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

CPRE Oxfordshire Comments on South Oxfordshire Local Plan 2033 SECOND PREFERRED OPTIONS

SUMMARY

CPRE Oxfordshire supports the development of a robust Local Plan for South Oxfordshire, which is much needed both to guide appropriate development and to bring an end to the recent wave of developer-led speculative applications. Our fear is that, despite many fine words, the Plan will not deliver either of these objectives.

- a) The overall target of 23,468 new dwellings (unaccountably increased from 20,800) is unrealistic and unachievable. It sets a build rate well over anything previously achieved. This means that the District is likely to continue to fall foul of 5 Year Housing Supply rules with further rounds of inappropriate and speculative development to follow.
- b) The housing target makes no allowance for the fact that the District is heavily constrained by Green Belt and Areas of Outstanding Natural Beauty, and therefore numbers could potentially be lowered.
- c) The Plan shows a cavalier attitude to the Green Belt, proposing significant removal of Green Belt land at Culham, Berinsfield and Wheatley, in contradiction to national policy and its own stated objective of protecting the Oxford Green Belt.
- d) The draft Local Plan fails to draw adequate attention to the proposed Oxford-Cambridge Expressway which, were it to occur, would be by far the most significant development in the District over the plan period. The preferred route would cut through open countryside and Green Belt from the A34 to the West to Thame in the East, having an enormous

impact on local residents and irrevocably changing our rural District. It is not acceptable that this issue is not addressed.

- e) CPRE contends that all three proposed large settlements - Culham/Berinsfield/Chalgrove - are unsustainable, particularly in relation to the proposed transport solutions.

VISION & OBJECTIVES

CPRE supports the development of a robust Local Plan for South Oxfordshire.

We endorse the overall vision set out in 3.3 and in particular:

- Obj 1.2 *'Support rural communities and "their way of life", recognising that this is what attracts people to the District'*
- Obj 5.2 *'Deliver high quality, innovative, well designed and locally distinctive developments in sustainable locations'*
- and all Objectives 7 & 8 relating to Natural & Built environment and Climate change.

We also welcome the statement in Para 4.14 that the *'vision and objectives for South Oxfordshire recognise the rural nature of our District and the importance of our rural settlements in contributing to what makes South Oxfordshire such a beautiful and prosperous place to live.'*

STRAT1 - The Overall Strategy

CPRE believes the overall spatial strategy is flawed in directing major development to Culham, Berinsfield and Chalgrove, two of which are dependent on the significant release of Green Belt land and none of which are currently shown to be sustainable. In particular the final bullet point *'Protecting and enhancing the countryside and particularly those areas within the AONBs and Oxford Green Belt by ensuring that outside towns and villages any change relates to very specific needs such as those of the agricultural industry or enhancement of the environment'* appears in direct contradiction to these developments.

Whilst we are generally supportive of the categorisation of villages laid out in Para 4.13, we are also concerned by bullet point 6 of STRAT1 which states *'Supporting other villages by allowing for limited amounts of housing and employment to help secure the provision and retention of services'*. Since there is no longer a category for 'unlisted' villages, with all smaller settlements being grouped under the term 'other', there is no longer a distinction between villages with no services, unable to sustain development, and those with some services which might have an ability to do so. We believe this policy is therefore flawed. (See also Policy H1)

STRAT2 - The need for new Development in South Oxfordshire

CPRE reiterates our belief that the housing figures underlying this plan are deeply flawed. The Oxfordshire SHMA is widely acknowledged to double count the social housing need and assumes very high, continuing growth figures.¹ It envisages building rates far in excess of anything achieved in past decades and there is no evidence that developers intend to accelerate housing delivery in the District, despite the large number of sites already allocated. We thus find it surprising that the target is now 23,468 new dwellings, up from 20,800 (Para 5.8 table 5c), particularly as even this latter figure is already inflated and unachievable.

We regard these excessively high projected growth figures as a particular threat in South Oxfordshire - where over 60% of the land is protected by the Green Belt or is in an Area of Outstanding Natural Beauty. This fact makes it particularly anomalous that South Oxfordshire should be expected to take 5,000 of Oxford's unmet need.

Para 4.15 states that '*National Planning Policy is clear that local planning authorities should ensure that they meet the full, Objectively Assessed Needs (OAN) for market and affordable housing in the Housing Market Area (HMA).*'

This is a misrepresentation. National Planning Policy does indeed make it clear that constraints should not be applied when calculating the OAN, ie the housing numbers, but the housing target in the Local Plan can be reduced in light of evidence of environmental and social constraints:

*"Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints. However, these considerations will need to be addressed when bringing evidence bases together to identify specific policies within development plans."*²

This is acknowledged in the Oxfordshire Strategic Housing Market Report, para 1.16.

Recent research by national CPRE has shown that a significant number of authorities have reduced their OAN in the light of Green Belt and AONB constraints.³

SODC should therefore think again about its overall targets.

STRAT3 The unmet housing requirements from Oxford city

¹ See [Unsound & Unsustainable: Why the SHMA will increase greenfield use but not meet housing needs](#) - A critique of GL Hearn's April 2014 Oxfordshire Strategic Housing Market Assessment (SHMA) Urban & Regional Policy, May 2014

² <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

³ <http://www.cpre.org.uk/media-centre/latest-news-releases/item/4592-councils-failing-to-protect-countryside-in-growth-plans>

CPRE believes that Oxford City has failed to bring forward an updated version of its Local Plan in a timely manner, and notes that it continues to prioritise land for employment, rather than housing. We also reject the notion that the City is a suitable location for a growth hub, which serves only to increase housing pressure, and we therefore believe the overall figures are flawed.

The distribution of these figures between the Districts was a result of a non-transparent and undemocratic process masterminded by the Oxfordshire Growth Board, which was not subject to any public consultation. Although South Oxfordshire residents are now invited to comment in relation to the figures being allocated to their District, it is virtually impossible for anyone to assess whether this 'divvying up' of the allocation was justified or sound.

We accept that SODC is constrained by the Duty to Co-operate, and in these circumstances an early review of the Plan seems an appropriate step.

We support SODC's intention to allocate these houses in line with its spatial strategy, rather than through a single allocation. It is quite clear that, in the real world, it is impossible to dictate that Oxford residents will live in one house whilst South Oxfordshire residents will live in another.

STRAT 4 Didcot Garden Town

It is vital to keep in mind the intention to have a **'garden town' rather than just a 'new town'**, and the use of varying densities to achieve the best results. With the following considerations taken **strictly** into account and acted upon in timely fashion, there is a real possibility of making appropriate use of a fine opportunity. **Otherwise, the idea should be moth-balled.**

(i) The full implications for related infrastructure in the whole Vale and South Oxfordshire area, including the availability of complete and committed funding, should **be thoroughly investigated**, and in particular for highways including river crossings, etc. - any need for new roads across green fields would need careful placement and justification.

(ii) The plans for **development should be staggered/phased**, with the aim of achieving organic growth and hence a town that will be one of human dimensions, attractive to live in: the point here being that one section of the town should become established, with a well-defined character, before the next section is built; **'cherry-picking' by developers** as to the order of development and the type of development (in particular as regards avoidance of affordable housing) should **be outlawed**.

(iii) **Design features should everywhere be tested**, both by regular consultation with the community, with 'stakeholders', and with a range of independent planning and design experts with knowledge of successful such developments in Britain **and abroad**; here a main aim should be **to avoid the uniform, mediocre appearance**

of so many recent modern developments (eliminating, for example, repeated, similar house-design in the same brickwork, etc.)

(v) It would be important that as **yet unbuilt strategic sites in the Local Plans are designed to fit well into the plans** for the garden town.

(vi) Any new development plans should **protect and enhance** existing community green space.

(vii) **Coalescence** with existing villages, with their own distinctive character, should be **avoided**.

Green Belt Allocations: STRAT 6 & 7 - Culham, STRAT 8 - Berinsfield, STRAT 10 - Wheatley Campus, and Appendix 4, Page 208 - Wheatley

CPRE is distressed by the cavalier attitude exhibited towards the Green Belt, with major developments proposed at Culham and Berinsfield, plus the Wheatley Campus allocation.

This is despite a recent Council sponsored study which found that every part of the Oxford Green Belt fulfilled at least one of the five functions of the Green Belt and surveys that have consistently shown strong public support for the Green Belt in the county.⁴ The main purpose of the Green Belt is its permanence. We do not feel that any sort of *exceptional* case has been made for these incursions (as required by NPPF), especially given the large additional land take proposed which appears to be well beyond that which would be required for the level of development currently envisaged.

We would urge that development be restricted to the brownfield sites in Culham (and Wheatley) and severely restricted in Berinsfield.

Culham

In relation to Culham, we note:

- a) One of the justifications is that the Science Centre and the No.1 site were previously identified as “major development sites in the Green Belt”. Our understanding is that there were covenanted restrictions on at least some of this area stating that once the original use was over, the site would be returned to be compatible with Green Belt uses.
- b) It is also claimed that ‘Development here would make the most of a sustainable transport opportunity at the railway station’. Our understanding is that the current single track line means the railway has very limited ability to accommodate additional stopping services.

We would be grateful for clarification from SODC on these points.

⁴ [CPRE Oxford Green Belt Survey](#), March 2015

Berinsfield

A vastly expanded Berinsfield would put huge pressures on traffic on the A4074 and southern entries to Oxford (this will be in addition to traffic generated by the large expansion of Benson, Crowmarsh and Wallingford to the south). This development also risks damaging the rural approaches to Oxford (one of the major purposes of the Oxford Green Belt).

Wheatley Campus

It is welcome that the Council have now accepted that the Brookes site at Wheatley can be redeveloped whilst remaining within the Green Belt. However, we note the appendix shows a line around the whole of the Brookes site at Wheatley, not just the previously developed area. It should have only gone around the part that is previously developed, as it is only that which can be redeveloped within Green Belt rules. Otherwise, the redevelopment will be spread across all of the open green space as well, which should be retained.

Appendix 4 - p.208 - Wheatley

Although not referred to in the text, Appendix 4, p.208, shows an extension of the inset Green Belt area of Wheatley to the East. A similar proposal was refused by the Inspector considering the previous Local Plan.

Since no further explanation is provided, this page should be deleted from the Plan.

Green Belt enhancement

Paragraph 81 of the NPPF says: *‘Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.’*

CPRE would therefore expect to see appropriate policies in place in the Local Plan to protect *and enhance* Green Belt land.

We note that the proposed Monitoring Target in relation to Green Belt is ‘No inappropriate development’ - this is welcome but too limited and should be amended to reflect the authority’s duty to enhance Green Belt use.

STRAT 9 - Chalgrove

The proposed Chalgrove new town will put intolerable pressures on the local roads and the entry into Oxford through Cowley.

Whilst acknowledging the start of further thinking on this issue, with proposals for safe guarding various edge routes/by-passes, there seems little likelihood of funding for these roads.

In the highly unlikely event that they were all to come to fruition, this would still leave smaller settlements such as Cuxham without adequate mitigation.

Although a semi-brownfield site, there are still significant environmental constraints given that it is sandwiched between the AONB and Green Belt, and a major new settlement would inevitably damage the rural nature of South Oxfordshire (including the views from the Chilterns AONB).

Unfortunately, all the major allocations proposed within the Plan have a huge reliance on cars for transport, which is completely unsustainable in term of carbon emissions, air pollution (already a major problem in South Oxfordshire and Oxford), traffic congestion and parking.

Harrington

We are pleased to note that SODC has dropped Harrington as a potential site and support this decision, on the basis that it would be without doubt a commuter town, doing little to nothing to meet Oxfordshire's needs but causing considerable blight to the environment and neighbouring rural communities.

For the avoidance of doubt, it would be helpful if SODC could spell out their reasons for rejection.

HOUSING

Density

Where development is necessary, it should take place at as high density as possible, to reduce land-take. Higher density, particularly in the towns, would create cheaper housing, allow for a more sustainable transport system and reduce the use of valuable agricultural land.

Although the Plan does quote a minimum build density, it is only 25 to the hectare, whereas previous Government guidelines were 30-50 per hectare, and Victorian terraces, as in Jericho in Oxford, are at 150 to the hectare.⁵

SODC really needs to set a much higher minimum, and a "target". High density housing is less expensive and therefore more affordable as well as being just what aspiring new buyers need. Although on page 26 it is claimed that higher density

⁵ See: '[How densely should we build?](#)' - CPRE Oxon guidelines on density, April 2016

was explored there is a lack of evidence that this important strategy was seriously considered.

Policy H3 - Housing in the towns of Henley-on-Thames, Thame and Wallingford & Policy H4 - Housing in Larger Villages

We welcome the clarity provided by the use of a 15% rise in dwellings for towns and large villages, over the 2011 census. We would like to see the figures fully outlined (in for example tables 5e and g). The numbers here are ambiguous and confusing. We need a table with: the 2011 number of dwellings, total planned new dwellings (since 2011), how many have been built, how many already have planning permission (or are designated) and how many more need to be allocated? We would like to see more flexibility, for example, many of the villages in the AONB, such as Goring, will not be able to accommodate the additional number without damaging the landscape and integrity of these settlements.

Policy H11 - Affordable Housing, Policy H12 Exception Sites & Policy H14 Self-build

The 40% target for affordable housing is admirable (Policy H11) but is immediately undermined by paragraph 5.45! The target would be much easier to achieve if housing densities were increased (see above). We fully agree that local affordable housing should remain for local people in perpetuity (Policy H12). The Council should also set out proposals to encourage smaller builders (who will be more responsive to local needs) - in line with the recent Housing White Paper. CPRE is supportive of Policy H14 on self-build.

Policy H15 - Specialist Housing for Older People

This policy is welcome but needs to be widened. A recent report from the DCLG projects that nearly all future growth of households in the UK will be in the over 65 category (with a lesser increase in young single households and a decrease in the 25-45 age group).⁶ This underlines the need for high density small dwellings for one to two people close to transport and other infrastructure.

EMPLOYMENT & ECONOMY

There is no mention of agriculture, the rural nature of South Oxfordshire or related rural employment opportunities in the entire vision (Sections 3.3-3.9). Equally in the 'Objectives' Section (p 21-22), although the advantages of the rural nature of the landscape of South Oxfordshire is recognised, there is no recognition in the

⁶ DCLG, 2014-based Household Projections: England, 2014-2039, DCLG London, 2016

Employment Section, nor in Policy EMP11, of the importance of agriculture or rural industries (such as forestry). In Britain we only grow half the food we eat. With growing world populations and demand, all commentators agree it is going to get progressively more difficult to import food. For a robust and sustainable economy we must be encouraging food production and the rural economy servicing this.

Policy EMP1 - The amount and distribution of new B-class employment land

Having adopted the higher estimate of requirement for employment land (25 ha from estimate of 16 to 25, plus 5 already allocated, from an Employment Land Requirement study, paragraph 4.21) this policy then identifies 35.5 ha (Policy EMP1). There is no justification for this uplift.

INFRASTRUCTURE

Policy INF1 - Infrastructure Provision

We welcome that this version of the Plan begins to address the infrastructure required to implement the ambitious housing figures, although the mechanisms for the delivery of this infrastructure are far from clear. In particular, we welcome the requirement on development that ‘Infrastructure and services must be already in place or provided on an agreed timescale.’

Policy INF4 - Chinnor Reservoir

We note that the discussion regarding the Chinnor Reservoir is probably out of date. Our understanding is that this option has been rejected by Thames Water on cost grounds in favour of the Abingdon Reservoir.

Policy INF5 - Water resources

South Oxfordshire is projected to be short of water in the future. The Council should certainly consider more stringent water use figures (para 5.51) - building regulations say 135 l/p/d but considering the large projected supply shortfall in the Thames Valley we should aim for nearer 100 l/p/d. We note the policy later has a target of 110 l/p/d.

Policy INF5 is welcome - but fails to mention flooding or water efficiency. Similarly there are major challenges in providing the sewerage infrastructure for new (and existing) housing. The Plan needs a specific policy providing that new development can only take place if this infrastructure is in place.

TRANSPORT

General

There should be more recognition and discussion in the Plan that transport, and particularly cars, but also freight, has considerable environmental consequences. It causes considerable air and noise pollution, it introduces considerable safety issues, and it damages nature by placing barriers to movement and degrades the environment for many people. This only reinforces the need for sustainable transport and intelligent zoning of development.

Oxford-Cambridge Expressway

The Plan refers almost in passing to two potential Oxford/Cambridge (actually Southampton /Felixstowe) Expressway routes across the District south of Oxford from the A34 to the M40. **CPRE believes there is no good case for a road-based Expressway. Any new links between Oxford and Cambridge should be based on enhanced public transport. If road-based solutions are provided they should be facilitated by “on route” improvements, focussed on pinch points, rather than new roads and should certainly avoid the Green Belt and green field sites.**

Given that these discussions are being driven by the non-elected and non-accountable National Infrastructure Commission, supported by the non-elected and non-accountable Oxfordshire Local Enterprise Partnership, our elected local authority has even more responsibility to keep its residents fully informed and to make it clear where it stands on these issues. It is unacceptable to leave these important matters hanging, as SODC appears to be seeking to do. The Plan alludes to the possibility of an Expressway, but with no indication that the apparently preferred route would cut through open countryside and Green Belt from the A34 to the West to Thame in the East. This is despite the general route being well known and having been in the public domain since last autumn. Were it to occur, it would be by far the most significant development in the District during the entire Plan period.

In comments outside the Plan the Council has indicated that there are no issues to be addressed until the precise route is known. But long before the precise route is known the Expressway route will be decided and irreversible.

The Local Plan needs to state:

- What is known about the impact of a potential route across the District.
- How it would affect landscape, existing communities and other policies in the consultation Plan.
- Whether the District supports or accepts a South of Oxford route in principle - and if so for what reasons.

This will be the last Local Plan before the Expressway is constructed or at least decided and the public deserves an opportunity to be consulted on such a major change to the planning of the area in the context of a Local Plan process.

Policy TRANS 2 - Park & Ride

This refers to support for Park & Ride proposals, identified in TRANS 3 as the proposal in Local Transport Plan 4 for a Park & Ride at Sandford-on-Thames.

CPRE believes the remote Park & Ride strategy is fundamentally flawed, as part of a City of Oxford aim to increase employment growth. If Park & Rides must exist, they should from preference be located as close as possible to the areas from where people are travelling. The worst option is to locate them in rural sites between major settlements, which does nothing to reduce the number of car journeys, but shifts congestion to rural roads and villages with inadequate supporting infrastructure, as well as impacting on the local landscape.

Policy TRANS 3 - Safeguarding of Land for Strategic Transport Schemes

We note the proposals for a substantial programme of new roads. We are concerned that new road building only encourages road traffic and is against the stated aim to make South Oxfordshire more sustainable. Recent research from national CPRE has shown that road-building frequently fails to relieve congestion or deliver promised economic benefits, but does damage the environment.⁷

In particular the bypasses planned for Watlington, Benson and Didcot are likely to produce substantial east-west traffic. If these go ahead it will be important to ensure these do not develop into a substantial traffic and freight corridor.

Policy TRANS 7 - Development generating new lorry movements

CPRE believes there should be a stronger policy discouraging warehousing and freight transport across the District. Policy TRANS 7 needs to be strengthened to actively discourage freight transport across the District and encourage more sustainable transport and distribution.

NATURAL & HISTORIC ENVIRONMENT

These proposals need to have a more indepth recognition of the local nature reserves, Areas of Outstanding Natural Beauty and green and blue corridors; thus, for example, Berinsfield is very close to a number of nature reserves, notably Wittenham Clumps and the Thames corridor. There needs to be a substantial environmental assessment of the impacts of these settlements on nature,

⁷ [‘The end of the road? Challenging the road-building consensus’](#), CPRE, March 2017

biodiversity, heritage and landscape before these are agreed. A stronger link to the District Green Infrastructure Plan is required.

We believe that the District needs a stronger commitment to low carbon development (for example why are opportunities for District heating and low carbon on site energy generation not included on all major sites, see Objective 5.1 and STRAT 7 and STRAT 8). And what about low carbon housing?

The District and Country face major existential challenges in the coming century, not least from climate change and food provision. We are pleased to see that the need for carbon emission reduction and flood prevention receives recognition in Objective 8.2, but there is no link to development design (e.g. Objective 5.1) and is forgotten until paragraph 9.26 and Policy DES8 (page 158!). We feel these imperatives should have much higher prominence and permeate throughout the Plan.

We also note that the need to protect and enhance agricultural land, local food production and livelihoods are barely mentioned - despite becoming increasingly important in the future.

Dark Skies policy

There is no reference to a Dark Skies policy, which would be relevant particularly within the Areas of Outstanding Natural Beauty.

Noise / air / light pollution

There is no reference to policies on these issues. We assume these will be treated as saved policies from the existing Local Plan?

CPRE welcomes the development of a Green Infrastructure Strategy for South Oxfordshire (and the Vale). We comment on this strategy in detail in a separate submission. We would urge that the main body of the Local Plan makes direct reference to this additional document.

SUSTAINABILITY APPRAISAL

The heritage and archaeological implications of the Plan are clearly substantial.

The sustainability appraisal has failed to identify adequately the actual likely effects on the environment of areas allocated or safeguarded for development. Instead of *predicting* the effects (as required by SEA regulations) it is mostly assumed that they will not be significant due to the *mere existence of policies*.

The strategic need for the quantum of development proposed across Oxfordshire, which is far greater than the last few decades, has never been subject to any

consideration or assessment of environmental capacity. It is of concern that the heritage and other environmental constraints are not mapped in the detailed site allocation and safeguarding plans, and that measures to *mitigate harm* are in some cases presented as *positive* effects.

Where, for example, development is proposed in or adjacent to Conservation Areas and other heritage assets, this does not square with the great weight to be given to preserving or enhancing their value. For example, at Nettlebed multiple significant adverse effects including heritage and landscape are identifiable - but this is treated as a brownfield site and is NOT being addressed in terms of enhancing heritage and landscape by restoration - for which only very small scale enabling development would be needed.

These concerns are illustrative, but cast doubt on how far the Plan is sound with respect to national and local heritage and landscape policies.

CPRE Oxfordshire

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