

Date: 6<sup>th</sup> August

Dear Oxford City Council Planning Policy Team

## **Oxford Local Plan 2042**

### **Overview**

CycloX welcomes the opportunity to comment on the options phase of the Oxford Local Plan 2042. We have largely restricted our comments to matters relating to cycling and active travel.

### **General Observations**

Many aspects of the Plan reflect a genuine aspiration to encourage active travel and public transport, which we applaud. We are also pleased to see the recognition of the need to tackle traffic congestion through support for the initiatives in the Central Oxfordshire Transport Plan. We wish to see much more city centre car parking spaces removed to contribute to traffic reduction.

We have indicated the options in relevant Policies which CycloX supports. We have also suggested additions or amendments to policy options where we feel they are necessary to encourage active travel.

The challenge for Oxford City Council is to translate more of the high-level aspirations into specific actions.

One thing to note is that the word 'bicycle' should be replaced with 'cycle' as cycling provision needs to cater for non-standard cycles, three-wheelers, recumbent cycles, cargo bikes, handcycles. Using the word 'cycle' is more inclusive.

### **Our comments on Policy Options of importance to CycloX follow:**

#### **1. Introduction and Spatial Strategy and Presumption in Favour of Sustainable Development (S)**

We support policies S1 and S2.

Policy S3: Infrastructure Delivery in New Development

- We would like you to add in that developers need to engage not only with the council and with infrastructure service providers but also with local

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active travel stakeholders such as our partners, the Coalition for Healthy Streets and Active Travel and the Oxford Pedestrian Association, and of course ourselves.

- Oxford railway station should be the centre of a transport hub that includes a bus and coach station in close proximity. The Beckett St car park is the ideal location for the bus and coach station, being close to the railway station and under Network Rail control. This needs to be considered urgently before plans for housing and employment are set in stone. Moving the bus station away from George Street is essential for creating a quality east-west cycle route across the city centre.

## **2. A healthy, inclusive city to live in (H)**

We support these policies.

## **3. A prosperous city with a globally important role in learning, knowledge and innovation (E)**

We support these policies.

## **4. A green, biodiverse city that is resilient to climate change (G)**

We support these policies.

## **5. A city that utilises its resources with care, protects the air, water and soil, and aims for net zero carbon (R)**

We support these policies.

## **6. A city that respects its heritage and fosters design of the highest quality (HD)**

We support these policies.

- We note that the Parking and Bike Parking Technical Advice Note (TAN 12) is dated 2022. At the request of Cllr Louise Upton CycloX was invited to make suggestions for updating the TAN. We submitted evidence of best practice in 2024 and attach our response with this submission. The issues that need to be addressed in the current TAN are the types of cycle stands, their spacing, and the importance of putting cycle parking on the carriageway not the pavement.

- Policy HD15 should cross-reference cycle parking standards in Appendix 7.4. Appendix 7.4 needs some changes to align with LTN 1/20, see policy C7 for details.

## **7. A more equal city with strong communities and opportunities for all (C)**

We support most of these policies with some provisos as written below. We specifically object to policy C8 see below.

- Policy C1: we are pleased to note that you are aspiring for residents to be within 20 minutes' walk or a short cycle ride of most services. This will encourage people to walk or cycle and is consistent with your overall aims.
- Policy C6: We support the proposed policy for Transport Assessments, Travel Plans and Service and Delivery Plans and refer you to the Coalition for Healthy Streets and Active Travel (CoHSAT)'s response which we agree with. We want to add that pavements in Oxford are very uneven, bumpy and irregular, and often filled with obstacles like A boards, lampposts, notices, scooter and e-bike parking. This makes for very uncomfortable journeys for wheelchair users and buggies, and for others with mobility problems, and even prevents some making journeys at all. We urge you to ensure through these policies that pavements should be horizontal and not dip down to the road at driveways – a demonstrably car-centric approach. This means redesigning kerbs. We would like you to require all developers, and home owners undertaking renovation, to ensure that pavements outside the property are horizontal and to require them to use [Dutch Entry Kerbs](#) which are now Oxfordshire County Council policy.
- Policy C7: We support this policy overall, but as mentioned in the introduction use the term 'cycle parking' rather than 'bicycle parking' as there are many types of cycles. People need to know that their bike is going to be safe and secure once parked – lack of secure parking is a major deterrent to getting people cycling. We want to see more on-street cycle hangars outside residences if it is not possible to have internal cycle storage. Please also refer to Cycle Infrastructure Design LTN 1/20, Chapter 11.
- Policy C8: This policy appears unchanged from the last Local Plan and has proved problematic as currently green/brownfield sites are not



designated CPZs and results in developers not needing to restrict parking. In addition proximity to public transport is de facto not needed until developments are occupied. This again is a reason that developers do not limit parking spaces. This irregularity needs to be addressed through having the equivalent of a CPZ for green/brownfield site in the city. We would expect to see low car schemes for all developments in the city.

## **8. Grey and Digital Infrastructure**

We support these policies.

## **9. Areas of Focus**

We support these policies.

With kind regards

Professor Ian Loader

Chair of CycloX, the voice of cycling in Oxford

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