

Appendix 2 Local Transport Plan 3.

Draft response of Oxford City Council to Local Transport Plan 3

Context

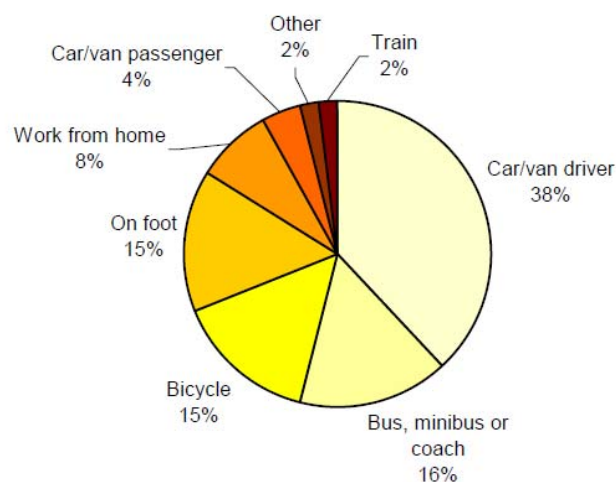
Oxford City Council welcomes the opportunity to respond to the draft LTP3. This is a crucial document that should support (and be supported by) relevant spatial strategies, and steer transport infrastructure planning over both the shorter and longer terms. The latest guidance on producing LTPs makes clear that the document should fulfil two distinct roles:

1. Set out **policies** (i.e. the strategy and the type of measures that will contribute to that strategy);
2. Set out an **implementation plan** for those measures. This should act as a detailed business plan for implementing the measures which contribute to the strategy. It may include a funded programme of transport improvements, key milestones and risk assessment. It should be informed by deliverability and likely available funding.

Oxford Core Strategy

The Core Strategy has undergone examination and, subject to the Inspector's report, is expected to be adopted early in 2011. As suggested in the LTP3 Oxford Area Strategy (paragraph 13.14), the Core Strategy seeks to balance pressing local housing and regeneration needs with fulfilling its role as a world class city of international cultural and economic significance, and as a regional transport hub. A strategic objective is to promote a reduction in car use, minimise the impact of traffic, and encourage walking, cycling and the use of public transport.

Section 5.1 of the Core Strategy recognises the physical constraints of the transport network in Oxford, but also its high level of accessibility particularly by public transport, walking and cycling. This is reflected in the high share of total journeys made by these modes, relative to the rest of the South East outside London.



Mode of Travel to Work, Oxford (Source: 2001 Census)

The text of Section 5.1 emphasises the key partnership role held by the City Council in helping to implement key transport strategies. It makes clear that the transport impacts of new growth will be fully mitigated, principally through seeking rigorous demand management, and through building on Oxford's existing 'green travel culture'. Policy CS15 sets out a number of

specific measures being sought by the City Council to support City-wide movement, based principally around improving the attractiveness of walking, cycling and public transport.

Previous consultation stages

Oxford City Council has submitted board member endorsed responses to all previous consultation stages. These comments are not repeated, however this formal response is made in the context of our previous input.

Response to main LTP3 document (Chapters 1-12)

The main LTP3 document constitutes a series of background papers within the context of theme-based policies at the head of each section. These constitute the Oxfordshire-wide strategy.

The City Council considers that the generic nature of most of the policies in this document is not especially helpful in steering future decision making, and are rather compartmentalised. Most policies seem to make fairly general statements about supporting, managing or encouraging a particular approach, but are not consistently backed up with the detail of how that approach will be applied. Instead, there is a great deal of background information with only tentative suggestions of how the policies will be taken forward in the future, or how strategies will be prioritised. This leads in some cases to an overall backward-looking approach, giving little sense of future actions. It is generally difficult to find within the text proposed actions.

In particular, many of the policies do not consistently distinguish the responsibilities of the various delivery stakeholders. The policies should relate primarily to the responsibilities of the County Council as local transport authority, whilst making clear where partnership working will be required or sought. It is potentially very confusing for the reader to find policy assertions on, for example, the principles of where location is located, when this is primarily a function of the Local Planning Authority (i.e. the District Councils in Oxfordshire).

The City Council would also express concern that no Strategic Environmental Assessment has been published, to allow the prioritisation of scheme options on the basis of environmental sustainability criteria. We consider that the recent announcement from the Department for Transport regarding the Local Sustainability Transport Fund demonstrates that the ability to fund future schemes will be based on assessments that attempt to qualify the delivery of sustainability objectives. Furthermore, a sustainability appraisal of options would help to identify potential policy conflicts that may have arisen through developing such a wide range of objectives.

The SEA process would also lend itself to identifying quantifiable objectives, that can be applied to scheme options, with subsequent assessment. Such a model has been used successfully to develop the Oxford Air Quality Action Plan, through the last LTP.

Chapter 1 – Our Ambitions

The City Council supports the high prioritisation of the objective ‘develop and increase cycling and walking for local journeys, recreation and health’, and ‘develop and increase the use of high quality, welcoming public transport’ (**paragraph 1.15**). It also supports the high prioritisation of ‘reduce congestion’ on the proviso that this should not be interpreted as a barrier to delivering viable development as envisaged in the Core Strategy. Overall, and in principle, the prioritisation of objectives for Oxford is reasonable.

The Council strongly supports explicit recognition of the Local Infrastructure Partnership objectives, in particular the pressing need for more homes, and the infrastructure required to support their development.

Chapter 2 – The Challenges

The City Council has no specific comments on this chapter.

Chapter 3 – Transport in Oxfordshire

The City Council has no objection in principle to **Policies G1-G7**. However it could be questioned whether **Policy G5** (supporting sustainable travel) and **Policy G6** (taking account of location, best use of space and potential to prioritise particular movements) are meaningful or applicable policies.

The Council supports in particular **Policy G4** to seek, as a priority, external funding to deliver access to Oxford improvements, although it should be clarified that this does not solely relate to Oxford City centre but other strategic growth areas in the City. It is acknowledged that securing such external funding will be more challenging than envisaged at the time of drafting the LTP3, due to the recent withdrawal of the provisional regional funding allocation towards the project.

Chapter 4 – Highway Maintenance

The City Council fully supports the approach taken to managing flood risk, particularly the commitment to partnership working. There is a clear need for consistency between the management of highways to incorporate sustainable drainage systems (SUDS), and the County Council working in partnership with local planning authorities in implementing the Flood and Water Management Act with respect to built development. It is helpful that a clear list of commitments is given in **paragraph 4.30**.

Chapter 5 – Congestion

The City Council is concerned that we currently have no objective baseline understanding of what is meant by congestion. We acknowledge it is a valuable parameter linking traffic management to localised air pollution. This omission should be addressed in LTP3.

The City Council considers that **Policy TC2** should refer to working with major traffic generators and the district councils to promote sustainable travel. Partner local authorities are responsible for land use planning, play a key role in economic development, and are also major employers in their own right.

Policy TC4 should explicitly seek cooperation and coordination with partner district authorities, who are able to exercise control over off-highway parking. It is vital to maintain an integrated approach to public parking both on-highway and off-highway. The City Council notes that **paragraph 5.26** states that the County Council has developed a parking policy document that “brings together existing district and county council policy in one document”, however this statement is potentially misleading given this document has never been endorsed by the City Council.

Furthermore, the policy is not supported by any obvious strategy, therefore no judgement can be made on how the policy will be implemented.

Paragraph 5.5 refers to the Network Management Plan, and reviewing controlled parking zones in Oxford. It is important that the City Council is fully engaged with this process, in terms of timing and design. There are particular concerns surrounding legalised pavement parking and the impact this can have on disabled people. The paragraph also refers to Urban Traffic Management Control in Oxford; this is supported in principle as a means of

encouraging sustainable mode choice and improving the public realm, but must take full account of local environmental impacts arising from queue displacement.

Paragraph 5.46 sets out general measures for traffic reduction. 'Walking' and 'Flexible working practices' should be added to this list.

Chapter 6 – Road Safety

The City Council welcomes the support given to promoting safer speeds (**paragraphs 6.22 & 6.23**). In particular, the support for speed reduction measures to address community concerns with the assistance of the district councils is welcomed. However, there is little sense of how **Policy RS1** relates to local street safety for pedestrians and cyclists, as distinct from motorists' safety on rural and inter-urban roads. The section would benefit from explicit policy requiring the designing-in of street features in urban areas that discourage speeds of above 20 miles per hour.

Chapter 7 – Improving accessibility

The City Council is generally supportive of initiatives that improve access to services, particularly where this helps reduce social exclusion. **Policy AX2** is therefore supported in principle, but the Council would suggest the policy is amended to prioritise local accessibility improvements for socially excluded communities. However there appears to no strategy in the text that follows to explain how the policy would be implemented, other than paragraph 7.20 on partnership working; the City Council objects to this omission.

The City Council requests that **Policy AX5** is amended to say that the County Council will work in partnership with district councils to manage parking, for the reasons set out above.

The City Council welcomes the commitment set out in **paragraph 7.28 under 'Scheme Development'**¹ regarding the early views of disabled and mobility-impaired in designing schemes.

Paragraph 7.21 under heading 'Scheme Development' notes the implications of shared space for disabled people, particularly those who are visually impaired. Whilst the City Council supports the use of shared space in appropriate locations, it would be helpful for LTP3 to contain clearer guidance on how shared space schemes will be judged taking into account these issues.

The City Council also requests that, under **Taxis and Private Hire Vehicles (paragraphs 7.23 – 7.24)**, more explicit recognition is given to the role of hackney carriages and private hire vehicles in potentially reducing car use.

The City Council supports the inclusive use of the County's waterways and towpaths (Policy AX6). However there is no clear strategy to implement the policy and the City Council objects to this omission.

Chapter 8 – Supporting Development

The policies within this section appear to be additional to those consulted on in January 2010. The City Council is strongly concerned that this section sets spatial and development management policies that unnecessarily duplicate local development frameworks, and would therefore not be effective (i.e. could not be applied). It is strongly recommended that the whole section is redrafted in close consultation with the district authorities.

¹ There is a mistake in the paragraph numbering in this section whereby the first para. 7.28 is followed by 7.21 and the sequence restarts

The text under **Objective 8** is unclear in its intention. There is no doubt that new development should contribute to the social and economic wellbeing of their area, however this will rarely apply on a truly county-wide scale. It is also not clear what is meant by “a more fully integrated county” given that there are well-recognised sub-regions within our area that cross both district and County boundaries.

Policy SD1 reads as a spatial planning policy and is therefore inappropriate in its current wording. The policy should be amended to refer to working with the local planning authority towards the objective stated. **Paragraph 8.1** should also be re-written in the context of working with the relevant LPA. The first sentence of **paragraph 8.2** concerning LTP3 documents applying to the planning process should be deleted to avoid confusion between the responsibilities of County and district councils.

Policy SD2 is not supported by a definition of ‘unsustainable location’ and therefore has limited applicability. The City Council would recommend this policy is deleted, as in any case the principles of sustainable development are set out in local development frameworks.

Policy SD3 could not be pragmatically applied, given that much of the County’s strategic road network is at or approaching capacity, and there will be limited opportunities to create additional capacity that meets the full growth aspirations of the local authorities in Oxfordshire. The policy as worded may effectively rule out any additional strategic development in Oxfordshire, and is at odds with the ambitions to support growth set out in Chapter 1. This policy should be substantially reworded to reflect the more flexible and pragmatic approach that is in reality exercised.

The City Council is particularly concerned that **Policy SD5** and the **fourth bullet point of paragraph 8.3** implies that the County Council will secure contributions from all new developments for all modes of transport, and public rights of way. Circular 01/07 on planning obligations sets out five tests, on the principle that contributions must reasonably relate to the impacts of the development. Given the need to ensure development is deliverable, it would be inappropriate to impose these blanket requirements, particularly given that the policy has not been agreed by the local planning authorities responsible for negotiating Section 106 Agreements. The City Council strongly recommends that this policy is substantially reworded, in close consultation with the district authorities. Furthermore, it would be difficult to justify seeking contributions toward, for example, strategic cycling infrastructure in the absence of a Cycling Strategy (see further comments below).

Paragraphs 8.8 – 8.10 deal with transport assessments (TAs). These are generally required as part of the development process and it is therefore ultimately the responsibility of local planning authorities to determine when a TA is appropriate, and whether the information submitted is acceptable. Whilst the City Council does not object to the County Council setting out a framework for requiring and assessing TAs, this should be firmly in the context of the County Council’s expert input as transport authority. Paragraphs 8.8 – 8.11 should be redrafted to say that the determination of planning applications and transport assessments supporting them are the responsibility of the local planning authority, and that reference should be made to the Local Development Framework.

In addition, **paragraph 8.11** refers to contributions being sought to a wider area strategy. Given ‘wider area strategy’ is not defined (and therefore open to interpretation), it would be potentially difficult for the local planning authority to negotiate planning contributions on this basis. In Oxford, a standard contribution towards strategic transport improvements is already sought on top of site specific contributions, therefore such an approach could not be additionally employed. The paragraph should be more flexibly worded to refer to seeking

contributions from development towards strategic transport improvements, in accordance with the relevant local development framework policy.

Paragraph 8.13 refers to spatial planning policy which is the responsibility of LPAs. The paragraph should therefore be deleted, or at least substantially reworded to make this distinction clear.

Paragraph 8.14 is entirely inappropriate as it appears to require all new developments to contribute financially to developing bus infrastructure. It would be difficult to justify this in much of Oxford, given the already highly-developed bus network, and in any case could not be reasonably applied to small developments with minimal impact. Paragraph 8.14 should be deleted.

Paragraphs 8.15 – 8.17 make specific spatial policy requirements relating to the design and location of new development to facilitate bus travel. These matters are for the local planning authority to determine; these paragraphs therefore confuse responsibilities. In any case they cannot be universally applied, as each area and site will be assessed within their context, often supported by the local development framework or a site masterplan. These paragraphs should be deleted.

Paragraph 8.18 should also be deleted for the same reasons set out in the paragraphs above.

Chapter 9 – Carbon Reduction

The City Council considers that the policies in Chapter 9, such as travel planning and developing alternative modes, can only be successful if there is a framework in place for assessing the impact of implementing these measures. We therefore object to the lack of baseline information allowing a full integrated assessment of policy options. We consider that soft policy options should be promoted as a package, enabling a wide range of measures to be promoted, rather than on an individual basis.

Oxford City Council supports in principle **Policies CBR1, CBR2 and CBR3**. However we request that **Policy CR1** is amended to refer to working with partner authorities (in addition to communities and employers). Local planning authorities have a particular responsibility to secure travel plans as part of the development management process.

Furthermore there is no strategy outlined for implementing these policies. It would be helpful if specific commitments or actions could be outlined in this section, in terms of the processes for engaging local employers in the travel planning process, and the level of support to be given to implementing workplace travel plans secured through the planning system. At the least, a framework for prioritising the targeting of workplace TPs based on, for example, particular localities and/or number of employees should be included. The City Council believes that much could be gained from closer joint working between County and district authorities on this issue.

The City Council supports paragraph 9.34 (last three sentences) which refers to working with the City Council to identify suitable locations for charging points.

Chapter 10 – Reducing the Environmental Impact of Travel

The City Council considers that the policies in Chapter 10 can only be successful if there is a framework in place for assessing the impact of implementing these measures. We therefore object to the lack of baseline information allowing a full integrated assessment of policy options.

The boxed text supporting **Objective 7** is unclear in its meaning and needs rewording. Strategy on economic development will in future be taken forward jointly through the Oxfordshire Local Enterprise Partnership², therefore it is premature to state objectives on the pattern of economic development in the LTP3. The last part of the boxed text should therefore be deleted.

The City Council supports in principle Policies RE1, RE3 and RE4. It is not clear how **Policy RE2** will operate; a general aim to 'balance' protection of the environment with freight access is ambiguous. We recommend re-wording policy RE3 to improve clarity.

The City Council notes that **paragraph 10.25** acknowledges the conflicting interests regarding City and town centre deliveries. The existence of delivery vehicles at busy times in some Oxford streets can adversely affect the public realm and pedestrian flows (e.g. Broad Street, New Inn Hall Street). In light of the commitment set out in the Oxford City Centre Street Scene Manual to promote a 'pedestrian first' approach, the City Council recommends a commitment in LTP3 to investigating further ways in which delivery patterns can be further rationalised in Oxford City centre.

The City Council would request the addition of a further paragraph after **paragraph 10.35**: "Specific guidance on the public realm in Oxford City centre is set out in the Oxford City Centre Street Scene Manual".

Paragraph 10.37 should additionally refer to working with stakeholders in respect of designing new schemes in the context of the landscape and townscape. (Stakeholders include partner local authorities, Natural England, and local wildlife groups and civic societies.)

We would also recommend acknowledgement of the public rights of way network, and other public access, to green infrastructure, and the need for scheme design to mitigate any impacts on access to green networks.

Chapter 11 – Public Transport

The City Council supports in principle Policies PT1 – PT5 and PT7. It could however be clarified in Policy PT3 that 'high quality public transport interchanges' includes Park and Ride (given that technically park and ride facilities are private to public transport interchanges). The overall approach to developing the bus network, including the core Premium Routes network and hierarchy of lower tier services, is an appropriate strategic approach for Oxford and the County. We would particularly support more efficient ticketing systems, improved emissions standards, and providing bus priority where congestion most affects journey reliability.

The LTP3 correctly acknowledges the importance of Oxford Park and Ride as crucial to demand management in Oxford. The City Council supports developing the "ring of 'remote' Park and Ride sites" referred to in **paragraph 11.11**, but is disappointed that there is little commitment to progress this concept. We therefore recommend that a firm commitment in principle is made to publish a strategy for the implementation of remote park and ride, outlining ways in which this could be funded. The City Council also supports the existing commitment to expand Thornhill by around 500 spaces (**paragraph 11.10**), and will work with the County Council to plan improvements to the other park and ride sites.

² . The role of LEP's requires a strategic overview on transport, housing and planning, as 'part of an integrated approach to growth and infrastructure delivery.' This would be delivered through active partnership working between local authorities, agencies and business.

Paragraph 11.21, which deals with coach access to Oxford, should acknowledge that joint working is required with Oxford City Council to improve coach access to the City centre, possibly in the context of the West End Area Action Plan.

Paragraph 11.34 and 11.35 set out plans for implementing a Bus Quality Agreement to rationalise the number of buses in the City centre and on some radial routes. The City Council strongly supports this initiative, which is likely to greatly improve the environment of the City centre and other busy routes.

Paragraph 11.48 sets out opportunities for rail development in the future. The proposed Evergreen 3 route needs to be added to the list, given it is a vitally important opportunity to improve access to Oxford by a sustainable mode. Similarly, East West Rail should be added to the list, reflecting its importance in supporting the Oxford-Cambridge Arc. A policy should be added specifically supporting these projects.

Chapter 12 – Encouraging Walking and Cycling

Oxford City Council strongly supports Objective 9. Improvements to cycle infrastructure are potentially low cost interventions, particularly in the context of Oxford as an urban area with a strong cycling culture. It follows that the Council supports in principle Policies CW1 – CW5, and the overview of strategy given in **paragraph 12.1**. There should be an additional policy to formally adopt the street user hierarchy for populated areas (as set out in the Manual for Streets).

Paragraphs 12.2 – 12.13 set out general background and principles for promoting walking. The City Council feels however that these aims need to be translated into a comprehensive Walking Strategy to meaningfully guide decision-making – a commitment to this should be identified in LTP3. This would need to identify core networks, and identify priorities for developing the pedestrian network (e.g. particular links that need improving, such as street improvements, traffic reduction, new pedestrian crossings, subway improvements etc.). Opportunities arising from planned new development could also be identified in a strategy where justified, to be taken forward jointly with other partners (for example the Eco-Bicester project is identified in paragraph 12.11, but there are many more).

The City Council supports measures indicated in **paragraph 12.13**, in particular the consideration of traffic calming measures to reduce speeds (in consultation with local residents and councillors).

Paragraphs 12.14 – 12.32 set out general background and principles regarding cycling. Whilst the City Council overall supports the thrust of this, we consider there should be a firm commitment to producing a Cycling Strategy to guide decision-making on allocations of funding in future, i.e. identifying priority schemes towards meeting Objective 9, and providing a steer for project prioritisation and land use planning for implementation of **Policy CS5**..

We would request that **Paragraph 12.15** includes the modal split for Oxford from the 2001 Census (e.g. insertion of the pie chart on page 1 of this response), as the City is very different from the rest of the County in this respect and helps demonstrate why cycling is a priority objective in Oxford.

Paragraphs 12.19 highlights the need to target promotion of cycling towards those who have traditionally cycles less, such as teenage girls, over 45s etc. The City Council would in principle support this approach, which also relates to how physical cycle infrastructure is developed (see below).

The City Council supports recognition in **paragraph 12.25** that poorly maintained highways and cycleways can discourage cycling. We would therefore recommend explicit prioritisation of maintenance schemes that directly benefit cyclists, in Oxford at least.

The City Council objects to paragraph 12.27 which proposes revocation of the long-held principle of developing a dual cycle network in Oxford (to provide direct on-road 'upper tier' routes for more confident cyclists and quiet 'lower tier' routes for less confident cyclists, or to provide a more environmentally pleasant option for all). This could directly conflict with aspirations to appeal to lower participation groups (paragraph 12.19), as it is likely there would be less opportunity in future to choose continuous quiet routes. Alternatively, it could lead to fewer safe, attractive direct routes available to those who are more confident cycling alongside general traffic. It is perhaps unhelpful to compare Oxford with those European cities that often have entirely different street layouts to work with. It is considered vitally important to keep the dual network concept as a long term aim, even though the rate of progressing the concept is likely to be slow in the shorter term.

The City Council generally supports all the potential measures listed in **paragraphs 12.28 and 12.29**. We would note that improved signage of best routes (paragraph 2.29) is a potential 'quick win' that, together with appropriate route branding, publicity and minor infrastructure improvements, could make wayfinding for new cyclists much easier. It is recommended, however, that prioritisation is given to measures to guide the decision-making process. Also, that specific priority schemes are identified in a Cycling Strategy (see above).

Paragraph 12.31 regarding partnership working should additionally refer to working with district authorities.

The City Council has no specific comments on **paragraphs 12.33 – 12.49** concerning public rights of way, other than that there are no objectives or strategy following on from background analysis to steer future opportunities for improvement.

Response to Chapter 13 – Oxford Area Strategy

Transport within Oxford, Goals and Objectives and Challenges (paragraphs 13.1 – 13.34)

These sections provide useful context. The City Council broadly agrees with the analysis of existing challenges. The Council welcomes the recognition of the particular challenges surrounding the Eastern Arc, responding to longstanding accessibility issues in this part of the city, and future challenges and opportunities arising from housing and employment growth, regeneration projects, and the future expansion of Cowley centre.

On **Figure 1**, the City Council objects to the omission of Rose Hill housing estate from the Eastern Arc. There is no logical reason for excluding this area, which is closely related to the Littlemore and Cowley areas, and has some need for accessibility improvements.

On **Figure 5**, showing future developments and regeneration in Oxford, we recommend that, in the legend:

- the label for 'Development sites' is amended to 'Development sites – Oxford Local Plan and Core Strategy allocations'
- the label for 'Regeneration areas' is amended to 'Regeneration areas – Oxford Core Strategy'

Geographical priorities

The City Council supports the new focus on the Eastern Arc as set out in **paragraph 13.36**, however we recommend the last sentence of this paragraph is qualified to state that improving transport 'to and within the city centre and Eastern Arc' will also bring benefits to other parts of the City.

The City Council recommends that, for avoidance of doubt, in **paragraph 13.39** the term 'sustainable modes' is substituted with 'walking, cycling and public transport'.

Paragraph 13.43 refers to the development planned at Barton. The City Council requests that the following addition (underlined) is made to the text, to reflect our understanding of the County Council's considered view in its role as a delivery partner:

...Further development is planned up until 2026 (with more likely beyond then) in locations in the Eastern Arc, e.g. Barton. The County Council firmly believes that the Barton site has the potential to deliver the highest standards of sustainable travel. Nevertheless, the resulting increased demand for car travel ~~would~~ could impact further on current congestion hotspots.

In respect of **paragraph 13.44**:

The City Council strongly supports in principle the idea of high quality 'rapid transit' serving Eastern Arc and the City centre. However LTP3 should make clear that this is a long-term aspiration, and depends on an assessment of feasibility, the future availability of funding, and partnership working with the City Council and other stakeholders. The paragraph should refer to improving bus priority at existing junctions as an interim measure.

The aim of reducing the availability of car parking for staff (e.g. at Oxford business Park) can only be realistically achieved in parallel with delivery of the rapid transit scheme, and also with statutory measures to reduce the attractiveness of workplace parking, e.g. a workplace parking levy. This 'package' of measures needs to be explicit in LTP3, as is a firm commitment to developing a future Eastern Arc Strategy. As currently drafted, the City Council objects to this proposed measure, but may withdraw objection in principle pending further details of how this objective will be delivered.

Otherwise the framework strategy set out is, in principle, supported.

Paragraph 13.46 seems to indicate that accessibility improvements to local centres by walking and cycling will be afforded priority over other areas. This is supported in principle, but should specifically focus on District centres (including proposed new district centre at Blackbird Leys) and made generally clearer.

Strategy Measures

In **paragraph 13.47**, the City Council supports the highest priority being given to pedestrians and cyclists. However we object to omission from 'medium priority' the improvement of city bus services and infrastructure. This may be necessary from a strategic viewpoint to improve accessibility in the Eastern Arc, should the rapid transit idea fail to progress.

Paragraph 13.48 touches on the proposed Access to Oxford improvements. This package of measures has been strongly supported by both County and City councils, and is seen as a vital component of supporting the spatial strategies within the central Oxfordshire sub-region. Notwithstanding the recent Government decision to withdraw provisional funding, this project needs to be explicitly supported in this section as a key element of transport strategy supporting economic and housing growth across the sub-region, including Oxford.

The City Council supports in principle the strategy to continue to develop Oxford's Park and Ride (**paragraphs 13.49 – 13.52**).

Paragraph 13.50 states that pricing mechanisms will be used to encourage travellers to choose conventional bus journeys from journey source over Park and Ride. This is a sensible approach, however there needs to be clearer explanation as to how this will be achieved – it is not clear how differential parking tariffs can be used to achieve this given all Park and Ride sites are currently free of charge, and also given bus fares are constant throughout the day. Further consultation with the City Council on the details of this proposal is required before full support can be given.

Paragraph 13.52 sets out future schemes and investigative work. Improvement to Seacourt, Redbridge and Peartree park and ride sites should be added to this list. Also, a stronger commitment to progressing remote park and ride should be given.

The City Council supports the proposed Rail Strategy (**paragraphs 13.53**), provided that reference to partnership working with the City Council on public realm and pedestrian network improvements is given.

Paragraphs 13.55 – 13.57 outline future traffic management strategy. The thrust of this is supported, being in line with Oxford Core Strategy. However the City Council considers that the boxed header text to this section should refer to investigating a workplace parking charge, rather than road user charging, as this is by far the more realistic option.

However as stated above the reduction in commuter parking in Eastern Arc (**paragraph 13.56 & 13.57**) cannot realistically be delivered other than as part of a longer term package of measures, which should be spelt out alongside a commitment to deliver in parallel.

Also the City Council notes and supports the scheme to improve northern and southern approaches to Oxford (**paragraph 13.57**); the text should acknowledge the opportunity presented by possible strategic development at Northern Gateway in respect of the northern approaches.

Paragraphs 13.58- 13.60 outline the walking strategy and are in principle supported. However the section needs to go further, with a commitment to progress a walking strategy for Oxford (incorporating elements of the West End AAP and Oxford City Centre Streetscene Manual).

The City Council supports in principle the outline cycling strategy (**paragraphs 13.61 – 13.63**). However it is unclear how the provision of quieter, direct 'off road' routes ties in with the revocation of the 'dual network' approach: does this imply that on-road radial routes will not be developed further, and that the 'quiet routes' (including Sustrans routes) will be realigned? Is the latter practicable given the physical constraints that exist? Furthermore, what form would a cycle 'expressway' take, and what implications would there be for car parking and existing land uses and allocations for development? The City Council feels unable to respond given the ambiguity of this approach, and strongly requests that more detail is given at the earliest opportunity.

The City Council supports the schemes set out in **paragraph 13.63** but requests that 'new cycle and footbridge crossing Thames at Oxpens' is added to the list.

The City Council supports in principle the bus strategy set out in **paragraphs 13.64 – 13.67**, but requests that in respect of improvements to Eastern Arc, additional text is added to state *"...giving buses priority where possible in the Eastern Arc, extending to the Northern Gateway (Peartree) in the longer term".*

Paragraphs 13.68 – 13.71 outline an emissions strategy for Oxford. There is no clear definition of what is meant by 'a city that becomes carbon neutral with high eco standards', This section should cross-refer to the Low Emissions Strategy being developed by the City

Council. The City Council supports **paragraph** 13.69 regarding the exploration of charging points for electric vehicles in Oxford.

Paragraphs 13.72 – 13.73 outlines strategy for behaviour change. This section would benefit from being better integrated with the section on traffic management, for example by prioritising travel planning initiatives on the Eastern Arc (and, in partnership with developers, at Northern Gateway).