

25 March 2015

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

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Sent by email to: planning.policy@southoxon.gov.uk

**RE: CPRE response to South Oxfordshire Local Plan 2031: Refined Options
Consultation, March 2015**

The Oxfordshire Branch of the Campaign to Protect Rural England promotes the beauty, tranquillity and diversity of rural Oxfordshire by encouraging the sustainable use of land and other natural resources in town and country. Established in 1931, the charity's volunteers have been helping to protect and enhance our local countryside for over 80 years.

We therefore welcome the opportunity to comment on this Refined Options document.

Q1: Does the vision identify the right priorities for South Oxfordshire and, if not, what changes do you suggest?

We welcome the vision: in particular the commitment to the rural nature of the district and the preservation of 'the **natural beauty and character of areas such as the Chilterns and North Wessex Downs**'. The commitment to 'careful **management of the Green Belt**' is welcome but ambiguous and implies that areas might be removed from it. We would like to see a stronger commitment to protecting, or even strengthening, the Green Belt.

Q2: Is this the most appropriate strategy to deliver the vision and, if not, what changes do you suggest?

It makes sense to focus development in the Science Vale, where the facilities and services are, but we must protect the rural nature of the market towns and villages (large and small). We would like to see a commitment to development only when supported locally in the market towns and large villages (as well as small villages).

Q3: Is 3,600 for our needs and around 3,000 for Oxford City the correct number of additional new homes we should plan for, if not why?

Firstly, we contend that the figures are potentially misleading.

- The 3,600 is at the lower range of the SMHA figures and could be as much as 5,000.
- The figure does not include 'windfall houses' - which are estimated at 660 for the period.
- It guesses we will have to take a further 3,000 homes to help Oxford City - but Oxford City has already said it should be at least 5,000 (See [Oxford Mail, 26 Feb](#))

This is on top of the existing SODC core strategy of 11,487 homes - giving a minimum total of 18,747 new homes, but probably several thousand more, between 2011-31.

Secondly, such a dramatic increase in housing numbers is unsustainable and unsound.

- CPRE Oxfordshire accepts the need for more housing, and in particular affordable housing for local people. However, we do not believe that such dramatic and rapid growth - a 40% increase in the total housing stock across Oxfordshire by 2031, and up to a 130% increase in the rate of building in South Oxfordshire over and above the 2012 Core Strategy - is achievable. In the panic to hit targets, we risk serious damage to the rural character of our District and to our infrastructure and services.
- These figures are based on the overblown Oxfordshire Strategic Housing Market Assessment (SHMA), which in turn is based on a notional target of over 80,000 new jobs. As the authors of this forecast put it themselves, these figures are based on "potential for growth, not need or capacity".

Thirdly, the SHMA does not have to be blindly followed. Planning Minister, Brandon Lewis, wrote to the Planning Inspectorate in December 2014, confirming that SHMA figures should be seen as a *starting point only*, and that Councils should 'take adequate time to consider whether there are environmental and policy constraints, such as Green Belt, which will impact on their overall final housing requirement'.

CPRE believes that the existence of a number of constraints is obvious - such as impacts on the Oxford Green Belt and the Chilterns Area of Outstanding Natural Beauty, and water issues including drought, flooding and sewerage, and the need to retain the character and integrity of our precious villages and towns which must not be swamped by new houses.

These constraints should have been properly understood, and the housing numbers reduced accordingly, before we were asked to make choices about where houses should be allocated.

Q4: What do you think is the most appropriate way of dividing the 3,600 homes between a) Science Vale within South Oxfordshire, b) the market towns and larger villages, and c) the smaller villages?

CPRE would agree with Option B: Science Vale and 'sustainable settlements' bearing in mind the reservations voiced above that we disagree with slavishly following the SMHA projections. The commitment to 'protecting the most important natural and historic environments in South Oxfordshire; for example in the AONBs, the Green Belt and conservation areas' is admirable. We, however, question whether a 40% increase in housing can be sustainable and there is no evidence that the needs for services (such as transport, water and education) have been properly considered, let alone in a sustainable way.

Further we would urge a proper review of brownfield sites, unoccupied housing and real housing needs before conclusions of this revision can be developed.

Q5: Which locations in Science Vale do you think could be suitable for additional new housing and what positives would you like to see the development bring?

We welcome any development being properly integrated into a transport system and providing housing where the jobs are. It is essential to the sustainability and vibrancy of any new developments that they do not become dormitory towns for Oxford, Reading and London. An absolute priority should be the protection of the Green Belt and AONBs.

Q6: Are there particular places within or around the market towns and larger villages where some of the additional growth could be located, how much housing would be appropriate and what positives would you like to see the development bring?

There are already substantial development plans for the Market Towns (for example the 550 house plus Habitat warehouse development in Wallingford). There has been very little consideration so far about how these are integrated into the towns and how they will deal with traffic congestion, transport links, education etc. While there may be modest development opportunities within the Market Towns, and obviously any brownfield sites should be the primary focus, the assumption that increasing population alone will increase the sustainability of the towns is clearly false. These towns need to be incrementally developed with careful regard to services, demographics and local needs. This logic also applies to villages, where we would suggest that local people themselves should be able to determine whether they need growth and to what extent (once known as Localism!).

Q7: Which of the Benson sites - particularly the sites we have shortlisted BEN1, BEN2, part of BEN3, part of BEN5 - should be used for new homes, and what positives would you like to see the development bring?

Q8: Which of the Chinnor sites - particularly the sites we have shortlisted CHI7, CHI8 or CHI20 - should be used for new homes, and what positives would you like to see the development bring?

Q9: Which of the Cholsey sites - particularly the sites we have shortlisted sites CHOL1, CHOL2 and CHOL3 - should be used for new homes, and what positives would you like to see the development bring?

Q10: Which of the Crowmarsh Gifford sites - particularly the sites we have shortlisted sites CRO6 and CRO7 - should be used for new homes, and what positives would you like to see the development bring?

Q11: Which of the Goring sites - particularly the sites we have shortlisted sites GOR1, GOR2, GOR4 and GOR11 - should be used for new homes, and what positives would you like to see the development bring?

Q12: Which of the Nettlebed sites - particularly the sites we have

shortlisted sites NET1 and NET3 - should be used for new homes, and what positives would you like to see the development bring?

Q13: Do you think that policies for smaller villages should be relaxed to enable a small increase in the number of homes built, and are there other things we could do to help meet the local housing need in these villages?

Combined answer to Questions 7 to 13

Looked at together, CPRE would make a number of generic points:

- a. Any development has to be planned very carefully to achieve the vision of the plan, i.e. the commitment to the rural nature of the district and the preservation of its natural beauty and character.
- b. Any development also needs to be sustainable, which means very high quality of housing (in terms of design, and energy and water use), carefully sited and developed in agreement and in consultation with the resident population).
- c. Developments need to serve the needs of a rural economy - so consideration should be given to tied agricultural housing, rural industries (for example woodland management and food production) and affordable housing.
- d. The Green Belt and Areas of Outstanding Natural Beauty must be protected at all costs.

Without following these underlying principles it is hard to see any positives coming from such developments.

In general, we believe the existing policies that manage development in and adjacent to smaller settlements are sufficiently flexible as they stand. If they were to change, this should not apply to settlements within the Green Belt or Areas of Outstanding Natural Beauty.

Q14: Where do you think is the most appropriate place to plan for Oxford's unmet need and why?

CPRE would firstly question the need for South Oxfordshire to absorb the Oxford need. Oxford should be challenged harder to fulfil its own housing needs and if this is deemed not possible reassess its development plans - this is in line with the need to consider properly environmental and policy constraints.

The proposed locations for Oxford's needs do not reflect the responses from the previous consultation. The public said then, strongly, that neither Green Belt sites nor a new settlement are acceptable. Any overflow from the City we are forced to take should be dispersed in line with the distribution of South Oxfordshire's own housing.

- a) *Extension to Oxford in the Green Belt (at Grenoble Road or Wick Farm)* - the Green Belt as a whole is essential to South Oxfordshire. Its primary purpose is to prevent urban sprawl. Without the Green Belt, Oxford would engulf its surrounding villages and Hoover up even more of the work and employment in the County. Once the Green Belt starts to be dismantled the process will not stop.

This is particularly the case at the edge of the City at Grenoble Road. An urban extension there, which the City is pushing for, would be in no-one's

interest but that of the landowners (including Oxford City itself!) who would see astronomic appreciation in land values.

We note that in the Options Consultation document published June 2014, South Oxfordshire District Council itself agreed that this option was unacceptable.

- b) *A new settlement* - A new settlement in the M40 corridor, Stone Bassett, was proposed and rejected in the 1990s and at the more recent South East Plan. Not only would it “take out” valued countryside, and destroy settlements like Great Haseley, but would be more likely than other options to be a commuter town (because of motorway access) rather than meeting “local housing needs”. Additionally creating a new town, with its infrastructure, could take longer than the plan period, especially if developers were reluctant to proceed, and thus lead to a five year housing supply problem and developer led predatory development.

In the event that housing overflow must be accepted from Oxford, the sensible distribution would be in line with the distribution of South Oxfordshire’s housing allocation.

Q15: Our suggested locations for additional employment land are at Monument Business Park, Culham Science Centre, Didcot station area and the market town centres. Do you have other suggestions?

No comment

Q16: Our suggested approach is to focus new shopping at Didcot, while continuing to allow for limited growth in the other town centres. Can you suggest site opportunities for expanding or redeveloping parts of the town centres?

CPRE is alarmed to see the continued development of shopping centres on the edges of towns. Even in Didcot the proposal to site a retail park on the Power station site seems perverse - being separated from the main shopping centre. With the rise of internet shopping there is a trend from big retail parks to smaller and local shops - this should be encouraged.

Q17: Do you think that these sites are suitable for traveller caravan pitches and can you suggest any further or more suitable sites?

No Comment

Q18: What sort of housing should we plan for people as they get older and where should it be?

This needs much more thought and analysis. The need to provide a range of smaller housing units with varying degrees of support form care services suitable for older people is obvious and urgent - and would ultimately take pressure off housing supply

demands from families. Unfortunately we are seeing no evidence of this trend from the developers. SODC need an active policy here.

Q19: Are there any of our policies that need changing, if so why, and are there any new emerging topics we should be introducing policies on?

Q20: Do you have any other comments you would like to make?

CPRE would like to re-iterate the view that the SHMA is only one vision of Oxfordshire's future. In addition the SHMA has not been subjected to the full force of public consultation and agreement and has not been tested against the many constraints on development existing in the region. We therefore feel it should not be adopted as the only vision of the future.

We question why local taxpayers' money is being wasted on a Green Belt Study that the majority of respondents to the previous consultation specifically said was undesirable. There is no point in doing a study unless your intention is to build on Green Belt land, and the public did not consider building on Green Belt land acceptable.

To retain the rural nature of South Oxfordshire, policy needs to protect the Green Belt and AONBs and the characters of our towns and villages. If we lose any of these we risk losing the whole beauty of the region and the reason why people want to live here! Development does not make communities sustainable and vibrant - indeed done in an unplanned way it will do untold damage to societies' cohesion and sense of place.

Issued on behalf of:

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