

The Local Plan 2045 will be used to ensure Oxford is a fairer, greener and healthier city

OXFORD LOCAL PLAN 2045

OXFORD CITY COUNCIL

Oxford City Council Response to Inspectors' Matters, Issues, and Questions

Matter 12: Transport

Issue 1 – Transport Assessments (Policy C6)

Q1 Policy C6 states that planning permission will only be granted where the City Council is "…satisfied that necessary transport-related measures will be put in place." Is this sufficiently clear to decision-makers, developers and the local community? Is the policy effective?

To provide greater clarity we propose the following modification to the first line of Policy C6:

"Planning permission will only be granted for development proposals that prioritise sustainable and active travel modes, and that mitigate adverse impacts on the transport network. ~~if the City Council is satisfied that necessary transport-related measures will be put in place.~~"

This modification would provide more certainty for users about the requirements of the policy which are then detailed in the subsequent paragraphs. The policy clearly states that Transport Assessments (TA) must demonstrate the transport measures which would be used to mitigate the development's impact and in doing so facilitate the outcomes under criteria a) to h) of Policy C6. Appendix 7.2 sets out the scenarios where a TA will generally be required, highlights what TAs should address, and confirms that any document should be easy to understand for non-technical people.

A Travel Plan (TP) must be submitted for development that is likely to generate significant amounts of movement, which is consistent with paragraph 118 of the NPPF 2024. Appendix 7.3 confirms the specific circumstances in which a Travel Plan (TP) will be required to be submitted alongside planning applications, including individual uses and their thresholds for requiring a TP. TPs should address objectives, measures, and targets for implementation; detailed guidelines can be found under Appendix 7.3.

This approach, taking into account the proposed modification, is effective because it encourages measures that reduce the need to travel and manage congestion whilst promoting sustainable modes of travel within the city. Without a requirement to assess and manage traffic-related impacts, this may result in an increase in congestion and a lack of provision for active and sustainable ways of travel.

Q2 Is the test of "no unacceptable impact" on highway safety consistent with national planning policy?

Yes, paragraph 116 of the NPPF 2024 states that "development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety…". Criterion a) of Policy C6, which relates to "no unacceptable impact on highway safety", uses the same terminology and is therefore considered to be in line with national policy.

Q3 Are the thresholds in Appendix 7.3 and Policy C6 justified?

The thresholds set out in Appendix 7.3 have been taken from Appendix 1 of the Oxfordshire County Council Transport for New Developments: Transport Assessments and Travel Plans

document (March 2014). This has now been superseded by the County Council's Implementing Decide & Provide: Requirements for Transport Assessments document (January 2026), although this does not include specific travel plan thresholds, instead these are set out in the following Guidance Note on the County Council's website (https://www.oxfordshire.gov.uk/transport-and-travel/transport-policies-and-plans/transport-new-developments/travel-plans-statements-and-advice/travel-plan-and-monitoring-fee).

To ensure that the thresholds set out in Appendix 7.3 are justified and up-to-date with the County Council's thresholds we propose the following modification to Policy C6:

"A Travel Plan, or Travel Plan Statement, which has clear objectives, targets and a monitoring and review procedure, must be submitted for development that is likely to generate significant amounts of movement in accordance with the thresholds set out in Appendix 7.3. Travel Plans and Travel Plan Statements must support outcomes (a) to (h) set out above."

And the following modification to Appendix 7.3:

~~Proposals over the following thresholds will require a TP:~~

~~Food retail . . . . . 1,000m2~~

~~Non-food retail . . . . . 1,000m2~~
~~Leisure . . . . . 1,000m2~~

~~Cinemas and conference facilities . . . . . 1,000m2~~
~~Stadiums . . . . . 1,500 seats~~
~~Offices . . . . . 2,500m2 B2~~
~~industry . . . . . 5,000m2~~

~~B8 distribution and warehousing . . . . . 10,000m2~~
~~Hospitals . . . . . 2,500m2~~

~~Higher and further education . . . . . 2,500m2~~

Land Use	Size of development	Type of Travel Plan
E(a) Display or retail sale of goods, other than hot food	Over 3,500m^2	Travel Plan
	100-3499m2	Travel Plan
	250-999m2	Travel Plan Statement
E(a) Display or retail sale of goods, other than hot food	Over 3500m^2	Travel Plan
	1500-3499m^2	Travel Plan

	800–1499m²	Travel Plan Statement
E(c)(i) Financial services, E(c)(ii) Professional services (other than health or medical services)	Over 3500m² 2500-3499m² 1000–2499m²	Travel Plan Travel Plan Travel Plan Statement
E(b) Sale of food and drink for consumption (mostly) on the premises	Over 3500m² 2500-3499m² 300–2499m²	Travel Plan Travel Plan Travel Plan Statement
Sui Generis. Drinking Establishments public houses, wine-bars or other drinking establishments.	Over 1000m² 300–999m²	Travel Plan Travel Plan Statement
Sui Generis. Hot Food takeaway eaten on or off the premises	Over 1000m² 250 to 999m²	Travel Plan Travel Plan Statement
E(g) Uses which can be carried out in a residential area without detriment to its amenity: E(g)(i) Offices to carry out any operational or administrative functions, E(g)(ii) Research and development of products or processes	Over 5000m² 2500-4999m² 1500-2499m²	Travel Plan Travel Plan Travel Plan Statement

E(g)(iii) Industrial processes		
B2 General industrial - Use for industrial process other than one falling within class E(g) (previously class B1) (excluding incineration purposes, chemical treatment or landfill or hazardous waste)	Over 5000m^2 4000-4999m^2 2500–3999m^2	Travel Plan Travel Plan Travel Plan Statement
B8 Storage or distribution - This class includes open air storage.	Over 7500m^2 3000-7499m^2 2000-2999m^2	Travel Plan Travel Plan Travel Plan Statement
C1 Hotels - Hotels, boarding and guest houses where no significant element of care is provided (excludes hostels)	Over 150 bedrooms 100 to 149 bedrooms 75 to 99 bedrooms	Travel Plan Travel Plan Travel Plan Statement
C2 Residential institutions – Residential care homes, hospitals and nursing homes	Over 75 beds 50 to 74 beds 30 to 49 beds	Travel Plan Travel Plan Travel Plan Statement
C2 Residential institutions - Boarding schools, residential colleges and training centres	Over 225 students 150 to 224 students 50 to 149 students	Travel Plan Travel Plan Travel Plan Statement

C2A Secure Residential Institution - Use for a provision of secure residential accommodation, including use as a prison, young offenders institution, detention centre, secure training centre, custody centre, short term holding centre, secure hospital, secure local authority accommodation or use as a military barracks	Over 600 residents 400 to 599 residents 250 to 399 residents	Travel Plan Travel Plan Travel Plan Statement
C3 Dwellinghouses - This class is formed of three parts • C3(a) covers use by a single person or a family (a couple whether married or not, a person related to one another with members of the family of one of the couple to be treated as members of the family of the other), an employer and certain domestic employees (such as an au pair, nanny, nurse, governess, servant, chauffeur, gardener, secretary and personal assistant), a carer and the person receiving the care and a foster parent and foster child • C3(b) covers up to six people living together as a single household and receiving care e.g. supported housing schemes such as those for people with learning	Over 400 homes 200 to 399 homes 80 to 199 homes 50 to 79 homes 10 to 49 homes	Travel Plan Travel Plan Travel Plan Travel Plan Statement Travel Information Pack

disabilities or mental health problems • C3(c) allows for groups of people (up to six) living together as a single household. This allows for those groupings that do not fall within the C4 HMO definition, but which fell within the previous C3 use class, to be provided for i.e. a small religious community may fall into this section as could a homeowner who is living with a lodger • C4 Houses in multiple occupation - Small shared houses occupied by between three and six unrelated individuals, as their only or main residence, who share basic amenities such as a kitchen or bathroom.		
• E(e) Provision of medical or health services (except the use of premises attached to the residence of the consultant or practitioner) • E(f) Creche, day nursery or day centre (not including a residential use) • F1(a) Provision of education • F1(b) Display of works of art (otherwise than for sale or hire)	Over 1500m^2 1000 to 1499m^2 500 to 999m^2	Travel Plan Travel Plan Travel Plan Statement

• F1(c) Museums • F1(d) Public libraries or public reading rooms • F1(e) Public halls or exhibition halls • F1(f) Public worship or religious instruction (or in connection with such use)		
F2(c) Areas or places for outdoor sport or recreation (not involving motorised vehicles or firearms) F2(d) Indoor or outdoor swimming pools or skating rinks Sui generis: • cinemas; • dance and concert halls; • sports halls & swimming baths; • gymnasiums; • bingo halls; • casinos	Over 2250m^2 1500 to 2249m^2 500 to 1499m^2	Travel Plan Travel Plan Travel Plan Statement

Schools / Education

Land Use	Type of development	Type of travel plan
Schools / Education	New Increase in the school roll	Travel Plan Updated Travel Plan

Q4 What is required of Delivery and Service Management Plans? In particular, where Policy C6 requires a 'consideration' of factors? Is this effective?

Delivery and Service Management Plans will be required for proposals that would affect the city or district centres and for sites near residential areas. This is set out in the policy implementation text under bullet 3. They should lay out how deliveries will be managed and specify how any negative impacts will be minimised. The inclusion of delivery and service plans as part of the assessment process will help to mitigate potential negative impacts arising from deliveries and servicing by requiring consideration of how congestion, safety and noise will be managed. This is especially important within busy and confined areas, including the city centre, and sites near residential areas, hence why the 'Policy Implementation' text makes specific reference to these areas. The policy wording does not include a requirement for the "consideration" of factors in general terms, rather it explicitly states what elements should be included within a Delivery and Servicing Plan. As such, the policy is considered to be effective.

Issue 2 – Parking Design Standards (Policy C7 and C8)

Q1 Is the approach to parking standards consistent with national planning policy in paragraph 112 of the Framework, which sets out the factors to take into account when setting standards?

Yes, Policies C7 and C8 are consistent with the considerations identified under paragraph 112 of the NPPF 2024. Paragraph 112 states:

If setting local parking standards for residential and non-residential development, policies should take into account:

> *a) the accessibility of the development;*
>
> *b) the type, mix and use of development;*
>
> *c) the availability of and opportunities for public transport;*
>
> *d) local car ownership levels; and*
>
> *e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.*

For Policy C7, which relates to cycle parking provision, paragraph 112 a, b, and e would be applicable. Policy C7 sets minimum standards for cycle parking for residential and non-residential developments. Oxford is a cycle friendly city which is highly accessible for wheeling and cycling as a result of the city wide cycle infrastructure. As such, cycle parking requirements are set across the city on the basis that all development locations will be accessible to some degree.

The policy allows for cycle parking lower than the minimum standards if new student accommodation is located close to the institution where most of its occupants will be studying. It also makes clear reference to multiple different uses and types of development i.e. student accommodation, commercial, non-residential and residential. Additionally, paragraph 5 of the policy states that cycle parking should be designed to include electric charging infrastructure for E-bikes. As such, Policy C7 is considered to be consistent with paragraph 112 a, b, and e.

The approach to motor vehicle parking design standards set out by Policy C8 is also consistent with the considerations identified under paragraph 112 of the NPPF 2024. For low car residential developments, the accessibility of the site and its connectivity with public transport services is referenced under criterion b) and c) of Policy C8. In relation to non-residential development, the Council will seek a reduction in parking for highly accessible sites. On less accessible sites, additional parking provision may be acceptable if this can be justified through the submission of a Transport Assessment (TA). Furthermore, a Transport Plan (TP) should set out measures to maximise the use of public transport and other sustainable methods of transport.

Oxfordshire County Council's 'Parking Standards for New Developments' considers local car ownership levels; Oxford City has lower parking standards compared the rest of the County, which reflects the lower rates of car ownership. This addresses criterion d) of paragraph 112.

Policy C8 includes a section on Electric Vehicle Charging, which details how this should be implemented into development proposals. This addresses criterion e) of paragraph 112.

Overall, the criterion set out in paragraph 112 of the NPPF 2024 have been considered across Policies C7 and C8 and the policies are consistent with the Framework.

Q2 Is the approach consistent with paragraph 113 of the Framework, which explicitly states that maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport?

The Council's approach to parking standards reflects the city's low rate of car ownership, excellent accessibility to non-car modes of travel, and need for the efficient use of land within the constrained boundary. Given these unique characteristics, there is significant opportunity to support both car-free and low car developments in Oxford, and in doing so encourage more sustainable travel, reduce congestion and emissions, and improve public health in line with paragraphs 110 and 115 criterion a) of the NPPF 2024. A lower level of parking provision means that less land is being used for car parking, resulting in higher density developments which the Plan supports especially in city and district centres.

Development proposals for commercial / employment uses are required to promote sustainable travel behaviour by encouraging employees to travel to their place of work via non-car modes and reduce the number of commuter trips on the highway network. Fewer car movements may encourage more people to walk or cycle to non-residential uses as they may feel safer with less traffic on the roads.

Overall, the approach is consistent with the Framework because seeking low car development, where possible, will help to maximise positive sustainability impacts, reinforce Oxford's high public transport connectivity, and facilitate higher density developments in accessible locations, whilst simultaneously minimising the risk of negative sustainability impacts caused by high levels of parking provision.

Q3 What is the justification for requiring compliance with the Oxfordshire County Council Street Design Guide, which falls outside the scope of the development plan?

The justification for requiring compliance with the Oxfordshire County Street Design Guide is to ensure that adequate standards for parking are met and to promote high-quality and well-designed development. However, we understand that the guidance falls outside the remit of the development plan and therefore it is deemed appropriate to relocate reference of this document from policies C6 and C8 into the supporting text. We would like to propose modifications as follows:

Policy C6 – Amend criterion f) as follows: "The development helps to create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards ~~as set out in the Oxfordshire County Council Street Design Guide[11]~~."

Policy C6 – Amend first bullet point of 'Policy implementation' section of Policy C6 as follows: " A Transport Assessment is a comprehensive and systematic process to ensure that transport impacts of all major applications are properly considered, and where appropriate includes measures to help mitigate development impacts. A Transport Statement is a simplified version of a Transport Assessment and is often used for smaller developments where the traffic impact is limited in both volume and area impact. Transport Assessments should demonstrate how transport measures would respond to local character and have regard to the design guidance set out in Oxfordshire County Council's Street Design Guide, or future equivalent standards."

Policy C8 – Amend final sentence of Policy C8 as follows: "When off plot parking is proposed within a new residential development it should incorporate electric vehicle charging infrastructure to enable the charging of electric vehicles on the street ~~in accordance with the Oxfordshire County Council Street Design Guide, or any subsequent update to this~~."

Amend fourth bullet point of 'Policy implementation' section of Policy C8 as follows: "The design and location of any EV charging infrastructure should consider and avoid negatively impacting on street scene in line with the principles of high quality design, ~~and~~ the supporting design checklist, and Oxfordshire County Council's Street Design Guide (or future equivalent standards)."