July 2020

CPRE Oxfordshire input to Oxfordshire OpenThought consultation,

CPRE Oxfordshire welcomes this new look approach to public engagement and the opportunity for the public to have their say on Oxfordshire's future.

However, this comes with a significant health-warning.

It is great to be asked about what development might look like and how it should be guided, but we also need a say in the first principles of how much growth is desirable in the first place.

Whilst Oxfordshire OpenThought is in progress, **a growth needs assessment to set out the future growth levels for the county has already been commissioned behind the scenes**. The terms of reference for this have not been made publicly available. We do know that the consultants working on it are the same as those behind the previous inflationary growth strategy. And it will certainly be influenced by the expansionist Local Industrial Strategy drawn up by the unelected Local Enterprise Partnership and signed off by Government without any public consultation.

So, we welcome the chance to say how important it is that such development as does come forward must include high quality, high density, affordable and zero carbon housing, supported by protection of and investment in our green spaces and countryside, backed by a proactive rural transport strategy and mindful of Oxfordshire's rural character and heritage.

But we also say that local people deserve and demand a genuine say in the overall growth agenda that, in the breadth and scale of what is being threatened, would work to undermine all of the above.

There is little point working out which trees to plant in the forest if the lumberjacks are already sharpening their saws.

Living & Working

Achieving Sustainable Communities

A Sustainable Response to Population Growth

> *What if...*Oxfordshire's population continued to grow (as predicted) and there were enough homes for everyone, infrastructure and services kept up with the pace of growth, and communities were built/strengthened?
> What would this look like?
> How could accommodating the needs of a growing population be balanced with the need to protect the natural environment?
> Where would people live?

CPRE response 1

Our positive suggestion is that we plan for Oxfordshire's *natural* growth in population.

Based on the latest Office of National Statistics predictions, by 2050, Oxfordshire's population will have grown to approx.770,000, **an increase of 163,000** from 2011 (pop.607,000). This allows for both an increase in the local population and inward migration based on past trends.[1]

The current Oxfordshire Housing & Growth Deal will see an additional 100,000 houses added to the county's housing stock by 2031 (based on 2011 figures). Assuming an average occupancy of 2.4 people per household[2], this would theoretically **meet the needs of 240,000** people.

That means that very little/no additional housing should be required beyond that already addressed in existing Local Plans to meet the natural growth in our population to 2050.

Instead we should concentrate on driving investment towards:

- Ensuring a far greater supply of genuinely affordable housing (the *real* need), with a mix of tenures.
- Retrofitting existing housing stock to meet 21st century environmental standards

Any housing growth over and above predicted population rates is likely to be to the detriment of other parts of the UK and contrary to the Government's 'levelling' up agenda.

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[1] See Table 2
https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesinenglandtable2)
Oxon population – 607,000 (2011), 750,633 (2043), 769,320 (extrapolated to 2050) = total increase 2011-2050 – 162,320

[2] The Oxfordshire SHMA 2014 Para 5.64 states 'For the purposes of the projection it is assumed that average household sizes start at about 2.52 in 2011 and reduce down to 2.41 in 2031 (although exact figures do vary depending on the projection being run).'

Focusing on this 'natural' level of growth would instead strengthen conversations about the quality of development, rather than the quantity, and be the single best step that could be taken to maintain Oxfordshire's existing rural character and environment.

CPRE Response 2

Brownfield First, Housing Density & Design Quality

1. Brownfield first – we need to recycle land that's already been used for buildings by adopting a truly 'brownfield first' policy. This will not only help maximise the protection of green spaces but also provide housing and amenities where people need them.

2. High densities of development should become standard, to avoid losing more land than necessary. High density settlements are more sustainable in terms of supporting higher levels of services, public transport and sustainable energy sources. The Oxfordshire 2050 Plan must be ambitious in its overall density targets, setting a minimum density of 50 dwellings per hectare, and much more in urban centres.

3. Alongside higher density, must come higher quality design. A national Housing Design Audit from CPRE found that the design of new housing developments is overwhelmingly 'mediocre' or 'poor'.[3] Recommendations for local authorities include:

- Setting very clear aspirations for sites (in advance)
- Design review for all major housing schemes
- Dealing with the disconnect between highways and planning - perhaps through the establishment of multi-disciplinary urban design teams across the county/districts.
- Refusing sub-standard schemes on design grounds.

Development that meets all these criteria can be done and done well – witness Goldsmith Street in Norwich, winner of the 2019 RIBA Stirling Prize.[4]

More locally, the work of Greencore Construction[5] looks to be a model worth exploring.

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[3] https://www.cpre.org.uk/wp-content/uploads/2020/03/Place-Alliance-A-Housing-Design-Audit-for-England_2020.pdf
[4] https://www.architecture.com/knowledge-and-resources/knowledge-landing-page/norwich-council-estate-named-uks-best-new-building-2019-riba-stirling-prize-winner#:~:text=The%20Royal%20Institute%20of%20British,the%20UK's%20best%20new%20building.
[5] www.greencoreconstruction.co.uk

We cannot spend the next generation creating developments that require retrofitting from day one. The focus must be on zero carbon (or better!) development and the Oxon Plan 2050 must be ambitious and robust in the standards it requires for the county. As a general principle we should require all new development proposals to be assessed against the requirements of the Government's official climate change policy.

Strengthening Oxfordshire's Natural Assets

Access to green space

> *What if...*Everyone in Oxfordshire had access to a network of high-quality green spaces? What if green and blue infrastructure was fully embedded in the design of our urban areas? What if people of all ages had opportunities to connect with and explore nature where they live/work/play? What would this look like? How could this be achieved?

CPRE Response

Covid 19 has demonstrated the vital importance of safe access to quality green space. We need to be careful that the interpretation of this is not just small green spaces embedded within development (as important as this might be) but that we protect and enhance the countryside where people can connect with and explore nature and landscapes on a broader scale.

What if we genuinely protected the Oxford Green Belt, our countryside next door?

Freed of the hope of development value, landowners would be more receptive to discussions about enhancement through greener farming methods and land use. This is in line with National Planning Policy which requires local planning authorities to plan positively to enhance beneficial use of Green Belt.

Nationally, CPRE is campaigning for 20% of funds for the countryside around towns through the new Environmental Land Management system, providing more fresh food for people in our towns and cities; and better managed countryside that's easier for people to visit and enjoy.

CPRE Oxfordshire created the Oxford Green Belt Way, a 50 mile circular walk around the City. There is potential to run a programme of activities with communities in Oxford to encourage those that are less confident in accessing their local countryside to explore parts of the Green Belt Way, with all the associated health & wellbeing benefits.

What if we created new Green Belts for our 'garden towns' of Bicester and Didcot?

This would help check the unrestricted sprawl of large built-up areas, prevent neighbouring towns and villages merging into one another, assist in safeguarding the

countryside from encroachment, and assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

A Night in Nature - What if Oxfordshire led the way?

CPRE believes that every child should be guaranteed a night in nature in a National Park or Area of Outstanding Natural Beauty (AONB) as part of the national curriculum. Meaningful time in the countryside should be a universal right for every child.

With three different AONBS (Cotswolds, Chilterns and North Wessex Downs), together accounting for around 25% of the county's land area, Oxfordshire is extraordinarily well-placed to put such a programme in place.

Making green and blue spaces work better

What if...We re-thought how we plan for Oxfordshire's green and blue spaces?
What might a new relationship between rural and urban areas, countryside and river be?
How might this shape the way that we deliver growth in Oxfordshire?

CPRE Response

Dark Skies

Light pollution impacts on people's experience of the countryside, impacts on wildlife (interrupting natural rhythms including migration, reproduction and feeding patterns)[6] and impacts on human health (affecting our biological clocks)[7]. Light spilling up into the night sky is also a waste of money and energy.[8]

Tackling light pollution is an issue that demands collaborative action between different public authorities and local communities. It is intimately linked to other strategic choices – especially settlement patterns and suburbanisation of the countryside.

As a policy objective "Dark Skies" is the positive counterpart of tackling light pollution and includes not only preventing additional new intrusion but also seeking to remedy existing problems.

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[6] Royal Commission on Environmental Pollution (2009) Artificial Light in the Environment https://www.gov.uk/government/uploads/system/uploads/attachment_data/ file/228832/9780108508547.pdf.pdf 7

[7] British Astronomical Association's Commission for Dark Skies Blinded by the Light? A handbook on light pollution Chapter 4 'Light pollution and human health' Steven W Lockley Ph.D. http://www.britastro.org/dark-skies/pdfs/HANDBOOKTEXT.pdf

[8] 8 Department for Communities and Local Government 'Local authority revenue expenditure and financing England: 2014 to 2015 budget' https://www.gov.uk/government/uploads/ system/uploads/attachment_data/file/365581/RA_Budget_2014-15_Statistical_Release.pdf

CPRE's *Night Blight* report and accompanying mapping[9] has revealed more about the nature of problem, and highlighted ways in which light pollution can not only be contained but actively reduced.

Key recommendations relevant to the Oxon Plan 2050 include:

- Policies to control light pollution which will ensure that existing dark skies are protected, and that new developments do not increase local light pollution.
- Identification of areas with severe light pollution and target action to reduce it, such as investing in dimming technology, running part-night lighting schemes (in consultation with the local community) or replacing street lighting with less light polluting types.
- a Street Lighting Policy, which could include Environmental Lighting Zones to ensure that appropriate lighting is used in each area.

Connectivity

Taking the services to rural Oxfordshire

New technology, such as AV, drones, user focused business models and the levels of digital connectivity that will be delivered across the county, will enable new models of service delivery to be applied to support rural areas

CPRE Response

A third of Oxfordshire's population lives in rural areas, rising to nearly two thirds in areas such as West Oxfordshire.[10] Not surprisingly perhaps, people living in rural areas in England make more trips and travel further than those living in urban areas and they also rely more on their car to make these trips (76% of trips by car v 52% for urban dwellers).[11] Per capita CO_2 emissions related to transport are estimated to be 66% higher away from cities.[12] With transport acknowledged as 'the largest single source of greenhouse gas emissions in Oxfordshire (45% of the total)' (Climate Emergency & Air Quality- Climate Emergency & Transport paper), that makes tackling rural transport requirements a high priority.

Being realistic, private vehicle use is, and is likely to remain, the only viable main option for travel for the majority of these residents for some time to come, and if electric cars become the norm then the carbon impacts will be much reduced. Whilst viable alternatives do not exist, there should be no undue penalty for this. The focus will need to be on building up alternative options, reflecting the established hierarchy of sustainable travel, reducing the need to travel, minimising

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[9] https://www.nightblight.cpre.org.uk/images/resources/Night_Blight_cpre.pdf
[10] https://insight.oxfordshire.gov.uk/cms/rural
[11] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/823068/national-travel-survey-2018.pdf
[12] https://www.bbc.co.uk/news/science-environment-49639003

journey distances and supporting modal shift to active travel / public transport. This will need to include measures such as:

- Better full fibre broadband to facilitate both home-working and leisure activities

- Increasing flexibility of services eg online medical consultations

- Increasing public transport links between market towns (not just spokes to Oxford)

- Establishing rural mobility hubs[13] where viable, but recognising that private car use will still be essential

- Integrated ticketing between companies/modes of travel

- Support for moving to electric vehicles (including not just cars, but e-bikes and scooters)

- Special regard for the requirements of our designated landscapes, in particular Oxfordshire's three Areas of Outstanding Natural Beauty.

Climate Change

Water

> *What if*…Oxfordshire's water usage declined so much that the need to increase the capacity of the water networks fell away? What could this look like? Could communities recycle water? Perhaps installing community rainwater collection systems?

CPRE Response

All new housing and employment developments should have 'grey water' installed, including collection of rainwater.

Communities should certainly be encouraged and supported to minimise water use. For example a network of local water champions could provide advice and help to stimulate appropriate community projects.

However, Thames Water must also be much more ambitious in its targets for reducing leakage and installing water meters.

Furthermore, even if the current Oxfordshire population were to halve its water usage, any savings would be more than over-taken by the population growth being driven by the Oxfordshire Growth Board's current economic growth strategy.

We need a fundamental re-think from first principles about the level of development that Oxfordshire can support given that it is in an area of water-stress[14].

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[13] Future of Rural Mobility Study - Rural Hubs, Midlands Connect – www.midlandsconnect.uk

*What if…*We could swim in any one of our rivers and even take an accidental gulp, without worry? What could this look like? Could the county initiate clean-up missions across our rivers and waterways?

CPRE Response

Oxfordshire's landscape is defined by its river network, including eight major rivers (Leach, Windrush, Evenlode, Glyme, Cherwell, Oxon Ray, Ock, and Thame) and smaller tributaries that flow through the county and into the Thames, plus the Oxford and Wiltshire & Berkshire canals.

Of the 101 water bodies either in or partly in the county, it is pitiful that only 5% are judged to be at 'Good' status under the European Water Framework Directive.[15] Concerns about sewage pollution are growing[16], especially in the context of the county's rapid and significant development plans.

We need urgent action to reverse this situation and improve biodiversity, which would also increase leisure opportunities for local communities, with associated economic and health benefits.

CPRE's positive suggestions are:

a)   A Blue Flag standard (or equivalent) for Oxfordshire's rivers - a clear vision for the quality standards we expect our rivers to meet and recognition for where this is achieved.

b)   A programme of community engagement to support local interest in, and care for, our rivers

c)   A study to identify the economic, social and environmental value of our rivers to the county (incl. cultural / historic factors) and the additional potential that might be achieved if we could return these rivers to a healthy state.

d)   Robust engagement with Thames Water and the Environment Agency to demand clear, financed plans to address the current appalling standard of our local rivers and to ensure necessary infrastructure is in place ahead of further growth plans. All new proposed development must have a waste water additional volume plan.

Oxfordshire's housing stock is already set to grow by 40%, 2011-2031. We need to be clear how this additional demand will be met in advance, not leaving our streams to pick up the overflow.

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[14] We note that the proposed mega-reservoir at Abingdon will not create 'new' water and would not offer resilience against significant drought events.

[15] Oxfordshire State of Nature Report 2017 – Wild Oxfordshire

[16] https://www.theguardian.com/environment/2020/jul/01/water-firms-raw-sewage-england-rivers