Annex 2: Draft response letter

County Hall
New Road
Oxfordshire County Council
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Oxfordshire Plan Team
Speedwell House
Speedwell Street
Oxford
OX1

Director name Bill Cotton
Directorate Environment and Place

8 October 2021

Dear Oxfordshire Plan Team

Re: Oxfordshire Plan 2050 Regulation 18 (Stage 2) Consultation: Response from Oxfordshire County Council

We would like to thank you for the opportunity to make representations on the Oxfordshire Plan 2050 Regulation 18 (Stage 2) Consultation.

We have gathered a wide range of comments from members and officers and our response is set out at Annex 1 to this letter and was agreed by Cabinet on 21 September 2021

Yours faithfully

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Annex 1: County Council response

General comments

We are pleased that the Oxfordshire Plan 2050 is, along with the Strategic Vision for Long Term Sustainable Development, a key document that will continue to drive all six local authorities in the county to work in partnership to deliver good growth in Oxfordshire for the next 30 years and beyond. We consider that the Plan will give long-term certainty over the future sustainable development of the county for residents and businesses.

We welcome policies within the draft OP2050 plan that:

- Strengthens and drives policies for net zero carbon homes, specifically construction and design standards that reduce energy demand in line with the energy hierarchy, and the use of gas boilers.
- Ensure for spatial planning to accelerate and drive the UK's transition to a zero-carbon energy system.
- Enable greener, more inclusive strategic infrastructure provision, including energy and transport networks.
- Make provision for tree planting in urban areas as part of healthy place-shaping, urban design and biodiversity net gain.

Whilst we support the five Themes, we would urge that work is undertaken to ensure that there is no conflict between the five themes and the policies contained within them. For example, we would not wish to see the drive towards a zero-carbon economy have a negative impact on our poorer residents who may not be able to afford an electric vehicle and therefore not be subject to charges in a future zero emission zone.

We would also like to point out that whilst we support the intent of the Policy Options, we feel that some effort is required to get policies drafted in an appropriate manner for Reg 19 of this joint statutory plan. The policies are of varying degrees of length and quality. For example, Policy Option 28 Homes: How Many? Commitments and Locations is not drafted as a policy. It is unclear what is meant by statements such as 'homes and jobs to be delivered in strategic locations following a process of assessment'. Of course, many homes and jobs will be delivered outside of strategic locations. Also, it is only the second time in the document that the phrase 'strategic locations' is used, so it is unclear what it is.

Other policies, meanwhile, such as those on air and water quality are well written and clear.

We note and support paragraphs 37 to 48 which outlines the important relationship between the Oxfordshire Plan and the Oxford to Cambridge Arc Spatial Framework, and in particular paragraph 46 which states:

The respective timetables for the Oxfordshire Plan and the Arc Spatial Framework mean that the Oxfordshire Plan – together with the Strategic Vision – will be able to help ensure that Oxfordshire has a strong voice in the development of the Arc Spatial Framework and that its interests are taken into account. Likewise, as work on the Arc Spatial Framework gathers pace, it will help inform the choice of options to be considered at the next stage (Regulation 19) of the Oxfordshire Plan process.

We would also like to note that Oxfordshire is the only area in the Oxford to Cambridge Arc that is embarking on a long term, Strategic Plan for the county, and is therefore in a good position to influence and drive ambitious Arc Spatial Framework emerging policies to allow the move to a zero-carbon economy and society to become a reality.

We do not have anything in particular to say at this stage about the levels of new housing growth as set out in the Plan. We understand much work is needed over the coming months to identify the number of new housing to be included at the Regulation 19 stage of plan making. We would like to point out though that in the context of the climate emergency, the number of new houses and supporting infrastructure to be built up to 2050 must not compromise efforts to tackle the emergency.

The county council supports the Plans vision, objectives and principles for good growth. The county council recognises and is pleased that the preferred policy options have a strong correlation to six of the agreed nine county council priorities, which are in bold below.

OCC Priority 1 - Tackle the Climate Emergency through rapid decarbonisation, proper accounting of carbon emissions and ambitious targets, as well as supporting climate resilience.

We are pleased to see a Theme that is devoted to addressing climate change. The recent extreme weather events and the publication of the latest IPCC report has highlighted the need to take a fresh and holistic approach across the county to make sure we are doing everything we can to address this crisis. The policies on sustainable design and construction, energy, water efficiency and flood risk are welcomed.

We note the requirement of a financial contribution towards carbon offsetting requirements should only be permitted where it is demonstrable that net zero carbon cannot be achieved on site, in line with the UKGBC Net Zero Carbon definition.

We do feel that there is an opportunity to strengthen policy wording to support circular economy principles and to embed the principle more comprehensively within the policies. The Oxfordshire Plan must be seen to be driving the principle as much as possible now that the concept itself is being more widely recognised as being a key component of the move towards a zero carbon economy. An example of this is included in the London Plan policies D3 'Optimising site capacity through a design-led approach', and SI7 'Reducing waste and supporting the Circular Economy' that supports the delivery of a circular built environment. Policy SI7 of the London Plan also requires development proposals that are referable to the Mayor of London to submit a Circular Economy Statement as part of a planning application. https://www.london.gov.uk/publications/circular-economy-statement-guidance

The Circular Economy should be included at the highest level as it's such a cross cutting theme that impacts every area, not one on its own, and then incorporated into the policies as much as possible. Ideally what we would like to see in the Plan is a commitment to the Circular Economy alongside an explanation of what this is and how it fits across the Themes of the Plan.

More detail on how we consider the circular economy could be more embedded in the Plan is on pages 29 to 31 below.

Policy Option 17: Towards a Net Zero Transport Network is also relevant to this county council priority and is supported. However, we consider that Policy 17 does not fully reflect many elements of the preceding text. For example, there is nothing about supporting electric vehicle infrastructure (or other supportive innovative tech), and nothing about digital infrastructure. Whilst (some of) these elements are considered in policy 18, it would be good to consider them within the transport network decarbonisation policy as well, since these are aiming at different sections of the transport network.

We support the concept of the 20-minute neighbourhoods as set out in PO 17: High-Quality Design for New Development and Garden Town Standards for New Settlements. We note it is mentioned throughout the Plan, and in particular how the concept relates to the Spatial Options. We would like to point out however, that developing such neighbourhoods would require careful planning, especially if new urban extensions are planned around our country towns in the future. These (namely Banbury, Bicester, Didcot and witney) have seen considerable urban extensions over the past decades, which means new communities are further away form the traditional town centres. We consider that new centres would need to be planned within new developments, including community facilities, space for businesses and/or new infrastructure to allow active travel into existing centres.

To further reduce the need to travel into Oxford for work, it is important that new business space is also built within new housing developments. This would not only reduce the need to travel but would help to rebalance Oxfordshire's economy away from Oxford City, thereby making our towns and more rural areas more sustainable.

From a broad climate perspective, we think the plan is not really putting climate change impacts in the frame, though the emphasis on decisive action to mitigate and even reverse climate change and biodiversity loss is very encouraging.

It should be remembered that in the last 5 years we have seen:

- 2 pandemics – Zika and Covid. The pandemic gave us a glimpse of how fragile supply chains can be, and Brexit is giving us another peep.
- A dramatic and unexpected acceleration in extreme, damaging and lethal weather events that are almost unprecedented, for example the "Heat Dome" in Canada would be expected once in 1500 years, the Flooding in China once in 1000 years, and the flooding in New York from Hurricane Ida, once in 500 years. These events caused surprise and shock among climate scientists, because models didn't suggest they would be a factor with only just over 1C of heating.

The recently published IPCC report demonstrates that every realistic pathway has temperature increasing through to the 2040s. Across the world, wet areas are getting wetter, and dry ones, drier. Environmental degradation and loss of biodiversity adds to the impact of climate change and there is the risk of sudden ecosystem collapse under the dual impacts of adverse weather and loss of keystone species.

In fact, we're consistent with the CCCUK's criticism that the UK is way behind on adaptation and resilience, except in flooding. They particularly highlighted the gross failure of government to amend building regulations to reduce the risks from overheating in new homes, which they have been advising for five years. Similarly, there is still a sense that urban trees are a good thing, rather than one of the simplest and most effective ways of reducing the urban heat island effect.

Before 2050, if we continue as is, there are almost certainties that:

- We will see at least one more pandemic.
- The UK will experience multiple unprecedented extreme weather events.
- Some parts of the world will experience heat extremes that render them un-survivable by human beings without artificial cooling.
- There will be hundreds of thousands if not millions / tens of millions of climate refugees as a result of the above, or of extreme drought, local food shortage, etc.
- Extensive episodic supply chain disruption at local, regional national level due to extreme and destructive weather events disabling or interrupting local supply chains, factories, whole regions, or supply routes.
- Global or regional food shortages.
- A significant possibility of the disintegration of large-scale organised society in at least some parts of the world from the impact of resource shortages.

More information can be found at *<https://www.mdpi.com/2071-1050/13/15/8161/htm#B26-sustainability-13-08161>*

Given that, a prudent long term strategic plan would probably at least lay out a set of principles designed to promote layers of resilience from individual building level right up to county and wider regions. That might include:

- Conscious and planned building of community networks and strengthening of communities.
- Public education, training and support in building skills and knowledge base
- Built-in system / supply chain redundancy, preference for local sourcing, and resilience by design in food, water, power supplies at each level (local, district, county, nation). This would include deliberate planting of trees and shrubs with edible fruit/nuts within and around settlements, support for allotments, smallholdings.
- Sustained support for developing circular economy, reducing dependence on resources from external sources.
- Building-level resilience including shutters to block sunlight in extreme heat events, correct orientation of new builds, measures to prevent damage from flash flooding, designed resilience to high winds.
- Risk-based zoning of development and rigorous enforcement (including for example a complete and absolute block on building on flood plains and areas liable to flood in extreme circumstances).
- Hardening and protection of critical infrastructure.
- Proactive disaster prediction and emergency planning, down to house / street level.
- Universal deployment of nature-based / agroecological defences against extreme climate events.

OCC Priority 2 - Tackling inequalities and providing opportunities for everyone in Oxfordshire to achieve their full potential.

Tackling inequalities and promoting social justice is key for the county council. We therefore welcome the range of policies in the Plan that relate to this priority, namely:

Policy Option 22 – supporting the creation of jobs
PO 23 Protection of economic assets
PO25 – Visitor economy
PO28 – Homes – how many?
PO29 Urban renewal
PO30 Affordable housing
PO31 Specialist housing needs

We note that PO16 states *"*School sports halls and outdoor playing fields should be made available to the local community. New facilities of this type would be required to enter into community use agreements."

As an increasing number of schools, and all new schools, are academies, and thus independent of the county council's control, they cannot be required to make their facilities available to the community, only encouraged. Where new schools are being provided, it is necessary to attract academy sponsors to run the school and community use requirements should not be so strict as to deter otherwise suitable sponsors. In saying that however, we consider that if facilities are paid for using public funds, then the school should be compelled to make the facilities available to the public.

We do recognise however that there are other practical limitations on the availability of school facilities to the community including safeguarding, health and safety, maintenance, and potential expansion needs of schools.

The council's current policy position on community use of school facilities was approved by the Cabinet Member responsible for Education on 15 May 2019 and is available at CMDECS_MAY1519R02.pdf (oxfordshire.gov.uk)

OCC Priority 3 - Prioritisation of wellbeing – improved outcomes for residents and improved air quality and access to libraries, cultural facilities and the arts

Policy Option 12 - Air Quality recognises that clean air is essential to the health and wellbeing of Oxfordshire's communities and the natural environment. Air pollutants can have direct effects on human health, habitats and biodiversity and climate change.

The Oxfordshire Plan aims to help to:

- prevent new and existing development from contributing to air pollution
- prevent new and existing development from being affected by unacceptable levels of air pollution; and
- ensure that new development seeks to improve air quality wherever possible.

We strongly support the proposed policy option. It is important air quality is tackled in a strategic, consistent way across the county with an expanded view of broader public health

and habitat protection outcomes, in addition to the more traditional focus on bringing AQMAs into compliance.

We are pleased to see, and support policy options in particular:

- PO 06 Protection and enhancement of the historic environment
- PO14 Health infrastructure
- PO16 Leisure, recreation, community and open space facilities
- PO26 Culture and arts

We would like to point out however that paragraph 172 is misleading and should be removed. The Historic Landscape Characterisation maps the changing character of the landscape from existing maps only, in the case of Oxfordshire the Davis and Roque maps of the C17th, the late C19th OS Maps and the modern mapping. As such it does not provide any information or understanding on the archaeological potential of the county.

The archaeological potential for any part of the county must therefore be assessed using data from the Historic Environment Record.

The plan should explicitly recognise in PO 14 that health place shaping includes the ability for the elderly to be independent, consequently the increase in sustainably powered transportation will lead to a marked increase in travel by mobility scooters, not just walking and cycling, which must be considered to future proof developments in the period of the plan.

We would like to draw your attention to the role of good planning and design for people with dementia – please see Design | Dementia Services Development Centre I DSDC, Stirling

OCC Priority 5 - Increased investment in an inclusive, integrated, county-wide active and sustainable travel network fit for the 21st century to improve choice and reduce car journeys across the county

We are pleased to see a Theme (Planning for sustainable travel and connectivity) devoted to this priority and overall, we support the preferred policy options including PO17 as being consistent with delivering a net-zero carbon transport network. We suggest referencing the provision of smart charging vehicles that can support aligning energy demand and power supply from renewables, however.

We support Policy Option 18: Sustainable Transport in New Development as being in line with the hierarchy as set out in the emerging Oxfordshire Local Transport and Connectivity Plan (LTCP).

In this approach, all development proposals should consider and plan for transport and access against a vision, focussed on enabling people to travel by active and sustainable means. In particular, plans should be considered in a hierarchical way as follows:

- *Reducing the need to travel - ensuring that high quality digital connectivity is provided to enable working and access to services from home, and that necessary*

> *services and facilities are planned and provided in close proximity to new housing areas which can be accessed through safe and direct walking and cycling routes.*

- *Planning for sustainable travel modes - ensuring that new development is primarily designed to enable movement by active travel and public/shared transport, and that sites are well connected to surrounding sustainable transport networks. The street and movement network should be designed to focus on enabling residents to be able to walk and cycle, and easily access public transport options.*

- *Providing for zero emission vehicle use - ensuring that any essential vehicle travel for people and goods is prioritised for zero carbon emission vehicles, with adequate charging and other supporting infrastructure provided.*

We note the reference above to *necessary services and facilities,* which in our view could include community projects such as car sharing or car clubs.

PO 18: Sustainable Transport in New Development - Whilst it is very important that the policy has referenced local design guidance, it also ought to reference national guidance on these matters, such as the DfT's Cycling Infrastructure Design LTN 1/20. It is recognised that this document is likely to be superseded during the lifespan of OP2050, so would recommend appending the text above with text along the lines of, '…and any applicable national standards and guidance, such as the DfT's Cycling Infrastructure Design LTN 1/20 or the latest equivalent document.

Policy Option 24: Town Centre Renewal - Given the prevalence of the provision of free car parking in town centres around the county as a means of encouraging the patronage of shopping and other leisure facilities, we ask if the OP2050 could have a policy position on this? What evidence exists to either support the improvement or retention of town centre parking (free or otherwise) and how does this accord with Policy Option 17: Towards a Net Zero Transport Network?

Further to this, the policy option references supporting new measures, including, *'Improved walking, cycling and public transport facilities to and from town centres to surrounding residential areas.'* We ask if consideration is given to the compatibility, or potential incompatibility, of supporting measures to encourage sustainable modes of transport, whilst maintaining current levels of town centre parking.

We are pleased to see reference made in paragraph 331 which states that the Oxfordshire Plan needs to take account of and support wider infrastructure and transport strategy development. We note the work that has been in train to ensure that the Oxfordshire Plan complements and supports the new Oxfordshire Local Transport and Connectivity Plan (LTCP), especially in a wider context that aligns with other cross-boundary strategies including the England's Economic Heartland Transport Strategy, and guidance and strategy being developed at a national level as part of the de-carbonisation agenda. Major planned strategic schemes such as East West Rail will also significantly impact on the transport choices available in Oxfordshire and more widely across the Oxford-Cambridge Arc.

We note and support the references to the importance of rail in Policy Option 17: Towards a Net Zero Transport Network, in particular in relation to:

All development proposals should be planned to both take account of, and take opportunities to support delivery of an Oxfordshire net zero carbon emissions transport network, including (amongst others):

- *Supporting delivery of enhancements to the rail network, including linking in with new and improved stations, and supporting service enhancements.*
- *Supporting delivery of improvements to transport interchange, including enhanced transport hubs such as at rail stations that facilitate take up of sustainable travel opportunities, and where relevant link with opportunities for park and ride.*

We believe that with the right investment and continuing focus on feasibility studies into rail (for example that which is already happening at Hanborough Station) in Oxfordshire, the county will be a welcoming crossroads for rail services across the country.

Finally, we have identified a policy gap within this particular theme.

Public Rights of Way (PRoW) and the statutory Oxfordshire Rights of Way Improvement Plan (RoWIP) do not feature within this plan, despite PRoW contributing to Theme 1-4 and spatial strategy options. There are nearly 4,000km of PRoW in Oxfordshire. They are highways and give free access to the public for recreation, leisure, transport, access to nature, health and wellbeing as well as providing landscape and natural capital services as green corridors.

The RoWIP adopted in 2014 contains detailed network and opportunities mapping and with the RoWIPs from 2006 and 2012, contains a substantial and robust evidence base of needs and opportunities across the county. The Oxfordshire Plan could be widened to include specific sections on PRoW including network information, issues and policies for improvement and extension.

We would be happy to help with the wording of such a policy.

OCC Priority 6 - Improved access to nature and green spaces for all communities, and landscape-scale nature recovery across the county.

Again, we are pleased to see a Theme (Improving environmental quality) related to our priority.

Preferred wording for Policy Option 05 - We generally support the policy but feel that it would benefit from slight rewording as it is not entirely accurate in what studies are required at different parts of the development process. Landscape and Visual Impact Assessment (LVIA) tend to be carried out for a specific development – we assume that this will not apply for the development of the Spatial Options in OP2050 but when specific developments are proposed Landscape Character Assessment and/or Sensitivity Assessment tend to be used to inform options.

Overall, we are supportive of the inclusion of natural environment policies 07: Nature Recovery and 08: Biodiversity Gain. The detailed consideration of biodiversity and its wider value is a positive step towards achieving meaningful gains for biodiversity across the county.

It is encouraging that the plan supports the establishment of a Nature Recovery Strategy and recognises the importance of the draft Nature Recovery Network as a valuable evidence base which will be used to achieve environmental benefits required under strategic policy. As an overarching policy this can permit change and adaptation over time, as the evidence base increases.

Stronger wording in some parts of the plan would be beneficial, for example para 211 states that 'net gains through planning are likely to be desirable', this needs to ensure commitment and recommended wording would be 'net gains through planning will be necessary'. Stronger wording will reflect the requirements anticipated within the upcoming Environment Bill.

We would suggest that there is further consideration of the percentage target, which is 20% across the whole of the county. While of course this is an encouraging step towards nature recovery, different targets at the district level may be required. Oxford City is highly spatially constrained, therefore a target of 20% may be hard to achieve within the administrative boundary of the City. The option of delivering net gain outside of the City may therefore be required, while ensuring it is delivered where it will have the greatest benefits.

More detailed comments on enhancing the environment, landscape and biodiversity are on pages 32 to 41 below.

OCC Priority 7 - Supporting all our children and young people to achieve improved health, wellbeing and educational outcomes; improved provision for children with additional needs; all decision-making to have regard to impact on young people and future generations.

We support PO 27 which aims to support the provision of modern and up to date facilities to support existing and future education and training needs across the county.

We agree that local planning authorities should work with partners to support the provision of new schools, universities and colleges, community learning and other training facilities which provide for education and the development of skills across each district, the city and county-wide, where needed.

Spatial Strategy Options

While it is recognised that these options are necessarily high-level appropriate to this stage of the plan-making process, it does mean that it is difficult to make well-informed comments on the relative benefits of each of the options until more detail is available at Regulation 19.

Detailed officer comments

Please note: The submission forms in this annex reflect the views of various county council officers and teams. Different officers and teams in some instances have made comments on the same policy and spatial option.

Vision and Objectives

To which part of the consultation does this representation relate?

Paragraph	29	Policy Option		Spatial Option	

What is the nature of your comment?

Support		Object		Observation	X

Please provide details of your response as necessary:

Strategic Vision 2050 Guiding Principles: Headlines

These guiding principles should include the enhancement and conservation of the historic environment in line with the Oxfordshire Plan objectives #3.

Theme 1 – Addressing Climate Change

Climate Action Team

To which part of the consultation does this representation relate?

Paragraph	☐	Policy Option	☐	Spatial Option	☐

What is the nature of your comment?

Support	☐	Object	☐	Observation	☐

Please provide details of your response as necessary:

General climate comments:

Oxfordshire County Council welcomes policies within the draft OP2050 plan that:
- Strengthens or supports policies for net zero carbon homes, specifically construction and design standards that reduce energy demand in line with the energy hierarchy, and the use of gas boilers.
- Ensure for spatial planning to accelerate the UK's transition to a zero-carbon energy system
- Enable greener, more inclusive strategic infrastructure provision, including energy and transport networks
- Make provision for tree planting in urban areas as part of healthy place-shaping, urban design and biodiversity net gain.

We note the Pathways to a Zero Caron Oxfordshire (PAZCO) report was published on the 29th June 2021. This report builds on the previous Low Carbon Economy Report (2014), with updated the evidence of pathway options for Oxfordshire to achieve net zero carbon.

To which part of the consultation does this representation relate?

| Paragraph | | Policy Option | 01 | Spatial Option | |

What is the nature of your comment?

| Support | x | Object | | Observation | |

Please provide details of your response as necessary:

Policy Option 01: Sustainable Design and Construction

Support the preferred option to bring forward higher design requirements though we are in the view that policy wording should be strengthened to require major developments to be net zero (see the London Plan Policy SI 2: Minimising greenhouse gas emissions). As referenced within the draft plan, the London Energy Transformation Initiative's (LETI) Emergency Design Guide is an example of best practice for delivering net-zero developments and these principles should be reflected in the policy (page 31).

Observe the requirement of a financial contribution towards carbon offsetting requirements should only be permitted where it is demonstrable that net zero carbon cannot be achieved on site, in line with the UKGBC Net Zero Carbon definition.

Observe an opportunity to strengthen policy wording to support circular economy principles. An example of this is included in the London Plan policies D3 'Optimising site capacity through a design-led approach', and SI7 'Reducing waste and supporting the Circular Economy' that supports the delivery of a circular built environment. Policy SI7 of the London Plan also requires development proposals that are referred to the Mayor of London to submit a Circular Economy Statement as part of a planning application. https://www.london.gov.uk/publications/circular-economy-statement-guidance

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To which part of the consultation does this representation relate?

Paragraph		Policy Option	02	Spatial Option	

What is the nature of your comment?

Support	x	Object		Observation	

Please provide details of your response as necessary:

Policy Option 02 – Energy

Support the level of ambition of the preferred policy option, noting that '100% of energy needs of major developments to be met from renewable energy sources' is challenging but achievable (see Salt Cross AAP).

To which part of the consultation does this representation relate?

Paragraph		Policy Option	09	Spatial Option	

What is the nature of your comment?

Support	x	Object		Observation	x

Please provide details of your response as necessary:

Policy Option 09: Natural Capital and Ecosystem Services

<u>Support</u> the OP2050 Plan requiring, 'an assessment of natural capital and ecosystem services impact for major developments, policies, plans or programmes including the identification of strategic environmental opportunity areas and green infrastructure'.

<u>Observe</u> there could be a role for the OP2050 Plan to help deliver measures with land use implications that are outlined within the PAZCO report's 'Oxfordshire Leading the Way' scenario, including:

- a greater proportion of land is allocated for growing bioenergy crops
- increased capacity of solar share would require 1,200–2,600 hectares of land
- double tree cover in Oxfordshire from the current 9% (23,000 ha) to 18%, which is consistent with the High Ambition scenario in the Climate Change Committee's Land use: Reducing emissions and preparing for climate change report (2018).
- All semi-natural habitats are protected from development and any existing hedgerows and trees are incorporated into the design as green infrastructure features.

To which part of the consultation does this representation relate?

| Paragraph | | Policy Option | 13 | Spatial Option | |

What is the nature of your comment?

| Support | x | Object | | Observation | |

Please provide details of your response as necessary:

Policy Option 13 - Healthy Place Shaping and Health Impact Assessments

<u>Support</u> for the preferred policy which includes principles outlining the design of good quality buildings which are energy efficient and mitigate against the impacts of climate change.

To which part of the consultation does this representation relate?

Paragraph		Policy Option	15	Spatial Option	

What is the nature of your comment?

Support	x	Object		Observation	x

Please provide details of your response as necessary:

Policy Option 15: High-Quality Design for New Development and Garden Town Standards for New Settlements

Support for the preferred policy requiring new developments respond to climate change. It is noted a standard will be developed setting an ambition for high-quality design in Oxfordshire, with local plans, neighbourhood plans and design guides providing more detailed, locally specific requirements as appropriate. It is expected new development should seek to minimise the carbon and energy impacts of their design and construction through mitigation and adaption measures.

Observe, like Policy Option 01: Sustainable Design and Construction, wording can be strengthened to require all major developments be built to net zero carbon standards.

To which part of the consultation does this representation relate?

Paragraph		Policy Option	17	Spatial Option	

What is the nature of your comment?

Support	x	Object		Observation	

Please provide details of your response as necessary:

Policy Option 17: Towards a Net Zero Transport Network

<u>Support</u> delivery of improvements to the road network that are consistent with delivering a net-zero carbon transport network. We suggest referencing the provision of smart charging vehicles that can support aligning energy demand and power supply from renewables.

To which part of the consultation does this representation relate?

Paragraph		Policy Option	18	Spatial Option	

What is the nature of your comment?

Support	x	Object		Observation	x

Please provide details of your response as necessary:

Policy Option 18: Sustainable Transport in New Development

Observe the proposed hierarchy resembles the 'Avoid, Shift, Improve' approach outlined in the PAZCO report.

Support a role for policy within the OP2050 Plan to ensure the spatial context of any proposed developments are measured against the sustainable travel hierarchy.

To which part of the consultation does this representation relate?

| Paragraph | 65 | Policy Option | | Spatial Option | |

What is the nature of your comment?

| Support | | Object | | Observation | x |

Please provide details of your response as necessary:

Paragraph 65

Observe the Pathways to a Zero Caron Oxfordshire (PAZCO) report was published on the 29th June 2021. This report builds on the previous Low Carbon Economy Report (2014), with updated evidence for pathway options for Oxfordshire to achieve net zero carbon. As a result, the data informing the Oxfordshire Energy Strategy has been superseded by evidence available in the PAZCO report.

To which part of the consultation does this representation relate?

| Paragraph | 86 | Policy Option | ☐ | Spatial Option | ☐ |

What is the nature of your comment?

| Support | ☐ | Object | x | Observation | ☐ |

Please provide details of your response as necessary:

> **Paragraph 86**
>
> Propose deleting the word ambitious, *'The Government's proposals to strengthen Building Regulations and to define future standards for new buildings have the potential to deliver a consistent approach for the delivery of zero carbon buildings and take a big step on the pathway to net zero carbon. However, they may not be ~~ambitious~~ enough to meet targets for achieving net zero carbon in Oxfordshire.*

To which part of the consultation does this representation relate?

Paragraph		Policy Option	01	Spatial Option	

What is the nature of your comment?

Support	x	Object		Observation	x

Please provide details of your response as necessary:

Changing technologies should be considered, as well as changing needs over time.

To which part of the consultation does this representation relate?

Paragraph		Policy Option	02	Spatial Option	

What is the nature of your comment?

Support	x	Object		Observation	x

Please provide details of your response as necessary:

Inclusion of battery / electricity storage systems in development would also be beneficial, given grid constraints.

Corporate Landlord Team

To which part of the consultation does this representation relate?

| **Paragraph** | page 87 | **Policy Option** | 3 | **Spatial Option** | |

What is the nature of your comment?

| **Support** | x | **Object** | | **Observation** | x |

Please provide details of your response as necessary:

Suggest replace ''and'' with ''including'' – to remove implied statement that people with disabilities are not part of us all…….Equal access for all and those with disabilities must be designed into the proposals.

IHUB

To which part of the consultation does this representation relate?

Paragraph		Policy Option	17	Spatial Option	

What is the nature of your comment?

Support		Object		Observation	x

Please provide details of your response as necessary:

The policy does not fully reflect many elements of the preceding text. For example there is nothing about supporting electric vehicle infrastructure (or other supportive innovative tech), and nothing about digital infrastructure. Whilst (some of) these elements are considered in policy 18, it would be good to consider them within the transport network decarbonisation policy as well, since these are aiming at different sections of the transport network.

To which part of the consultation does this representation relate?

Paragraph	355	Policy Option		Spatial Option	

What is the nature of your comment?

Support		Object		Observation	x

Please provide details of your response as necessary:

It is worth considering hydrogen alongside electric charging infrastructure when thinking about HGVs – at the moment it's unclear on whether the route forward for HGVs is more likely to be electrical or hydrogen power, or a combination of the 2. They have very different infrastructure requirements.

To which part of the consultation does this representation relate?

Paragraph		Policy Option	19	Spatial Option	

What is the nature of your comment?

Support		Object		Observation	x

Please provide details of your response as necessary:

It may be worth also considering location in terms of potential knock-on impacts for where HGVs would be likely to travel.

<u>Air Quality</u>

To which part of the consultation does this representation relate?

Paragraph		**Policy Option**	12	**Spatial Option**	

What is the nature of your comment?

Support	X	**Object**		**Observation**	

Please provide details of your response as necessary:

We strongly support the proposed policy option. It is important air quality is tackled in a strategic, consistent way across the county with an expanded view of broader public health and habitat protection outcomes, in addition to the more traditional focus on bringing AQMAs into compliance.

Waste Management

To which part of the consultation does this representation relate?

Paragraph ☐   **Policy Option** ☐   **Spatial Option** ☐

What is the nature of your comment?

Support ☐   **Object** ☐   **Observation** ☐

Please provide details of your response as necessary:

We are pleased to see the Circular Economy referenced in the document, however we feel that the plan, and Oxfordshire, would benefit from it being embedded more comprehensively.

The Circular Economy should be included at the highest level as it's such a cross cutting theme that impacts every area, not one on its own, and then incorporated into the Policies as much as possible.   Ideally what we would like to see in the Plan is a commitment to the Circular Economy alongside an explanation of what this is and how it fits across the Themes of the Plan.

We feel that the following could be beneficial to include within the OP2050 Regulation 19:

"Oxfordshire 2050 recognises that in terms of growth and economy this can only be done if there is move from a linear economy model to that of a circular economy. There is no separate objective or policy set for this, but many areas of the plan feed into the circular economy:

- *Theme One: Addressing climate change. This includes moving towards renewable energy production; making buildings flexible and adaptable for future needs; seeking to reduce energy consumption; and increasing water efficiency.*
- *Theme Two: Improving environmental quality. This includes seeking nature recovery and securing a net gain in biodiversity; and protecting and enhancing water and air quality.*
- *Theme Three: Creating strong and healthy communities. This includes building high quality developments that are healthy places with adequate health infrastructure and has adequate leisure and community facilities.*
- *Theme Four: Planning for sustainable travel and connectivity. This seeks to move towards a net zero carbon network where all new development considers sustainable transport, and includes electric vehicle charging points. It also seeks to improve digital infrastructure.*
- *Theme Five: Creating jobs and providing homes. This includes seeking to ensure the business parks remain fit for future needs and evolve and adapt to business changes.*

In addition, we feel that the Circular Economy could be included in the following areas:

Could a line be added within paragraph 5. In sentence 2 insert: " ….at the forefront of sustainable development and the circular economy because……."

Introduction and Overview

8. Insertion of the word "circular" into the following sentence.

Addressing these issues to secure better outcomes requires a long-term co-ordinated circular approach across Oxfordshire.

What is the Oxfordshire Plan seeking to achieve?

24 This Plan seeks to deliver real and lasting positive change in Oxfordshire by creating the right environmental, social and economic conditions and by building resilience whilst encouraging and supporting a circular economy.

25 …the approach proposed in the Oxfordshire plan is to adopt circular economy principals and align and integrate the policies, so they are mutually supportive.

Policy 01 (after para 90)

Sustainable design and construction requirements should seek to improve energy efficiency and support the move towards a low carbon circular economy.

Policy 02 (after para 117)

Developments will be required to maximise energy efficiency whilst integrating renewable and smart energy technologies in order to minimise energy demand and move towards a circular economy.

Theme 3 (after para 298)

No 9 – To deliver high quality, innovatively designed development that ensures efficient and circular use of land and resources.

Policy 13 (after para 310)

Reduce social isolation and loneliness through providing good quality social community infrastructure which encourages opportunities for social interaction and helps to support the growth of friendly, circular, communities. Also, to create community development strategies which contain actions to encourage community cohesion, both within the development itself and between the new development and existing communities.

Policy 15 (after para 324)

Encourage creative and innovative design solutions, including the use of new materials and building methods where appropriate and move towards a circular economy.

This policy option for the Oxfordshire Plan would expect:

- Neighbourhood centres and community facilities (including community centres, circular economy spaces, schools and health facilities) to be provided
- Well designed with sustainable building materials used to achieve carbon reduction and support the circular economy.
- All housing, business and retail units to contain space for waste and recycling segregation, energy management

Policy 17 (after para 340) or Policy 19 (after para 356)

Support the transition to a circular economy to use and reprocess resources as close to source as possible, reducing the need for long haul freight.

Policy 23: (after para 395)

Support the circular economy by extending as well as re-purposing economic assets, re-provisioned and re-used for new and innovative economic activities.

Policy 24 (after para 401)

New cultural and circular activities, community uses and the consolidation of civic facilities

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Waste and recycling:

Waste and Recycling are included as a metric as detailed in para 527 but are not included anywhere else. Inclusion of the comments above on the circular economy would help to address this omission.

The strategic map is missing Oxfordshire's Joint Municipal Waste Management strategy.

Theme 2: Improving Environmental Quality

<u>Environment Team</u>

To which part of the consultation does this representation relate?

Paragraph	☐	**Policy Option**	☐	**Spatial Option**	☐

What is the nature of your comment?

Support	☐	**Object**	☐	**Observation**	☐

Please provide details of your response as necessary:

Theme 1

Para 59: Observation: In addition to mitigating climate change (principally addressing carbon), the two themes of adaptation and resilience should carry equal importance.

Para 89 and elsewhere: Observation: there is reasonable consideration of flooding in the Plan but very little consideration of heat and increased storm intensity both of which are likely consequences of climate change in the county.

Policy 01: Observation

It is proposed that offsetting opportunities should be first sought within the county.

Design and construction should seek to make settlements and communities resilient to the impacts of climate change, not just individual buildings. This could be, for example, through the way in which green infrastructure is incorporated in new developments.

Alternative Policies 01-1 and 01-2. Support: Agree that failure to deliver appropriate policies at a national level should not hold back aspirations in Oxfordshire.

Para 117: Where possible renewables should be located in places that cannot deliver the same multiplicity of environmental benefits that land achieves, for example the installation of solar on rooftops in industrial areas.

Policy 4: Support and Observation:

Support in particular for the catchment-based approach and the use of nature-based solution to flood risk management.

Observation: bullet 3: change to "…impact pathways on habitats of principal importance".

Alternative Policy 04-01: Object: The loss of the catchment-based approach would reduce the effectiveness of the flood risk management approach.

Para 155: Observation: Include a clearer acknowledgement of the role of farming in creating and maintaining Oxfordshire's natural environment e.g.: From the county-wide landscape scale to the individual development and community scale, nature is important to the health and resilience of people and wildlife. *Oxfordshire's farmers and the production of food have and will continue to play a key role in shaping the county's natural environment.*

Theme 2

Para 157: Observation: Water is not a significant part of the Chilterns and North Wessex Downs AONBs.

Para 159: Observation: AONBs *and their setting* continue to have….   The accompanying map would benefit from having the names of the AONBs included.

Policy Option 5: Support, subject to following:

- Policy Option 5: Observation: the first para' would benefit from the inclusion of heritage character in respect of townscapes.

- Policy Option 5: Observation: there should be specific mention of the duty of regard to the "purpose of conserving and enhancing the natural beauty of the areas of outstanding natural beauty"

Para 172: Observation: Refer to archaeological advice on the potential of historic landscape characterisation to identify archaeological potential.

Para 176: Observation: This para should reflect that the loss of nature in the county has been taking place for much longer than a decade. The historic 'nature deficit' is an important factor in understanding how to achieve long term sustainability and the measures needed to achieve mutually supportive economic, environmental and social outcomes. The county's economic success has, in some respects, been achieved at the expense of nature. A rebalancing and indeed, 'catching-up of nature', is required. This is picked-up on in para 180, but the point could be made more strongly and reflected throughout the Plan. See also the link to Para 211.

Para 186 / 187: Observation: There is a wide distribution of wildlife rich sites but not all of these are protected. It would be more appropriate to amend Para 187: This well-established approach may have been successful in protecting individual sites but less successful in arresting *the decline of wildlife-rich sites that are not protected, the* fragmentation of habitats and….

Para 191: Observation: Suggested addition. "For nature to recover it is important to look beyond currently protected *sites and wildlife-rich sites and* take action to extend… "

Page 56 / 57 / 58 / 61: Observation: Check the licensing details on the maps. Should these also include TVERC copyright data? The maps would also benefit from clear titles to explain what they show in addition to the comments in accompanying text.

Para 200: Observation: Further work is required to tackle sewerage discharges *and other sources of pollution of water courses and water bodies.*

Para 204: Observation: Suggest a slight re-word the reinforce the nature focus. The focus within the wider landscape zone should be on *making room for nature and strengthening landscape character*, including hedgerow restoration and creation, managing farmland with nature in mind or improving access to the countryside.

Para 205+: Observation: The Plan should support the development of a Nature Recovery Strategy which would link to the detail of a Nature Recovery Network. This would be comparable in context to Para 148: "provide a strategic planning framework for managing flood risk in Oxfordshire". The Nature Recovery Strategy is picked up in Policy 07, so it would be appropriate to introduce it in the text.

Policy Option 7: Support subject to modification: There is an opportunity to include a prominent ambition for nature. The Growth Board and County Council has endorsed the OxCam Arc Environmental Principles. Amongst these is the aim to double the area of land managed primarily for nature. Whilst the detail of what this means in an Oxfordshire context is still to be worked out, including this ambition within the Plan with supporting information in the accompanying text would provide context and a clear direction of travel. It would also help to make a strategic link to the OxCam Arc Spatial Framework. To this end the following addition is proposed in para 5 of the Policy: "The Oxfordshire Plan would support the establishment of a Nature Recover Strategy for Oxfordshire *with the overall aim of doubling the area of land managed primarily for nature by 2050*".

Para 206: We support the statement concerning the Alternative Policy Option 07-1.

Para 210: Observation: Supplementary text: Such issues of fragmentation and ecological connectivity can be addressed to a significant extent through the establishment *and implementation* of a Nature Recovery Network

Para 222: Observation: Would merit including reference to a future Nature Recovery Strategy as well as network.

Para 236: Observation: The fundamental role of soils in the county's wellbeing should be emphasised. The protection and enhancement of biodiversity and geodiversity, *in particular soil*, is fundamental to protecting stocks of natural capital and the flows of ecosystem services that underpin human health and wellbeing.

Policy Option 08: Support and Observation: it is noted that achieving 20% net gain in some local authority areas may not always be possible. In this respect the City of Oxford is a particular concern where land supply is limited. This should not detract from the wider ambition of achieving 20% net gain but the locations in which this is achieved may need to be drawn more widely. Similarly, the scope to deliver gains in CTA's may also prove limiting over time. An amendment to the last paragraph of Policy 08 is proposed: "…gains should be delivered within the administrative area of the Local Authority *where possible and wherever possible within the Core or Recovery Areas of the Nature Recovery Network as described in the Nature Recovery Strategy.*

Alternative Policy 08-01: In combination with the main elements of Policy 08, there is merit in considering further differential % net gain, subject to further assessment of the achievability and viability of this option.

Alternative Policy 08-02: Support the statement that this is not a preferred option.

Para 247: Observation: This may be an appropriate point to note the recommendations of the new England Trees Action Plan and para 131 in the NPPF July 2021 which relates to trees and development.

Policy Option 09: Support

Para 265: Observation: the NPPF para number referred to has changed in the July 2021 update to para 141.

Para 267: Observation: the NPPF para number referred to has changed in the July 2021 update to para 145.

Para 268: Observation: could usefully include reference to natural capital.

Para 269 / 270: Observation: Check the NPPF para number referred to in the July 2021 NPPF.

Policy Option 10: Support and Observation: include reference to natural capital to capture the widest range of environmental improvements and support Policy 09.

Policy 271: Observation: This should include ponds both natural and man-made. Oxfordshire is notable for the quality of its pond habitat.

Policy Option 11: Support.

Policy Option 12: Support.

To which part of the consultation does this representation relate?

Paragraph	x	Policy Option	05	Spatial Option	

What is the nature of your comment?

Support	x	Object		Observation	x

Please provide details of your response as necessary:

Support and Observations: We have some minor suggestions for revised wording as set out below.

Policy Option 05: Protection and Enhancement of Landscape Character~~s~~

Para 157: The protected landscapes of the Chilterns, Cotswolds and North Wessex Downs Areas of Outstanding Natural Beauty cover over a quarter of the land area of the county. These distinctive ~~and varied~~ landscapes~~, defined~~ <u>have been shaped</u> by their underlying geology, land use practices, ~~and~~ ~~the many~~ <u>habitats</u>, water courses ~~that cross them~~ and <u>historic and cultural associations and</u> are highly valued ~~and protected~~ for their natural <u>and scenic</u> beauty, <u>recreational value,</u> distinctiveness and tranquillity.

Para. 158: Great weight has been given to conserving and enhancing ~~landscape~~ <u>the natural</u> and scenic beauty ~~in~~ <u>of the</u> Areas of Outstanding Natural Beauty and their settings in Oxfordshire, and this has shaped the pattern of development in the county over time.

Para 159: The conservation and enhancement of wildlife and cultural heritage are important considerations in these ~~areas~~ <u>protected landscapes</u>, and the Oxfordshire Plan will continue to support this, as AONBs continue to have the highest level of protection in relation to their ~~landscape~~ <u>natural</u> and scenic beauty.

Preferred wording for <u>Policy Option 05</u>

We generally support the policy but feel that it would benefit from slight rewording as it is not entirely accurate in what studies are required at different parts of the development process. Landscape and Visual Impact Assessment (LVIA) tend to be carried out for a specific development – we assume that this will not apply for the development of the Spatial Options in OP2050 but when specific developments are proposed Landscape Character Assessment and/or Sensitivity Assessment tend to be used to inform options.

Suggestion for slight rewording:

Policy Option 05: Protection and Enhancement of Landscape Character~~s~~

The Oxfordshire Plan would establish a positive strategy for the conservation and enhancement of <u>Oxfordshire's</u> landscapes and townscapes ~~features at a county-wide landscape scale~~, taking account of landscape ~~protection status~~ <u>designations,</u> topography, vegetation, <u>biodiversity,</u> settlement pattern, <u>historic and cultural associations</u>, tranquillity, light pollution <u>and</u> dark skies.

Landscape ~~character~~ and visual impact assessments would be required to support major new developments and urban extensions ~~as well as the preparation of the Oxfordshire Plan itself and subsequent plans and strategies guiding development in Oxfordshire.~~

Regard should be had to the Oxfordshire Wildlife and Landscape Study and relevant landscape character studies relating to parts of Oxfordshire.

It might be possible to refer to the requirement for Landscape Sensitivity assessments in the policy itself since it is addressed in the supporting text and later in the document. Such assessments tend to be carried out at the option stage (i.e. when different locations are being considered) to identify areas that are least sensitive to development.

If reference in the policy itself is sought the following wording might be more appropriate.

> *<u>Relevant landscape studies would be carried out for</u> the preparation of the Oxfordshire Plan itself and subsequent plans and strategies guiding development in Oxfordshire.*

To which part of the consultation does this representation relate?

Paragraph		Policy Option	7/8	Spatial Option	

What is the nature of your comment?

Support	x	Object		Observation	

Please provide details of your response as necessary:

Overall, we are supportive of the inclusion of natural environment policies 07: Nature Recovery and 08: Biodiversity Gain. The detailed consideration of biodiversity and its wider value is a positive step towards achieving meaningful gains for biodiversity across the county.

It is encouraging that the plan supports the establishment of a Nature Recovery Strategy and recognises the importance of the draft Nature Recovery Network as a valuable evidence base which will be used to achieve environmental benefits required under strategic policy. As an overarching policy this can permit change and adaptation over time, as the evidence base increases.

Stronger wording in some parts of the plan would be beneficial, for example para 211 states that 'net gains through planning are likely to be desirable', this needs to ensure commitment and recommended wording would be 'net gains through planning will be necessary'. Stronger wording will reflect the requirements anticipated within the upcoming Environment Bill.

we would suggest that there is further consideration of the percentage target, which is 20% across the whole of the county. While of course this is an encouraging step towards nature recovery, different targets at the district level may be required. Oxford City is highly spatially constrained, therefore a target of 20% may be hard to achieve within the administrative boundary of the City. The option of delivering net gain outside of the City may therefore be required, while ensuring it is delivered where it will have the greatest benefits.

<u>Archaeology Team</u>

To which part of the consultation does this representation relate?

Paragraph	172	Policy Option		Spatial Option	

What is the nature of your comment?

Support		Object	X	Observation	

Please provide details of your response as necessary:

The Historic Landscape Characterisation maps the changing character of the landscape from existing maps only, in the case of Oxfordshire the Davis and Roque maps of the C17th, the late C19th OS Maps and the modern mapping. As such it does not provide any information or understanding on the archaeological potential of the county.

The archaeological potential for any part of the county must therefore be assessed using data from the Historic Environment Record.

This paragraph is therefore misleading and this reference to HLC data and archaeological potential should be removed.

To which part of the consultation does this representation relate?

Paragraph	173	Policy Option		Spatial Option	

What is the nature of your comment?

Support		Object	X	Observation	

Please provide details of your response as necessary:

The HLC only sets out the modern and post medieval landscape and how this has changed and therefore can only be use dot assess and inform the historic landscape character. This paragraph should be amended to

An understanding of the historic importance of landscapes can help shape the Oxfordshire Plan spatial strategy to ensure that they are protected and enhanced for the value that they bring in terms of recreation, education, sense of place and historic landscape character.

To which part of the consultation does this representation relate?

Paragraph		Policy Option	06	Spatial Option	

What is the nature of your comment?

Support		Object		Observation	x

Please provide details of your response as necessary:

Policy Option 06 refers to HLC data as informing the significance of heritage assets. This is however not the case. The Historic Landscape Characterisation data only considers landscape types and does not include any data on heritage assets or their significance.

This is therefore misleading and should be removed from this policy.

Theme 3: Creating Strong and Healthy Communities

Housing and Social Care Commissioning

To which part of the consultation does this representation relate?

Paragraph		**Policy Option**	13	**Spatial Option**	

What is the nature of your comment?

Support		**Object**		**Observation**	x

Please provide details of your response as necessary:

A healthy place-shaping standalone policy is welcomed to establish a framework that can apply across Oxfordshire for the design and master-planning of major developments.

A policy might usefully include design which focuses on good quality standards <u>and long-term</u> decent home conditions.

Promotion of mixed tenure communities with truly affordable homes, promoting the use of social rented, low-cost home ownership models and long-term tenures.

Consideration of needs evidencing and seeking to provide a proportion of housing to meet the supported housing needs for older people, people with mental health needs and physical & learning disability.

Corporate Landlord Team

To which part of the consultation does this representation relate?

Paragraph		**policy**	14	**Theme**	3

What is the nature of your comment?

Support	x	**Object**		**Observation**	x

Please provide details of your response as necessary:

The plan should explicitly recognise that health place shaping includes the ability for the elderly to be independent, consequently the increase in sustainably powered transportation will lead to a marked increase in travel by mobility scooters, not just walking and cycling, which must be considered to future proof developments in the period of the plan.

To which part of the consultation does this representation relate?

Paragraph		Policy	16	Theme	3

What is the nature of your comment?

Support	x	Object		Observation	x

Please provide details of your response as necessary:

It would be helpful to explicitly broaden the scope to encompass recreational facilities aimed at the elderly for example Bowls, Boules, grouped external chess etc – to help encourage connections between the elderly and reduce isolation

<u>Public Health</u>

To which part of the consultation does this representation relate?

Paragraph		Policy Option	16	Spatial Option	

What is the nature of your comment?

Support		Object		Observation	x

Please provide details of your response as necessary:

Development proposals for high quality strategic leisure, recreation and open space facilities in Oxfordshire will be encouraged that serve more than one District, or county-wide, sub-regional, regional or national purpose, including (but not limited to):

Strategic indoor sports and recreational facilities, such as leisure centres, aquatic centres, and indoor pitches, courts and stadiums.

Strategic outdoor sports facilities and open space, such as pitches, courts, golf courses, as well as more informal green spaces such as large-scale community woodlands and country parks which may attract visitors from across the county, and associated visitor facilities.

A strategic facility is a high-quality facility that will serve a county-wide, sub-regional, regional, or national purpose, for example (but not limited to) county sports grounds, stadiums, new golf courses, and country parks. It could also include activities associated with the stately homes of Oxfordshire. Due to the extent and variety of facilities that can fall under this definition, whether the facility is ultimately considered strategic will be decided on a case-by-case basis.

The Oxfordshire Plan would expect all new strategic leisure, recreation and open space facilities development to meet the following criteria:

They must be located within the built-up areas of the city, towns and villages.

In the villages, development must be proportionally scaled and in keeping with the character of the settlement.

Development outside of these areas will only be supported in exceptional circumstances, for example where it is evidenced that it cannot reasonably be located in the city, or a town or village in the county, such as water-based facilities or parkland uses. Ensuring connectivity by means of sustainable, active travel and public transport to neighbouring communities will be required.

They must be located in accessible locations, with excellent public transport and link to networks for walking and cycling and the public rights of way network.

Use of sustainable travel is encouraged and a sustainable travel plan will be required that sets out the details of the bus and rail connectivity to be secured.

They must be designed with renewable energy provision incorporated to help reduce use of carbon. They must have minimal traffic, environmental, visual and landscape impact. Provision for the long-term maintenance and management of the facilities will be sought and must be agreed as part of a planning application.

School sports halls and outdoor playing fields should be made available to the local community. New facilities of this type would be required to enter into community use agreements.

Sports lighting would operate within agreed hours where there is a need unless the lighting gives rise to demonstrable harm to biodiversity.

Community facilities would be a matter for individual local plans except where community facilities are intended to meet the needs of a wider district or neighbouring district(s) in which case they should be located within or adjoining rural service centres to maximise accessibility.

Theme 4: Planning for Sustainable Travel and Connectivity

<u>Public Rights of Way Team</u>

To which part of the consultation does this representation relate?

Paragraph		Policy Option		Spatial Option	

What is the nature of your comment?

Support		Object	x	Observation	x

Please provide details of your response as necessary:

Public Rights of Way (PRoW) and the statutory Oxfordshire Rights of Way Improvement Plan (RoWIP) do not feature within this plan, despite PRoW contributing to Theme 1-4 and spatial strategy options. There are nearly 4,000km of PRoW in Oxfordshire. They are highways and give free access to the public for recreation, leisure, transport, access to nature, health and wellbeing as well as providing landscape and natural capital services as green corridors. The RoWIP adopted 2014 contains detailed network and opportunities mapping and with the RoWIPs from 2006 and 2012, contains a substantial and robust evidence base of needs and opportunities across the county. The Oxfordshire Plan needs to be widened to included specific sections on PRoW including network information, issues and policies for improvement and extension.

We are happy to aid in developing an appropriate policy.

To which part of the consultation does this representation relate?

| Paragraph | ☐ | Policy Option | ☐ | Spatial Option | ☐ |

What is the nature of your comment?

| Support | ☐ | Object | ☐ | Observation | ☐ |

Please provide details of your response as necessary:

General observation

The document refers to NPPF (2019). This was updated in July 2021 so any reference to NPPF should be updated to reflect the update in national guidance and change of paragraph numbers.

Policy Option 24: Town Centre Renewal

Given the prevalence of the provision of free car parking in town centres around the county as a means of encouraging the patronage of shopping and other leisure facilities, should OP2050 have a policy position on this? What evidence exists to either support the improvement or retention of town centre parking (free or otherwise) and how does this accord with Policy Option 17: Towards a Net Zero Transport Network?

Further to this, the policy option references supporting new measures, including, *'Improved walking, cycling and public transport facilities to and from town centres to surrounding residential areas.'* Has consideration been given to the compatibility, or potential incompatibility, of supporting measures to encourage sustainable modes of transport, whilst maintaining current levels of town centre parking?

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

Commitments – as part of commitments site brought forward outside of planned growth such as speculative should also be counted towards the committed growth either approved by the Local Planning Authority or allowed by a Planning Inspector at appeal.

Spatial Strategy Options

While it is recognised that these options are necessarily high-level appropriate to this stage of the plan-making process, it does mean that it is difficult to make well-informed comments on the relative benefits of each of the options until more detail is available at Regulation 19.

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

As the commentary in the consultation document acknowledges, although on the face of it places such as Banbury and Didcot seem to be sensible locations to locate more growth, such places (along with others referenced in the table on p.138) are reaching their limit, both in respect of remaining land availability and in terms of the existing and future pressures on the transport network (both local and strategic). Furthermore, as they increase in size, the connectivity to the outer reaches of these towns becomes more disjointed and dislocated, and access to public transport (both bus and rail) starts to degrade.

Option 2: Focus on Oxford-led growth

Aside from the fact that (as noted in the consultation document) there are limited options for additional growth within the greenbelt, opportunities for connecting to walking, cycling, and public transport networks, tend to be very site-specific. For instance, the feasibility of serving by bus each of the three sites allocated on the periphery of Oxford in the South Oxfordshire Local Plan 2035 varies considerably, as do the challenges of addressing the severance of walking and cycling routes caused by the A40 Northern Bypass compared with the A4142 Eastern Bypass.

Furthermore, the benefits of this spatial strategy appear to be predicated on the basis that new housing would be near to employment, which while true, does not take into account that the bulk of anticipated employment growth (per the district's local plans) will be located elsewhere in the county.

This whole option appears to be at odds with Policy Option 10 (Green Belt) and also the Oxfordshire Strategic Vision.

Option 4: Focus on strengthening business locations

Harwell Campus is currently struggling to demonstrate how it can mitigate its transport impact on key strategic junctions such as the A34 Chilton Interchange and Rowstock Roundabout (A417/A4130/A4185). It should also be noted that the land around Harwell Campus is within the North Wessex Downs Area of Outstanding Natural Beauty. Twice the Vale of White District Council has allocated land within its Draft Local Plans and twice at Examination in Public this site was removed due to the impact on the AONB.

Option 5: Focus on supporting rural communities

This option would make it difficult to secure S106 contributions towards strategic infrastructure putting a bigger ask on the public purse – which is unlikely to be forthcoming.

As is recognised in the supporting commentary for Option 5, very careful consideration would have to be given to the appropriateness of surrounding rural roads to accommodate not only traffic growth, but also their ability to be upgraded to facilitate appropriate walking and cycling provision, noting that many of the locations shown in the accompanying map are too far from local centres and employment locations for active modes to be attractive. Furthermore, while some of the villages and small towns are on existing public transport routes, in many cases the ongoing viability of these routes is uncertain and as such the scale of development would need to be of sufficient scale to ensure that bus services could be made commercially viable in the long-term.

Bearing all of the above in mind, it would appear based on the information currently available, that Options 3 (Focus on opportunities in sustainable transport corridors & at strategic transport hubs) and 4 (taking into consideration the concerns raised above) have the potential to be the most effective in respect of supporting the strategic objectives set out in paragraph 485, page 132.

General comment on mapping

Suggest that the maps that accompany all of the spatial options include the AONBs as the only one to show this is the Option 5 Map – although it is not labelled as such.

Theme 5: Creating Homes and jobs

No comments received.