

March 2019

working locally and nationally to  
protect and enhance a beautiful,  
thriving countryside for everyone to  
value and enjoy

## **Oxfordshire Plan 2050: Vision & Objectives Consultation - March 2019**

### **CPRE Oxfordshire Response**

#### **Overview - Who is this Plan for?**

**CPRE Oxfordshire welcomes the principle of strategic planning for the County, providing it allows consideration of the cumulative impacts of development and actively involves Oxfordshire residents in the choices to be made.**

**But the fundamental question is - who is this Plan for?**

It doesn't appear to be for existing residents, taxpayers and voters. We are being asked to accept as a done deal an overwhelming rate of growth that will have transformational impacts on our currently rural County. Our Local Councils have accepted £215 million from the Government in exchange for planning to build 100,000 houses by the mid 2030s. This would grow the housing stock of Oxfordshire, which has taken a thousand or so years to get to its present level, by 40% in just the next fifteen years. This is roughly three times the rate needed to meet Oxfordshire's actual housing requirement, based on natural rates of growth, and can therefore only happen if there is a significant influx of new people into the County to buy them. What is dressed up as 'need' is in fact growth at all costs, pure and simple.

We are promised vast numbers of new jobs, in a County with full employment. We are promised 'affordable' housing, but with no clear mechanism to deliver genuinely affordable homes - just more and more housing over our countryside.

We are promised a better quality of life, but told there is a vast funding shortfall to meet current infrastructure requirements, let alone what may be required to cope with a doubling of the Oxfordshire population by 2050.

We are promised engagement and consultation, but told the plans up to the mid-2030s are fixed and beyond that we are at the whim of the Government's Oxford-Cambridge growth corridor proposals - including the new Expressway and the unprecedented levels of development that it is intended to unlock.

We are told that growth in Oxfordshire is vital for the UK economy as a whole, but there is no assessment of how directing investment here will impact on areas elsewhere that may have far greater need for support and regeneration. The Local

Industrial Strategy, intended to drive jobs growth in Oxfordshire, is being decided separately between the Oxfordshire Local Enterprise Partnership and the Government, without public consultation.

**The inevitable conclusion is that this is not a plan for us - Oxfordshire residents of a rural county - but an arbitrary and unproven plan for developers and big business.**

## **What's the alternative?**

Let's start from a different place.

**The County's rural character is the fundamental starting point from which decisions about the future development of the County should be made.**

Oxfordshire's countryside, towns and villages are at the heart of its environmental, economic and social well-being.

- Local people, not unelected quangos such as the National Infrastructure Commission, should be in the driving seat.
- The amount of development, and its timescale, should be based on natural growth and migration, not arbitrarily inflated figures.
- Job creation should reflect Oxfordshire's existing skill base and requirements, while addressing areas of real need to reduce unsustainable commuting. Contribution to the UK economy can be made by acknowledging and supporting Oxfordshire's role as a *seed-bed* for innovation across the country, not as the primary place for expansion.
- The priority for development should be genuinely affordable (ie low-cost) housing made available, in perpetuity, to address local need. The open market has proved spectacularly incapable of delivering this, so we need to explore alternatives including social housing.
- Urban brownfield land should be developed first, with high density of development as standard. Green Belt and AONB land should only be considered as a last resort under *truly* exceptional circumstances and when it can be publicly demonstrated there is no acceptable alternative.
- Intelligent design is required to support healthy and sustainable communities and help meet our climate change targets.

The countryside is not just a 'nice to have' - it is a social good in its own right, providing food, water, clean air and more, and vital to our physical and mental well-being.

This shouldn't be about how much development we can cram in over the next 30 years.

It should be about what Oxfordshire actually needs and how that can best be accommodated over time, within its social and environmental limits.

**This plan should prioritise the needs of existing Oxfordshire residents and their families, working to ensure that anyone living in Oxfordshire in 2050 can still experience and enjoy the rural character of the County that exists today.**

## Detailed Comments

### Discussion Point 1

#### *Does the draft vision meet your aspirations for the future of Oxfordshire?*

No. The Vision is a general statement that could apply to anywhere in the UK and ignores the most fundamental issue facing the County which has prompted the Plan - namely the level of future growth that the County should accommodate. It is tilted too much towards growth and not enough towards maintaining Oxfordshire's rural environment and character and the established needs and aspirations of existing residents

#### *Are there any changes you would like to see to the Vision?*

There is no recognition of Oxfordshire's rural character or the importance of landscape, both of which are significant factors in its current economic, social and environmental well-being.

Needs re-wording:

*The integrity and richness of the county's historic **rural** character, ~~and~~ natural environment **and landscapes** are valued and conserved.*

...

*The private and public sector continue to have the confidence to invest in the county, **including in protecting and enhancing its environment.***

The wording also needs to reflect:

- The need to control and restrain development pressures to keep within our environmental capacity to protect and enhance the environment and maintain social cohesion.
- The need to prioritise sustainable housing, at appropriate density, that people can genuinely afford.
- The need to respond to our climate change commitments.

### Discussion Point 2

#### *Do you feel that we've identified the right aspirations for Oxfordshire?*

Economic growth for its own sake is not a primary measure of success.

Aspiration 3 should be amended: Support ~~economic growth~~ **economic well-being**

**Where do you think the balance should lie in prioritising these aspirations?**

In our view, the balance should lie in Aspiration 1: Protect environmental quality

We broadly agree with the assessment (Paras 36-37) of the environmental and cultural assets that make Oxfordshire such a special place to live and underpin the economy, and also agree with Para 38: *‘There is a long-term responsibility on us to ensure that these environmental and cultural assets are maintained and enhanced for the benefit of future generations. There is also a clear short to medium term benefit\* in terms of preserving our quality of life and the county’s distinctive character.’*

\*We think this is also a long-term benefit.

**It is this Aspiration that should set the framework against which decisions on all the other aspirations should be judged.**

In addition, we say that the Plan should start with the people of Oxfordshire and what they want/need. So, start with a plan to provide affordable [and desirable] homes for those in need, near to places of work, with good connectivity, but with a focus on retaining what is most special about the County.

**Further development which supports national growth requirements (critically considered and comparing Oxfordshire against other areas of England with potentially greater needs) should be a secondary driver, not the primary driver as it seems in this document.**

**Discussion point 3**

**Do you feel the draft objectives are appropriate for the plan?**

Patchy (see below).

The plan appears to serve the needs of the Treasury and a few, not all, of Oxfordshire residents. It should be refocused on well understood local needs/problems (housing, recruitment of key workers, improved transport, reduced pollution, climate change targets) before considering the needs of the national economy (which may be better met in other areas where the local population would derive much needed benefit).

**Are there any changes or other objectives that you would like to see?  
Should they be bolder? Or more specific?**

Specific suggested changes are marked - deletions ~~striketrough~~, additions in **red, bold**

### ***Aspiration 1: Protect environmental quality***

*Draft Objective 1:* To maintain and enhance the historic built and natural environment of the county, **and its ecosystem services, social and cultural capital and legacy**, through strategic investment and high quality design and to capitalise on **recognise** the benefits these assets contribute to quality of life and economic success, **as well as their intrinsic value, so that they can be protected for future generations, with measures including strategic investment and high quality design.**

*Draft Objective 2:* To protect and enhance the County's distinctive **historic rural environment** and landscape character, **and** recreational and biodiversity value by considering the benefits these assets bring when selecting **the overall scale as well as choice of** areas for growth, by optimising densities, by improving connectivity between environmental assets and securing a net gain for biodiversity.

#### *Additional objectives:*

To ensure that the level and pace of development proposed within the County is within its capacity to deliver without environmental harm or disturbing its rural nature (as Secretary of State James Brokenshire promised).

To reverse recent decline and ensure environmental net gain within Oxfordshire over the period to 2050, in line with the Government's 25 year plan for the environment and 2017 Heritage Statement.

We note that the environmental context section omits mention of Conservation Target Areas, which are a key consideration in achieving the stated ambition of a net gain in biodiversity.

A comprehensive heritage management plan is also needed to bring the historic environment up to speed with biodiversity.

### ***Aspiration 2: Strong & healthy communities***

*Draft Objective 3:* We support this objective as written.

*Draft Objective 4:* To create sustainable communities by providing good access to employment, housing, open **and green** space, transport, education, services and facilities to meet identified needs and that respond to the challenges of climate change, **within a clear vision of enhancing Oxfordshire's natural and cultural capital.**

### ***Aspiration 3: Support economic growth***

Overall, we feel that this section confuses the notion of ‘best’ with ‘biggest’ ie ‘more’ is always the right option, without considering what we are actually trying to achieve. In our view, the needs of Oxfordshire residents should be prioritised, followed by consideration of how the County can also contribute to the broader UK economy. What is needed is higher quality growth replacing lower quality and this is exactly the area with better qualified people and a so far largely unspoilt environment where people will be capable of it and businesses willing to provide it.

*Draft Objective 5:* To establish the right conditions to sustain ~~and strengthen~~ the role of Oxfordshire in the UK economy by building on our key strengths ~~and assets~~. **as a seedbed for innovation. High tech and high margin businesses will be the key, but major support for the rural and agri-economy equally important.**

*Draft Objective 6:* To ~~create~~ **maintain** a prosperous, successful and enterprising economy, but ensuring the ~~with~~ benefits ~~felt~~ are shared by all **Oxfordshire residents, in both urban and rural areas, and that this is delivered within Oxfordshire’s capacity to protect and enhance the environment and maintain social cohesion locally as well as County- and district-wide.**

#### *Additional objectives:*

To ensure the protection and enhancement of a range of jobs to suit the differing needs of Oxfordshire residents, whilst also supporting investment in education and training to improve skills and flexibility.

To support flexible working, including the growing numbers of people working from home.

To steer new jobs away from overcrowded Oxford and towards the County Towns to distribute wealth more evenly and to protect the valuable setting of the historic City and to support the co-location of jobs and housing (given the extensive housing allocations already directed to these areas).

We also note (Para 43) the reference to the Local Industrial Strategy. It would be helpful to understand what role this will play in influencing the aspirations and objectives of the Oxfordshire Plan 2050, given that it has been developed by the Oxfordshire Local Enterprise Partnership (an unelected body) and has not been subject to public consultation. We suggest that nothing should appear in the Plan that is not to be tested through stakeholder and public consultation.

Para 46 states ‘Maximising the creation of wealth in the County will help address infrastructure challenges and tackle inequalities.’ This is not the County’s experience to date: all growth plans for the County that CPRE has so far seen involve a larger and larger gap in infrastructure funding. If the County is not to find itself driven into poverty by future growth deals, it must build up an infrastructure fund that more than covers what is required.

#### ***Aspiration 4: Improve housing availability & affordability***

*Draft Objective 7:* To meet the county's identified housing needs, particularly **genuinely** affordable housing, **need being defined as based on the natural growth of the resident population** and support our selected economic aspirations.

*Draft Objective 8:* To ensure that a range of housing options are available that will cater for a variety of **local resident and key worker** needs and are built for adaptability, energy efficiency and to a high quality **and good design, and at maximum density to minimise landtake**.

As it stands, there is an implicit conflict between the needs and reasonable aspirations of the residents of Oxfordshire on the one hand, and on the other the authorities' desire for a dash for growth which will further marginalise those who are underhoused and will never have the earning capacity to buy local homes, and yet this part of the population is essential to the community - nurses/carers, teachers, technical and admin staff etc.

We note that the 100,000 houses agreed in the Oxfordshire Housing & Growth Deal will already cater for numbers way beyond Oxfordshire's 'need', as acknowledged by the Minister himself when signing off the Deal.

#### ***Aspiration 5: Improve connectivity & movement***

*Draft Objectives 9 & 10:* We support these objectives as written.

##### *Additional objective*

The whole issue of through traffic (incl. OxCam Expressway and East West Rail) is ignored and needs debate and an objective in its own right so that it can be properly assessed and the balance of benefits and harms considered, with integration into plans, together with infrastructure costs.

#### **Discussion Point 4**

***Do you agree with the commentary relating to the spatial scenarios illustrated, or do you think there are important considerations we have missed? Do you consider there are any other potential spatial scenarios we should consider? Are there any spatial scenarios you think we should avoid (please provide reasons if you can)?***

Dividing the spatial patterns in this way is somewhat arbitrary as in reality it is of course likely that a mix of these suggestions will be required.

Today's spatial pattern of settlements, communications and business is the result of ongoing long-term historical change, not the last 80+ years of Town and Country Planning - which has too often obliterated historically distinctive patterns that give

Oxfordshire its character. This issue should be approached from the point of view of managing the trajectory of change in ways that retain, complement and enhance the historic character and current distinctiveness of the County seeking to focus change in areas where major 20<sup>th</sup> century impacts have obliterated earlier historic character without creating new landscapes of intrinsic historic or ecological interest

We therefore comment below on various matters of principle:

1. *CPRE supports the intensification of city, town and district centres and within existing suburbs.*

Urban brownfield land should be developed first, with high density of development as standard, and the Oxfordshire Plan 2050 should set out mechanisms and incentives to encourage this.

It is a common misinterpretation that the supply of brownfield sites is finite, when in fact research shows that over time new sites frequently come forward. This may well be particularly true at the moment, given the changing nature of retail.

In particular, we would urge the City Council to re-consider its approach to the large areas of land it is currently protecting as employment sites and make these available for housing, which is its primary need.

**Overall, our local authorities should be much more ambitious with regards to the density of development, setting a target density of at least 70 dwellings per hectare. High density development makes for more sustainable communities in terms of co-location of jobs and housing and better public transport and services. It minimises the land required (a scarce resource) but also encourages developers to build smaller and more affordable properties (rather than large-scale ‘executive’ homes for commuters). Accompanied by high quality design, such as adherence to accessible green space standards, there is every reason to think high density communities can be attractive, healthy, affordable and desirable places to live.**

2. *The permanence and openness of Oxford Green Belt must be protected, in the interests of the environment and the clear and informed wishes of local residents. The creation of further Green Belt designation could ensure existing and new ‘garden’ towns benefit from a natural, designated and protected boundary.*

The Oxford Green Belt’s role as a constraint for urban sprawl is more vital today than ever, helping to protect the setting and character of the City, which is fundamentally unsuitable to be a large-scale metropolis. Access to green space is now well-recognised as a vital part of people’s health and well-being. For City

dwellers the Green Belt is the countryside on their doorsteps but is being slowly eroded as the City seeks to absorb surrounding villages.

The development of new Garden Towns at Didcot and Bicester provides an opportunity to consider the creation of additional Green Belt land within the County.

Oxfordshire residents have consistently expressed their overwhelming support for retaining the permanence and openness of the Green Belt<sup>1</sup>. It is notable that the Sustainability Appraisal Scoping Report commented that not doing the Oxfordshire Plan 2050 would most likely result in the Green Belt remaining unchanged - the implication being that carrying out this Plan will automatically lead to removal of land from the Green Belt. This is unacceptable': we should keep what we have and look to increase where it is needed.

3. *New settlements* - we accept that there may well be a role for new settlements in meeting housing needs. However, any new settlement must be appropriately located, taking environmental, social and economic factors into account, and of sufficient size to be self-sustaining.
4. *Dispersal* - *this may be part of the solution, providing it is managed differently to recent experience.*

The assumption often is that smaller communities (and CPRE itself!) will be entirely opposed to development in their area. This is not the case. Nearly all communities are happy to see some level of development brought forward, providing it is in keeping with local character, is at a scale and pace appropriate to the settlement and its services and facilities, and meets local need (which generally means low-cost).

Too often over recent years we have seen instead large-scale housing estates dumped onto the outskirts of villages, sold at exorbitant prices but with insufficient infrastructure funding. It is little wonder that people are disenchanted with the system.

Meanwhile, the lack of truly affordable housing in rural areas is a real issue that threatens to turn some of our most picturesque villages into commuter ghost-towns rather than vibrant local communities.

The Oxfordshire Plan 2050 should therefore give careful consideration to this issue as part of its healthy place-making agenda and be clear about the type of development, including the best design, that is needed and exactly how this will

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<sup>1</sup> See <http://www.cpreoxon.org.uk/news/item/2447-cpre-survey-shows-majority-don-t-want-to-build-on-green-belt?highlight=WyJncmVlbiIsIdnncmVlbiIsImdyZWVuJyIsImJlbHQiLCJiZWx0JyIsImJlbHQnLCIsImJlbHQnLiIsImJlbHQncyIsInN1cnZleSIsImdyZWVuIGJlbHQiLCJncmVlbiBiZWx0IHN1cnZleSIsImJlbHQgc3VydmV5IIO=>

be achieved, avoiding the disastrous examples of the recent past. We must avoid the uniform and mediocre developments that seem commonplace at present.

5. *The 'spoke and hub'* - presumably an interpretation of the 'County towns' strategy which intended to direct both jobs and housing to towns such as Witney, Wantage and Bicester, ensuring dispersal of economic benefits

In practice this policy has only been half delivered - local authorities have directed extensive housing growth to these towns, but continued with a centralised approach to employment, promoting jobs within the City and the knowledge spine (supposedly stretching to Bicester, although there has been little evidence of this with jobs clustered to the centre and south of the spine).

Inevitably this has led to increased commuting and all the challenges this brings.

The time has come to re-think this approach and ensure that job creation is considered equally alongside truly affordable housing allocations. The Oxfordshire Plan 2050 should be much more ambitious about the level of job creation in these County towns.

6. *Connections between settlements as a way of taking pressure off routes in and out of Oxford* - current public transport connections between villages and market towns are poor to non-existent, especially in terms of facilitating commuting. A complete re-think is required if the connectivity and movement objectives are to be achieved.

It is disappointing that the upgrade to Local Transport Plan 4 is being taken forward separately to the Oxfordshire Plan 2050 when it is clearly such an integral part of effective spatial planning. One important issue is a necessary re-consideration of the placing of Park & Rides.

7. *Over suburbanisation of rural settlements should be avoided.*

Much of Oxfordshire's countryside has seen the widespread suburbanisation of villages, often so much so that their historic cores are now entirely divorced from their once rural setting, often even where they are Conservation Areas. The insidious suburbanisation of the countryside has had other knock effects such as the serious diminution of dark skies and quiet places across much of the County. These effects most often arise in small incremental steps where the impact of individual developments may be small but their number and extent cumulatively year on year is very substantial. Instead of destroying the historic character of villages through mass suburbanisation far more sensitive ways of respecting and building on historic character of such settlements must be found if they are to make any contribution.

8. *Taking account of the full range of historic patterns of settlement* - While towns and villages characterise much of Oxfordshire, some areas are characterised by more dispersed forms where turning every settlement into a 'village' with defined limits is not in keeping with the historic character and may artificially limit scope for a more sensitive way to conserve and enhance long term character. Just as green fields, without special designation, are important to the County's landscapes, villages which are not themselves Conservation Areas remain important to the historic character of a whole area.

### **Discussion Point 5**

**Do you agree with the commentary relating to the main infrastructure issues?  
Are there any changes or other issues that you would like to see referred to?**

In general, a far smarter approach is needed that clearly recognises the potential speed of change and should be steered towards minimising environmental harm, promoting environmental enhancement both at local level and landscape scale, leaving options available for flexible solutions, less reliant on major infrastructure, more adaptable to new technology and thereby **more resilient to risk**.

### ***Key regional projects (Paras 61-62)***

This is nonsense.

**The Oxford-Cambridge growth corridor proposals will lead to the absolute transformation of our rural County into an urban conglomeration, with a doubling of housing stock and population within the timescales of this Plan.**

**They are currently being taken forward without public consultation, parliamentary scrutiny or environmental assessment.**

**It is disingenuous not to acknowledge the dramatic and harmful impact these proposals would have or the absolute lack of influence that local people have had over them to date.**

We believe that current aspirations to build on the Oxford-Cambridge 'arc' are far too narrowly envisaged: in the first half of the 20<sup>th</sup> century, before the spread of higher education, the University of Oxford had centres for external studies all over Britain especially in the industrial north. Now inter-university collaborations and innovations are not only UK-wide but international: they are the life blood of innovation and high-tech enterprise, and with digital technology it is increasingly easy to spread these benefits across the whole of the country, not just the already over-heated SE, let alone all crammed into the so-called Oxford Cambridge 'arc.'

There is a fundamental problem in the whole strategy for which - as far as we can tell - no alternatives have ever been examined or assessed for their environmental, social and economic impacts. For this sector above all, a far more imaginative vision is needed, exploiting and developing a more balanced, cohesive and socially responsible approach to share the social and economic benefits of this national asset nationwide, and thereby disperse rather than concentrate the environmental impacts.

It is obvious to all concerned (including local council leaders) that it is not possible to develop the Oxfordshire Plan 2050 and the Oxford-Cambridge Expressway simultaneously - one cannot develop a spatial plan without knowing where the Expressway will be routed.

On the other hand, if the decision on the Expressway is left down to Highways England, this will effectively disenfranchise Oxfordshire residents in terms of having any say on the scale and location of development.

We appreciate that these problems are not necessarily of our local authorities making but there are options available - in particular, to refuse to progress the Oxfordshire Housing & Growth Deal until the situation is resolved.

### ***Transport connectivity (Para 66)***

*'A bold, forward thinking Oxfordshire Plan that sets a clear vision for growth is more likely to release opportunities for Government funding and will help direct local authority funding and Community Infrastructure Levy income to the projects that are priorities for supporting growth.'*

**This appears to us to get to the heart of the issue. The Plan is effectively self-justifying - we need the growth to get the funds that will only be needed to support the growth.**

See also Para 53: *'this means that providing significant new pieces of infrastructure is only usually realistic where new development is delivered'*.

Growth seems always to provide a bigger gap between the need and provision of infrastructure.

In this endless cycle of doom, there is nothing said about improving quality of life for existing, or even future, residents.

Our alternative proposal is 'A bold forward thinking Oxfordshire Plan that sets a clear vision for environmental protection and enhancement, to ensure a continued vibrant economy and enhanced wellbeing for Oxfordshire's residents and wildlife'.

There also needs to be clarity on how money will be apportioned so that projects and communities that are not deemed "priority growth areas" (likely rural areas) are not disadvantaged over time. Already the A40 problems are being "demoted" in

importance below others. This may be something that should be addressed by the proposed Strategic Infrastructure Tariff.

***Social infrastructure (Para 73)***

*‘Population growth if not planned carefully, can add pressure on services for new and existing residents.’*

The Oxford-Cambridge growth corridor proposals envisage a doubling of Oxfordshire’s population by 2050.

Adapting successfully to this would require not just careful planning, but a budget way beyond the capacity of the UK treasury and the tearing up of Darwin’s rules of evolution to allow our nature and wildlife to cope with such a rapid and complete transformation of their habitats.

**Development at anything approaching the scale and rate intended is wholly incompatible with improving or even maintaining people’s quality of life and the environment we cherish.**

**How does the Oxfordshire Plan 2050 intend to tackle this conundrum?**