



The countryside charity
Oxfordshire

Campaigning to protect our rural county

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To Parish councillors,

South & Vale Local Plan - Lets keep our countryside open

South Oxfordshire & the Vale of White Horse District Councils are currently consulting on the key issues for the new South & Vale Local Plan 2041. You can find all the consultation information [here](#). The closing date for responses is Thursday 23 June.

There is plenty to welcome in the documents, including the identification of '*protecting our countryside*' as a key issue. In due course, we will publish both our response to the questionnaire and a fuller response document on our website.

However, here's a quick summary of the points we will be raising, which we hope will be helpful if you intend to put in your own response – which we strongly encourage you to do!

Climate emergency

The Issues consultation document appears based on assumptions that the planning context will, essentially, be much the same as that for previous plans despite the disruptive impact of climate change. This fails to recognise the major change in the planning context that has already begun and will accelerate over the period of the new joint plan.

In particular, the document presents protecting the countryside as, largely, an amenity issue. We believe it should also recognise the countryside's essential role in carbon removal and capture and its contribution to food production (and biomass) as global food production falls as a result of climate change.

1. Protecting our countryside

We are pleased that this is identified as a key issue (p15).

However, when it comes to the Vision (p19) the terms 'countryside' and 'rural' have disappeared. This is important as it is not just about maintaining key 'honeypot' sites but about the broad rural character of the area and the value of the 'ordinary' countryside.

We need open countryside and rural character to be safeguarded and valued as well.



2. Making effective use of land – increasing housing density

We strongly support the option around ‘*Minimise greenfield use by increasing density of developments*’ (Nature Recovery & Landscape Section).

There are multiple benefits to higher density development. It not only reduces the amount of land required but creates housing that is more affordable to buy and run and is more efficient in terms of heating, transport and other services so better for the climate too. Well-designed terraced housing and 2-3-4 storey units can deliver good quality, high-density housing that would also help to balance out the existing range of Oxfordshire housing stock.

3. Renewable energy – we need a county-wide strategy

More openness is needed about the impacts of the current ambitions around renewables which could see as much as 10% of Oxfordshire’s land being given over to renewable energy generation. (Reducing Carbon Emissions section)

We have produced a map, [March 2022 map](#) , that illustrates the growth of large scale solar panel arrays the South & Vale districts.

Carbon neutrality will only be achieved by a combination of renewable energy and a reduction in CO₂ emissions. Thus, the plan should reduce the need for the countryside to be used for energy generation by:

- requiring new homes to have the highest level of insulation, to be designed to maximise passive energy capture, and to have solar panel installations on their roofs;
- requiring all new commercial and public building to use their roofs to capture solar energy; and
- reducing CO₂ emissions from transport by concentrating new development in high density schemes in towns.

Climate change, energy security and fuel prices all mean that increasing renewable energy is vital. But we also need our countryside for food, wildlife and people’s health and well-being. The district’s efforts to provide renewable energy locally should be supported but not at the expense of the countryside. The natural world is a substantial absorber and fixer of CO₂ and, at a time of increasing concern over food security, should not be covered by solar panels when other locations are available and other, less intrusive, means of generation possible.

CPRE Oxfordshire is in favour of a county-wide strategy, supported by public consultation and engagement, setting out the amount and spatial location for renewables projects.

4. Hedgerows – protection and creation

We welcome the opportunity identified to “*protect trees and recognise the value of nature, giving us clean air, flowing water, soils to grow food in, and enjoyment*” (Nature Recovery & Landscape Section).

But we need hedgerows to be included too!



This means both strong protection for existing hedgerows but also creation of new hedgerows. The Climate Change Committee has recommended a 40% increase by 2050.

South Oxfordshire in particular could be a leader in this regard, as there are already best-practice projects happening locally (e.g. CPRE Hedgerow Heroes project in Watlington) and the District is even home to the National Hedgelaying Championships.

5. Dark Skies

We welcome the opportunity identified to *“respect landscape character, dark skies and the natural beauty of the countryside in development decisions”* (Nature Recovery & Landscape Section)

This should translate not just into management policies for controlling new lighting but also a positive/proactive dark skies policy, for reducing existing light pollution and supporting creation of dark sky areas.

6. Housing numbers

The South & Vale Plan will take its housing numbers from the quantity of development that is still to be agreed within the Oxfordshire 2050 Plan. However, for the record, CPRE advocates the use of the most up to date version of the Office for National Statistics projections overlaid with the current requirements of the Government’s “Standard Method”. This would produce a housing trajectory lower than any of the three alternatives in the most recent Oxfordshire 2050 consultation.

7. Spatial Strategy

We do not agree that the Plan should *“support affordable housing on sites we’d normally protect from development”* (Thriving Inclusive Communities section). If sites are not suitable for development, then they are not suitable, especially given the currently very woolly concept of ‘affordable’.

The broad locations for growth will be set by the Oxfordshire 2050 Plan. However, the S&V LP should set out a hierarchy in terms of location of development, which will cover smaller sites as well as major allocations.

CPRE Oxfordshire believes Green Belt, Areas of Outstanding Natural Beauty and core/recovery zones of Nature Recovery areas should be off limits unless truly exceptional circumstances are shown, with clear evidence that no other location is possible.

We hope this information is helpful. Our full response will appear in due course on our website – www.cpreoxon.org.uk

Meanwhile, if you have any questions or comments, we would be pleased to hear from you.

Geoff Botting
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