

## **South Oxfordshire Local Plan 2034**

### **Matter 5 - Spatial Strategy**

#### **CPRE Oxfordshire Hearing Statement, June 2020**

The Spatial Strategy is unsound because it is based on flimsy and unsound evidence dating back to 2014 and because its proportional allocations do not take into account easily identifiable local circumstances.

#### **1. The overall Strategy is unsoundly based.**

The overall spatial strategy appears to be based on the 2014 Issues and Options consultation immediately after the SHMA and, significantly, before the Growth Deal on which the 2034 Plan is based. Although elaborated in the 2015 preferred options, this effectively let the public choose - unguided - between a number of single choices.

It was based on a housing number of 3,600 for SODC and 3,000 for Oxford's unmet need.

The responses received were derisory in number and frequently single word in content (e.g. No). The Council's report stresses - as though that needed to be said - that responders had had their own interests in mind when responding.

There is no argument from us that public consultation is a key part of the planning process.

But a consultation six years ago, based on unrepresentative figures, with self-selected respondents (many of whom had special interests in either protecting themselves or as it might be promoting their own pet schemes) is no basis at all for determining the spatial strategy for the District, especially when the Council's preference was represented as being to continue the spatial strategy from the 2012 Plan and failed to - for instance - give respondents the pros and cons of alternative strategies to consider. If anything is clear it is that development in the Green Belt should be avoided

To give one example, if the magnitude of the housing development in the 2034 Plan had been revealed and if it had been clear that it was sufficient to justify the

creation of a new single settlement and conversely the potential impact on existing towns and villages of a % distribution strategy had been made apparent, then responses might have been very different. They would still have been of little weight, even then, because of the self-selected nature of the sample.

It is unsound to base the Spatial Strategy for the District on such an unrepresentative and uninformed consultation.

## **2. Another way of doing it.**

Planning for Prosperity, the NIC proposal for the development of the Oxford Cambridge Arc, was itself based on the economic advantages perceived and the infrastructure required. Whilst CPRE by no means supports the scale or nature of the NIC development proposed, it is noteworthy in this context that attached to the NIC report, and commissioned by them, was a similar in-depth report by 5<sup>th</sup> Studio into the spatial implications, essentially for the “million houses” development across the Arc.

This considered in considerable depth various versions of what they termed “pearls on a string” from extensions of existing settlements through a number of new settlements of various sizes, to just two new cities - neither of them being Oxford or Cambridge, or indeed being in either of their receptive shires, but at Calvert, Buckinghamshire, and Sandy, Bedfordshire.

Of these options, Bridget Rosewell of the NIC, speaking for Sir John Armit at the Westminster conference in February last, stated that the preference was for the two large cities approach and added that the Oxford and Cambridge Green Belts should be particularly avoided.

The 5<sup>th</sup> Studio Spatial Strategy report was published in November 2017, well in time to have informed the development of the SODC Local Plan.

If the 5<sup>th</sup> Studio Spatial Options had been translated to SODC and led to an informed consultation, it might well have been that a single settlement outside the Green Belt (and AONB) would have been seen as being the least damaging and most flexible solution, and a proper exposition of the pros and cons could well have led to general public acceptance (except of course amongst the most likely responders to unsound consultations, those who would be directly affected on the one hand or had other sites to sell on the other) .

## **3. Other Issues**

### **a. Green Belt**

The Green Belt allocations in the Local Plan will be considered at another session. It is CPRE’s view that none of these allocations are justified, and to the extent there may be considered there are “exceptional circumstances” to justify them there are even “more exceptional circumstances” why they should be dismissed. This is not

the place to rehearse our arguments. It is relevant however that should the Green Belt releases be deleted as we recommend, this will leave a considerable part of the Plan's housing trajectory unallocated.

If the Green Belt had been the only option to provide for these numbers then it should not have been allocated until all other alternatives - including their re-allocation under the duty to co-operate - had been explored. In this context it is noted that when the Oxford unmet need allocation was imposed on SODC through the 2016 Growth Board apportionment process, SODC had no intention of accommodating it in the Green Belt and the 2033 Plan accommodated (albeit a reduced number) without doing so.

#### b. Strategic Sites

All but one of the Strategic Sites, Chalgrove, is in the Green Belt. Chalgrove is a partially previously developed site and falls between the designated Green Belt and AONB. It also has further land available for future expansion should the site be selected, and it is also close to Oxford, although transport links would require considerable investment. However the extent of the proposed development would not only harm the existing village of Chalgrove and its character but also risk harming surrounding villages through the volume of the traffic that would be generated. It is hard to see that these concerns are capable of being satisfactorily addressed and there is still apparent doubt over delivery in relation to Martin Baker's lease on the site.

#### c. Other allocations

Although larger and smaller villages are differentiated, within the category each has a fixed percentage allocation for development. This takes little if any account of past expansion - some villages may already have seen substantial development, others little or none - nor of the spatial nature of the settlement. A linear village, for example, is treated in the same way as a compact nuclear village. But whilst infill, for example, might have little impact within a nuclear village it would fundamentally harm the character of a linear village.

Some villages are treated as though they have services with the implication that these can support development - or even require development to support them - whereas for example in the case of Waterperry these "services and shops" are all related to the garden centre's activities except for an upmarket farm shop adjacent to it, and do not serve the needs of the population as say a village store might do, nor make it a weekly shopping destination.

The one size fits all approach to spatial planning may appear to "share the pain" equally but does not recognise the particular circumstances or character of the settlements to which it is applied.

An exception is those settlements with NDPs as the process requires recognition of the village's capacity and character. Even that however fails to take account of

wider impacts. The release of Green Belt land at Wheatley, on the assumption of an NDP to justify it, and without for example formally taking into consideration that surrounding villages who use the Wheatley services might have the capacity to accommodate the housing is a case in point.

#### d. AONB (Area of Outstanding Natural Beauty) Policy

**A new standalone policy on the Chilterns Area of Outstanding Natural Beauty (AONB) is required** to meet the Council's statutory duty under the CROW Act 2000 to have regard to conserving and enhancing the natural beauty of AONBs and the NPPF requirement that great weight be given to conserving and enhancing landscape and scenic beauty in AONBs, noting that *'they have the highest status of protection in relation to these issues and that major development should be refused'*. This would be in line with Local Plans elsewhere in Oxfordshire, for example the West Oxfordshire District Local Plan in relation to the Cotswolds AONB.

The larger villages policy H4 does not mention the AONB. The arithmetically derived 15% allocation will involve major development in the AONB, which is specifically prohibited by the NPPF unless exceptional circumstances exist or it is in the public interest. No exceptional circumstances or local need are provided, and alternative sites exist.

The Council's position that a case for a lower housing number for AONB villages could be made through the NDP process is inconsistent with Policy H4 which refers to the numbers as "requirements" and threatens to enforce a presumption in favour for planning applications if NDPs have failed to meet these "requirements". This sanction should be amended such that applications will be supported unless specific policies in the NPPF indicate that development should be restricted.

**The SODC Examination Library refers to the Chilterns Area of Outstanding Natural Beauty Management Plan 2014-2019 & the North Wessex Downs Plan, but there is no reference to either document in the Local Plan itself (only the Chilterns design guide - a supplementary planning document). It should be noted that both of these 2019 Plans have now been replaced.**

#### 4. Recommendation

It is no part of CPRE's responsibility to prepare alternative spatial strategies for which we have neither the human nor financial resources, but it is our remit to challenge spatial strategies proposed where they are clearly inadequate evidence or justified.

The sole justification for the 2034 Local Plan is the number of new houses proposed, which are in turn justified solely by the Government's willingness to fund the infrastructure to build them, given that all the evidence of "need" or "requirement" is unreliable and long out of date. (How long that the Government's willingness or even ability to fund will continue post Covid is another matter).

However, whilst the Plan's justification may be the Growth Deal housing numbers, its sole purpose is to create the optimum spatial strategy to accommodate them.

There is therefore no evidence sound and reliable enough on which to base a housing distribution which will impact on the District's settlements and Green Belt "for ever".

Little imagination or creativity appears to have gone into this prime function; what has been done is years out of date and based on different numbers, notably pre-OxCam Arc; and the execution is broad brush and lacking depth.

**The Local Plan is therefore unsound and the only reasonable option is to suspend the Plan whilst a "5<sup>th</sup> Studio" level report is prepared and considered.**