

CPRE South Oxon response to 'Proposed Main Modifications of Local Plan' Sept. 2020

Policy STRAT2: South Oxfordshire Housing and Employment Requirements

MM5

CPRE continue to contend that the housing numbers proposed are far in excess of the needs of the residents of South Oxfordshire nor of the likely emigration into the District – see our earlier written submission to the Inspection. Despite considerable evidence, based on publications from the Government's Office for National Statistics, being presented by CPRE and others at the hearing at the hearings. The Inspector chose to ignore this clear evidence but considered excessive growth demanded by the Government and the subsequent Oxfordshire Deal more important.

The pro rata increase to accommodate the extra year (2035) in housing and employment targets proposed is unsound. All the evidence (again presented by CPRE at the hearing) shows that the growth rate of population and household formation drops substantially in the late 2020s and 2030s – to less than 0.3% per year. Again the Inspector has made chose to ignore the facts.

Oxford's housing numbers, although the subject of separate examination, remain contested given that evidence provided by the City itself suggested that the figures are based on requirement not need, and therefore should not provide justification for the 'exceptional circumstances' required for Green Belt release.

Policy STRAT4: Strategic Development

MM7

The new criteria ix) should say: 'ix) a statement of how it is intended to achieve *zero* carbon emissions and facilitate renewable energy generation' in line with Council ambition for South Oxfordshire to be zero carbon by 2030. The change from 'low' to 'zero' should be reflected through the rest of the modifications and a clear statement included of the extent to which the Council's zero carbon ambition by 2030 will be achieved (a) by 2030 and (b) by the end of the Plan period.

Policy STRAT5: Residential Densities

MM8

CPRE continue to contend that the use of firm requirements for minimum densities is essential to ensure the efficient use of land in the District (see our earlier written submission). The proposed modified policies are vague and are laced through with qualifications, such as 'where relevant', and will carry little weight when used to judge planning applications. CPRE considers higher higher densities, than the proposed Strat 5, should be considered in certain sites and firm targets should be set. We propose there should be "bands" for each site.

Policy STRAT6: Green Belt

MM9

CPRE can see no evidence for the Exceptional Circumstances required by the NPPF to remove land from the Oxford Green Belt. (for details see our earlier written submission). Nor that, given that 70% of the new housing and six out of seven strategic sites, are on Green Belt that Green Belt release is anything but the norm rather than the last resort when all other options have been dismissed as the NPPF requires. Additionally we have seen no evidence assessing the cumulative impact on the Oxford Green Belt of the South Oxfordshire allocations combined with other allocations in the Local Plans of adjoining Districts, in particular Oxford City and Cherwell. Taken together, these would lead to nearly 20,000 houses in the Oxford Green Belt which is equivalent to a City a third the size of Oxford. CPRE Oxfordshire contends that failure to consider these cumulative impacts render the South Oxfordshire Local Plan fundamentally unsound.

The modified wording proposing 'compensatory improvements' is vague and undefined and will carry little weight in planning decisions. We call for specific plans to compensate for the loss of Green Belt, including, as a minimum, the addition of new parcels of land to the Oxford Green Belt equivalent to those removed, as compensatory measures. The Plan should as a minimum outline the nature and extent of these measures.

Policy STRAT8: Culham Science Centre (and page 13 of the [Policies Map Changes](#) doc)

MM11

The amount of land to be released from the Green Belt at Culham has been increased from 73 hectares to 77 hectares. There is no justification given for this change nor any indication of how the additional land will be used.

The land now proposed to be safeguarded for the Didcot-Culham river crossing (see page 13 of the [Policies Map Changes](#) document) is a new route that was not in any of the original safe-guarded routes and is much closer to Culham and the school. There is no evidence base to justify this radical change. Rather bizarrely, it now doesn't even link with the safeguarded land south of the river in the Vale (unless its going to be a very diagonal bridge!). .

Policy STRAT14: Land at Wheatley Campus, Oxford Brookes University

MM 18 - Para 4.119 (page 72 of the Main Mods document).

The modification adds this text: 'The preparation of the Wheatley NDP (2019-2034) overtook the production of this Local Plan so has been examined in advanced of this Local Plan. This meant that the NDP (2019-2034) was unable to make detailed amendments to the Green Belt. The council is committed to supporting Wheatley and their ambitions for a review of their Neighbourhood Development Plan. *The Wheatley Neighbourhood Plan will be reviewed within two years of the adoption of the Local Plan to release land from the Green Belt, to enable the allocation of land for mixed use development.*' [our emphasis]

Surely this is completely pre-judging the case? we can see that it might talk about reviewing the plan, but surely it can't go this far, not only anticipating Green Belt release but stating for what purpose? We suggest an alternative wording:

'At the time of making this Plan it was accepted that a proposal to review its Green Belt boundary might be included in a future review of the Wheatley Neighbourhood Plan. As the NPPF requires, the Local Plan recognises that this may then be strategically justified should the need for an extension to

the Wheatley boundaries and the proposed uses to which it may be put have been ratified through public consultation and by an appointed Inspector..'

Policy H1: Delivering New Homes

5.11 table 5c

We note that the net number of new dwelling to 2035 is now 30,056. CPRE believes this will lead to either a gross oversupply of houses in the District or, more like, a situation of under-delivery against the target leading to the loss of the District's 5 year housing supply and subsequent loss of planning control.

Policy H3: Housing in the towns of Henley-on-Thames, Thame and Wallingford

MM25

CPRE is alarmed by the introduction of the words 'minimum' and 'at least' against the targets for the Market towns. We consider this is both unnecessary and dangerous. It is unnecessary because these towns already have ambitious plans for expansion which will take many years, probably over a decade, to be built out. A future review of the Plan could adjust the figures if additional need emerges. It is dangerous because it presents a loophole to allow developers to bring forward additional sites, outside the plan, thus negating the entire purpose of the plan.

The same "at least" is added to employment land. Again "at least" is open-ended and when a developer comes forward with a gross increase it will be hard to argue it is not in line with the Plan.

Policy H4: Housing in the Larger Villages

MM26

Although paragraph 5.30 recognises that some villages may be constrained by the AONB and not able to achieve the 15% growth, policy H4 (paragraph 2 and the associated footnote) indicates that, if a Neighbourhood Plan does not allocate sufficient sites to meet the requirements set out in paragraph 1, additional planning applications for sites outside those allocated in the Neighbourhood Plan will be supported. This implies that, if the Neighbourhood Plan allocates sites for fewer houses than set out in paragraph 1 of policy H4, SODC will approve planning applications for sites in addition to those allocated in the Neighbourhood Plan to make up the numbers, despite the recognition in paragraph 5.30 that some villages may be constrained by the AONB.

It is acknowledged that failure to bring forward a Neighbourhood Plan means that SODC must take other steps to meet the requirements, a point that was made in paragraph 5.21 which has been deleted in the main modification MM26. However, if the Neighbourhood Plan has progressed to an adequate stage and does allocate sites for a number of houses that can be achieved taking into account constraints or other factors, then it is inappropriate for SODC to override the Neighbourhood Plan and approve applications for other sites, thus ignoring the requirements of paragraph 172 of the NPPF. The requirement is for the LPA to protect the AONB unless exceptional circumstance apply which, in this case, cannot be, and has not been demonstrated.

We support Woodcote Parish Council proposal that the second paragraph of policy H4 should be amended to remove the words “to meet these requirements” and the footnote amended to remove the word “sufficient”.

Policy DES10: Renewable Energy

MM70

CPRE fully support the development of renewable energy across the District. We are however concerned about the use of greenfield sites to site solar farms and the broader landscape impact of large wind turbines. We therefore suggest a new wording to page 210:

The Council encourages schemes for renewable and low carbon energy generation and associated infrastructure at all scales including domestic schemes. It also requires the incorporation of renewable and low carbon energy applications within all development. Planning applications for renewable and low carbon energy generation will, however, only be supported, provided that they can demonstrate they do not cause a significantly adverse effect to:

- i) landscape, both designated AONB and locally valued biodiversity, including protected habitats and species and Conservation Target Areas;*
- ii) the historic environment, both designated and non designated assets, including by development within their settings;*
- iii) openness of the Green Belt;*
- iv) the safe movement of traffic and pedestrians; or*
- v) residential amenity*

RJH 26 Oct. 20