

Oxford City Local Plan Pre-Submission Consultation December 2018 CPRE Oxfordshire Response

CHAPTER 1 Overall Spatial Strategy

CPRE Oxfordshire considers the overall spatial strategy to be unsound on the grounds that it is not justified, effective or consistent with national policy.

Oxford is constrained by its ancient heritage buildings, the medieval layout of much of its internal infrastructure, two rivers running through it, and its Green Belt which not only surrounds it but slices through it along the lines of the Rivers. The City has statistically more than full employment and is in no need of more.

Despite its constraints, which either constitute the City's heritage and setting or have been created to protect it, and despite claims at the forefront of each Plan including this one, that *addressing the housing issue is a key priority*, Oxford's Strategy is, and has been for at least forty years, to continually grow employment to an extent, and on a scale, that far outstrips its provision of houses for even its present residents and employees, much less those new employees who will result from its employment-first growth strategies. It is a Strategy that it is entirely inappropriate to the City and its circumstances.

CPRE has often referred to the Oxford's strategy as a clear ambition to be a new Birmingham, whereas it should accept that its infrastructure, topography and heritage dictate that it should be a compact jewel of a City, housing its own people.

The direct outcomes of Oxford's strategy of racing employment growth ahead of housing provision have been the very problems it complains of in its Plan - high levels of commuting, poor air quality, high house prices (because housebuilding has been deliberately constrained whilst demand has been deliberately inflated) and lack of affordable homes. The strategy has led in turn to a (as we shall show, entirely notional) claim of unmet need for housing. In this Plan the City states that *as far as possible, this need should be met within Oxford or very close to its boundaries, as this will enable new development to be connected to areas of employment and other facilities by sustainable modes of transport*. In other words, the City demands that neighbouring Districts accept urban sprawl into their Green Belt, despite it being specifically created to prevent urban sprawl and vital to the City's unique setting within its surrounding hills.

This Plan period is the moment when all these conflicts between the City Council's strategy and the City's actual interest are exposed at their most stark.

If, as planned, land is withheld from meeting housing need and instead used to create more employment, from here on in all housing need will be "unmet" and, if the precedent for urban extensions is created, the vital Green Belt will be peeled away like segments in an orange from the City outwards.

This is especially the case given that the Government has determined that Oxfordshire as a whole should be targeted for even higher levels of exponential growth as part of the Oxford-Cambridge Arc from 2031, just within the present Plan cycle.

Now is the time for the City's longstanding strategy to be reversed and for priority to be switched from creating housing demand to satisfying it.

It is true that the City's universities generate high tech spin off businesses, but these could be relocated outside the City as easily as within it. It is true that Oxford can support more shopping facilities far in excess of its own citizens' needs, but it is not appropriate that it should do so when all it creates is congestion, traffic and commuting for the shop workers its housing strategy cannot accommodate. The same goes for the offices, which are a primary development objective, all inevitably creating reluctant commuters too.

This Plan cycle is literally the last chance to re-think the City's strategy.

There is now enough available land to be switched from employment that creates housing need to building houses to satisfy it. If this Plan is adopted, there may not be in future. If the strategy of creating more employment continues, and the policy of forcing urban extensions into the Green Belt is confirmed, all the purposes of the Green Belt, urban sprawl, setting of the City, preventing coalescence, are perhaps fatally undermined and its whole future will be in doubt.

It is urgent that it is recognised that the City's long-standing strategy of bursting through the Green Belt that rightly surrounds it by concentrating on employment growth, in a City that already has more than full employment, results only in ratcheting up its housing need is inappropriate and unsustainable.

Instead the City should put its own housing need first and foremost, share the benefits arising from University spin-offs with its neighbours, respect the values of its Green Belt and recognise that its medieval layout and geography make it unsuitable to be a major conurbation.

That was the policy behind the old County Structure Plans and is the best policy not just for the City but the County as a whole.