



The countryside charity  
Oxfordshire

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Landscapesconsultation@defra.gov.uk

8 April 2022

Dear sir/madam,

## **Re: Government response to the Landscapes Review Consultation**

### **CPRE Oxfordshire response**

The Campaign to Protect Rural England (CPRE) Oxfordshire works to improve, protect and preserve the landscape of Oxfordshire and its towns and villages for the benefit of everyone. There is a separate response from CPRE at a national level, and this Branch submission is intended to support that document by providing local evidence and examples related specifically to the Cotswolds and the Chilterns.

South Oxfordshire contains parts of two AONBs: the Chilterns AONB which runs in a south westerly direction to meet the North Wessex Downs AONB at the Goring Gap. The UK is a small, heavily populated and very urban island among, as noted by Michael Gove in 2019, the most nature-depleted nations in the world and the proximity of the Chilterns to major urban areas both places that landscape under particular pressure whilst providing landscape to large numbers of people.

West Oxfordshire has a distinctive vernacular with stone villages and towns, rolling hills, river valleys, abundant hedgerows and drystone walls. A third of West Oxfordshire is in the Cotswolds AONB and the remaining two thirds rural and includes a large part of the Oxford City Green Belt. Although depleted, the once common Oxfordshire dialect can still be heard from generations of local families who live and work in the area and people living in West Oxfordshire have a strong sense of place and pride. It is frequented by day trippers from Oxford and tourists from all over the world generating £282m a year (£900m for the whole of The Cotswolds).

Within the Vale of the White Horse, the North Wessex Downs AONB also forms a key part of the Oxfordshire landscape and is subject to threats such as the proposed caravan park at the foot of Uffington Hill, but this response concentrates on the Cotswolds and Chilterns as AONBs that were specifically identified within the Glover Review.



CPRE Oxfordshire:

- observe the value of, and pressure upon, Chilterns and The Cotswolds and strongly supports the Glover suggestion that the Chilterns is an “obvious candidate” and The Cotswolds is a “leading candidate” for redesignation as National Parks. We note that The Chilterns is on the list announced by Natural England for an extension to the AONB.
- until such designation be made then we support the National response that AONBs should receive additional resources. The Chiltern Conservation Board and The Cotswolds Conservation Board should be given increased resources and further powers to address the threats they face when conserving and enhancing the AONB.

CPRE Oxfordshire believes that upgrading the protection and designated status of both the Chilterns and The Cotswolds AONBs and their areas will:

- i. help achieve the Prime Minister’s goal to protect 30% of our land by 2030;
- ii. boost biodiversity; and
- iii. contribute to the removal and storage of CO<sub>2</sub> from the atmosphere.

CPRE Oxfordshire further comments:

*Glover Proposal 1: National landscapes should have a renewed mission to recover and enhance nature and be supported and held to account for delivery by a new National Landscapes Service.*

CPRE Oxfordshire:

- i. applauds the suggestion in this proposal that the current statutory purpose to ‘conserve and enhance’ is not strong enough. The current NPPF requirements do not provide adequate protection in areas where housing pressure is high nor give sufficient guidance when considering the value of the landscape and nature against extensive arrays of solar or wind powered renewable energy generation.
- ii. Supports the establishment of a single set of statutory purposes for AONB teams and National Park Authorities; and
- iii. Suggests that the Sandford principle that where there is a conflict between the statutory purposes of national parks, any relevant authority “shall attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area comprised in the National Park” should be extended to Areas of Outstanding natural beauty.

*Glover Proposal 3: Strengthened Management Plans should set clear priorities and actions for nature recovery including, but not limited to, wilder areas and the response to climate change (notably tree planting and peatland restoration). Their implementation must be backed up by stronger status in law*



CPRE Oxfordshire:

- i. supports this and would suggest that strengthened Management Plans be given **statutory weight**. Without the protection by law, good intentions may not be enough to fulfil the Government's vision set out in their 25-year Environment Plan.
- ii. notes the increased capability of those communities within AONBs that have Neighbourhood Plans and suggests that this local input could beneficially reflect the particular opportunities and challenges of the Chilterns and North Wessex Downs AONB and The Cotswolds AONB.

*Glover Proposal 6: A strengthened place for national landscapes in the planning system with AONBs given statutory consultee status, encouragement to develop local plans and changes to the National Planning Policy Framework*

CPRE Oxfordshire strongly supports this suggestion but note the often-apparent prioritisation of housing over the landscape in AONBs. When consulting on Local Plans the requirement should be for the LPA to provide robust justifications for development proposals opposed by the AONB Management or Conservation Boards. CPRE South Oxfordshire notes, for example, the rejection of strong opposition from the Conservation Board of development proposals in the AONB that ignore the designated status of the landscape. CPRE Oxfordshire would also like to see a much higher density of housing to ensure more previous landscape and open countryside is saved from development. Integral to nature recovery is to ensure the infrastructure such as sewage facilities can cope with proposed capacity before any plans are approved.

Despite the welcome improvements in protection of AONBs in the recent (and previous) update to the NPPF, the South Oxfordshire Local Plan, for example, still fails to attach an appropriate level of protection to the landscape of the AONBs. A strong and effective planning system is required to ensure clear, unambiguous policy to ensure their statutory purposes and special qualities are meaningfully protected. Planning Guidance must reinforce this requirement. This involves giving greater weight to their special qualities in planning policies, procedures, and decisions.

CPRE Oxfordshire notes the Government's consideration of broadening the legal competence of National Park Authorities and the Broads Authority to a more general power, similar to that of local authorities. We believe this would support a more innovative and proactive role for the protected landscapes and reduce legal risks associated with a wider range of activities such as affordable housing, public health, and sustainable transport, or working beyond their boundaries. We support this and believe that considerable advantage could be gained by granting such powers to AONB Conservation Boards.

*Glover Proposal 8: A night under the stars in a national landscape for every child*

CPRE Oxfordshire strongly support all measures to reduce light pollution in AONBs – as well as throughout the Country more generally - which will be necessary for children to appreciate the beauty of the night sky. We suggest that light pollution prevention, an essential part of supporting wildlife, be considerably and explicitly strengthened in future updates to the NPPF and Planning guidance. We suggest specific guidance for approved external lighting for planning not only within LPAs but Nationwide



to reduce light pollution and best practice shared between stakeholders and the public for minimal light spill within architectural domestic and commercial designs.

*Glover Proposal 20: New designated landscapes and a new National Forest*

In line with the CPRE National response CPRE Oxfordshire support this as essential to achieving the protection of 30% of our land by 2030, boosting biodiversity and contributing to the removal and storage of CO<sub>2</sub> from the atmosphere. In so doing CPRE supports the enlargement of existing AONBs and wildlife corridors which could usefully lead to nature and landscape restoration.

*Glover Proposal 24: AONBs strengthened with new purposes, powers and resources, renamed as National Landscapes*

In line with the CPRE National response CPRE Oxfordshire strongly supports this proposal and the Government's intention that Natural England replace the former Countryside Agency to set out clear governance principles, processes, and structures that local authorities would be expected to follow.

CPRE Oxfordshire strongly supports the Government's suggestion that grant agreements must provide robust evidence of compliance with principles and process but, while understanding the need for flexible guidance, note that flexible guidance often leads LPAs to submit to developer pressure that that they would wish to resist. The auditing process should be well funded with the ability and agility to take any necessary steps to deter non-compliance. Without this the Government's vision will be in danger of unravelling against the considerable clout and influence of developers and land agents.

Yours faithfully

Helen Marshall  
Director  
CPRE South Oxfordshire