



CPRE Oxford District response to Oxford Local Plan 2036 - 1st Steps Consultation, July 2016

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1: Living and Housing

Oxford has a housing crisis, with buying and even renting a property now out of reach of many people; to what extent do you agree that any of the following suggestions would help address this?

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
A mix of home sizes (number of bedrooms) should be required	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Some housing sites should be protected for key worker housing	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Having more student halls would reduce pressure on the housing market	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
New student halls should be prioritised for the universities (rather than other institutions)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Specialist housing for the elderly would encourage downsizing and release homes	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please enter any additional comments

HOUSING NUMBERS

CPRE continues to reject the overall housing figures underlying this plan. We believe the analysis is fundamentally flawed and practically untenable. It assumes unfeasibly high economic growth, with resulting high numbers of people coming into the County. The building of 1,400 new houses per year for the District (and 5,000 across the County) has never been achieved and is unlikely to be achieved. These targets become even less likely to be achieved with the depressed state of the housing and construction market following the Brexit vote. **We therefore believe that Oxford City Council should work with its local authority partners to review**

the Oxfordshire Strategic Economic Plan and to commission a new assessment of the housing market.

We would also remind Oxford City Council of the 'Unlocking Oxford's Development Potential' report, commissioned by South Oxfordshire and the Vale of White Horse District Council's which indicated that far more of Oxford's development needs could be met within its own boundaries.

HOUSING DELIVERY

One of the major problems for Oxford is not housing allocation but housing delivery.

Oxford was a growth point authority and should have completed 5,692 homes by 2016 but built less than 3,460 by 2015.

We also believe 2,000 affordable homes (ie 50% of the housing allocated in the Strategy) should have been delivered between 2006 and the latest monitoring report (2014/15). However, only 993 affordable houses have been achieved in this time, despite the sites being allocated for development.

In our view this relates to two issues:

1. Developers need to deliver on existing allocations - We are increasingly seeing land that has been allocated for development that is not then being brought forward. This in turn is leading to further green field sites being sought and allocated for development. CPRE would very much like to see the City Council taking all measures possible to ensure that developers actually move quickly to deliver development on allocated sites.

The existing Core Strategy, para 7.18 says:

"The Council will use the annual monitoring process (informed by Strategic Housing Market Assessments and Strategic Housing Land Availability Assessments) to manage land supply. Action will be triggered to increase supply if monitoring reveals that housing completions have fallen more than 15% below the rate set out in the trajectory, and a review of site deliverability indicates that the trajectory is unlikely to be recovered over the next five years without action. Such actions may include holding discussions with developers and landowners to identify barriers to delivery, use of the Council's land acquisition powers (where appropriate to bring forward constrained sites), investigating and progressing urban renewal projects, advancing sites in the development programme, granting planning permission, or identifying the need to undertake a timely review/preparation of an appropriate DPD. Priority will normally be given to actions that improve the delivery of housing on previously developed land, but not at the expense of securing the necessary range of deliverable and developable sites. Policy CS2 allows for the development of greenfield sites if required to maintain a five-year rolling housing land supply. Policy CS8 identifies the potential for strategic residential development on land at Summertown".

CPRE believes the City has fallen well behind on the housing completion rate set out in the trajectory and would like to know what action has been triggered as a result.

2. Difficulties in provision of affordable housing - we believe that recent Government changes in legislation have made it increasingly hard to secure permanently affordable housing for local people, which is where the real housing need lies. We have considerable sympathy with the City Council in this respect and welcome its recent decision to set up a housing company. We would urge further consideration of imaginative solutions such as the **Community Land Trust model**, co-housing and self-build.

DENSITY

The most important single step would be to increase housing densities on new build, including sites in progress. Victorian terraces, some of the most desirable properties, were built at 75 per hectare compared to a target of 40 (still towards the bottom end of the previous planning policy guidance range of 35-50). Taking the City as a whole, the current density is only 12 per hectare.

Increasing densities would not only dramatically reduce land take, but also make it possible to accommodate all of Oxford's actual (as distinct from hypothetical future) need within the City, reducing carbon footprints. It would also provide cheaper housing because of the reduced land cost, and smaller homes which are the main deficit.

STUDENT HOUSING

According to the Council's Oxford Profile: Key Facts 2016 leaflet, there are 32,000 students at Oxford's two universities, with presumably many more attached to other institutions. This sector clearly have different housing needs to the rest of the population and it is not clear how this has been taken into account in calculating Oxford's housing needs.

POPULATION

CPRE believes there needs to be much greater clarity around the population levels the City is planning for (20%+ increase), how these projections have been arrived at and what assessment has been made of the environmental and infrastructure capacity of the City to absorb such growth.

What evidence is there that Oxford, a constrained medieval city in an area of high environmental pressure such as flooding/drought, is the right location for this deliberate policy of expansion?

What evidence is there that supporting infrastructure such as schools, doctors, roads, public transport, can in any way cope with this proposed level of growth?

Why should national funds be spent on creating additional infrastructure to support growth in Oxford, where there is virtually full employment, when other areas of the country are desperate for jobs?

What evidence is there that the people of Oxford have been clearly made aware of this proposed level of growth and are supportive of it?

2: Economy and Skills

Oxford plays a vital role in the local and national economy, providing thousands of jobs; however whilst 64% of people have at least a degree, 22% have fewer than 5 GCSE's (A-C); to what extent do you think any of the following suggestions would help the economy grow?

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Employment sites should continue to be protected so that businesses can grow	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Live-work units and hubs for small businesses would help start-ups and creative industries	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Land should be protected to provide new and expanded schools	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Developers should be	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

required to provide training for local people					
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Please enter any additional comments

The Local Plan should focus on rectifying the housing v jobs imbalance, rather than seeking aggressive employment growth.

Implications of Brexit

Housing numbers are being determined, and valuable green space (including Green Belt) put at risk, on the basis of high predicted growth figures. CPRE believes these figures should be reviewed, especially in light of the inevitable period of economic uncertainty following the Brexit vote.

What evidence can the Council provide that it has considered the impacts of Brexit and reviewed the economic growth figures accordingly?

Number of jobs

There is a discrepancy on job numbers which needs explaining.

1. Background Paper 7.1 Employment & Economy states:

'For **Oxford** the **Planned Economic Growth** projections show that in 2031 Oxford will have 147,600 jobs, an increase of 24,300 from the 2011 figures. This equates to an increase in jobs of 0.9% pa.'

This indicates that the 2011 baseline is 123,300 jobs. For this growth to be on track (at 0.9% pa), this would require a current jobs level of 128,960, an increase of 5,660 jobs.

2. However, the Council's paper version of this Local Plan Questionnaire states that Oxford currently has 114,000 jobs and this figure is backed up by the City Council's Oxford Profile: Key Facts 2016 leaflet.

3. But then the City Council Monitoring Report 2014-15 (https://www.oxford.gov.uk/downloads/file/2113/annual_monitoring_report_2014-15) quotes NOMIS figures that Oxford had 120,000 jobs in 2013.

A clarification of the 2011 baseline and growth/decline in numbers since then is clearly required. This should include both jobs figures and numbers of people economically active.

3: Resources

As Oxford's population grows there will be increasing pressure on land, energy and water resources; to what extent do you agree that any of the following suggestions would help to make the best use of limited resources?

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Some poor quality/under-used recreational areas could be partly developed for housing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Urban extensions close to Oxford (on the Green Belt) would help meet future housing needs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
New developments should be required to include on-site renewable energy generation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please enter any additional comments

Answer

URBAN EXTENSIONS

The question is artfully phrased, because urban extensions on the Green Belt might indeed to some extent fill Oxford's hypothetical future housing needs, although not any current and demonstrable needs which are being accommodated within the City, and could continue to be so. The question should be "urban extensions close to Oxford, in the Green Belt, would be an unacceptable way to help meeting housing needs".

To suggest urban extensions to Oxford in the Green Belt is to fatally misunderstand the purposes of the Green Belt, and the value it brings to both City and County.

The Green Belt was created to check the unrestricted sprawl of large built up areas; prevent coalescence of settlements; assist in safeguarding the countryside from encroachment; protect the setting of the City; and encourage urban regeneration.

It was not created as a pressure valve, to be released when pressure mounted.

On the contrary its essence was its permanence. The City has had over fifty years to modify its expansionist behaviour but has failed so far to do so. There is still time.

The benefits of the Green Belt are obvious.

1. Oxford is a beautiful historic City, and a major tourist attraction. The entrance to the City through open countryside, and the views across open countryside to the hills surrounding it are a major part of that attraction. Expansion would harm the tourist economy.

2. The villages surrounding the city each have their own characters. They provide attractive places for wealth creators to live. If they were threatened or engulfed by urban sprawl their characters and attractiveness could be lost, and the wealth creators depart.

3. Oxford is a medieval City, crossed by rivers and with poor internal communications, which are exacerbated the more the City sprawls.

4. The economies of the towns and villages beyond the Green Belt would be harmed by a predatory Oxford soaking up all employment – and benefit from the City's containment within the Green Belt. It forces a spread of the proceeds of growth which would otherwise disproportionately accumulate within a growing conurbation.

It may be argued that there is still Oxford's housing need to consider. But the 32,000 houses suggested are not housing need in the generally accepted sense of current people needing houses. Nor are they the future requirements of our sons and daughters. All of that could be met within the City itself, particularly if building is carried out at urbanized densities of 60 or more houses per hectare. At those densities housing would also be less expensive.

The vast proportion of the projected need, and almost all of that which could not be accommodated in the City, is of employees coming from elsewhere to take up (hypothetical) jobs which could be created anywhere, and should be created elsewhere, where there is less than the full employment Oxford already enjoys.

By reckless employment creation the City is (almost certainly deliberately) stretching its capacity to accommodate its own residents. It is telling that the urban extensions proposed would be for mixed development that includes employment sites – that is, they are intended to create as much housing need as they satisfy.

The City will say that their housing need is a "very special circumstance" – but urban sprawl, the very thing the Green Belt was set up to prevent, can hardly be a "very special circumstance" for breaching it.

Irrespective of Green Belt considerations, there is also now evidence coming through from both Cambridge and the Netherlands that the concept of urban extensions is not sustainable because of the increased car use. For example, 'In 2014, there were just over 200,000 motor vehicles entering and leaving Cambridge per 12-hour day (7am to 7pm). This represents an increase of 5% compared with 2013. ([Annual Traffic Monitoring Report 2014, Cambridgeshire County Council](#))

4: Transport

Oxford has very high levels of cycling and bus use, especially for commuting trips; however with increased population the way people move around the city will need careful planning, to what extent do you agree that any of the following suggestions would help encourage sustainable travel patterns?

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Numbers of parking spaces should be limited for workplaces	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Numbers of parking should be limited for residential developments	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Walking and cycling routes separated from traffic should be provided	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Road space should be reallocated from cars to buses, for example through the introduction of a one-way system for cars on Woodstock and Banbury Roads	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
More restrictive	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

emissions zones should be introduced					
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Please enter any additional comments

Answer

5: Strong communities, health and wellbeing

Oxford is a diverse city and surveys have found that residents of Oxford are generally satisfied with their lives. There are significant levels of inequality in Oxford, with some areas among the most deprived in England and some among the least deprived. To what extent do you agree that any of the following suggestions would help address this?

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Walking and cycling routes and facilities for sport, recreation and leisure should be made available to help physical and mental wellbeing	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Local facilities such as GPs, hospitals and medical research should be strengthened to support the health services	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provision of more key worker/staff accommodation should be encouraged as it would help support schools and hospitals	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Space/facilities should be provided for communities to gather and interact	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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6: Green and open spaces

Oxford has a range of spaces with different functions including parks, sports fields, allotments, floodplain, wildlife sites, Green Belt and cemeteries. With the limited land available and a growing population, to what extent do you agree that any of the following suggestions would be beneficial?

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
A network of green spaces should be protected	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Public access to existing private green spaces and recreation facilities should be sought	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Development on less sensitive green spaces should be allowed if it brings improvements to public open space	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

• A network of green spaces should be protected

CPRE is committed to protecting, promoting and enhancing the City's green spaces and the public rights to enjoy them. Oxford has a range of different green spaces that perform a variety of functions. This includes: Green Belt, wildlife sites, parks and open spaces, sports fields and allotments, University and College land. Many of these sites are not publicly accessible and there is currently no equitable distribution

of publicly accessible land across the city, as acknowledged in the 2005 Scott Wilson study. This was updated in 2012 where it identified that Oxford had 785 ha in green spaces for a population of 157,000. We would not want to see this ratio getting worse with the planned new development in Oxford. The Scott Wilson report identified a shortage of unrestricted open green spaces in densely populated areas of the City, in particular East of the Cherwell. As the population of the city continues to grow this shortage will inevitably get worse and green spaces will become increasingly threatened as more land is sought for development. CPRE would like to see the Local Plan contain a policy to establish a standard of green space provision linked to population which is similar to the current Policy CS 21 in the Oxford Core Strategy which states:

“The City Council will seek to maintain an overall average of 5.75 ha of publicly accessible green space per 1,000 population.”

Such a standard would be a useful tool to ensure that new development does not threaten the provision of green spaces.

We would also like to see the Local Plan retain the Oxford Urban Village model as defined in the Oxford Core Strategy 2011. This model identified publicly accessible green spaces on the basis of sixteen urban villages within the city boundaries. On the basis of the CS 21 policy this can help ensure a more equitable distribution of green spaces throughout the City. The sixteen urban villages are defined by Oxford City Council in its Core Strategy to reflect more accurately how people use green space, an objective which is central to the work of CPRE. The classification of urban villages are not political divisions (the wards and parishes), nor do they necessarily reflect the historic villages that were encircled by the expanding urban development of the city. For example, Iffley is not identified as a separate urban village

We strongly support the objectives of the Oxford Green Spaces Strategy 2012-2027 report which include minimum distance criteria for accessing large, medium and small parks. Furthermore we support the recommendations on the connectivity of green and blue spaces and their importance in relation to biodiversity, sustainability and recreation.

We would like the City Council to further identify and develop the “green lungs” and/or “green infrastructure network” within the city boundaries, i.e. all the green and blue spaces, the radial and circular routes linking them and the wildlife corridors, and in particular ensuring accessibility from each part of the city to the Green Belt, and the Oxford Green Belt Way.

We have seen and support the submission by the Oxford Green Belt Network (OGBN) with whom we work in partnership. We are seeking strong policies to protect the existing Oxford Green Belt both within the City and outside its administrative boundaries.

• Public access to existing private green spaces and recreation facilities should be sought.

We would support the Council in seeking public access to existing private green spaces and recreation facilities. For example, to encourage Colleges to make their sports grounds more accessible to Oxford citizens and help relieve the pressure on the current scarce facilities, particularly in East Oxford.

• Development on less sensitive green spaces should be allowed if it brings improvements to public open space.

We would in general object to the loss of a green space and would be seeking enhancement of the recreational and biodiversity capacity of “a less sensitive” green space, however that would be defined.

Green Belt

The City Council should ensure that its Green Space policies include reference to the Green Belt and highlight its value and importance, including in relation to urban regeneration and the protection of Oxford’s historic character.

7: Design and historic environment

Oxford is famous for its history and architecture, and the character of local "villages" or centres is valued by residents. The design of the urban environment has a big impact on how cities work and quality of life; to what extent do you agree that any of the following suggestions would be beneficial?

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Taller buildings could be located in some areas if well designed	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Modern architecture and higher densities should be encouraged	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

1. Taller buildings could be acceptable in some places provided that they did not interfere with historic or heritage views (both into and out of the City), or harm heritage assets.

2. **Higher densities** - yes.

The most important single step would be to increase housing densities on new build, including sites in progress. Victorian terraces, some of the most desirable properties, were built at 75 per hectare compared to a target of 40 (still towards the bottom end of the previous planning policy guidance range of 35-50). Taking the City as a whole, the current density is only 12 per hectare.

Increasing densities would not only dramatically reduce land take, but also make it possible to accommodate all of Oxford's actual (as distinct from hypothetical future) need within the City, reducing carbon footprints. It would also provide cheaper housing because of the reduced land cost, and smaller homes which are the main deficit.

8: Centres, shopping and leisure

In addition to the city centre, there are five district centres at Summertown, Headington, Cowley Road, Cowley Centre and Blackbird Leys. These provide a range of facilities, some are currently more focused on retail (e.g. Cowley Centre) and others more on evening entertainment (e.g. Cowley Road). To what extent do you agree that any of the following suggestions would be beneficial?

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Local centres should be enhanced to provide a greater range of facilities for local needs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Modern high streets should include other uses alongside retail	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pedestrianisation should create a more pleasant environment for users	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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9:

What things about Oxford do you like the most?

Small size, historic buildings, its green setting

10:

What things about Oxford do you like the least and how would you improve them?

Poor traffic flows & air quality, poor management of heritage assets, focus on growth rather than sustainable development

Lack of affordable housing - need to focus on providing housing rather than employment. Look at more imaginative solutions such as Community Land Trust model, self-build and co-housing. Limited further growth of student numbers.