



The countryside charity
Oxfordshire

Campaigning to protect our rural county

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Dear sir/madam,

Re: Oxford Central (City and University) Conservation Area: Management Plan and Design Advice 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.

Oxford is an ancient city and its historic setting within a shallow valley, its dreaming spires and its timeless appearance make it one of the world's greatest and most beautiful urban environments. The Green Belt plays an essential role in preserving this setting and Oxford's unique character.

As the on-line survey in relation to this consultation elicits views only from private individuals, we provide this letter as a response from our organisation and ask that it be included in your considerations.

1. Lack of reference to the Green Belt

There is no mention of the Green Belt within either document; we consider this to be a fundamental omission which needs to be rectified. We would point out:

- 1.1. The basic purpose of the Green Belt is to protect the setting of Oxford and how this relates to other Districts
- 1.2. The Green Belt and Green Belt Way is part of how Oxford's setting is appreciated by all
- 1.3. National Planning Policy framework (NPPF) Section 13, paragraphs 137-151 should be referenced as the Greenbelt surrounds the whole city and also runs through its centre. (<http://www.oxfordgreenbelt.net/popwins/map09c.htm>). The views from within the city, looking out over the countryside play a vital role in the "essence" of the beauty of the city and need to be protected from development. As per paragraph 137 of NPPF "*The fundamental aim of Green Belt policy is to prevent urban sprawl*".



2. Settings and Views (Management Plan Section 7.5)

- 2.1 Much of Oxford's Central Conservation Area (CA) setting extends beyond the District boundary into neighbouring Districts, Cherwell and the Vale of the White Horse, with South Oxon and West Oxon being responsible for aspects of wider setting which can also be important in how the character and appearance of the CA is experienced in the different ways that it is approached. The Management Plan needs to be more of a joint effort so as to achieve a seamless standard of high quality management.
- 2.2 Aspects of setting are not just views but physical characteristics. The Management Plan should consider MAPPING key aspects of setting, based on physical factors identified in Historic England's Advice note 3. It should distinguish between those areas/features that are important contributors and are especially sensitive to change and those that detract from historic character and are negative factors.
- 2.3 In terms of setting as defined by NPPF as including how the physical surroundings that contribute to the significance of the area are appreciated and understood, it is important to acknowledge that the vast majority of people who seek to understand the CA's setting do so by accessing the increasing number of publicly accessible towers, cafes and restaurants that afford rooftop views looking across and out from the CA not looking at it from a distance.
- 2.4 Effects on the setting of the Central CA can be very insidious: the green backdrop of wooded hills has been eroded by the insidious insertion of medium scale buildings that encroach just a bit higher than the previous roof heights – this is perhaps most obvious looking out from centre to West and Northwest (e.g. Castle Mill and Canalside developments).
- 2.5 A substantial way in which Oxford's setting is appreciated is on foot or by bike on longer journeys combined with accessing through Green Belt areas and other CAs of different ages; this reveals how the central CA has evolved historically and how its core characteristics have expanded into other historic parts of the City.
- 2.6 The role of the Thames and Cherwell in framing the East and South limits of the CA needs far more acknowledgement in terms of management and technical guidance.

3 Green spaces (Management Plan Section 7.2, Design advice 8.8)

- 3.1 We strongly support the design advice given in section 8.8 relating to Public and green spaces and, in particular, that *“Development of green space will be resisted where this will cause harm to the character and appearance of the conservation area and other heritage assets”*. We feel that this advice must go further to identify and protect the Green Belt from development not only within the CA but around its boundaries.
- 3.2 There is a lack of recognition that some green spaces within the CA are contiguous with others beyond its boundaries where consistent management principles need to apply.



3.3 Both documents lack substance and detail about open green spaces and their management; extending from the enormous concentrations of registered parks and gardens, SSSIs and local nature reserves and greens that Oxford enjoys to the wider management of rural surroundings and issues of building in the Green Belt and public access between the centre.

4 Sustainability and Climate Change (Design advice 8.9)

The advice given should go further in seeking to tackle the climate change emergency we face, and the carbon emission targets that need to be achieved. Whilst we support the advice that existing historical buildings should be retained and improved in a sympathetic way in relation energy efficiencies, we believe any new build MUST incorporate sustainable energy design such as solar panels and air heat pumps, and it would be helpful to have guidance about how this could be achieved in a sympathetic manner.

5 New building development

- 5.1 There is no guidance within the Planning Advice in relation to target density of any new development. We feel all new development should be of high density to minimise land use and increase affordability. With good design this can be done in a sympathetic way to fit in with neighbouring buildings and in keeping with other guidance relating to rooftop height etc.
- 5.2 There is a lack of identification or advice on how to manage small, insidious but ultimately significant harm caused by piecemeal erosion of character, appearance and setting values.

Overall, the Management Plan and design guidance makes insufficient reference to:

- the Green Belt, its purpose of protecting the city and the responsibilities of the City and other Councils to protect it,
- the key importance of green spaces, the Green Belt and rivers, and
- the positive impact of towers and roof top restaurants, pedestrian and bicycle access, and in particular kinetic experience of the CA both from within Oxford and outside it.

Yours faithfully

Lynda Moore
Planning Co-ordinator
CPRE Oxfordshire