document is best suited to include this information.</p>	<p>Oxford City Action: delete reference from BGP9</p> <p>Oxford City Action: Consider inclusion of suggested text.</p>
BGP 010 Health and Wellbeing	<p>Public Health</p> <p>The Health and Wellbeing chapter of the Sustainability Appraisal is welcomed. Draft Policy HD10: Health Impact Assessments needs to be specific on the threshold for triggering the need for a developer to conduct an HIA. For example, requiring all developments which include 50 or more residential units, or over 1,000sq.m if</p>	<p>Noted. Already covered in Policy HD10 HIA.</p>	<p>No Action Required</p>

<p>commercial, to do an HIA, as is the case in Birmingham's Local Plan.</p> <p>This helps to remove any ambiguity over whether or not a development requires an HIA and should actually remove some of the extra burden that has been outlined as a potential negative consequence of this approach in the SA. As such, Option A is my preferred approach for this policy, on the basis that formal thresholds are included.</p>		
--	--	--

Evidence Base

All Public Responses

Evidence base	<p>The HBF note that the Council has not included a housing trajectory within the draft regulation 18 local plan, nor could we find one within the evidence base. Given that the NPPF states in paragraph 74 that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period we would expect to see such a trajectory in the submitted local plan. The Council should also provide an annualised trajectory setting out when each site contributing to the city's housing supply will come forward and the rate at which it will deliver. Previously the HEELA provided an indication of supply rates within five-year tranches, however this lacks the detail necessary for effective scrutiny of the deliverability of the submitted plan. Only an annualised trajectory will allow interested parties to effectively scrutinise land supply over the whole plan period and by extension the level of unmet needs arising over the plan period.</p>	<p>A trajectory is included in the Draft Submission Local Plan. It is not realistic for the SHLAA to provide an annual breakdown against sites for those delivering in the later stages of the plan period as there are too many uncertainties.</p>
Evidence base	<p>Hallam considers that the evidence based studies being undertaken to support the preparation of the plan should not be simply restricted geographically to Oxford and be broadened to joint strategic studies with the neighbouring authorities, none more so than to undertake a strategic review of the Oxfordshire Green Belt. Whilst the evidence base includes Oxford Green Belt Additional Site Assessments, this will only serve to clarify the limited and constrained opportunities for the city to accommodate additional housing. A strategic Green Belt review is necessary if the city's unmet need is to be met whilst promoting sustainable patterns of development.</p>	<p>Although an update has been made to the Green Belt assessment following changes to the NPPF, it still broadly follows the methodology developed jointly through the Oxfordshire Growth Board. The City Council cannot make decisions on how neighbouring authorities consider Green Belt within their areas.</p>
Evidence base – Green Belt Assessment of Additional Sites	<p>Strongly oppose going ahead with this grey belt designation for Cutteslowe park- it is obviously inappropriate - green and biodiverse park (including all the sports fields hay meadow and planted trees and the allotments).</p>	<p>Cutteslowe Park is not being removed from the Green Belt designation through the Local Plan process. Grey belt is not a formal designation.</p>

	<p>Do not want to see any of the sites on the list for possible designation as grey belt to go forward in the final plan as this makes them easier in future to release for building. Would be total abdication of responsibility for the biodiversity on these sites by the council and for the experience/well-being of visitors.</p>	
Evidence base – Lye Valley SSSI Hydrogeological Impact Assessment Report	<p>Study appears to consider only the needs of the SSSI fen areas and not the old fen areas on peat within the LWS that surrounds the two SSSI sections.</p> <p>Not enough evidence that development can continue within the catchment without future harm to Lye Valley fen habitats in the face of predicted future Climate Change. Report actually appears to support more small developments in the calculated fen catchment.</p> <p>Disagree with conclusions in Section 6.2.2 regarding recharge to site, and also page 89's wording that says some features of the site are relatively robust and insensitive to change, which ignore impact of volunteers maintaining site.</p> <p>Monitoring includes some of the wettest years recently and ignores other much drier years (e.g. 2018, or this year's drought)- Longer term hydrological study was needed.</p> <p>Don't consider that the comments on precautionary measures in the Lamberth report of 2007 can be regarded as superseded by conclusions in this JBA report – factors in no precautions about future climate change, unlike the Lamberth report (which should therefore be maintained as important baseline).</p>	<p>Whilst the Lye Valley study is focused on impacts on the SSSI, as this is afforded the highest level of protection, the findings and analysis should help to inform the approach to protecting the wider area including other associated designations. The study provides an additional level of analysis and understanding about the hydrogeological functioning of the areas and its key sensitivities which was not available previously. As with any study, there might be additional benefits in longer term monitoring and analysis in helping to expand evidence, however, this is not always practical within existing time constraints and resources. Whilst there may be some disagreement as to the methodologies and conclusions, the study is a useful piece of additional evidence supporting the approach to handling applications that might affect the Lye Valley. It supports the ongoing protection of the wider Lye Valley but highlights that</p>

		<p>‘protection’ varies in how it should be undertaken depending on the location and particular impact pathway mechanisms, which will help applicants in meeting their responsibilities set out in national and local policy.</p>
--	--	--

Statutory Body Responses

Oxfordshire County Council

Topic	Summary	Response	Outcome
Evidence Base – HIA Screening Report	<p>Public Health</p> <p>This document provides a useful guide and includes some of the essential criteria for measuring the health of a population, such as life expectancy. However, it also needs to include reference to 'healthy life expectancy', which is a crucial indicator of local health inequalities and helps the assessor to uncover potential mitigative action to promote healthier lives and reduced pressure on health services. The document makes reference to Oxfordshire's HIA toolkit but with no clear link or indication of where the user can access this guidance.</p> <p>Please include a link to the Oxfordshire Leader's Joint Committee website where appropriate. It is useful that the document signposts the user to the JSNA, however this has now been replaced by the Oxfordshire Data Hub – Welcome to the Oxfordshire Data Hub. There needs to be a reference to this as a key data source, along with others such as Census and ONS.</p>	<p>Noted.</p> <p>Thank you for the update. We will seek to review and ensure that correct references are included.</p>	<p>No Action Required</p> <p>Oxford City Action Consider including reference to OLJC Website and note that the JSNA has been replaced by the Oxfordshire Data Hub</p>

Topic	Summary	Response	Outcome
Evidence Base – HRA	<p><u>Landscape and Nature Recovery – Biodiversity</u></p> <p>It is noted that atmospheric/air pollution has not been identified as a potential impact pathway with Little Wittenham SAC. Further justification for this decision would be requested as it is considered atmospheric pollution could still impact this site and its designated features.</p> <p>The HRA identifies that likely significant effects on Oxford Meadows SAC in the absence of mitigation have not been ruled out. If these impacts cannot be ruled out through Appropriate Assessment then it is recommended that these sites are removed from the Local Plan.</p>	<p>Natural England do not consider this an issue. NE guidance considers for air pollution associated with a plan to have an impact on a designated site, that site needs to be within 200m of a road. The Little Wittenham SAC (designated for Great Crested Newt breeding ponds), is located more than 200m from any likely source of air pollution. JNCC does not consider air quality to be an issue.</p> <p>Noted. A dialogue with NE is on-going. The HRA will be updated to support the forthcoming Reg. 19 consultation.</p>	<p>No Action Required</p> <p>No Action Required</p>

Topic	Summary	Response	Outcome
ELNA	<p>The principle of a county-wide FEMA is supported.</p> <p>The ELNA needs to be updated at paragraph 2.42 in respect of Cherwell's employment land needs, to align with the information found the Cherwell Local Plan 2042 submission documents.</p> <p>The pattern of employees travelling from neighbouring authorities will be exacerbated unless residential development is prioritised in city above providing additional employment floorspace.</p> <p>The ELNA suggests that industrial/warehousing space is accommodated outside the city and refers to locations within Cherwell District. There has been no formal request or</p>	<p>Support noted.</p> <p>The ELNA has been updated in respect of Cherwell's latest employment land needs position.</p> <p>The city's strategy is to prioritise new sites for housing. However, intensification of existing employment sites is needed in order to meet the city's identified employment needs.</p> <p>The ELNA describes the current situation regarding warehousing, i.e., limited demand within the city as it is not a good location for such uses. There is no request for unmet warehousing need to be taken.</p>	

Topic	Summary	Response	Outcome
	agreement for unmet warehousing need. Clarity on this point would be welcomed.		

South Oxfordshire District Council and Vale of White Horse District Council

Topic	Summary	Response	Outcome
ELNA	<p>1. We are concerned that the interim ELNA does not adequately define the city's employment needs, which means effective and informed consultation is impossible.</p> <p>2. We do not recognise the collaborative Oxfordshire-wide study on the need and supply of logistics (2.17-2.19) and the assertion that past practice is for logistics need to be met outside the city is made without supporting evidence. This has potential to significantly and negatively impact the planning and development within districts.</p> <p>3. Concur with the definition of Oxford's FEMA being Oxfordshire, but we strongly object to the inappropriate critique of other established local FEMA designations. The study conflates the OGNA and AECOM's ELNA for S&V only and so</p>	<p>1. The Interim ELNA did not include the city's employment land needs. This will be available as part of the Reg. 19 evidence.</p> <p>2. There is no reference to an Oxfordshire-wide study on need and supply of logistics in para 2.17-2.19.</p> <p>3. A review of existing FEMAs was considered a useful exercise by our ELNA consultants as it provided a useful context for establishing Oxford city's FEMA.</p>	No Further Action.

Topic	Summary	Response	Outcome
	<p>wrongly suggests AECOM were establishing the FEMA for Oxford or Oxfordshire.</p> <p>4. Reference to a HMA in para 3.36 is factually incorrect.</p> <p>5. We note the intention to use 2021 Census data, but this is generally considered to have significant limitations for commuting pattern analysis. It leads to inconsistencies with evidence bases of neighbouring authorities, and this poses a risk to future collaborative planning efforts and could undermine the efficacy of joining strategic approaches across the wider Oxfordshire area if required.</p>	<p>4. The S&V ELNA considers that the HMA is “the majority of” Oxfordshire (para.4.28)</p> <p>5. Limitations of the 2021 Census are noted however it does represent the most recent Census data.</p>	
Evidence base - Specialist housing needs assessment	<p>1. It is a significant omission to not include households climbing out of need as part of stage 4 of the methodology, and Table 4.5.</p> <p>2. The Housing Needs Assessment (HNA) needs to consider the impact of in and out migration.</p> <p>3. The Housing Need Assessment HNA should provide links within the footnotes to any data used, such as Office for National Statistics (ONS) modelled income estimates and data from the English Housing Survey (EHS) or Annual Survey of Hours and Earnings (ASHE).</p> <p>4. We suggest that the HNA consider using housing benefit eligibility criteria to inform need.</p>	<p>1. Table 4.5 shows simply projected housing need arising per annum. Whether existing affordable homes may become available is considered in the supply section.</p> <p>2. The impacts of in and out migration are considered in the demographic analysis that forms the basis of much of the assessment.</p> <p>3. Links can become out of date. As long as it is clear what</p>	

Topic	Summary	Response	Outcome
	<p>The current use of an income multiplier does not take account of different household circumstances and the 35% multiplier currently chosen has no justification.</p> <p>5. There needs to be a reliable data source for the number of households living in unsuitable housing. 6. Paragraph 4.15 identifies that 'current need is estimated to be 2,446 households'. There should be a description provided about how this figure is arrived at. It also bears no relation to figures in table 4.3, so this should be explained.</p> <p>7. Table 4.4 estimates current affordable housing need by affordability. There needs to be a reliable data source provided for this estimate.</p> <p>8. Paragraph 4.19 estimates that 1,160 new households would form annually and two-thirds will be unable to afford market housing, equating to 708 newly forming households of need per annum on average. The assumptions made to inform these figures needs to be explained.</p> <p>9. Paragraph 4.20 should identify the period considered, and it should provide any data that has informed this section, such as the additions per year to register, if that's what is used.</p> <p>10. Paragraph 4.22 cites the sources used and the time period to identify supply through relets. As this is not stated for elements of need it's not possible to determine if the time periods align. The choice of a 3-year period should also be justified because the oldest figure of the 3 years</p>	<p>the source is, this should be adequate.</p> <p>4. Using a percentage of household income to estimate affordability is a common and standard approach. Previous MHCLG guidance has recommended the use of a % of gross household income in assessing affordability and ONS continues to use this approach.</p> <p>5. Table 4.3 is a collation of different types of unsuitable housing (e.g. overcrowding), compiled by Iceni from the preceding parts of the analysis, which are all sourced individually.</p> <p>6. The households in unsuitable housing in Table 4.3 is a starting point, but not itself indication of the level of need- there are exclusions of those who are likely to be able to afford market housing and those already in affordable housing. Once excluded, the figure of 2,446 is derived. This is clearly explained in paragraph 4.15</p>	

Topic	Summary	Response	Outcome
	<p>has the lowest number of relets, which may inadvertently assume a lower supply.</p> <p>11. Paragraph 2.45 requires a data source for the 251 homes sold below the lower quartile price.</p> <p>12. Paragraph 4.33 to 4.34 indicates the need of those who can't afford to rent on the market could be met through affordable rents. However, Policy H2, part b only requires social rents. This requires justification, particularly as the delivery of more social rents impacts viability and the thresholds for the Policy.</p> <p>13. The analysis on shared ownership, first homes and rent to buy is a simplistic comparison of likely affordability of different products and it should link to data on incomes, savings, and identify the number of households able to afford.</p>	<p>7. This 2,446 number is derived as explained in response to point 6.</p> <p>8. The second element of newly arising need is existing households falling into need. To assess this, information about existing households who have been housed in social/affordable rented sector housing over the last three years has been used to represent the expected annual flow of existing households falling into need. The analysis excludes transfers.</p> <p>9. Paragraph 4.20 gives annual figures. The plan period is used for all the demographic data behind calculations. The paragraph is clear that information about households entering the social/affordable rented sector has been used to represent the expected flow of households onto the housing register over the plan period.</p> <p>10. Equally, selecting only two years, that avoids the lower year, could over-estimate supply. Three years is considered a robust enough time period to give a good</p>	

Topic	Summary	Response	Outcome
		<p>idea, whilst remaining recent enough to be relevant. It is in line with the PPG, which makes reference to consideration of recent trends.</p> <p>11. The number is derived using Land Registry data</p> <p>12. It is not correct that Policy H2 only requires social rents. Part of the tenure split includes intermediate forms of affordable housing. However, it is also the case that social rent is prioritised because it meets the needs of those in greatest housing need. Also, standard affordable rent discounts are not considered affordable in Oxford, so a greater degree of discount would be required for it to be considered affordable housing in Oxford.</p> <p>13. the analysis is considered fit for purpose.</p>	

General/Other Responses

Topic	Summary	Response
15-minute cities	Support for the 15-minute cities concept – it was not publicised well, but it has worked in other cities.	Noted.
Recreation grounds	These sites are used by residents, football teams and clubs from all ages and all walks of life. To lose these would be at the detriment of the area and locals, especially young people.	The detailed site allocation policies seek reprocision of sports facilities.
Clarity over how housing figures have been reached	There should be greater clarity regarding: <ul style="list-style-type: none"> the capacity for housing within the city's administrative boundaries; why the plan period start date of 2022 has been chosen; how the housing figures from the existing OLP and the extant Local Plans for neighbouring local authorities relate to the housing requirement over the new plan period; and the approach to be taken to meeting residual unmet need. 	Since the Reg 18 consultation the plan period has been adjusted to 2025 – 2045. Policy H1 calculates housing need using the Standard Method, and latest government affordability data.
More deference to national policy	Re-stating the NPPF's contaminated-land rules, the Environment Act's 10 % biodiversity-net-gain requirement or the Future Homes Standard's net-zero-ready fabric provisions does not enhance protection; it merely piles extra reports onto applicants.	The city has a local net zero target of 2040 and the national requirement is 2050. Many policies are bespoke to ensure we meet this target.
Council tax is too high	The excessive regulation enforced by the Council means Council Tax is too high. People can't afford to buy houses because they are having to subsidise social housing.	This is beyond the remit of Planning.
Transport issues	<ul style="list-style-type: none"> Please could you find ways to stop cars and traffic dominating our city? Please could you make park and ride work? Please could you stop stationary traffic where queues of drivers try to get into the Westgate Centre? If that continues to be the reality once the 	The City Council will continue to work with the County Council to identify potential solutions to these issues, with the aim of enhancing public realm. However, the details of this work, and implementation of schemes, will be led by

Topic	Summary	Response
	<p>Botley Road is open again, it will be very bad.</p> <ul style="list-style-type: none"> • Please could you find ways for cyclists to be able to use the roads without confronting potholes and drain covers with large gaps around them? • Please could you find a way for cyclists to go east west without having to dismount from their bikes? • Please could you stop buses driving up Queen Street? • Traffic congestion is significantly caused by private school drop-offs. • Proper cycle highways and trams needed to connect the city. • Move the coach station to the Becker street carpark next to the main station to save public transport network and pedestrian accessibility. 	<p>the County Council as Highways Authority and are outside the realm of the Local Plan.</p>