



The countryside charity  
Oxfordshire

Campaigning to protect our rural county

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14 November 2022

Dear Sir/Madam,

**Re: Oxford Local Plan Preferred Options consultation- CPRE Oxfordshire response-addendum to full 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 has made a full response to this consultation on 11 November 2022, with receipt of our submission acknowledged by Arome Agamah from the Planning policy team.

In addition to this we wish to submit some further comments which relate only to :

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

At the outset, this study outlines the approach as follows:

1.1 Approach to the Assessment

1.1.1 *Landscape character assessment is an established tool to assist in local planning and management.*

1.1.2 *Urban characterisation is less studied and, in the absence of specific guidance for the assessment of urban areas, various approaches have been used. This study is therefore unusual in that it uses a combination of landscape and townscape character assessment to articulate:*

- *What makes the setting to Oxford distinctive and why; and*
- *What makes the landscapes and townscapes within the City of Oxford distinctive and Why*

The failure to articulate the statutory and policy framework is a fundamental flaw that makes the study fail in both in its aim to *assist in local planning and management* and in the limitations of the approach in NOT reflecting approaches required for assessing where and how statutory 'setting' 'character' and 'appearance' considerations apply OR the purposes of the Green Belt policy.

The document presents two whole chapters on what makes the setting and landscape of Oxford distinctive without once mentioning the function and characteristics of the Oxford Green Belt, a serious oversight.



In most of these characterisations heritage is just one very brief entry in a long list of character traits where in fact it is the **predominant** consideration in complex, interrelated issues of **SETTING**. As such there is no indication of which or how all of the traits contribute to the traits that contribute to setting under HE guidance OR what are the key character and appearance issues for the Conservation areas. It is these designations that raise some, but not necessarily all, of the traits examined to a statutory consideration not just general character or design issues.

The problem derives from this study being an update of the similarly limited 2002 study; this predated the Castle Mills flats proposal, next to Port Meadow. The Goodstadt review of this proposal clearly identified the shortcomings of this approach and stated:

*“In terms of planning policies the Review has already identified the need to strengthen the policy approach to protecting the setting of the City and its design policy. There is also a difference between the way policies are interpreted and the expectations of the wider community in Oxford. There is also a need to consider the implications of the 1990 Act (refer paragraph 161-164) and a clearer and more explicit approach to determining departures from the plan. Wider concern has been raised about the commitment to the existing heritage policies and the need to bring forward the Heritage Strategy. There is much in hand but it is important that it is integrated into the assessment process and not treated just as a specialist area.”*

There is a need to identify in policy and practical terms the interrelationship between landscape/townscape character, views and setting (see below). In planning/legal terms, these can be seen within a rough hierarchy of

A) *statute:*

Setting of listed buildings and character or appearance of conservation areas (a high percentage of central Oxford (setting of scheduled monuments is within secondary legislation)  
Designated habitats SSSIs SACs and general duty of regard for wildlife

B) *‘great weight’ policies for defined assets/areas:*

Heritage assets including conservation areas RPGs and their settings  
Designated habitats SSSIs SACs and general duty of regard for wildlife  
Green Belt – including setting of historic towns and how development outside the Green Belt may affect its purposes

C) *Other policies:*

Non-designated landscape and townscape character except in so far as being setting of heritage assets  
Views not contributing to heritage settings/character

Separate studies for heritage, views and landscape/townscape with no integration nor indeed, in this case, even any cross-referencing or contextual explanation are wholly inadequate. This separate study approach was identified as flawed in the Goodstadt review and lesson must be learnt.

There remains a fundamental structural failure to integrate heritage character/appearance settings, views and landscape/townscape character which is not fit for the mid-21<sup>st</sup> century: for a world-class city such as Oxford this is wholly inadequate.

Yours faithfully,

Helen Marshall  
Director, CPRE Oxfordshire