



The countryside charity
Oxfordshire

Campaigning to protect our rural county

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This consultation response has been submitted to the West Oxfordshire website consultation portal here:

<https://yourvoicecounts.commonplace.is/proposals>

Individuals can respond in each section, but we have responded in the final section where the views of organisations and businesses are sought.

Please tell us the name of the Organisation you are responding on behalf of

Campaign to Protect Rural England (CPRE) West Oxfordshire District

Tell us your thoughts on how much we should focus on 'tackling the climate and ecological emergency' in the Local Plan and Council Plan?

We agree that we are facing a climate & ecological emergency and addressing this should be at the forefront of all decisions.

We cannot assume that the planning context will, essentially, be much the same as that for previous plans despite the disruptive impact of climate change. This would fail to recognise the major change in the planning context that has already begun and will accelerate over the period of this Local Plan.

In that context, protecting the countryside cannot be seen simply as an amenity issue. It is the countryside that is essential for carbon reduction and mitigation measures and for food security.

Protection and enhancement of the countryside is therefore vital if we are to address the climate and ecological emergency.

Tell us your thoughts on how much we should focus on 'an enhanced natural and built environment' in the Local Plan and Council Plan?

The overall principle should be to keep the Oxfordshire countryside open.



The countryside, landscape and rural character of West Oxfordshire are what makes the area so special and a desirable place to live, work and visit.

This is not just about maintaining key 'honeypot' sites but about the broad rural character of the area and the value of the 'ordinary' countryside, whether for farming, a soft edge to a town, general landscape and rural character or as a green space amenity.

SPATIAL STRATEGY

The West Oxfordshire Local Plan should set out a hierarchy in terms of location of development.

CPRE Oxfordshire supports a spatial strategy which recognises the relative value of various categories of land and defends them accordingly. In brief:

- Prioritise brownfield sites, especially in the larger towns
- Make more efficient use of already allocated. For example, as a key objective, ensure that the MOD allocated sites are delivered to ensure that the centre of Carterton is revitalised and has a suitable Hub, whereas it has been a 'doughnut' development
- For areas around larger villages and smaller towns, ensure development is strictly to meet local needs, to support local infrastructure, or to provide necessary housing, identified through Neighbourhood Plans and is located close to main infrastructure, like the A40, as opposed to open countryside where it is divorced from the main settlement and damaging to the landscape
- In the countryside, resist new development because of the inevitable harm and because new housing is better located in or within reach of existing services including public transport
- Independently check developer EIAs, as conclusions are often biased and mitigation inadequate. For example, flooding cannot be mitigated via attenuation ponds in saturated land and ecological damage cannot be mitigated with a few bird boxes. Destroying hedgerows before newly planted ones have been established damages our local flora and fauna, counting new plantations and hedgerows before they have become established is futile when they are most vulnerable drought or predation. It's important to be real about the damage developing a greenfield site does and replacing an established ecosystem with new greenspace post-build is not acceptable. It's best not to do the damage in the first place.
- Development within the Green Belt (which is already limited in the District), other designated sites (SSSIs, CTAs and Local Wildlife sites), heritage assets such as *ridge and furrow*, and core/recovery zones of the emerging Oxfordshire Nature Recovery strategy to be off limits. Also, whilst we know that development is not automatically prohibited, it should be avoided unless truly exceptional circumstance were shown with clear evidence that no other location is possible.

HOUSING DENSITY



We would highlight again the need to relate all actions to the climate emergency and reduce CO2 emissions from transport by concentrating new development in high density schemes in towns which, with a full range of facilities, reduce the need to travel and the loss of essential countryside.

We would encourage the plan to spell out the multiple benefits of higher density in more detail – i.e., not just saving greenfield but generating housing that is more affordable to buy and run and more efficient in terms of heating/transport so better for the climate too. Well-designed terraced housing and 2-3 storey units can deliver high density development that is both attractive and desirable.

We note this recommendation from the [Pathways to Zero Carbon Oxfordshire report](#):

“Minimising the footprint of all new development by optimising housing density while also building in connected green and blue spaces. In typical urban extensions, housing densities of 60 dwellings per hectare should be possible with good design, use of mid-rise 3 and 4-storey dwellings, compact developments with a variety of services and amenities, and a shift away from private car ownership towards more active travel, public transport and shared car use to minimise land needed for car parking. Much higher densities are possible in urban centres.”

CPRE Oxfordshire’s 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.”

RENEWABLE ENERGY

Renewable energy is desirable in principle, but not at unacceptable cost to the countryside, our rural communities, or to the economy. More honesty and detail is needed around the impacts of the current ambition on land-take.

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.

One of the final recommendations of the PazCO report is that the adoption of rooftop solar should be encouraged as far as possible, with which we concur. In our view solar panels should be considered as ‘**rooftop renewables**’ on commercial roofs, a stipulation on all new housing developments and brownfield sites. Instead, we are seeing large areas of Oxfordshire farmland (needed for food, biodiversity, other climate mitigation measures, health & wellbeing) being given over to solar panels, and large newly built commercial buildings with several hectares of roof space between them, almost never utilised for solar energy.



See our March 2022 map of solar industrial units in West Oxfordshire:

<https://www.cpreoxon.org.uk/news/cpre-calls-for-county-wide-renewable-energy-strategy/>

Specific measures we would like to see adopted are:

- Require the highest level of building insulation, passive energy capture to reduce energy consumption, and solar panel installations of at least 3 kW/Hr for every new home.
- Require all new commercial building to have solar panel installations on their rooftops.
- Support local companies that devise carbon-free energy sources or employ technology to capture and permanently store CO2 emissions.
- Support local small scale and/or community schemes in a small area without the loss of countryside.

PUBLIC FOOTPATHS ACROSS OPEN COUNTRYSIDE

There is a need for a specific Local Plan policy setting out protection of existing public footpaths across open countryside.

HEDGEROWS

There is a need for a specific Local Plan policy setting out protection of existing hedgerows (especially ancient hedgerow that relate to the parcelling up of land under the 'Inclosure Act') but also supporting the creation of new hedgerows.

The Climate Change Committee (CCC) has recommended a 40% increase in hedgerows by 2050.

The Oxfordshire Treescapes [Our Land, Our Future report](#) says that meeting the 40% increase recommended by the CCC means: "Increasing the proportion of the county's field boundaries that are hedged from 47% to 66%, giving us 18,200 kilometres of hedges compared to the current 13,000 kilometres".

West Oxfordshire can already demonstrate good examples of community-led hedgerow projects such as at Eynsham. It is essential that this is reflected in, and supported by, strong planning policy.

For example, on new developments, developers should be required to plant hedgerows and hedgerow trees around the borders and be obliged to protect and maintain them for at least the first five years.

DARK SKIES

The current West Oxfordshire Local Plan has a reasonable policy on light pollution and this should be retained. It could be further strengthened by a more proactive approach to maintaining dark skies (ie



positive intervention, not just damage limitation). Conditions should be put on and enforced for all new developments as well as road furniture and advisory signposting to more acceptable forms of lighting to reduce light pollution.

WATER & WASTEWATER

CPRE Oxfordshire's [Flooding & Pollution Report 2021](#) highlighted the seriousness of our local situation, with one in 5 Oxfordshire parishes experiencing flooding and/or sewage issues. The pollution of our rivers is untenable, as is the suffering of affected residents. The Plan must confront this issue and ensure that new housing and development is not permitted ahead of the provision of adequate sewerage and water infrastructure. A long term strategy to separate run off with sewage would go a long way to stopping river pollution and capturing run off into ponds and localised smaller reservoirs mean water can be used usefully rather than wasted.

All new buildings must include measures for water conservation.

Tell us your thoughts on how much we should focus on 'attractive, accessible and thriving places' in the Local Plan and Council Plan?

The concept of the 20-minute neighbourhood is definitely worth exploring but it must offer a full range of facilities. Even in a village classed as a larger one there is often no dentist, optician, post office or other essential services within 20-minute walk or cycle and yet it may be identified as a local service centre. The creation of such neighbourhoods should not trump the protection of land within AONBs, Green Belt, other designated sites or Nature Recovery core/recovery zones.

We would highlight again the need to relate all actions to the climate emergency and reduce CO2 emissions from transport by concentrating new development in high density schemes in towns which, with a full range of facilities, reduce the need to travel and the loss of essential countryside.

Tell us your thoughts on how much we should focus on 'meeting the housing needs of all' in the Local Plan and Council Plan?

In the not too distant past, West Oxfordshire significantly over-delivered housing stock to a level well-above recognised local need. This was 'rewarded' with a Housing & Growth Deal that carried forward and indeed increased this past exceptionally high growth rate. The 2031 Plan (from a start date of 2011) promoted approximately 40% growth in 20 years, when national growth in that period is predicted to be 9.5%. It is of note that roughly 2/3rds of that growth occurs in the first 10 years, with growth from 2021 to 2031 predicted to slow to 3% in the UK. UK growth is falling, starting from 0.84% per annum in 2011, to 0.73% in 2014 when the standard method was calculated, to 0.34% per annum today to 0.08% per annum in 2050. This must surely be reflected in the District's Plan.

[U.K. Population 1950-2022 | MacroTrends](#)



The consequence has been sadly all too predictable – the targets have proved unachievable and the District is therefore now vulnerable to speculative ‘off-Plan’ development, likely to impact the countryside and rural communities. Quite often these speculative permissions are just land banked leading to uncertainty and not addressing the real need which is for 1-2 bed affordable homes.

The long-term future of high growth must be considered. It is unlikely that the District will maintain its character and charm if it grows by 40% every 20 years.

The priority for the Local Plan must therefore be to set realistic targets that meet genuine local need but are not over-inflated by aggressive growth ambitions. The focus should be on genuinely affordable housing available in perpetuity.

Currently, we understand that the minimum requirement is likely to be the figure produced by the Government’s Standard Methodology. However, this relies on increasingly out of date ONS (Office for National Statistics) household growth projections that date back to 2014– we would urge a move to the use of the most up to date ONS projections (although even these will gradually need to be treated with caution as they begin to reflect recent high levels of enforced growth as opposed to need – the Levelling Up agenda will not be served by high growth always continuing in high growth areas and low growth targets cemented in low growth areas). In fact, if southern counties seek to replicate past growth trends, Levelling Up will never happen. UK growth is set to slow so whatever market there has been for growth in recent times, which has fallen below targets set, the market is likely to reduce.

CPRE Oxfordshire therefore currently advocates the use of the most up to date ONS (Office for National Statistics) household growth projections, inflated, as is considered unavoidable, by the Government’s standard methodology.

We are aware that Government has stated its intention to review the National Planning Policy Framework, including housing number methodology, and this may well impact the Plan in due course. However, we need a realistic and common-sense approach to be taken from the start, focusing on meeting local need (organic growth) rather than carrying forward previous excessive growth targets. Indeed, there is an argument that left over allocations from the 2031 Plan should be carried forward as the target was falsely high and Council cannot be considered to have a shortfall.

The following points provide some further input into how the Council should identify and meet its housing needs:

- Look at cost of high growth and don’t just assume that more people means more prosperity. The opposite is likely to be true in view of cost of services and infrastructure.
- Look at the damage of high growth on the main industry- tourism.
- Do not justify a target based on jobs growth when the jobs are all related to extra services for more people ie) a circular argument.
- Set a target for how many new homes are on brownfield land to ensure that the focus remains on protecting green spaces.



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- Set a sensible occupancy and economic activity target per home, rather than setting them falsely low to justify more homes. People can't afford homes at low occupancy and economic activity.
- Break away from reliance on developers. Only 1-2 bed affordable homes are needed and there is sufficient stock of the rest. Allowing developers to build large numbers of 3, 4 & 5 bed homes to deliver a few affordable homes is inefficient. Council backed schemes are best.
- Encourage the University to use its land in the District to build homes for its key workers. Selling the land to developers might bring more short term profit, but will not deliver much of what it says it desperately needs which is homes for staff for the colleges. Again, it's inefficient. The University can afford to build homes and offer at favourable rents to ensure it attracts key workers and that it is sustainable.
- Look at other ways to house residents eg)
 - Set a target for extensions that include bedrooms and recognise the contribution towards the overall target
 - Set a target for homes for the elderly to help free up larger homes and also provide the care that is needed
 - Set a target for Annexes and recognise the contribution towards the overall target
 - Set a realistic windfall target as this has consistently been underestimated and has outperformed development via strategic sites, which are slow to deliver
 - Set a target for regeneration of disused buildings
 - Set a target for replacement of old shops with combined retail and housing as was done in Witney
- To limit land take set targets for 3 storey homes or building up existing homes or using loft spaces or building blocks of flats, with parking under.

Tell us your thoughts on how much we should focus on 'a vibrant, resilient and diverse local economy' in the Local Plan and Council Plan?

The Plan should seek to recognise and support rural land-based businesses, the local food economy and rural tourism.