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Eco-towns Team
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Dear Sirs

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PROPOSED ECO-TOWN AT “WESTON OTMOOR”

We refer to your consultation document “Eco-towns - Living a greener future”, and specifically to Page 31 detailing the “Weston Otmoor” proposed site in Oxfordshire.

To reiterate the CPRE’s national position on eco-towns, we can fully support the Government’s aspirations for achieving the highest standards in terms of sustainability and affordability, but achieving high environmental standards on site is not enough if the development is in the wrong place to begin with.

We can therefore agree with the aspirations for eco-towns, but we have substantial and grave concerns about the Weston Otmoor proposal and its siting in terms of planning merit and overall sustainability issues.

Our comments will centre on:

- Intrinsic site-specific problems and constraints in terms of sustainability;
- The lack of local engagement on such a significant proposal;
- The lack of proper examination of alternatives in Oxfordshire which might offer a more effective “eco” solution and a better strategic planning “fit”.

Site specific issues of concern:

We have some initial comments of a factual nature about the site description:

Total Area of the Proposed Site.

There was some confusion about the exact area that the site covers, not assisted by the initial information disseminated by the developer, but they now agree that it consists of 828 hectares, including a tongue of land surrounding Weston-on-the-Green to the west. Of this approx. 203 ha or 24.5% is designated Green Belt at the south eastern part of the site (see below).

Brownfield/Greenfield issues

The fact your minister first announced that the entire site was 90% brownfield must be put down to an aberration. Only 135 hectares or 16 per cent of the proposed site could be considered as “previously developed land” under the definition set out in Annex B to PPS 3, this being the MOD owned Weston-on-the-Green airfield, a grass airfield in continuous use since July 1918. It is currently used principally as a centre for parachute training, together with an active civilian gliding club. However, PPS 3 also states that: “The priority for development should be previously developed land, in particular vacant and derelict sites and buildings.” Unlike many other MOD sites in the country, this land is neither vacant nor derelict and apart from a small group of buildings is free from development - by no stretch of the imagination is it an area which is in need of regeneration. The remaining 693 hectares, or 84 per cent of the site, would be built on greenfield land, primarily productive farmland at a time when pressure on resources to produce food is mounting. The character of the area is one of open countryside and considerable rural charm.

The Oxford Green Belt.

The southern edge does not “fringe” the Oxford Green Belt, as stated in the DCLG site summary. In fact the whole south-eastern part of the proposed development intrudes into it to the extent that 24.5 % (approx 203 hectares) of the entire site lies within the Green Belt. It is difficult to reconcile this with recent Government comment on Green Belt issues. The DCLG announcement of the 15 proposed sites on 3 April 2008 said “Based on an evaluation of the bids, the Government can today announce no new homes would be built on Green Belt land.” This was confirmed in a telephone conference call to 20 MPs on 4 April hosted by Caroline Flint; and reiterated by her on the Simon Mayo Show on Radio 5 on 21 May. CPRE strongly supports the continuing application of restrictions imposed by PPG 2 for any proposed new development in Oxford’s Green Belt, which was established, inter alia, to prevent sprawl and to preserve the setting of the historic city of Oxford. Successive Governments have strongly and consistently supported the Green Belt for Oxford, and indeed the general concept of Green Belts as an important planning policy tool.

Based on the Parkridge Initial Proposals, it is clear that to make the scheme work the developer needs to include the 200 hectares of Oxford Green Belt in order to construct the new rail station and the associated permanent transport infrastructure, including the tramway and a 5,000 space Park and Ride. This is not an optional extra but key to the claimed sustainability of this scheme. This large intrusion must lead inexorably to the “expansion” into the Green Belt close to the new rail station. In reality there would be huge commercial pressure to locate new housing and business development closer to the rail access, rather than in a remoter area up to a mile away to the north, leading to the loss of extensive areas of

Green Belt. The proposals do not indicate how or where this might be compensated. This has to call into question the Government's bold statement: "no new homes would be built on Green Belt land".

If non-residential uses were envisaged on the Green Belt part of Weston Otmoor, the most likely options would be recreational, for example sports fields and parks that might be considered justified in view of PPG.2. We are strongly opposed to such development, as the landscape would be altered from its present semi-natural state to one that is manicured and unnatural and it would attract the range of ancillary uses associated with modern sports fields such as pavilions, car and coach parking, and floodlighting. In short it would become an extremely urbanised landscape contrary to the objective of the Green Belt.

Biodiversity and the Natural Environment.

Lying within the site are two nationally designated SSSIs. To the south-east is Woodside Meadows Nature Reserve, which is part of the Wendlebury Meads and Mansmoor Close SSSI, one of the largest complexes of increasingly rare species-rich wildflower meadows left in the country. To the north-west is Weston Fen SSSI, a species rich calcareous fen of particular interest for its wetland flowering plant communities and its invertebrate fauna, including a number of Red Data Book beetles and flies. Of particular importance to the health and richness of both these sites is the underlying hydrology. Any changes to the water supply will result in changes to the plant and invertebrate populations dependent on those conditions, and the possible elimination of the most sensitive species. The pressure of placing a town of the size contemplated in the immediate vicinity would make their future integrity highly unlikely, even if the actual SSSI sites were spared from direct development. This makes a particular nonsense of the "eco" label. In addition, in the middle of the site lies Warmough Copse (5 ha), which, like Weston Wood (18 ha) and Black Leys Wood (13 ha) lying on the western boundary, is a piece of ancient woodland with associated plant and animal communities. It is difficult to see how the developer can meet the challenge to "strengthen biodiversity" set by the Eco Challenge Panel when faced with the almost inevitable weakening or destruction of examples of nationally important habitats, which can not be 'fixed' by some urban landscaping.

Conservation, History and the Built Environment.

We would argue the beauty and character of this countryside and its historic villages deserve protection in their own right. In particular the relationship of the new settlement to Weston-on-the-Green - an attractive historic village and conservation area designated in 2000 - is unclear. As the DCLG summary states, there are historic settlements, listed buildings and landscape issues to be addressed. These should be protected and indeed enhanced by the proposals, but a new settlement of this scale would inevitably swamp the character of Weston-on-the-Green and the surrounding rural countryside.

Water matters.

The Environment Agency's 'Catchment Abstraction Management' Strategy, published in July 2005, for the Cherwell basin indicates that the river is already over abstracted, and is an area, as you state, of "serious water stress". We have to query seriously the sense of introducing a new population of up to 45,000 people given this situation. Here is a clear example of the importance of the concept of environmental limits influencing future plans.

Much of the site is known to be subject to flooding, and local surrounding farmers have expressed concern that the sort of development envisaged is likely to increase the threat of

flash flooding on their land with increased run off. At a time of more violent weather events associated with climate change this effect is likely to be exacerbated.

It is also noted that local sewerage infrastructure is grossly inadequate and requires major investment, even without the additional burden of 15,000 new homes.

Pollution

The proposed development would of course be located right next to two of the busiest roads in the country (M40 and A34) - and (one assumes) a busy rail line. It is not clear to us how the new development will take proper regard to minimising air, noise and light pollution given such an odd siting.

“Strategic” planning issues of concern

Transport.

You state that the scheme would “achieve exceptional standards of sustainability, particularly in relation to transport”. However, we note that the published review assessment acknowledges very serious issues - even at this stage - with the viability of rail links and the viability of traffic containment measures, and as far as we can see it will essentially be car-dependent, or, in the words of the Eco Challenge Panel, “commuterville”. It is notable that the chosen site at the junction of the M40 and A34 is located at one of the most congested parts of Oxfordshire’s road network. The Highways Agency has consistently expressed serious concerns in relation to future capacity and this scheme will have further potential implications for M40 and the A34. The development would also lead to huge pressures on the local rural road network, which is already over-crowded, and the rise in ‘rat-running’ through surrounding villages. We consider that, despite the relative proximity to Oxford, there are simply too many major drawbacks with the site location, which even optimistic scenarios for transport will not overcome. The massive ongoing subsidies mooted for rail and bus use are hardly exemplars of sustainability. We also understand that there are still considerable doubts about the practicability and viability of the rail ‘chord’ to link the Bicester-Oxford line to the Chiltern line.

We have consulted with the two ex heads of transport planning in Oxfordshire County Council, who advise that in their considerable experience New Town residents exhibit very similar car travel and commuting characteristics to the residents of other towns. It may be that with effective public transport and cycle facilities some internal trips may be attracted away from cars, but it will not be possible to divert significant proportions of external trips to public transport. Even if, by the application of various incentives and disincentives, 50 per cent of the households do not use cars (possibly up to 10 percent might use the new tram and rail facility) matching the very best examples elsewhere, there will still be a minimum of 10-15,000 new car trips per day (assuming only one outward and one returning trip) trying to use an already hopelessly congested road system. In reality it may well be double this number of trips.

It is significant that Cherwell District, according to County Council statistics, has the highest proportion of long distance commuters in the County, thought to be linked to the M40 bisecting the District – and the market town of Bicester (which is comparable geographically and demographically to this proposal in some ways) has one of the highest in the whole of the South East. It is difficult to envisage the proposed town being anywhere near self-sufficient

in many areas, especially employment. In order to provide for a balanced range of business and employment opportunities, a town of over 25,000 people would require areas for land uses which attract high vehicular usage. Such uses include supermarkets and retail, service industries, car showrooms and so on. If the eco-town only ‘cherry-picks’ the highest quality low car-use businesses, then the residents will need to access the nearby towns for these functions – thus defeating the object. We do not believe that draconian control of vehicle use in or out of the site on the scale this site will need is realistic. It is our understanding from developers that it takes over 10 years to develop employment opportunities for a town of this size.

A new “parkway” style station close to Oxford with Park and Ride facilities would arguably be very attractive to commuters from a wide area – how would that be resisted?

We are also gravely concerned about the impact the transport proposals will have on the Green Belt – as outlined above. As the Bicester-Oxford rail line lies within the Green Belt, it is inevitable that the new rail station and the associated permanent transport infrastructure, including the tramway and Park and Ride will affect the Green Belt. For the site to function, these facilities need to be built at a very early stage and this in turn will (logically) create pressures to develop the areas of the site closest to the rail access leading to the loss of extensive areas of Green Belt.

In summary, the transport issues raise serious questions about the true sustainability of this site.

“Affordable housing” pressures.

One of the main perceived benefits of this proposal is the developer’s promise to deliver 30 per cent of the new town dwellings as “affordable housing”, given the assessment that the Oxford area is one of “extreme” housing pressure. We feel it is far from clear from the developer’s proposals how this would be delivered. Oxfordshire County Council and Cherwell District Council are well aware of these pressures, and of the 47,200 new dwellings planned for the county in the Draft South East Plan (2006-26), around 17,000 will fall into the “affordable” category. In Cherwell the LDF is expected to require at least 30% “affordable” in future developments. For Cherwell’s provision in the Draft South East Plan (2006-26) of 11,800 dwellings, this would equate to about 3,540 affordable homes. This figure would rise pro rata if Cherwell’s allocation increased in the final RSS. In the about to be approved south-west extension of Bicester, out of the total 1,585 dwellings again 30% will be “affordable”, yielding about 475 affordable homes.

Whilst there are acknowledged housing pressures in the Oxford and Cherwell areas, we would argue that “affordable housing” needs a sophisticated approach. It should be provided ideally in the localities where it is actually needed – rather than in one lump of up to 5,000 in a relatively isolated new settlement. As the Government knows, in the north of the County the real need for affordable housing is primarily *within* the main urban areas of Oxford city, Banbury and Bicester, where low income households have good access to the facilities they require, with smaller scale needs within the rural settlements. One of the main constraints to delivery has in fact been a chronic lack of public funding for subsidy and we do not see why that is going miraculously to change – and there is the danger of housing subsidy simply being redirected from the three towns listed above. If extra funding can be made available by

Government and social housing providers, to match accelerated provision, it does not require a radical proposal of this nature to increase delivery.

The local authorities are well aware of the likely increase in housing provision that may emerge from the South East Plan /RSS later this year and it is ‘jumping the gun’ to assume that the Weston eco-town is the best strategic solution to providing overall housing numbers and the “affordable” component for the Central Oxfordshire Subregion.

We hope that the Government will not be swayed by the prospect of the affordable housing “bonus”, as this can and should be addressed in other sustainable ways by the local authorities. Such a perceived bonus should not outweigh the central concept of environmental sustainability.

Employment/The Economy

In terms of employment provision and the economy to balance housing growth, there has been considerable debate in recent Structure Plans and the Draft South East Plan about the economy of Oxford and the Central Oxfordshire Subregion. In many respects this fundamental planning issue - how to keep the ‘golden goose’ of Oxford without unrestrained growth - was never satisfactorily resolved and it is arguable that the Subregion does not have a robust economic strategy for the long term. Allocating significantly more housing to the Subregion in the South East Plan /RSS will exacerbate this difficult issue. As part of the current Draft South East Plan to 2026, Central Oxfordshire was identified as an area with high growth pressures and detailed consideration was given to the housing and economic pressures facing this Subregion over the next 20 years. The strategy of large urban extensions was again adopted as the preferred settlement pattern to address known pressures. The idea of new settlements was firmly rejected.

One of the key objectives of the Central Oxfordshire sub-regional strategy is to increase potential for creating high quality local employment outside Oxford City. Bicester is often cited as currently lacking the business “infrastructure” and delivery to create such employment growth – leading to extensive out-commuting, lack of a critical mass for the local economy and a lack of balance. It is also noted that the major pressures for jobs growth are to the south of the City.

It is not clear from the Parkridge scheme how the new settlement will address the difficult wider issue of employment and economic issues in a true eco-town. It has no existing employment base – private or public - from which to start. The site is essentially green fields. It must also be uncertain how successful a small embryonic town centre would be in retail and business terms. If the new eco-town were to attract mainly high quality employment with low car usage, e.g. by the universities, this would no doubt be at the expense of Bicester which hitherto has been perceived as just too distant from Oxford as a location for major investment. It is ironic that a new joint initiative to help to develop Bicester’s economy – The Bicester Vision – has just been launched. Similarly, the eco-town would tend to draw much needed investment from Kidlington. If however the eco-town offered a complete range of business and employment opportunities, a town of over 25,000 people would in reality require areas for land uses which attract high vehicular usage – another undesirable outcome.

As these issues have not been addressed by Parkridge, there needs to be much more careful assessment of the settlement and its impact on the economy of Central Oxfordshire – and importantly the strategic alternatives in Oxfordshire.

Local support.

Your senior officials have stressed the importance of local support for the new eco-towns. It would appear from the published material that about seven of the current short listed eco-town schemes elsewhere in the country are backed by their local councils, and these can no doubt be progressed with local support. However, in the case of the Weston proposal, it is important to note that in recent years there has been extensive detailed consultation on key planning policy documents but no support whatsoever from the local community for such an idea: In fact:

- the Weston concept has had no real consideration in any previous formal plan;
- previous Structure Plans have consistently rejected the idea of new settlements;
- the Central Oxfordshire Subregional strategy component of the Draft South East Plan does not support the idea of new settlements;
- the emerging LDF for Cherwell DC does not support the idea of new settlements.

Moreover there has been no meaningful engagement by the developer with the local community. The notion of a free standing “eco” settlement at Weston can only be construed as commercial opportunism. Many feel the scheme has been concocted in secrecy between landowners and developer outside the normal planning framework, without the involvement of the local planning authorities or local communities. This is far removed from the idea of a “shared vision ensuring their area's development meets the needs of local communities” so strongly promoted in the new PPS 12.

In fact there is overwhelming condemnation of the idea from the local MP, the County Council, the District Council, all of the surrounding Parish Councils (15), the local Wildlife Trust, RSPB, the Oxford Green Belt Network, The Otmoor Group, etc. CPRE Oxfordshire includes itself in that long list. Why in a democratic system would Government insist on ignoring local opinion when it has said that local support is a key component of the scheme? The minister might argue that the voices of homeless households are not adequately heard, but we would respond strongly that their interests are not best served by ill-conceived proposals formulated outside the normal planning framework.

Consideration of strategic alternatives.

The long term strategic growth of Oxfordshire and its settlements has been carefully considered and consulted upon for the last thirty years through successive statutory planning documents. The last two Oxfordshire Structure Plans had to carefully assess the issue of new settlements versus continuing urban extensions and the issue of balancing growth and restraint for Oxford City. Oxfordshire County Council adopted a well thought-through policy to 2016 of focussing new development on existing towns. This is predicated on infrastructure provision to support the housing growth in the most sustainable manner. The CPRE has consistently recognised the importance of a strong and effective planning policy framework arrived at after due public engagement.

As part of the current Draft South East Plan to 2026, the Central Oxfordshire Subregion was deliberately identified as an area with growth pressures and detailed consideration given to the housing and economic pressures facing this Subregion over the next 20 years. The strategy of large urban extensions was again adopted to address known pressures and existing towns deemed the most sustainable locations to provide for balanced growth. However, the local authorities are well aware of the likely increase in housing provision that may emerge from the South East Plan /RSS later this year, and we believe it is crucial to consider the best strategic planning solution to providing overall housing numbers and the “affordable” component for Central Oxfordshire as part of the statutory planning process i.e. through the LDFs.

To assume at this stage that the Weston eco-town is likely to be the best answer to the housing pressures is to disregard all the strategic implications and the ability of the local authorities to address these issues responsibly. These issues are wider than Cherwell and Oxford City, and must be assessed in the context of the Central Oxfordshire Subregion as a whole. It is noted that the major pressures for jobs and general economic growth are to the south of the City, not the north.

Even taking Cherwell District as a microcosm of the issues, there are clear strategic implications for the three existing market towns of Banbury, Bicester and Kidlington. At present these are seen as the most sustainable locations to provide for balanced growth. All face the challenges of expanding local physical and social infrastructure to keep pace with their continued growth and meeting local “affordable housing” need. All face the challenges of developing high quality local employment and education/training facilities. New developments give them the opportunities to improve key physical and social infrastructure.

To construct a new town of similar size to Bicester midway between Oxford and Bicester ‘out of the blue’ (it has appeared in no plan to date either at a Regional, County or District level) is bound to have serious impacts. Bicester has outgrown its existing infrastructure and there are serious deficiencies in local facilities to be addressed. The diversion of new resources into an entirely new town would mean less investment in new and replacement physical and social infrastructure for these existing settlements in future. No doubt Cherwell DC will respond to the exhortations in the new PPS 12 in due course by setting out their detailed requirements for new and replacement physical and social infrastructure in the LDF and how crucial new growth will be in delivering it.

It would be logical (and natural) to consider further expansion beyond the initial size of settlement suggested to take advantage of major investments in transport, water and other physical and social infrastructure. No consideration has been offered of the long term cumulative impacts on the other towns, the Green Belt, the environment, etc, which we believe is contrary to all existing planning policy.

If, for the sake of argument, Cherwell were faced with a strategic choice of additional major growth locations, judicious expansion at Bicester and, to a lesser degree, at Kidlington would be a better strategic “fit”, and more with the grain of the existing physical and social infrastructure. However, the main point here is the question has not yet been posed - since the South East Plan /RSS, with future growth levels, has not yet been published by the Government.

Conclusions

- It is very difficult, given the lack of details, to assess how successful the Weston Otmoor proposal would be in “eco” terms (it is interesting that the Eco Challenge Panel appears to share our concerns in this respect). In terms of overall sustainability there are a number of key problems in the shape of intrinsic site-specific problems and constraints – a number of which we have commented on. Based on the current master plan, we would argue that the scheme is so poor in terms of transport sustainability, the viability of future rail and bus provision, the impact on greenfield land and the Green Belt, and the weakness of existing infrastructure, that it hardly merits more consideration.
- In terms of the internal workings of the site, it is no doubt possible adopting new technologies and new building standards for most schemes to be made reasonably environmentally friendly in that sense. We cannot judge any of that at this stage. Nor can we see how this proposal is an “exemplar” in another field of environmental sustainability, as listed in the key criteria. There is vague reference to “innovations”. We also note that there has been widespread criticism of the current eco-town schemes from eco-experts, in terms of the superficiality of their approach to eco-solutions.
- There must be strong question marks over the true costs both in monetary and carbon emission terms of the eco-town concept when total infrastructure, travel to work and amenities are fully factored in, compared with the carefully planned expansion of existing settlements.
- We can agree with the aspirations for eco-towns, but they must be of the right scale, in the right place and developed in the right way. We believe the most effective approach would be to use the concept to regenerate previously used or run-down urban areas in full consultation with affected communities. However, we have substantial and grave concerns about the Weston Otmoor proposal and its location in terms of planning merit and overall sustainability issues.
- We have concluded that - measured against the criteria set out - the Weston Otmoor proposal has serious deficiencies:
 - A number of intrinsic site-specific problems and constraints in terms of sustainability;
 - A total lack of local engagement on such a significant proposal;
 - There should be a proper examination of alternatives in Oxfordshire which might offer a more effective “eco” solution and a better strategic planning “fit”.
- We would argue that eco-town development in Oxfordshire should take the form of a sustainable urban extension built to the highest standards, and other developers must be given the opportunity through the normal planning process to put forward suitable schemes – which might receive the support of the local authorities and the local community.
- The local authorities are well aware of the likely increase in housing provision that may emerge from the South East Plan /RSS later this year, and it is ‘jumping the gun’ to assume that the Weston eco-town is the best strategic solution. Rather than the

Government pre-selecting the Weston eco-town at this stage for examination through the LDF, we would argue strongly that the local authorities and the local community must be given the opportunity as part of the planning policy framework to assess the best strategic solution to providing overall housing numbers and the “affordable” component for the Central Oxfordshire Subregion.

- We hope that the Government will not be swayed by the prospect of the affordable housing “bonus”. This should not outweigh the central concept of environmental sustainability.
- In the meantime, we understand that up to seven schemes already have the backing of local councils and these can no doubt be progressed. We feel that it would be completely arbitrary to insist on ten schemes being short listed, although that may be an aspiration.
- We believe it is important that the nation should embrace sustainability, and all future developments should meet high environmental standards. But we feel the current process and the current ill-conceived proposals will have no credibility with the public, and will only serve to damage progress towards a sustainable future.

We strongly oppose the Weston Otmoor proposals for the reasons set out and trust these comments will be taken into account.

Yours faithfully

Bruce Tremayne
(Chairman)
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