

100
YEARS



Campaign to Protect
Rural England
Oxfordshire

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9 March 2026

Dear Consultation Team,

Re: CPRE Oxfordshire response to NPPF consultation

CPRE Oxfordshire respond this consultation by question number, on topics which are of concern to us.

Question 30

Do you agree that policy DM7 clarifies the relationship between planning decisions and other regulatory regimes?

Strongly disagree

CPRE Oxfordshire strongly oppose the core principle that Planning should be granted on the appropriate use of land only, with the assumption that other regulatory regimes are assumed to operate efficiently. This assumption has had a catastrophic impact on our county, where we have numerous applications approved (11,000 homes in Cherwell district alone) with Planning permission granted, but then failing to progress and actually be built and occupied as homes. This is almost entirely due to the inability of Thames Water to provide fresh and wastewater facilities to these homes. Thames Water have stated their inability without further investment prior to the planning permission, but permission was nevertheless granted. The district then falls short of meeting its five-year housing supply and so inappropriate speculative development, often in open countryside is granted, whilst meanwhile large sites remain empty. It is critical that development cannot be granted, by national policy, if vital infrastructure, such as water and sewerage provision cannot be provided in advance.

Question 56:

Do you agree our proposed changes to the definition of designated rural areas will better support rural social and affordable housing? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Strongly agree.

CPRE very strongly support this policy and call for tighter wording which will ensure it is delivered. The lack of affordable homes in rural areas is a major issue in Oxfordshire and this policy in our view will help to solve this problem. Developments must include affordable housing (ideally specified as for social rent) within the smallest sites of 10 homes or less in all rural areas.

Question 60:

Do you agree with our proposals to ask authorities to set out requirements for a broader mix of tenures to be provided on sites of 150 homes or more? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. Please provide your reasons and indicate if an alternative site size threshold would be preferable?

Partly disagree.

CPRE Oxfordshire support the policy principle of requiring a broader mix of social and low-cost housing on large housing sites being set out in national planning policy. In Oxfordshire we see many sites, particularly those in rural areas dominated by large homes, unaffordable to the majority. However, we do not feel that the policy goes far enough and must stipulate at least 10% social housing in all major new housing developments of more than 100 homes until plans are updated. We would propose a higher figure of 20% and a lower number of units (50).

Question 62:

Are any changes to policy HO7 needed in order to ensure that substantial weight is given to meeting relevant needs?

Yes.

The NPPF should set minimum expectations for at least 10% social housing in all major new housing developments of more than 100 homes until plans are updated. CPRE Oxfordshire would also be in favour of this threshold being lowered (50 homes minimum and ideally on all developments) and a figure of 20% being actively encouraged. Oxfordshire is one of the least affordable counties in England, with house prices being over ten times the average wage typically. Genuinely affordable, social rent homes must be mandated where they are required, mainly in city and urban areas close to employment and facilities. Instead, we see a scenario where brownfield sites within the city are allocated to employment instead of homes. Whilst the city council makes steps to address this situation Nation Policy must dictate and support this. Brownfield sites in city and urban areas must be allocated to genuinely affordable homes.

Question 133:

Do you agree with proposals to better enable development opportunities around suitable stations to be brought forward? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. Please provide your reasons, particularly if you disagree.

Strongly disagree.

CPRE Oxfordshire oppose changes to Green Belt policy contained in draft policy GB3 to enable more development on Green Belt land around any railway station.

While improved public transport access is important, CPRE Oxfordshire is deeply concerned that a blanket approach fails to recognise local context. Several Green Belt sites in Oxfordshire fall within these areas, and we do

not believe a one-size-fits-all policy is appropriate where landscapes, settlement character, environmental constraints and wider infrastructure needs vary so widely.

We would support a policy which defaults to allow development on brownfield land close to railway stations in urban areas only.

Question 136:

Do you agree policies GB6 and GB7 set out appropriate tests for considering development on Green Belt land? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. Please provide your reasons, particularly if you disagree.

Strongly disagree.

CPRE Oxfordshire oppose changes to Green Belt policy contained in draft policy GB7 to allow more development on the basis that it is close to a railway station.

While improved public transport access is important, CPRE Oxfordshire is deeply concerned that a blanket approach fails to recognise local context. Several Green Belt sites in Oxfordshire fall within these areas, and we do not believe a one-size-fits-all policy is appropriate where landscapes, settlement character, environmental constraints and wider infrastructure needs vary so widely.

We would support a policy which defaults to allow development on brownfield land close to railway stations in urban areas only.

Question 145:

Do you agree that proposed changes to the grey belt definition will improve the operability of the grey belt definition, without undermining the general protections given to other footnote 7 areas? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Strongly disagree.

CPRE Oxfordshire strongly oppose the Greybelt definition which we consider very much open to interpretation and misuse. We support the total exclusion of this definition, reverting to previous Green Belt policy of only development in “exceptional circumstances”. Failing this high quality farmland and local wildlife sites must be specifically excluded from grey belt development. Local democracy must also be exercised and where an application is rejected at Local district council level this should not be overruled.

The original concept of the greybelt was to develop poor quality and already developed Green Belt land, such as outbuildings, a concept we would not oppose. Instead, we see this definition being used by developers as a green light to develop on open countryside.

CPRE Oxfordshire currently oppose a Green Belt site in Kidlington, on the outskirts of Oxford City; an open countryside site, rich in wildlife and biodiversity and next to a heritage church. It seems inconceivable that a site such as this should be classified as “Greybelt” and there is a clear need to tighten policy wording to protect sites such as this.



Question 163

Do you agree with the approach taken to recreational facilities in policy HC7, including the addition of “and/or” with reference to quantity and quality of replacement provision?

Strongly disagree

The existing requirement for equivalent and better provision already gives considerable flexibility. Replacement with "and/or" inserts an additional vagueness which can be easily exploited. CPRE Oxfordshire have an example of a recreation ground at Bertie Park in Oxford which, under threat of development for 20+ years, has not been included in the council's rolling programme of refurbishment. This change would enable the replacement of an entire recreation ground with a play area for under 5s as long as the equipment was in better condition. This is not an appropriate replacement and not a hypothetical example of why “and/or” will not suffice.

Question 181:

Do you agree policy N2 sets sufficiently clear expectations for how development proposals should consider and enhance the existing natural characteristics of sites proposed for development? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. Please provide your reasons, particularly if you disagree.

Partly agree and partly disagree.

CPRE Oxfordshire strongly welcome the intent of Policy N2, but do not feel the wording is tight and specific enough to protect the valued landscapes it intends to; particularly valued farmland and hedgerows. We propose the following specific amendments to endure “good intent” is actionable.

- N2 paragraph 1(a) should be amended to refer to ‘landscape character and value’.
- N2 paragraph 1(b) to be changed to prohibit development of the highest quality (grades 1-3) farmland.
- N2 paragraph (1) (d), the words ‘wherever possible’ should be removed

Yours faithfully,

Lynda Moore
Planning coordinator CPRE Oxfordshire