



The countryside charity
Oxfordshire

Campaigning to protect our rural county

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Oxfordshire 2050 Plan Regulation 18 (2) Consultation – Response from CPRE Oxfordshire

OVERVIEW – We need a better balance

The Plan document does not attempt to address what level of growth is consistent with protecting our environment and rural character.

It talks about ‘good growth’ but makes no clear assessment of the different impacts of the three growth options (the lowest of which is still 50% above actual need) or the five spatial options outlined. It is not only silent on the tough choices that will be needed between meeting targets for carbon and nature and the push for economic growth but implies that we can effectively have it all.

It talks about climate change but ignores the disruptive impact of climate change which, during the plan period will lead to flood, extreme heatwaves, fires, drought, food shortages, hurricanes, crop failure, and massive population movements. Not only will Oxfordshire not be immune from this but also the social and economic stability required to implement the plans is unlikely to be there. We need a clear explanation of how the conflict between growth and climate change, the conflict between more new homes and protecting nature, will be resolved and an unambiguous statement that a reduction in Oxfordshire’s CO₂ emissions is an overriding priority.

The public deserves better. We need a clear assessment of the impacts, risks and benefits of the options proposed. That doesn’t mean burying information in long and complicated Sustainability Assessments but setting out the facts in straightforward wording with which local people can meaningfully engage. This is particularly vital if the Plan is to provide a robust defence against the top-down figures likely to be imposed as the result of the OxCam Arc.

Our local authorities must be able to demonstrate that the growth options they are presenting are deliverable without unacceptable environmental harm and without undermining some otherwise good policy proposals for getting to net zero and restoring nature.



Constraints to growth

Over recent years, the Oxfordshire Housing & Growth Deal has driven growth in the county significantly beyond local need. But this has been achieved at considerable cost. For example:

- Many of our market towns and villages are being changed almost beyond recognition, threatening the rural character which makes Oxfordshire an attractive place to live and underpins our economic success. Places such as Chinnor, Hook Norton, Wantage and Eynsham, and many others, are all seeing large-scale housing development way beyond any local need.
- There are now nearly 20,000 houses planned for the Oxford Green Belt, expanding Oxford by a third, removing countryside access, coalescing villages and putting the setting of our historic city at risk.
- Flooding & sewage – 4.2bn litres of sewage was dumped into the Thames and its tributaries in 2017 by Thames Water. The majority of Oxfordshire’s eight major rivers were classed as having moderate or poor cleanliness in 2016. Urbanisation has stressed natural drainage and added to the flood risk in the area. Some 1.7% of houses in Oxford have been flooded, well above the national average of 0.7 per cent.
- Food & farming – the UK already imports about 45% of its food, and as recent events have shown, supply chains are not always robust.
- Land is a scarce resource that we will need for climate change mitigation and adaptation including planting trees and hedgerows.

Any further above trend growth proposals must be considered in the light of issues such as these.



GROWTH OPTIONS – only the lowest, Standard Method option, is even broadly conceivable

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

- Standard Method ‘Adjusted’ – 102,000 houses
- Economic Growth Model 1 (described as ‘Business as Usual’) – 123,000 houses (2 more OxforDs)
- Economic Growth Model 2 (described as ‘Transformational’) – 153,000 houses (2.5 more OxforDs)¹

By comparison, the Office of National Statistics (ONS) figure for the same period is 53,000 houses – almost half the lowest growth option we are given.

CPRE Oxfordshire believes that the Government’s Standard Methodology is flawed, as it mandates an uplift for affordable housing without there being any evidence that increasing numbers in this way will have the desired effect. Theoretically, it is possible to present a lower target than the Government’s methodology, but in practice this has rarely, if ever, been accepted by planning inspectors. So, we can see why our local authorities feel obliged to consider this figure. As the lowest of the options presented, it is the most likely to be achievable within the county’s environmental constraints and therefore is the only one that CPRE would consider even vaguely appropriate. CPRE has substantial reservations about how the ‘adjusted’ standard methodology has been calculated here (see following).

The second option, “business as usual”, actually extrapolates the very high levels of growth in the SHMA based “growth deal” – in which Oxfordshire Councils were incentivised by the Government to plan for roughly twice the number of houses that the Office of National Statistics had forecast to be needed to support new household formation.

The third option, “transformational” is the high case forecast based on all of the local employers’ dreams of growth coming true. Obviously they will not all come true, nor will most of those which might be realised within the time frame of the forecast. A high growth forecast also places local councils in danger of losing their “five year supply” and therefore their powers to control development and a consequent uncontrolled free for all.

In addition, we would caution that the long-term impacts of both Brexit and Covid have yet to play out and there is inevitable instability in the figures, especially over such a long time period. This requires a cautious approach, focusing on qualitative rather than quantitative assessments, and building in the careful phasing of any proposed land release.

¹ OP2050 says that 85,000 houses are already accounted for in existing Local Plans (78,000 within the Local Plan periods, plus a further 7,000 already allowed for beyond this eg Culham, 1,400 after 2035 and Grove Airfield, 1,000 after 2031). This therefore leaves a balance to 2050 of: Standard Method Adjusted –16,000 houses Growth Model 1 – 38,000 houses Growth Model 2 – 67,000 houses.



The Oxfordshire Growth Needs Assessments (OGNA) – A flawed approach?

CPRE Oxfordshire believes that an independent peer-review of the Oxfordshire Growth Needs Assessment is required in order to address concerns about its approach that deviates from the Government's Standard Methodology and pushes assumptions consistently towards higher growth.

The Government's Standard Method, based on ONS 2014 standard household projections plus 'affordability uplift' is given as the starting point. This gives the following figures for 2020-2030:

Household increase	23,869
Plus 'affordability uplift	33,830
With 40% cap	33,500

(See table 7.2.2)

For Oxfordshire 2050 the 2020 to 2030 increase is simply extended to 2050 by multiplying by three to give a total 2020 to 2050 figure of 101,490 extra houses needed.

This procedure has two flaws. Firstly, the use of 2014-based household projections are considerably out of date and overestimate the household growth (because of declining fertility rates and international immigration). The 2018 base projections suggest a 2020 to 2030 growth of 19,161 households (cf 23,869 for the 2014 base).

Secondly the simple extrapolation of the 2020 to 2030 figures out to 2050 is decidedly dubious as the growth rates decline with time. The 2020 to 2030 annual percentage increase is 0.68% whereas the 2030 to 2040 increase is 0.53% and the 2040 to 2043 increase 0.46% (note the 2018 ONS projections only go to 2043). So, using the 2014 ONS base, the 2030 to 2040 increase should be 26,367 and the 2040 to 2050 22,885 and the total standard method 2020 to 2050 should thus be 83,082. Thus just this incorrect extrapolation exaggerates the housing need by 22%. This extrapolation technique is recommended by the standard method but the standard method was only designed for plans looking 15 years ahead, not 30 years in the case of Oxon 2050.

Taking into account both these effects the housing need 2030 to 2050 by standard method should be 64,000. (This of course still assumes that building 40% more houses than we need to allow for affordable housing – an assumption that has been repeatedly questioned.)

The OGNA goes on to make its own calculation i.e. it does not follow the Standard Methodology. This uses the 2018 population projections and the 2014 house occupancy figures, but then adjusts the 2020 baseline to take into account the discrepancy between the ONS population estimates and the Patient Register (PR) figures. The PR figures suggest there is an extra 26,000 residents of the County, compared with ONS. However, the PR figures are very likely be inflated by double registrations (particularly in the City of Oxford), which even the OGNA recognises (section 3.4). The methodology goes on to use the same extrapolation technique to go from 2030 to 2050, which will make the same 20% plus overestimate. This new methodology, almost magically, produces a projection for housing need for 2050 which is very close



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the original Government's Standard Method, in this case 101,580. This all demonstrates the assumptions made by this new, unreviewed methodology are decidedly dubious and inflate the true housing 'need' in Oxfordshire.

Of course all these projections are pre Covid and have not taken full account of the impacts of BREXIT. An inflated target is undesirable due to the unnecessary environmental impacts it will cause, the increased risk of leaving our local authorities unable to meet their housing supply figures and therefore vulnerable to speculative development, and the market uncertainty it creates for developers.

Overall, we note that between 30% and 44% growth is proposed, against a national prediction of 8.36% and a trend-based prediction for Oxfordshire of 6.8% over the same period.

At the very least, CPRE Oxfordshire would therefore expect to see the assumptions and conclusions of the OGNA robustly reviewed and tested by an independent third party.



SPATIAL OPTIONS

The consultation document sets out 5 options for spatial distribution, although it acknowledges that the final Plan is likely to be a mix and match of these.

CPRE believes that decisions on spatial options cannot be entirely divorced from the growth figures. For example, lower numbers would be easier to accommodate within existing growth locations. However, a summary of our current views is below:

Option 1: Focus on opportunities at larger settlements and planned growth locations. 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) i.e. the growth would be focused in line with current adopted Local Plan strategies.

Our view: Although CPRE resisted many of the larger sites, especially in the Green Belt, that were allocated in the current round of local plans, that land has now been released. In almost every case sufficient land has been released to accommodate considerable growth beyond that in the current plans themselves. If built out at suitable density, this would mean that no further large-scale allocations, and certainly no more Green Belt release, should be required (especially if growth is constrained to, or below, the Standard Method option) which would be welcome. However, this is not a blanket endorsement since some locations would struggle to accommodate any further growth without serious detrimental impact to the countryside.

Option 2: Focus on Oxford-led growth. This option covers urban intensification within the City of Oxford, new or extended urban extensions on the edge of the City. It is essentially a City ballooning over the Green Belt, in direct contravention of the purpose for which the Green Belt was created.

Our view: CPRE would strongly support this option in as far as it relates to efficient use of brownfield sites, including infilling at redundant retail sites and higher density urban development, but not if it entails Oxford's further 'flytipping' of housing on to the Green Belt.

Option 3: Focus on opportunities in sustainable transport corridors & at strategic transport hubs. This option covers new growth based in the most sustainable transport corridors, where frequent bus services operate and rail stations act as transport hubs. It includes the creation of entirely new settlements, and radiates out from Oxford, for instance along the A40/A418.

Our view: CPRE Oxfordshire gives qualified support to this option as it has attractions in terms of sustainability. However, it largely fails with regards to the A40 as this is unsuitable for traffic increases and also in relation to bus routes, which should generally be dictated to by housing locations and needs, not the other way around. In particular, a number of the transport corridors run through Green Belt or Areas of Outstanding Natural Beauty where opening up land for development would not be suitable (Iffley being a case in point).



Option 4: Focus on strengthening business locations. This option centres on the network of business and science parks that covers Oxfordshire and particularly those identified as priority economic assets by the Oxfordshire Local Enterprise Partnership.

Our view: CPRE Oxfordshire gives qualified support to this option as it has attractions in terms of sustainability and the co-location of jobs and housing. However, the existing rather random distribution of science and other parks would need to be focused into a more coherent strategy linked to transport improvements. Many of the current sites are not in locations where we could support expansion eg Begbroke within the Oxford Green Belt or Harwell within the North Wessex Downs AONB.

Option 5: Focus on supporting rural communities. This is a euphemism for developing the countryside, enabling growth in rural settings away from the main service centres and top-tier settlements that will accommodate the current local plan-led growth up to the mid-2030s and encouraging a redirection of development to more rural parts of the county provided that suitable access to the public transport network and key services and facilities is possible.

Our view: CPRE Oxfordshire is generally opposed to this option as it would direct development to precisely the countryside/rural settlements that we are seeking to protect. However, we recognise that there may be occasions when allowing some housing growth is both necessary and desirable and, in particular, could provide affordable housing so that villages are more sustainable and better able to meet the demands of climate change by being more self-contained.



POLICIES

The Plan contains a wide range of draft policies under 5 headings:

- Addressing climate change
- Improving Environmental Quality
- Creating Strong & Healthy Communities
- Planning for Sustainable Travel & Connectivity
- Creating Jobs & Providing Homes

CPRE Oxfordshire very much welcomes the general thrust of these policies and the moves to bring forward better designed, climate and nature friendly development.

We do have some concerns about whether the Oxfordshire Plan 2050 is the right place for such policies or whether these would be better decided at District/City authority level. We note that the option to do this was rejected because *'this could result in less certainty and clarity for developers'*. This seems a very poor reason for removing policy choices further away from local democratic accountability.

CPRE generally welcomes:

Policy Option 01: Sustainable Design & Construction –Zero-carbon development

Policy Option 03: Water Efficiency

Policy Option 04: Flood Risk

Policy Option 05: Protection and Enhancement of Landscape Characters

Policy Option 06: Protection and Enhancement of Historic Environment

Policy Option 11: Water Quality (*especially the reference to Bathing Water status*)

Policy Option 13: Healthy Place-Shaping

Policy Option 15: High Quality Design (*although we think the 700 house limit before the need for a masterplan & design guide kicks in is on the high side and could be lowered to 500 houses*)

Policy Option 17: Towards a Net Zero Carbon Transport Network

Policy Option 18: Sustainable Transport in New Development

Policy Option 19: Supporting Sustainable Freight Management

Policy Option 20: Digital Infrastructure

Policy 31: Specialist Housing Needs

CPRE supports with some caveats:

Policy Option 02: Energy – *a welcome focus on renewable energy but this should not trump landscape & visual impact considerations²*

Policy Option 07: Nature Recovery

CPRE welcomes the focus on Nature Recovery Networks, but we believe that this needs a firmer base in planning policy in order to provide the necessary protection to deliver the desired outcomes.

² See: <http://www.cpreoxon.org.uk/resources/item/2853-renewable-energy>



Nature Recovery depends on the relevant areas being left undisturbed except for enhancement measures. Whilst the general objective of nature recovery covers the whole County, it is focussed on the identified Core and Recovery Areas of the NRN (as defined by TVERC mapping) which should be specifically and statutorily protected.

Whilst some elements within these areas may be individually protected to a greater or lesser degree, ref. circular 06/2005, NRNs were not envisaged at the time that circular was prepared. Overall protection for an NRN as a whole is now required and should be equivalent to the protection given to AONB's and Green Belts reflecting the key significance of conserving and enhancing these areas in the spatial strategy.

Para 179 of the NPPF requires that *plans should:*

- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*
- b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.*

Footnote 62 to that paragraph encourages Local Authorities and other decision makers to *specify the types of development that may be suitable within them*. Specifying development that may be suitable by definition specifies that other forms of development would be unsuitable and we propose should therefore be permitted only in exceptional circumstances/very special circumstances.

In the case of the Arc a new Framework of Policies is under preparation which we are advised will sit beside rather than beneath the NPPF. Given that the Arc is to be a national focus for economic growth it is correspondingly even more essential that measures to protect and enhance nature and the NRN mechanism to do so should be strengthened.

The Oxfordshire 2050 project can and should influence by example the development of appropriate policies in the Framework and the follow up to the Environment Bill.

CPRE Oxfordshire therefore suggests the following policy wording:



Proposed Policy on Nature Recovery Networks

The fundamental aim of the Nature Recovery Network is to preserve and enhance the natural world requiring land designated as Core or Recovery to be kept permanently free of inappropriate development.

Appropriate development consists of the engineering of scrapes and the provision of modest hides (and such other development to conserve and enhance the natural world as may be considered appropriate). Appropriate development will not be subject to planning fees although requiring planning permission. All other development is inappropriate except where exceptional/very special circumstances exist.

Such circumstances will exist only when all alternatives have been exhaustively considered against an assumption that the Core/Recovery Area will remain free of new inappropriate development.

Should exceptional circumstances be found to exist the biodiversity net gain requirement for any development will be increased to 50%.

Policy Option 12: Air Quality – we do not see how it is possible to offset poor air quality in one area by improving it elsewhere.

Policy Option 21: Strategic Infrastructure Priorities – a strategic infrastructure framework should inform new development, but the delivery of infrastructure has to precede rather than occur ‘alongside’ new development. A further Reg 18 consultation on strategic spatial options might be appropriate once further detail of the strategic infrastructure framework is available.

Policy Option 22: Supporting the Creation of Jobs – we are not yet convinced that the Oxfordshire Growth Needs Assessment (OGNA) scenarios are valid. We must certainly avoid the situation where there is a circular argument of jobs justifying housing justifying jobs, without a framework for considering broader implications both for Oxfordshire but also for the county as a whole and the levelling up agenda. The priority for job creation should be to reflect Oxfordshire’s existing skill base while addressing areas of need to reduce unsustainable commuting.

Policy Option 30: Affordable Housing – we support the wording but wonder if anything further can be done to ensure that the definition of affordable is tightened up to mean what it says, rather than generally just minor discounts on market rates, plus an emphasis on such housing being available in perpetuity. The level of affordable housing expected should be clearly stated.



CPRE has particular concerns about the following policy areas:

1. Housing density

This is a key issue which is completely overlooked in the current document. The only policy reference is within Policy Option 29: Urban Renewal where there is a weak commitment to achieve higher density ‘where appropriate’.

Para 428 does state that the Plan ‘seeks to support achieving higher densities by building residential property higher, three or four storeys, in appropriate locations, to improve the overall land use and to reduce the need for more greenfield release.’

However:

- a. This is not reflected in policy. This is a serious omission in a situation where it is proposed to build between 100,000 and 150,000 new homes by 2050, increasing Oxfordshire’s housing stock by between 35% and 53%.
- b. Higher density is not just achieved by building three or four storey buildings, but is about overall good design to make efficient use of space. Both density targets and how they should best be achieved will be different in different locations.

Policy wording in this area must be significantly strengthened.

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.

Table 1. Landtake Based on average housing density of 12 homes per acre / 30 per hectare

Current Land area of Oxford City	45 km2
Standard Method adjusted – 102k houses	34.4km2
Econ Growth 1 – “Business as Usual” – 123k houses	41.5km2
Econ Growth 2 – “Transformational” – 153k houses	51.6km2

CPRE argues that *all* of the incremental housing should be high density, low cost, low land take, compact units, with the result that by 2050 the housing mix will have been improved with at least 25% of all Oxfordshire housing consisting of compact units more suitable for starter homes or those wishing to downsize, and we will have significantly have reduced the amount of valuable greenfield land lost to development.



All further development (except in exceptional circumstances) should be high density – 100 units per hectare and higher. All current local plans should be reviewed with the objective of achieving the same high levels of land use, which would make efficient use of land already allocated and minimise the need for any further landtake.

The benefits only higher density housing offers are:

- *Affordability* - higher density land use reduces individual unit prices making homes more affordable by reducing the land cost per unit to a minimum, as well as making them more economical to run. This produces homes ideal for and more affordable by individuals and new families starting on the housing ladder and older people trading down to more manageable accommodation, which in turn frees up larger houses for the market.
- *Land use* - More efficient land use means a lower overall land take for any given number of homes, three times less in the case of a target density of 100 d.p.h compared to a current Oxfordshire average of 35. Land is a scarce but vital resource, which we need for agriculture and to increase our food security, for climate change mitigation (tree planting, flood resilience etc) and for the health and wellbeing of people and nature.
- *Communities* - Compact housing increases the population and therefore effectiveness of '20 minute neighbourhoods' because more retail and leisure facilities can be supported through walking and cycling within the 20 minutes time circle, helping to build more resilient communities. *Additionally higher density population increases efficiency of public transport solutions*
- *Energy efficient & climate friendly* - Compact housing is more efficient to heat and insulate; it is more appropriate for community heating; and it benefits from the island effect typical of cities where adjacent properties heat each other, which is lacking in wider spaced areas with larger houses. Compact living, allowing self-sufficient neighbourhoods, would require less personal transport. Compact living is therefore climate friendly living, as well as minimising heating, insulation and travel costs.
- *High density does not mean high rise*. Tower blocks are in fact less space efficient than the terraces which many of them replaced. High quality, high density housing means smaller units, closer together, than the recent distanced developer-led building patterns, whilst still allowing accessible green space. Two or three storey Compact homes provide friendly compact, '20 minute neighbourhoods'.

CPRE therefore suggests the addition of the following new policy.



Proposed Policy on Housing Density

All future housing development will be of compact units at high density in order to adjust the balance of Oxfordshire housing stock in favour of lower cost, easier to maintain and more climate friendly units. Target density should be 70-100 dwellings per hectare, a density level historically found in both rural and urban communities respectively.

This will ensure the homes we need at more affordable prices, preserve land for its other benefits and services, and make a significant contribution to meeting climate change targets.

It will involve reviewing current Local Plans to improve site densities, as well as planning any additional units needed to meet 2050 ambitions.

2. Policy Option 10: Green Belt

CPRE is supportive of enhancing Green Belt land, in the same way that we would wish to support any land improvements with a view to enhancing landscapes, visual amenity and biodiversity or improving damaged or derelict land. Clearly any such enhancement would need to be constrained to that appropriate in the Green Belt. It must also be recognised that not all Green Belt land could support such enhancement and nor will many landowners be willing to do so. It must be confirmed that this would in no way reflect on the land's status as Green Belt one way or another, as this is a planning not an environmental designation. Furthermore, if it appears that enhanced Green Belt land might have a special status providing greater protection, landowners will in their own interests stand in the way of it in order to make the chances of development greater.

Unfortunately, as we have seen from recent housing allocations (19,000 houses now planned for the Oxford Green Belt), the protection provided by National Planning Policy is significantly weakened, despite Government assertions to the contrary.

It would therefore be desirable, if not essential, for OP2050 to consider guaranteeing continued Green Belt status to all current Oxford Green Belt land, at least for the duration of the Plan, before implementing any enhancement policy.

3. Policy Option 08: Biodiversity Net Gain

We support the proposal of 20% biodiversity net gain. However, CPRE Oxfordshire remains concerned about the overall net gain approach. These methodologies have yet to be thoroughly tested and in some cases are not even yet agreed. At the 'coal-face', we know that there are already instances where developers are considerably down-playing the value of existing sites as well as over-playing what their compensatory measures can deliver. This is challenging for local authorities who often lack the in-house



expertise and resources both to undertake robust scrutiny of such proposals and to carry out long-term monitoring and enforcement (since delivery is over a 30 year period). We cannot afford for this dynamic already playing out at planning application level to be repeated at a strategic planning level. **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** (i.e. the local authority, not developers or their agents) and we need to understand where the resources will come from to support the effective delivery of the Policy.

4. Urban Renewal – Policy Option 23: Protection of Economic Assets, Policy Option 24: Town Centre Renewal & Policy Option 29: Urban Renewal

Overall, the document is not transformational in the sense of urban renewal but pushes the City's tired line on ring-fencing employment land. We need a complete re-appraisal of how we use land in Oxfordshire e.g. changing urban centres and increasing densities.

Keeping the focus on sustaining investment in business and science parks ignores the fact that innovation might take place anywhere, including rural communities and town centres. These business and science parks could prove to be white elephants, not filled to capacity and not well linked to public transport.

We are particularly concerned about the phrase: 'we will not support the loss of economic assets to housing'. 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. This policy must be re-worded to provide a more flexible approach.



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Oxford-Cambridge Arc

The vagueness of the Plan document risks letting the top down OxCam Arc proposals take prominence. As the Oxfordshire 2050 documents euphemistically put it, that will “be an increasingly important influence”.

Oxfordshire residents were promised a long-term spatial Plan that would put the needs and wishes of Oxfordshire’s people first. We expect our local authorities to honour that commitment, and we expect Government to respect the outcome.

**We must make sure the Oxfordshire Plan only commits our future generations to a level of growth that can be accommodated within our environmental constraints and reflecting our rural character.
It’s time to get the balance right.**