



The countryside charity
Oxfordshire

Campaigning to protect our rural county

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Dear Sir/Madam,

Re: Oxford Local Plan Preferred Options consultation- CPRE Oxfordshire response

The Campaign to Protect Rural England (CPRE) Oxfordshire works to improve, protect, and preserve the landscape of Oxfordshire and its city, towns and villages for the benefit of everyone.

CPRE Oxfordshire welcomes the invitation to comment on the Oxford Local Plan 2040 Preferred Options consultation, although we are disappointed that this document lacks the detail and clarity to allow us to do this as thoroughly as we would wish.

OVERVIEW

1. CPRE Oxfordshire supports the provision of housing to meet identified need. However, additional housing growth to meet broader economic ambitions must be balanced and justified against the environmental and social costs that this will entail. Given limited availability of land within the City, it must be used to maximum efficiency, prioritising well-designed high density and genuinely affordable housing. The Oxford Green Belt should be recognised as a resource to be treasured, providing the countryside on the doorstep for Oxford's residents and protecting the character and setting of the City.
2. We are facing a Climate emergency and addressing this should be at the forefront of all decisions. There can be no assumption 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 the new plan.
Protecting the countryside is vital to address the climate emergency. It is the countryside that gives carbon removal and capture and contributes to food production (and biomass) as global food production falls as a result of climate change.



3. The Local Plan policy must make it clear that the 15 minute neighbourhood concept will NOT trump protection of the Oxford Green Belt.
CPRE Oxfordshire is generally supportive of the concept of the 15 minute neighbourhood as a way to ensure more sustainable communities, with appropriate access to services and facilities. However, this should not overtake the importance of protection of the Oxford Green Belt, which is vital to ensuring the continuing sustainability of the City as a whole, as well as the surrounding settlements.
4. A Local Plan's fundamental objective is to set out the quantity and spatial distribution of proposed development – this Preferred Options consultation is opaque on both these issues and is therefore not fit for purpose.
 - **The level of proposed housing is not clearly identified** – there are strong indications that the Council wishes to pursue housing numbers significantly above the Government's standard methodology, but this is postponed to a future consultation
 - **The spatial distribution is not clearly identified** – there are a list of sites but it is not made clear which are already allocated (in the Adopted Local Plan 2036) and which are new, nor is there any clear indication of the amount of housing that is proposed to be accommodated on these sites.

Without this basic information, it is virtually impossible for local residents to make informed comment on the options outlined.

RECOMMENDATION: Our preference would be for this consultation to be withdrawn until the above information is available. The alternative is to ensure that the promised follow-up consultation on housing numbers includes a clear presentation of which sites are already allocated, the outcome of a review into the potential of increasing delivery on these sites, which new sites will be required and the quantity of housing these will deliver. **It must make clear how many dwellings additional to the existing 2036 Plan the City believes are required outside of the City boundaries, potentially encroaching into the countryside and Green Belt.**

5. **It is not clear how the responses from the earlier Options consultation have been taken into account.** We note that neither the City Council's Scrutiny Committee or Cabinet meetings in September 2022 reviewed the consultation report before the Preferred Options document was authorised for publication (even though the consultation report itself is dated April 2022).

Example 1 Over 80% of respondents identified safeguarding the natural environment and its wildlife habitat and preserving open spaces as 'very important'. As a comparison, only 18% of respondents identified more housing in the City as 'very important', although this rises to 56% for more truly affordable housing in the City.



It is completely unclear how these priorities, as expressed by local residents, have been taken into account in the preparation of the Preferred Options. The introductory paragraph 0.1.1 states: “The delivery of new homes continues to be a priority for this plan, whilst ensuring that we deliver and support mixed and inclusive economic development across the city.” There is no mention of the natural environment, wildlife or open spaces.

Example 2 Of all the questions asked in the consultation “Green routes and space to exercise” was the one which received the most overwhelming support, with 94% of people rating this as important or very important. Many questions received a lot of neutral responses, but this was supported positively almost unanimously. CPRE Oxfordshire would argue that when replying to this question people were also considering their access to the Green Belt and countryside around the city. A specific question on the countryside was not consulted upon but this question came the closest to asking about this. The additional written comments (by far the highest level of comments to any question) support our view, with many people making specific reference to the need to protect the Green Belt and countryside:

“The need to preserve the greenbelt and character of Oxford for future generations”

“Save the green belt”

“Preservation and retention of Oxford's Green Setting and the protection of the green belt.”

“Ensuring residents have access to open space, and countryside”

“GREEN BELT'S CRUCIAL FOR ALL ASPECTS OF HEALTH.”

“Stop building on green field sites”

RECOMMENDATIONS:

1. The Council is asked to produce a document explaining how the responses to the Options consultation have been taken into account when preparing the Preferred Options.
2. There should be a commitment that any excess housing requirement for the city is not pushed out into the surrounding countryside and Green Belt.
3. For the countryside to be protected all existing sites (including those currently allocated to employment) must be reviewed to ensure they are developed at the highest maximum density and prioritising affordable homes.



POLICY OPTIONS

Chapter 1 & Intro

Strategic Policy Option Set S1: Directing New Development to the Right Locations

The Local Plan policy must make it clear that the 15 minute neighbourhood concept will NOT trump protection of the Oxford Green Belt.

CPRE Oxfordshire is generally supportive of the concept of the 15 minute neighbourhood, stated as the *preferred option* as a way to ensure more sustainable communities, with appropriate access to services and facilities.

However, this should not overtake the vital importance of protection of the Oxford Green Belt, which is vital to ensuring the continuing sustainability of the City as a whole, as well as the surrounding settlements.

Strategic Policy Option Set S2: Approach to greenfield sites

Green Belt - CPRE Oxfordshire **strongly objects to the proposal within the *Preferred Option*** that a further review of the Green Belt is required.

“This will include a review of the Green Belt to assess whether there are any sites in the Green Belt that could come forward, that are not biodiversity sites or flood storage and would not have an unacceptable impact on the integrity of the remaining Green Belt.”

The main characteristic of the Green Belt is its openness and permanence. The Oxford Local Plan 2036 was only adopted in 2020 and included a review of the Green Belt and the removal of a number of sites within the City boundary. Taking into account the Green Belt allocations by neighbouring authorities to meet Oxford’s housing need, there are now nearly 20,000 houses being brought forward within the Green Belt. There is no justification for a further review at this stage.

Instead, the City Council should look to bring forward a policy that seeks to capitalise on the Green Belt as the amazing resource it is for local residents, seeking to enhance its environmental features and recognising the important role it plays in improving people’s mental and physical wellbeing.

Chapter 2 – Healthy Inclusive City

H1 Housing Requirement – support for the Preferred Option, but in relation to Standard Methodology figures only

CPRE Oxfordshire supports the provision of housing to meet genuine need. The City argues that even this level of housing cannot be delivered within its boundaries. We agree that a constraint-based housing



requirement is therefore logical, *the preferred option* i.e. that the housing target in the Plan should be constrained to a level that is actually deliverable and excess need met elsewhere. There are two caveats that should be clearly referenced within the Policy:

- a) This Policy brings with it a responsibility to leave no stone unturned in exploring opportunities for bringing forward housing within the City, before seeking to offload onto surrounding Districts. This includes prioritising sites for housing rather than employment (e.g. the opposite of the current North Oxford site which is looking to deliver 4,500 jobs but only 480 houses), maximising density and exploring alternative uses for existing sites (e.g. transformation of the Botley Road retail 'sheds' into housing).
- b) This Policy should only apply to housing related to genuine need. It should not extend to higher housing targets based on the City's 'policy on' choice of seeking significant growth, which would be likely to have unacceptable environmental and social impacts, including potential erosion of the Green Belt.

H2 – Housing need – support for Policy Option A – Define housing need based on the Standard Method calculation of need

CPRE Oxfordshire supports Policy Option A as the maximum number that should be considered and would support this being identified as *the preferred option* which it currently has not been.

The Government's Standard Housing Methodology is by no means perfect but is the minimum housing number that is likely to be acceptable to the Planning Inspectorate and includes a 40% uplift to meet affordable housing requirements.

In the context of both climate and nature emergencies, housing growth above and beyond that to meet genuine need (i.e. Option B, driven by growth) must be subjected to close scrutiny.

The Oxfordshire Local Industrial Strategy (LIS) is not a justifiable basis on which to inflate housing numbers. It was a document signed off by the unelected Oxfordshire Local Enterprise Partnership and Government, without any public consultation. Para 31 of the National Planning Policy Framework says: "The preparation and review of all policies should be underpinned by relevant and up-to-date evidence." Produced in 2019, the LIS now predates Brexit, the Covid pandemic and the emergence of the Levelling Up agenda, and is completely out of step with the current global and UK economic situation. It can no longer be considered up to date evidence.

The Oxfordshire Housing & Growth Deal exists until 2031, but this Plan now stretches nine years beyond this time and there is no reason to suggest that the Deal should or will be extended. The housing required to meet the Growth Deal is already covered by existing commitments which will see Oxfordshire delivering housing well above identified need for the next decade. This includes approximately 20,000 houses in the Oxford Green Belt, severely damaging its openness and permanence and stretching transport infrastructure to the limit.



The standard need calculation does not take account of the climate and biodiversity emergencies nor the fact that Oxford is constrained by both the Oxford Green Belt and flood plains – all of which should justify a lower figure. The Preferred Options document indicates that the City can no longer accommodate either employment or housing growth. For the broader benefit of Oxfordshire and the countryside as a whole, the focus should now be on exploring how the benefits of Oxford’s technological and health innovation can be geographically diversified.

There is an indication within the Preferred Options document that the City Council will take forward the Oxfordshire Growth Needs Assessment (OGNA) as the basis for its work on identifying a housing forecast based on economic growth. The OGNA was prepared as part of the evidence base for the now abandoned Oxfordshire 2050 Plan. This was a deeply flawed document that was widely criticised by a large number of civic and amenity groups, including CPRE, the Oxford Civic Society, Need not Greed Oxfordshire, Friends of the Earth and others. In particular, we draw attention to the report by independent consultancy Opinion Research Services that criticised the methodologies used for calculating population and employment growth in the county, and more especially in the city of Oxford itself. Its conclusion was that: *“The unjustified use of adjustments made to official projections and the Standard Method together with the lack of a conventional central economic forecast call into question the soundness of this document as supporting evidence for the development of the Oxfordshire Plan.”*

We would therefore like reassurance from the City Council that:

- a) It will not be using the same consultants that prepared the OGNA to produce the updated evidence for the Oxford 2040 Plan.**
- b) Any consultants that are used are demonstrably independent and not reliant on the development sector for the majority of their income.**
- c) The brief for consultants should include consideration of whether there is a potential case for pursuing a figure below that generated from the standard methodology.**

H3 – Affordable Housing

CPRE Oxfordshire could not support options E or F (not maximising affordable housing or not having a policy on affordable housing). No *preferred option* is stated.

With regards to the other options outlined, we lean towards option A which appears to strike the best balance between delivering the highest amount of affordable housing overall whilst at the same time prioritising provision for Social Rent to deliver for those most in need.

H4 – Affordable housing contributions for student accommodation

CPRE Oxfordshire would support Option B combined with Option A (*preferred option*)– i.e. affordable housing to be provided on site wherever possible, but otherwise supported by a financial contribution.



H5 – Employer-linked Affordable Housing

CPRE Oxfordshire supports Option A, the *preferred option*– in favour of employer-linked housing on specific named sites.

Chapter 3: A Prosperous City

E1 – Employment Strategy

CPRE Oxfordshire supports Option A, *the preferred option*, which would prioritise housing (identified as the City Council’s priority) over employment provision.

E2 – Making Best use of Employment Sites

CPRE Oxfordshire **does not support** the *preferred Option A*, but rather supports alternative Option C, which would provide maximum flexibility in terms of identification of land for housing, particularly in relation to retail (the ‘sheds’ along the Botley Road appearing to be a good example).

E3 – Allowing Housing on existing Employment Sites

CPRE Oxfordshire supports Option A the *preferred option*, which would allow more of Oxford’s housing need to be met within its boundary.

E8 – Short-Stay Accommodation

CPRE Oxfordshire **does not support** any of the alternative *preferred options*, but supports Option D, which is stated as a detrimental option– resisting new short stay accommodation. Given the level of housing need in the City, it is important to control the loss of residential properties, which could be being lived in by permanent residents.

Chapter 4: A Green, Biodiverse City that is resistant to Climate Change

G1 – Protection of Green Infrastructure Network & Green Features

CPRE Oxfordshire supports Options A, B and C combined, *the preferred combination of options* to protect the network as a whole alongside specific policy provisions for different spaces, including the Green Belt.

CPRE Oxfordshire believes there is also a need for a specific new policy on hedgerows. (See the Policy Omissions section, p11.)

G2 – Provision of new GI features

CPRE Oxfordshire supports Option A, *the preferred option*, although this should take account of the existing under-provision in certain parts of the City.

G4 – Biodiversity Net Gain

CPRE Oxfordshire **does not support** *the preferred option* but instead supports Option B, a higher than 10% net gain. Evidence was provided by the environment sector, as part of the Oxfordshire 2050 Plan process,



to justify a 20% net gain approach across the County and this should be carried forward within the Oxford 2040 Plan. Describing this option as ‘detrimental’ because some of the mitigation might have to be carried out elsewhere in the county is a short-sighted approach.

G5 – Protecting onsite biodiversity

CPRE Oxfordshire supports Options A & B combined, *the preferred combination of options*.

G6 – Protecting Oxford’s ecological network

CPRE Oxfordshire supports Option A the *preferred option*.

G7 – Flood risk & flood risk assessments

CPRE Oxfordshire supports Options A-D, *the preferred combination of options*.

G8 – Sustainable drainage

CPRE Oxfordshire supports Options A & B combined, *the preferred combination of options*.

G9 – Groundwater flow & sensitive sites

CPRE Oxfordshire supports Options A&B combined, *the preferred combination of options*.

G10 – Resilient design & construction

CPRE Oxfordshire supports Options A&B combined, *the preferred combination of options*.

Chapter 5 – Resources & Zero Carbon

R1 – Net Zero Buildings in Operation

CPRE Oxfordshire supports Option B which is the most ambitious and would wish this to be the *preferred option*.

R2 – Embodied Carbon

CPRE Oxfordshire supports Options A & B combined, *the preferred combination of options*.

R3 – Retrofitting incl. Heritage Assets

CPRE Oxfordshire supports Options A & B the *preferred combination* – a presumption in favour of retrofitting, with key principles to follow when assessing benefits v harm in relation to heritage assets.

R4 – Efficient Use of Land

CPRE Oxfordshire **does not support** *the preferred combination of options*, but would support Option A, which requires efficient use of land, combined with Option C, which would apply minimum density requirements across the whole city, for various types of location.

However, the Preferred Options document fails to provide any options with regards to what these minimum densities should be.



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 attractive and desirable.

We note this recommendation from the Pathways to Zero Carbon Oxfordshire report¹:

“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.”

Recommended 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.

R5 - Air Quality

CPRE Oxfordshire supports Options A and B combined, the *preferred combination of options*.

R6 – Water Quality

CPRE Oxfordshire **does not support** the *preferred option*, but supports Option B, a bespoke policy on water quality. Given the importance of water quality to people and nature, and the known challenges around the current quality of our water sources, we think a bespoke policy is more than justified.

R8 – Amenity & Environmental Health Impact of Development

CPRE Oxfordshire supports Option A, the *preferred option*.

Although Oxford city is an urban area, we can see no mention within the report of protection of the “dark skies” in the countryside which surrounds it and is vital to the outlook from within the city.

There should be both a policy to minimise light pollution on new development but also to reduce existing light pollution and to protect dark sky areas such as South Park.

¹ Pathways to a Zero Carbon Oxfordshire – Oxford University Environment Change Institute, 2021
<https://www.eci.ox.ac.uk/publications/downloads/PazCo-final.pdf>



Chapter 6 – City of Culture & Heritage, and Design Quality

DH1 – Principles of High Quality Design

CPRE Oxfordshire supports Option A, *the preferred option*, which aims for bolder statements on what is expected.

DH3 – View cones & high buildings

CPRE Oxfordshire **does not support** *the preferred combination of options*, but supports Option E, which would include in the policy details about what is expected in retaining the significance of views out from key points in the central conservation area and note aspects of the views that are of particular significance in the setting of heritage assets, in particular the relationship with the landscape setting of the rivers and the surrounding hills that provide a green backdrop and should be preserved.

Chapter 8 – Development Sites, Areas of Focus & Infrastructure

The Preferred Options document fails to identify clearly which are new sites and which are already allocated in the Local Plan 2036.

In the 2036 Local Plan there are 66 “allocated sites”. In the Local Plan 2040 Preferred Options, nine of these sites have been removed and we are aware that there has been development on at least a proportion of these sites. This still leaves 57 sites from the 2036 plan which remain undeveloped or, at least, unclear on status. Clearly, progress has been very slow.

- What is the status of the already committed sites in the 2036 Plan?
- How many dwellings do these sites account for?
- Can these sites be reviewed to increase the amount of housing by increasing density or making more efficient use of the land?

A further 21 sites have been added in the Oxford Plan 2040 Preferred Options, but inadequate detail has been provided. There is no clear indication of the quantity of development that these sites might be able to accommodate. We require detailed information and reasons for selection of sites within the main consultation document - as was provided in the Preferred Options for the 2036 Plan - in order to give a constructive, considered response. To consult without providing this information to consultees is a futile, tick-box exercise.



Para 8.3 – Infrastructure needs

This section references an addendum to the Infrastructure Delivery Plan prepared by Lichfields. The Lichfield report states that it relies heavily on the work carried out by Cambridge Econometrics for the draft Oxfordshire Plan 2050

“4.2 the Interim ELNA draws upon the economic forecasts produced by Cambridge Econometrics as part of the OGNA [Oxfordshire Growth Needs Assessment] 2021 which represent the latest available economic forecast at the time of writing”.

The Oxfordshire Growth Needs Assessment reports were widely criticised, including by CPRE, as deeply flawed. Cambridge Econometrics has never explained what assumptions were made in preparing their various projections (not forecasts) on employment growth. The Future Oxfordshire Partnership, for whom this work was commissioned, agreed at a meeting on 13 June 2022 that further work was needed by CE to ensure that they were realistic and comprehensible *and* to take into account the war in Ukraine and the changing economic situation. As far as we are aware, that further work has not been undertaken and, with the collapse of the Oxfordshire 2050 Plan, is now unlikely to take place.

Later at a meeting of the 20 September 2022, the Future Oxfordshire Partnership Scrutiny Committee decided that they would not rely on the OGNA reports as evidence for the Oxfordshire Plan 2050.

In the circumstances the Lichfields report should not form any part of the evidence base for the 2040 Local Plan since it is clear that their assessments are based on the incomplete and now inaccurate work carried out by CE.

Commercial Property in Oxford

On 3 November 2022 a search on Realia web site which gives details of commercial properties available to lease there a large number of B1 properties available. Taking the largest 20 the total floor area available is 26,000 m^2 in Oxford. There appears to be little evidence of a shortage of available B1 floorspace. Lichfields has not commented on this which is a feature of the post Covid world where many more people work fully or part of the time from home and thus demand for office space has diminished.

There are four large areas of land in Oxford designated as Employment Protection sites which are suitable for further development, these are:

1. Oxford Business Park.
2. Oxford Science Park.
3. Osney Mead
4. Oxford North



Oxford Business Park

The Oxford Business Park was granted planning permission for development in the 1990s. The site was laid out by 2000 and due to the length of time it has taken for the Business Park to take off some of the older buildings have become empty and in need of renovation/ redevelopment. However, the major problem with the site is the large amount of land that has not been developed at all and still lies empty. The total area of the Park is 88 acres and currently 12 acres remains to be developed. This is at odds with the conclusions in the Lichfield's report that there is a shortage of land in the city for such development.

The Oxford Science Park

This large site has been in the process of being developed for the past 20 years and still has plenty of space. Again, no explanation is provided by Lichfields as to why this site remains only partly filled although it has plenty of space. No recent development has taken place there since the 2036 Plan was prepared in 2019 although there have recently been two applications for new laboratories.

Osney Mead

Originally developed in the 1970's much of this site is in desperate need of redevelopment. Various plans have been produced by OCC since 2000 for comprehensive redevelopment of the site but all fail to produce any tangible result. It would be helpful if Lichfields in their report would give some explanation as to why this very central site still sits largely empty and what is preventing this and the neighbouring Oxpens site from being properly utilised.

Oxford North

Although this site has had planning permission for some years and the infrastructure work is currently progressing there is no news of any organisation wishing to move there. There are plans for new homes to be built there by the side of the Oxford Canal but no new commercial buildings proposals are coming forward, which is surprising as the infrastructure will be all in place within the next 6 months in the main area.

In the light of the above and the fact that so little construction of commercial offices has taken place since 2016, the assessment of the future need for new employment space in the 2036 Oxford Local plan in the period up to 2036 appears exaggerated and needs revising.

It is clear that some presently protected employment land could be redesignated for residential use without any impact on the space available. Two candidates for redesignation are Osney Mead and Oxpens.

South Area – Cowley Branch Line

Para 8.10 – *“The opening up of passenger services along the Cowley Branch Line will provide a welcome public transport alternative for this area of the city.”*

It is disingenuous to present this as a viable and deliverable project. The Network Rail report on the Oxford Rail Corridor implies that the only interested passenger rail operator for this line, Chiltern Railways



(aka Deutsche Bahn) would consider running a passenger service to Cowley, after 2028, only if enough commuter passengers from the proposed new Cowley stations bought ‘through return tickets’ to London (i.e. not local commuting). The public bus service from Cowley to Oxford Station will always cost much less than using a passenger railway to carry workers into that part of Oxford, and long-distance commuting is now contra to local and national policy. This project was proposed by the National Infrastructure Commission before any realistic appraisal of its feasibility was undertaken by Network Rail. Whilst we would support the further exploration of this scheme, it is inappropriate to use it as a basis for planning the location of development without much greater certainty as to its delivery.

Evidence studies: A Character Assessment of Oxford in its Landscape Setting: 2022 Update - Addendum Draft Report

CPRE Oxfordshire is surprised to note that this document manages to devote two entire sections to describing what makes the setting and landscape of Oxford distinctive without once mentioning the **Oxford Green Belt**, which appears to us to be a serious oversight.

POLICY OMISSIONS

1. Hedgerows

Specific mention and targets relating to hedgerows should be added in, with both protection for existing hedgerows but also commitment to the creation of new hedgerows.

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

We draw attention also to Oxfordshire Treescapes Our Land, Our Future report which 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”.

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.

2. Renewable Energy

Renewable energy is desirable in principle, but not at unacceptable cost to the countryside, our rural communities, or to the economy. 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 Pathways to Zero Carbon Oxfordshire 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.

See our March 2022 map of solar industrial units across the county:

<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 such as the hydro-electric scheme on Goring Weir which produces power throughout the day and night, unlike solar schemes, in a small area without the loss of countryside.

CPRE Oxfordshire therefore proposes the following additional policy for the Oxford Local Plan 2040:

RENEWABLE ENERGY POLICY

Given the importance of increasing renewable energy generation and the significant land take that this could require, the Council will seek to work with other Oxfordshire local authorities to support the development of an Oxfordshire wide strategy, supported by public consultation and engagement, setting out the amount and spatial location for renewables projects.

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 unless there is overwhelming evidence as to why this cannot be achieved.

Planning applications for renewable and low carbon energy generation will be:

- *assessed regarding the most appropriate use of proposed site given cumulative land take for similar renewables schemes within the Parish(s), Council area and Oxfordshire as a whole*
- *viewed most favourably when incorporated as part of new build development (e.g. housing/warehousing), and on brownfield sites or retrofitted onto existing buildings*
- *viewed more favourably where the community in the immediate area of the proposed site benefit from and are supportive of the proposed development*
- *supported, provided that they are not in the Green Belt or AONB or on best/most versatile land, or otherwise are not disproportionately harmful 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 development within their settings; iii) food security iv) the safe movement of traffic and pedestrians; or v) residential amenity

- *assessed with regards to the efficiency of the energy source in relation to the extent and footprint of any harm caused*
- *considered in relation to the full life-time carbon costs of any project, including associated transport and infrastructure, noting that 'renewable' does not necessarily equal 'low carbon'.*

NOTES

Renewable energy development will not be permitted in either the Oxford Green Belt or Areas of Outstanding Natural Beauty because of the importance of retaining openness in the one case and the high value of the landscape in the other.

Elsewhere, the general benefit of renewable energy will need to be assessed against impacts on other issues such as biodiversity, public and private amenity, heritage and landscape.

In all planning applications the designation of the land for the site will be key in assessing impact.

Planning permission will not be granted on the best and most versatile land and proposed development must be able to justify robustly any potential impact on food security.

The efficiency of the renewable source, both in megawatts per hectare affected and in constancy of energy production, will be taken into account in determining whether harm is disproportionate to benefit, including the extent and footprint of the damage and any cumulative effects.

Yours faithfully,

Helen Marshall
Director, CPRE Oxfordshire