



The countryside charity
Oxfordshire

Campaigning to protect our rural county

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Dear Mr Peachey

RE: Oxford's Economic Growth Strategy – CPRE Oxfordshire response, Jan 2022

Overview

CPRE Oxfordshire is concerned that, despite recognised climate and biological emergencies, this Economic Growth Strategy appears to have been developed in a silo, with little recognition given to broader environmental objectives including those established by the Environment Act 2021.

It also fails to recognise the vital importance of the Oxford Green Belt, which was specifically established to protect the setting of the City and its surrounding villages and as such to contain Oxford's outward sprawl.

We believe that as a result, the proposed Strategy is likely to lead to more commercial and residential development on the outskirts of the City, threatening farmland and the integrity of the Oxford Green Belt.

Over 20,000 houses (effectively increasing the size of the City by a third) have already been allocated in the Oxford Green Belt. Absorbing this increase will create significant challenges to overall inclusion and this should be the priority for action, before any further growth is sought. Given that funding for public services and local authorities is currently severely overstretched, it is naïve to think that resources will be made available to support the infrastructure and services required to support the levels of growth envisaged by this strategy.

The Strategy should instead:

- Acknowledge the funding, spatial and environmental constraints
- Prioritise the use of brownfield sites, including making effective use of currently underutilised areas
- Maximise opportunities for housing, especially in the city centre, ahead of further commercial development.
- On all sites, high density space efficient development must be employed to minimise land take as well as providing direct advantages in low travel needs, low cost purchase and maintenance, and high climate efficiency development.

Overall, we believe that a more balanced approach is required that builds environmental and social considerations into the development of Oxford's economic strategy.¹

¹ For example, the Oxford-developed Doughnut Economics is one potential approach.



Specific Comments

Oxford as a 'global city' - It is highly unlikely that anyone outside Oxford City Council and perhaps certain commercial estate agents would describe Oxford as a 'Global City', comparing it to the likes of London, Paris or Tokyo (as the Strategy does on Page 19).

The truth is that Oxford is not an 'economic centre' at all in the normal sense of the world. Its real strength lies in providing world class research and education facilities. The Strategy should recognise that one of the features of the Oxford economy is its reliance on state funding. Most of the jobs in Oxford are found in the hospitals and in teaching and research, a considerable part of which is ultimately funded by the Government.

Commercial space – although lack of supply is identified as a factor, there is a great deal of unused or underused land reserved for commercial uses in the Oxford Local Plan. There are numerous sites in Oxford which have sat empty, in some cases for decades, which are suitable for commercial development such as areas within Oxford Science Park and Oxford Business Park.

Transport - The Strategy document is effectively silent as to how public transport in Oxford can be brought up to the "world class network" required. What is envisaged? The location of the major employment areas in Oxford are all at a considerable distance from the City centre and are not easily accessed by bus. A train service of the sort envisaged using the old Cowley line would not provide anything like a feasible alternative to the bus for the majority of Oxford's residents, as the railway line does not pass through any major populated areas and would be used primarily by those travelling to Oxford by train. We are aware of the separate consultation currently running on the Oxfordshire-wide Local Transport & Connectivity Plan 5 but would expect to see some joined-up thinking reflected in this Strategy.

Affordable homes - It is claimed that 5,000 affordable homes will be built in the city by 2036. However, the rate of construction will be controlled by developers to maintain profits. In any case, a so-called 'affordable' house is still likely to be out of reach for anyone supporting a family on the average wage earned in Oxford – such housing needs are not going to be solved by the building of large number of very expensive houses on the edge of Oxford. The need is for need social housing which is not referenced in the Strategy document. Opportunities to build houses continue to be missed in places like Oxpens, which formerly was scheduled to have 127 houses and which under the latest plans will take no houses at all.

City Centre – we are aware that this area is subject to a separate Action Plan consultation. However, this should be referenced within this Strategy as ensuring a mixed, vibrant centre – that works effectively for residents (including prospective students and academics), not just visitors and tourists - is surely central to Oxford's overall sustainability.

Delivery Plan - The Strategy set out is not really a strategy at all in so far as most of it is totally out of the control of the City Council and is subject to the whims of landowners and developers or in the case of improvements to public transport by Central Government. Although the Delivery Plan sets out actions



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and desired outcomes, these are not quantified and there are no measures to establish success (or otherwise). We would strongly recommend that clear measurable outcomes are established.