

## Weston on the Green Parish Council comments on Oxfordshire 2050 consultation

### Policy Option 28: Homes: How Many? Commitments and Locations

WOTG supports the **Standard Method** as the most likely of the three options to be achievable withing the county's environmental constraints.

Housing requirement in Oxfordshire should be limited to the amount that is deliverable without causing undue harm to or environment and rural character. However, **all the growth options are well above Office for National Statistics (ONS) projections for Oxfordshire**, being double or even triple their 50,000 estimate. The current high growth rates (described as 'Business as Usual') are well **above** local need and are already changing many of our villages beyond recognition and putting pressure on the Green Belt, our Areas of Outstanding Natural Beauty and our countryside more generally, including air, water and noise pollution. Any further above trend growth proposals must be considered in the light of issues such as these. *A clear assessment of the impacts, risks and benefits of each option is essential, in a format that the public can understand.*

In addition, the proposed 'adjustments' to the Standard Methodology are flawed, including an arbitrary uplift relating to 'patient registrations' that assumes ONS figures are wrong. This adjustment creates growth 2.5 times trend as a baseline upon which everything else builds. This must be revisited.

### Spatial Option 1: Focus on opportunities at larger settlements & planned growth locations SUPPORT

There are strengths and weaknesses of all the options presented and a mix is probably going to be required. Spatial Option 1 seems the best on paper, since many of the sites released in the current round of Local Plans include large amounts of additional land to accommodate considerable growth beyond the Plan period. By making efficient use of those sites, we can ensure that no new large-scale allocations are required, protecting our scarce land resource. This is especially true if growth is constrained to the Standard Method and the focus is on compact (high density) housing. However, *this is not a blanket endorsement since some locations would struggle to accommodate any further growth without serious detrimental impact to the countryside and there certainly should not be any further Green Belt release.*

### Policy Option 08: Biodiversity Net Gain – SUPPORT

This policy proposes to set a benchmark standard of 20% biodiversity 'net gain' on developments across the county.

The proposal of 20% biodiversity net gain is welcome in principle – this is above the Government's 10% proposal, and it is right to be ambitious given our current biodiversity emergency. However, the metrics for calculating net gain are yet to be thoroughly tested. *Developers are quickly developing the skills to play the system, downgrading the existing biodiversity value of the sites they wish to develop and overstating what their compensatory measures can deliver.* This is challenging for local authorities who often lack the in-house expertise and resources to undertake robust scrutiny of such proposals. The policy therefore needs to reflect a precautionary principle about erring on the side of caution in assessments and being clear who should take responsibility for making these judgements (ie the local authority, **not developers or their agents**).

### Policy Option 10: Green Belt Enhancement – SUPPORT

This Policy would commit the Oxfordshire 2050 Plan to identifying strategic opportunities to enhance the existing Oxford Green Belt.

This policy is supported, but to make it effective, OP2050 will need to guarantee continued Green Belt status to all current Oxford Green Belt land, at least for the duration of the Plan.

Landowners are unlikely to support enhancements if, by leaving their land to rot, they increase the chances of having it released for development. Unfortunately, we cannot rely on protection via national policy, as there are now over 19,000 houses allocated in the Oxford Green Belt, expanding Oxford by a

third, removing countryside access, coalescing villages and putting the setting of our historic city at risk.

**Policy Option 23: Protection of Economic Assets, Policy Option 24: Town Centre Renewal & Policy Option 29: Urban Renewal - OBJECT**

Overall, the document is **not** transformational in the sense of urban renewal but pushes the City's tired line on ring-fencing employment land. There should be a complete re-appraisal of how land is used in Oxfordshire eg changing urban centres and increasing densities.

The phrase 'we will not support the loss of economic assets to housing' is particularly concerning. This appears to entrench Oxford City's approach to protecting sites for jobs, even when the sites have been vacant for extended periods of time and the more pressing need is for housing rather than employment. These policies should be re-worded to provide a more flexible and ambitious approach.

**Para 428 & Policy Option 29: Urban Renewal – OBJECT**

These are the only places in the Plan where housing density is mentioned, but the references are vague and weak, referring only obliquely to increasing density 'where appropriate'.

Housing density is a key way of ensuring sustainable, climate-friendly development as it increases the viability of public transport and other services and infrastructure. It also facilitates the building of smaller, more affordable properties, rather than sprawling executive housing. Housing density really matters as it has a significant impact on landtake. Building at a fairly normal current rate of 30 dwellings per hectare could see Oxfordshire losing land area to development equivalent in size to the whole of Oxford City.

High density does not mean high rise. Tower blocks are less space efficient than the terraces which many of them replaced. It does mean smaller units, closer together, than recent distanced developer-led building patterns. Two or three storey Compact homes provide climate friendly compact, 20 minute neighbourhoods.

Any housing coming forward as a result of OP2050 should be high density, low cost, low land take, compact units, with the result that by 2050 Oxfordshire's housing mix will have significantly improved to support single occupancy or starter families and older people trading down to more manageable properties. *This statement must not be construed to mean that subdivisions of poor design, high density homes that are a blight to the area are supported. There are design solutions to high density, low cost, low land take with sensitive design and careful land use. Importantly, rural Oxfordshire must be protected from urban sprawl and unwanted subdivisions which impact heavily on established community life.*

Weston on the Green is a rural village with a large MOD site within the parish. We do not support the re-use of this for housing. Our Neighbourhood Plan policies strongly support biodiversity and to this extent the protection and enhancement of biodiversity corridors. We do not support "re-arrangement" of natural rural boundaries and do not believe that "mitigation" is an acceptable method of destroying important habitat for housing.

Weston on the Green Parish Council  
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