



The countryside charity
Oxfordshire

Campaigning to protect our rural county

www.cpreoxon.org.uk

Oxfordshire Plan 2050

August 2021

Initial views from CPRE Oxfordshire

The latest consultation on the Oxfordshire Plan 2050 has now launched and runs until 8 October.

See: www.oxfordshireopenthought.org/oxfordshire-plan (scroll to bottom of page for full Plan document)

The Oxfordshire Plan will set the development framework for the county for the next generation. It will affect all Oxfordshire residents, either directly (through development) or indirectly (through impacts on services, infrastructure, our countryside and rural character).

We urge you to respond to the consultation – it is our best chance of having a say and influencing both the outcomes of this Plan and the OxCam Arc proposals.

CPRE Oxfordshire's initial views on the consultation are outlined below and we hope this is of help when considering your own response. *NB We will also be providing a '10 minute guide' for responses which will be available on our website shortly.*

OVERVIEW – We need a better balance

The Plan document does not attempt to address what level of growth is consistent with protecting our environment and rural character.

It talks about 'good growth' but makes no clear assessment of the different impacts of the three growth options (the lowest of which is still 50% above actual need) or the five spatial options outlined. It is not only silent on the tough choices that will be needed between meeting targets for carbon and nature and the push for economic growth but implies that we can effectively have it all.

The public deserves better. We need a clear assessment of the impacts, risks and benefits of the options proposed. That doesn't mean burying information in long and complicated Sustainability Assessments, but setting out the facts in straightforward wording with which local people can meaningfully engage. This is particularly vital if the Plan is to provide a robust defence against the top-down figures likely to be imposed as the result of the OxCam Arc.

Our local authorities must be able to demonstrate that the growth options they are presenting are deliverable without unacceptable environmental harm and without undermining some otherwise good policy proposals for getting to net zero and restoring nature.

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CONSTRAINTS TO GROWTH

Over recent years, the Oxfordshire Housing & Growth Deal has driven growth in the county significantly beyond local need. But this has been achieved at considerable cost. For example:

- Many of our market towns and villages are being changed almost beyond recognition, threatening the rural character which makes Oxfordshire an attractive place to live and underpins our economic success. Places such as Chinnor, Hook Norton, Wantage and Eynsham, and many others, are all seeing large-scale housing development way beyond any local need.
- There are now nearly 20,000 houses planned for the Oxford Green Belt, expanding Oxford by a third, removing countryside access, coalescing villages and putting the setting of our historic city at risk.
- Flooding & sewage – 4.2bn litres of sewage was dumped into the Thames and its tributaries in 2017 by Thames Water. The majority of Oxfordshire’s eight major rivers were classed as having moderate or poor cleanliness in 2016. Urbanisation has stressed natural drainage and added to the flood risk in the area. Some 1.7% of houses in Oxford have been flooded, well above the national average of 0.7 per cent.
- Food & farming – the UK already imports about 45% of its food, and as recent events have shown, supply chains are not always robust.
- Land is a scarce resource that we will need for climate change mitigation and adaptation including planting trees and hedgerows.

Any further above trend growth proposals must be considered in the light of issues such as these.

GROWTH OPTIONS – ONLY THE LOWEST, STANDARD METHOD OPTION, IS EVEN BROADLY CONCEIVABLE

The document sets out three growth scenarios for 2020–2050:

- Standard Method ‘Adjusted’– 102,000 houses
- Economic Growth Model 1 (described as ‘Business as Usual’) – 123,000 houses (2 more Oxfords)
- Economic Growth Model 2 (described as ‘Transformational’) – 153,000 houses (2.5 more Oxfords)¹

By comparison, the Office of National Statistics (ONS) figure for the same period is 53,000 houses – almost half the lowest growth option we are given.

CPRE Oxfordshire believes that the Government’s Standard Methodology is flawed, as it mandates an uplift for affordable housing without there being any evidence that increasing numbers in this way will have the desired effect. Theoretically, it is possible to present a lower target than the Government’s methodology, but in practice this has rarely, if ever, been accepted by planning inspectors. So, we can see why our local authorities feel obliged to consider this figure. *As the lowest of the options presented, it is the most likely to be achievable within the county’s environmental constraints and therefore is the only one that CPRE would consider even vaguely appropriate.*

However, we note that the figures do not in fact follow the Government’s standard methodology process but are ‘adjusted’ to include an arbitrary uplift relating to ‘patient registrations’ that assumes the ONS figures are wrong. This adjustment creates growth 2.5 times trend as a baseline upon which everything else builds. This seems hardly credible and must be re-visited.

The second option, “business as usual”, actually extrapolates the very high levels of growth in the SHMA based “growth deal” – in which Oxfordshire Councils were incentivised by the Government to plan for roughly twice the number of houses that the Office of National Statistics had forecast to be needed to support new household formation.

1. OP2050 says that 85,000 houses are already accounted for in existing Local Plans (78,000 within the Local Plan periods, plus a further 7,000 already allowed for beyond this eg Culham, 1,400 after 2035 and Grove Airfield, 1,000 after 2031).

This therefore leaves a balance to 2050 of:

Standard Method Adjusted –16,000 houses

Growth Model 1 – 38,000 houses

Growth Model 2 – 67,000 houses.

The third option, “transformational” is the high case forecast based on all of the local employers’ dreams of growth coming true. Obviously they will not all come true, nor will most of those which might be realised within the time frame of the forecast. A high growth forecast also places local councils in danger of losing their “five year supply” and therefore their powers to control development and a consequent uncontrolled free for all.

Overall, we would caution that the long-term impacts of both Brexit and Covid have yet to play out and there is inevitable instability in the figures, especially over such a long time period. This requires a cautious approach, focusing on qualitative rather than quantitative assessments, and building in the careful phasing of any proposed land release.

SPATIAL OPTIONS

The consultation document sets out 5 options for spatial distribution, although it acknowledges that the final Plan is likely to be a mix and match of these.

CPRE believes that decisions on spatial options cannot be entirely divorced from the growth figures. For example, lower numbers would be easier to accommodate within existing growth locations. However, a summary of our current views is below:

Option 1: Focus on opportunities at larger settlements and planned growth locations. This option would distribute the bulk of growth to 2050 to those locations that have accommodated the majority of the allocations in the five Local Plans in the first phase of the Plan up to the mid-2030s, on the edges of the towns, the City and former MoD sites (such as Heyford Park, Carterton/Brize Norton & Dalton Barracks) ie the growth would be focused in line with current adopted Local Plan strategies.

Our view: Although CPRE resisted many of the larger sites, especially in the Green Belt, that were allocated in the current round of local plans, that land has now been released. In almost every case sufficient land has been released to accommodate considerable growth beyond that in the current plans themselves. If built out at suitable density, this would mean that no further large-scale allocations, and certainly no more Green Belt release, should be required (especially if growth is constrained to the Standard Method option) which would be welcome. However, this is not a blanket endorsement since some locations would struggle to accommodate any further growth without serious detrimental impact to the countryside.

Option 2: Focus on Oxford-led growth. This option covers urban intensification within the City of Oxford, new or extended urban extensions on the edge of the City. It is essentially a City ballooning over the Green Belt, in direct contravention of the purpose for which the Green Belt was created.

Our view: CPRE would strongly support this option in as far as it relates to efficient use of brownfield sites, including infilling at redundant retail sites and higher density urban development, but not if it entails Oxford’s further ‘flytipping’ of housing on to the Green Belt.

Option 3: Focus on opportunities in sustainable transport corridors & at strategic transport hubs. This option covers new growth based in the most sustainable transport corridors, where frequent bus services operate and rail stations act as transport hubs. It includes the creation of entirely new settlements, and radiates out from Oxford, for instance along the A40/A418.

Our view: CPRE Oxfordshire gives qualified support to this option as it has attractions in terms of sustainability. However, it largely fails with regards to the A40 as this is unsuitable for traffic increases and also in relation to bus routes, which should generally be dictated to by housing locations and needs, not the other way around. In particular, a number of the transport corridors run through Green Belt or Areas of Outstanding Natural Beauty where opening up land for development would not be suitable (Iffley being a case in point).

Option 4: Focus on strengthening business locations. This option centres on the network of business and science parks that covers Oxfordshire and particularly those identified as priority economic assets by the Oxfordshire Local Enterprise Partnership.

Our view: CPRE Oxfordshire gives qualified support to this option as it has attractions in terms of sustainability and the co-location of jobs and housing. However, the existing rather random distribution of science and other parks would need to be focused into a more coherent strategy linked to transport improvements. Many of the current sites are not in locations where we could support expansion eg Begbroke within the Oxford Green Belt or Harwell within the North Wessex Downs AONB.

Option 5: Focus on supporting rural communities. This is a euphemism for developing the countryside, enabling growth in rural settings away from the main service centres and top-tier settlements that will accommodate the current local plan-led growth up to the mid-2030s and encouraging a redirection of development to more rural parts of the county provided that suitable access to the public transport network and key services and facilities is possible.

Our view: CPRE Oxfordshire is generally opposed to this option as it would direct development to precisely the countryside/rural settlements that we are seeking to protect. However, we recognise that there may be occasions when allowing some housing growth is both necessary and desirable and in particular, provides affordable housing so that villages are more sustainable and better able to meet the demands of climate change by being more self-contained.

Policies

The Plan contains a wide range of draft policies under 5 headings:

- Addressing climate change
- Improving Environmental Quality
- Creating Strong & Healthy Communities
- Planning for Sustainable Travel & Connectivity
- Creating Jobs & Providing Homes

CPRE Oxfordshire very much welcomes the general thrust of these policies and the moves to bring forward better designed, climate and nature friendly development.

We do have some concerns about whether the Oxfordshire Plan 2050 is the right place for such policies or whether these would be better decided at District/City authority level. We note that the option to do this was rejected because *“this could result in less certainty and clarity for developers”*. This seems a very poor reason for removing policy choices further away from local democratic accountability.

CPRE GENERALLY WELCOMES:

Policy Option 01: Sustainable Design & Construction –Zero-carbon development

Policy Option 03: Water Efficiency

Policy Option 04: Flood Risk

Policy Option 05: Protection and Enhancement of Landscape Characters

Policy Option 06: Protection and Enhancement of Historic Environment

Policy Option 07: Nature Recovery (with a particular plea for the inclusion of hedgerows!)

Policy Option 11: Water Quality (especially the reference to Bathing Water status)

Policy Option 13: Healthy Place-Shaping

Policy Option 15: High Quality Design (although we think the 700 house limit before the need for a masterplan & design guide kicks in is on the high side and could be lowered to 500 houses)

Policy Option 17: Towards a Net Zero Carbon Transport Network

Policy Option 18: Sustainable Transport in New Development

Policy Option 19: Supporting Sustainable Freight Management

Policy Option 20: Digital Infrastructure

Policy 31: Specialist Housing Needs

CPRE SUPPORTS WITH SOME CAVEATS:

Policy Option 02: Energy – a welcome focus on renewable energy but this should not trump landscape & visual impact considerations ²

Policy Option 12: Air Quality – we do not see how it is possible to offset poor air quality in one area by improving it elsewhere.

Policy Option 21: Strategic Infrastructure Priorities – a strategic infrastructure framework should inform new development, but the delivery of infrastructure has to precede rather than occur ‘alongside’ new development. A further Reg 18 consultation on strategic spatial options might be appropriate once further detail of the strategic infrastructure framework is available.

Policy Option 22: Supporting the Creation of Jobs – we are not yet convinced that the Oxfordshire Growth Needs Assessment (OGNA) scenarios are valid. We must certainly avoid the situation where there is a circular argument of jobs justifying housing justifying jobs, without a framework for considering broader implications both for Oxfordshire but also for the county as a whole and the levelling up agenda. The priority for job creation should be to reflect Oxfordshire’s existing skill base while addressing areas of need to reduce unsustainable commuting.

Policy Option 30: Affordable Housing – we support the wording but wonder if anything further can be done to ensure that the definition of affordable is tightened up to mean what it says, rather than generally just minor discounts on market rates, plus an emphasis on such housing being available in perpetuity. The level of affordable housing expected should be clearly stated.

CPRE HAS PARTICULAR CONCERNS ABOUT THE FOLLOWING POLICY AREAS:

1. Housing density – this is a key issue which is completely overlooked in the current document. The only policy reference is within Policy Option 29: Urban Renewal where there is a weak commitment to achieve higher density ‘where appropriate’.

Para 428 does state that the Plan ‘seeks to support achieving higher densities by building residential property higher, three or four storeys, in appropriate locations, to improve the overall land use and to reduce the need for more greenfield release.’

However:

- a. This is not reflected in policy
- b. Higher density is not just achieved by building three or four storey buildings, but is about overall good design to make efficient use of space. Both density targets and how they should best be achieved will be different in different locations.

Housing density is a key way of ensuring sustainable, climate-friendly development as it increases the viability of public transport and other services and infrastructure. It also facilitates the development of smaller, more affordable properties, rather than sprawling executive housing.

² See: <http://www.cpreoxon.org.uk/resources/item/2853-renewable-energy>

Policy wording in this area must be significantly strengthened.

CPRE Oxfordshire will be proposing more detailed policy wording - please keep an eye on our website for further info.

Housing density really matters as it has a significant impact on landtake. Building at a fairly normal current rate of 30 dwellings per hectare could see Oxfordshire losing land area to development equivalent in size to the whole of Oxford City.

Fig 1. Landtake Based on average housing density of 12 homes per acre / 30 per hectare

Current Land area of Oxford City	45 km2
Standard Method adjusted – 102k houses	34.4km2
Econ Growth 1 – “Business as Usual” – 123k houses	41.5km2
Econ Growth 2 – “Transformational” – 153k houses	51.6km2

- Policy Option 10: Green Belt – CPRE is supportive of enhancing Green Belt land, in the same way that we would wish to support any land improvements with a view to enhancing landscapes, visual amenity and biodiversity or improving damaged or derelict land. Clearly any such enhancement would need to be constrained to that appropriate in the Green Belt. It must also be recognised that not all Green Belt land could support such enhancement and nor will many landowners be willing to do so. It must be confirmed that this would in no way reflect on the land’s status as Green Belt one way or another, as this is a planning not environmental designation. Furthermore if it appears that enhanced Green Belt land might have a special status providing greater protection, landowners will in their own interests stand in the way of it in order to make the chances of development greater.

Unfortunately, as we have seen from recent housing allocations (19,000 houses now planned for the Oxford Green Belt), the protection provided by National Planning Policy is significantly weakened, despite Government assertions to the contrary.

It would therefore be desirable, if not essential, for OP2050 to consider guaranteeing continued Green Belt status to all current Oxford Green Belt land, at least for the duration of the Plan, before implementing any enhancement policy.

- Policy Option 08: Biodiversity Net Gain – we support the proposal of 20% biodiversity net gain. However, CPRE remains concerned about the overall net gain approach. These methodologies have yet to be thoroughly tested and in some cases are not even yet agreed. At the ‘coal-face’, we know that there are already instances where developers are considerably down-playing the value of existing sites as well as over-playing what their compensatory measures can deliver. This is challenging for local authorities who often lack the in-house expertise and resources to undertake robust scrutiny of such proposals. We cannot afford for this dynamic already playing out at planning application level to be repeated at a strategic planning level. The policy therefore needs to reflect a precautionary principle about erring on the side of caution in assessments and being clear who should take responsibility for making these judgements (ie the local authority, not developers or their agents).
- Urban Renewal – Policy Option 23: Protection of Economic Assets, Policy Option 24: Town Centre Renewal & Policy Option 29: Urban Renewal

Overall, the document is not transformational in the sense of urban renewal but pushes the City’s tired line on ring-fencing employment land. We need a complete re-appraisal of how we use land in Oxfordshire eg changing urban centres and increasing densities.

Keeping the focus on sustaining investment in business and science parks ignores the fact that innovation might take place anywhere, including rural communities and town centres. These business and science parks could prove to be white elephants, not filled to capacity, and not well linked to public transport.

We are particularly concerned about the phrase: ‘we will not support the loss of economic assets to housing’. This appears to entrench Oxford City’s approach to protecting sites for jobs, even when the sites have been vacant for extended periods of time and the more pressing need is for housing rather than employment. This policy must be re-worded to provide a more flexible approach.

Oxford-Cambridge Arc

The vagueness of the Plan document risks letting the top down OxCam Arc proposals take prominence. As the Oxfordshire 2050 documents euphemistically put it, that will “be an increasingly important influence”.

Oxfordshire residents were promised a long-term spatial Plan that would put the needs and wishes of Oxfordshire’s people first. We expect our local authorities to honour that commitment, and we expect Government to respect the outcome.³

We hope this briefing has been of assistance and would be happy to hear any constructive feedback you might like to share. E: campaign@cpreoxon.org.uk

A reminder that we will be preparing a ‘10 Minute Guide to responding’ which will be available on our website in due course. www.cpreoxon.org.uk

Please do respond to the consultation and encourage others to do the same.

We must make sure the Oxfordshire Plan only commits our future generations to a level of growth that can be accommodated within our environmental constraints and reflecting our rural character.

It’s time to get the balance right.

3. The Government is currently consulting on the Vision for the Oxford Cambridge Arc Spatial Framework. See www.cpreoxon.org.uk for further info.