



The countryside charity  
Oxfordshire

Campaigning to protect our rural county

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## **Oxfordshire Plan 2050 (Regulation 18 Part 2) consultation – CPRE Oxfordshire’s ‘10 Minute Response’ Guide**

Thanks for caring about Oxfordshire’s future and wanting to speak up for the countryside. Our aim is to help make that process as easy as possible.

### **BACKGROUND READING – but only if you want/have time!**

You can read all about the Plan and download the consultation document here:

[www.oxfordshireopenthought.org/oxfordshire-plan](http://www.oxfordshireopenthought.org/oxfordshire-plan)

You can also see CPRE Oxfordshire’s Initial Views (our outline response) here:

<http://www.cprexon.org.uk/news/item/2874-oxfordshire-plan-2050-why-care-about-the-future-of-our-county>

### **THREE SIMPLE STEPS TO RESPONDING:**

1. Draft your response – we provide some thoughts for your consideration below.
2. If you like, you can fill in the OP2050 response form [here](#) but **you can just do a word document or email**. You should include your name and contact info and, if possible, make it clear whether you Support, Object or just wish to Comment on each issue raised.
3. Email your response to [info@oxfordshireplan.org](mailto:info@oxfordshireplan.org) or post it to: Oxfordshire Plan 2050, Speedwell House, Speedwell Street, Oxford, OX1 1NE.

Consultation deadline is **Friday 8 October 2021**

### **FOR YOUR COVERING EMAIL / LETTER**

Our Oxfordshire leaders have promised that the Oxfordshire Plan 2050 will reflect the needs and wishes of local people, not be dictated to by top down Government targets for the OxCam Arc or other proposals.

I/we hope you will keep that promise.

It is vital that any development that comes forward does not cause undue harm to our countryside and rural character which, aside from all the other benefits to our health and well-being, are essential to our ongoing economic prosperity.



## **'ONE MINUTE' RESPONSE**

Just copy the info below onto the form or into your email and amend as you think fit...

- I/we endorse the use of the Standard Method (the lowest growth option presented) as the one least likely to cause unacceptable harm to our countryside. This should be based on Office for National Statistics figures, not inflated by arbitrary judgements from individual consultants.
- I/we support a mix of the Spatial Options proposed, but with a focus on Spatial Option 1 (growth at existing planned locations). This should prioritise effective use of land already released for development and mean that no further new major sites are required.
- I/we believe that the Plan requires a policy on compact housing (housing density). This will make best use of our scarce land resource and ensure climate friendly compact neighbourhoods, re-balancing Oxfordshire's housing stock to provide more affordable housing that is better suited to the increase in smaller households.

## **10 MINUTE RESPONSE**

**If you have a few more minutes, here are some key policy points you may wish to raise.**

It's fine to use our words but even better if you use your own!

### **Policy Option 28 - Homes: How Many? Commitments and Locations - COMMENT**

*The document sets out three growth scenarios for 2020-2050:*

- *Standard Method 'Adjusted' – 102,000 houses*
- *'Business as Usual' – 123,000 houses (2 more Oxfords)*
- *'Transformational' – 153,000 houses (2.5 more Oxfords)*

*By comparison, the Office of National Statistics (ONS) figure for the same period is 53,000 households. Many of the above houses – around 85,000 – are already committed to within existing Local Plans.*

**SUGGESTED RESPONSE:** As the lowest of the options, the Standard Method is the most likely to be achievable within the county's environmental constraints and therefore the most appropriate of those presented.

Housing requirement in Oxfordshire should be limited to the amount that is deliverable without causing undue harm to our environment and rural character. However, all the growth options are well above Office for National Statistics (ONS) projections for Oxfordshire, being double or even triple their 50,000 estimate. The current high growth rates (described as 'Business as Usual') are well above local need and are already changing many of our villages beyond recognition and putting pressure on the Green Belt, our Areas of Outstanding Natural Beauty and our countryside more generally, including air, water and noise pollution. Any further above trend growth proposals must be considered in the light of issues such as these. A clear assessment of the impacts, risks and benefits of each option is essential, in a format that the public can easily understand.

In addition, the proposed 'adjustments' to the Standard Methodology are flawed, including 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 must be re-visited.



### **Spatial Option 1: Focus on opportunities at larger settlements & planned growth locations – SUPPORT/COMMENT**

*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. There are four other Spatial Options outlined focusing on Oxford-led Growth, opportunities in sustainable transport corridors & at strategic transport hubs, strengthening business locations and supporting rural communities.*

**SUGGESTED RESPONSE:** There are strengths and weaknesses of all the options presented and a mix is probably going to be required.

Spatial Option 1 seems the best on paper, since many of the sites released in the current round of Local Plans include large amounts of additional land to accommodate considerable growth beyond the Plan period. By making efficient use of those sites, we can ensure that no new large-scale allocations are required, protecting our scarce land resource. This is especially true if growth is constrained to the Standard Method and the focus is on compact (high density) housing.

However, this is not a blanket endorsement since some locations would struggle to accommodate any further growth without serious detrimental impact to the countryside and there certainly should not be any further Green Belt release.

### **Policy Option 08: Biodiversity Net Gain – SUPPORT/COMMENT**

*This policy proposes to set a benchmark standard of 20% biodiversity ‘net gain’ on developments across the county.*

**SUGGESTED RESPONSE:** The proposal of 20% biodiversity net gain is welcome in principle – this is above the Government’s 10% proposal, and it is right to be ambitious given our current biodiversity emergency. However, the metrics for calculating net gain are yet to be thoroughly tested. Developers are quickly developing the skills to play the system, downgrading the existing biodiversity value of the sites they wish to develop and overstating 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. 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).

### **Policy Option 10: Green Belt Enhancement – SUPPORT/COMMENT**

*This Policy would commit the Oxfordshire 2050 Plan to identifying strategic opportunities to enhance the existing Oxford Green Belt.*

**SUGGESTED RESPONSE:** This policy is supported, but to make it effective, OP2050 will need to guarantee continued Green Belt status to all current Oxford Green Belt land, at least for the duration of the Plan. Landowners are unlikely to support enhancements if, by leaving their land to rot, they increase the chances of having it released for development. Unfortunately we cannot rely on protection via national



policy, as there are now over 19,000 houses allocated in the Oxford Green Belt, expanding Oxford by a third, removing countryside access, coalescing villages and putting the setting of our historic city at risk.

### **Policy Option 23: Protection of Economic Assets, Policy Option 24: Town Centre Renewal & Policy Option 29: Urban Renewal - OBJECT**

**SUGGESTED RESPONSE:** Overall, the document is not transformational in the sense of urban renewal but pushes the City's tired line on ring-fencing employment land. There should be a complete re-appraisal of how land is used in Oxfordshire eg changing urban centres and increasing densities.

The phrase 'we will not support the loss of economic assets to housing' is particularly concerning. 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. These policies should be re-worded to provide a more flexible and ambitious approach.

### **Para 428 & Policy Option 29: Urban Renewal – OBJECT**

*These are the only places in the Plan where housing density is mentioned, but the references are vague and weak, referring only obliquely to increasing density 'where appropriate'.*

**SUGGESTED RESPONSE:** 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 building of smaller, more affordable properties, rather than sprawling executive housing. 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.

High density does not mean high rise. Tower blocks are less space efficient than the terraces which many of them replaced. It does mean smaller units, closer together, than recent distanced developer-led building patterns. Two or three storey Compact homes provide climate friendly compact, 20 minute neighbourhoods.

Any housing coming forward as a result of OP2050 should be high density, low cost, low land take, compact units, with the result that by 2050 Oxfordshire's housing mix will have significantly improved to support single occupancy or starter families and older people trading down to more manageable properties.

### **THAT'S IT. THANK YOU!**

Thank you again for taking the time to respond.

Please let others know (social media, friends, family etc) and encourage them to do the same. We want to help make sure the voices of Oxfordshire residents are heard.

If you have comments or questions, we'd be pleased to hear from you.

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