

Joint Local Plan - Issues Consultation May 2022.

Questions

1 What three things do you value most about where you live?

CPRE Oxfordshire value and seek to protect the countryside in our rural county.

2. In fewer than 50 words, if you could make one change to improve where you live, what would it be? Include the name of the town, village or area you're talking about.

Tighter protection for the countryside, AONB and Green Belt recognising its role as a major contributor to the quality of life for residents, its importance for the local economy, and its vital role in tackling our climate and biodiversity emergencies. This would include the extension of the AONB as proposed by the Glover report (together with the designation of the Chilterns AONB as a national Park) and definition of boundaries for settlements in the AONB to reduce the loss of designated landscape.

How things are right now

The issues

- Climate
- Protecting our countryside
- Our towns and villages
- Quality of life and affordability
- Traffic and transport
- Employment
- Development and Infrastructure

3. Overall, do you agree that these are the main issues that the Joint Local Plan should consider?

- Strongly agree
- **Agree**
- Neither agree nor disagree
- Disagree
- Strongly disagree

If you think there are other issues the Local Plan should consider, please let us know in this box:

Farming – especially in relation to food security

The setting of the AONB needs to be included.
Protection of our water sources, aquifers & chalk streams.

4. Which of these issues do you think is the most important?

We consider all these issues important and interlinked and the next stage of consultation needs to detail how priorities and inevitably trade-offs will be made.

Two issues, Protecting Our Countryside and Climate Change should be given the highest priority. The Council has declared a Climate Emergency and yet, as presented, in this consultation document, there appears an absence of urgency that an emergency would normally generate. Equally, protecting the countryside is not a should or nice to do. The countryside provides food (directly and through the support of pollinators), is a carbon sink and is a major contributor to the character of the district and its attractiveness to residents, employers and tourists.

The remaining five issues are important but very much secondary to Protecting the Countryside and Climate Change. If we fail to control these two priority issues then well before the plan closure date dealing with the impact of higher global temperatures and climate change on the district (extreme weather, drought, floods, wildfires, infrastructure failures, etc) will absorb all, and more, of the District Council's resources.

Our Vision

- Our vision is for **carbon neutral** districts, for current and future generations.
- For this to be a place where **nature** is thriving, and nature reserves are no longer isolated pockets. A place where **history** is still visible, where heritage and landscape character are safeguarded and valued, and the beauty and the distinctive local identity of our towns and villages have been enhanced.
- A place where **people can thrive**. Where people have housing choices they can afford, where villages, market towns and garden communities are diverse and inclusive places where people of all ages and backgrounds can live together.
- A place where local residents can reach the **facilities** they need for everyday living on foot, bicycle or by **zero-emission and low carbon transport choices**.
- Where residents and visitors can live **healthy lifestyles** and access greenspace. Where **people are safe** from pollution, flooding, and the effects of climate change.
- Where there are valuable and rewarding **jobs**, embracing clean technologies and growing the opportunities in Science Vale for the districts to contribute on a national and international scale to solving pressing global issues.

5. How much do you agree with this vision for the Joint Local Plan?

- Strongly agree
- **Agree**
- Neither agree or disagree
- Disagree
- Strongly disagree

If there is anything you disagree with in particular, or you have any other thoughts let us know here:

The current settlement pattern means that it is unrealistic to expect cars to go away and residents of rural communities should not be penalised for this. If this vision is to be anything other than a pipe dream, then the plan must contain, or be supported by, a substantial programme to transition to renewables, to install the infrastructure required to support non internal combustion engine motor vehicles without losing substantial areas of countryside and for measures to support carbon capture. All, not just new, houses need insulation and help to move away from gas. Public and voluntary sector buildings (e.g., village halls) will need help with transition to renewables.

Reducing Carbon Emissions

6. Please select the **THREE** opportunities that are most important to you.

1. Plan for a move away from fossil fuels and greenhouse gas emissions
2. Require new homes and buildings to minimise energy use through their layout and design, and have the highest standards of fabric efficiency
3. Transition to renewable forms of energy and support the districts in playing an international role in fusion energy power plant research and deployment
4. Ensure the amount of development taking place stays within the districts' carbon budget
5. Plan for new development in locations that enable sustainable lifestyles (20 minute neighbourhoods)
6. Limit parking at new developments
7. Require electric vehicle charging points
8. Encourage carbon sinks and increase tree cover
9. Limit developments with high greenhouse gas emissions e.g. intensive indoor livestock farming

7. Do you disagree with any of these opportunities? Tick all that apply.

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8. If you have any other thoughts on how we could use the Joint Local Plan to reduce carbon emissions, please write them here.

Further detail on our option choices in Questions 6

It is unreal to expect the district to achieve carbon neutrality given the renewable energy generation technologies that will be available during the plan period. A major effort to decarbonise the district is, therefore, vital.

Therefore, we consider "Plan for a move away from fossil fuels and greenhouse gas emissions" is a statement of the challenge, which needs to be addressed and is not an opportunity within this plan period.

Whilst we also support "Limit developments with high greenhouse gas emissions e.g. intensive indoor livestock farming", we feel this statements implies a number of smaller emitters would be acceptable, which we would oppose.

Further detail on our option choices in Questions 7

- i. We strongly support the principle of a transition to renewable energy, in a way that support the countryside.
- ii. 3 which is not a statement of how and refers to fusion energy which remains decades away and requires little or no support from the Local Plan. The reference to fusion energy should be omitted from this option.

Other thoughts on reducing carbon emissions.

- i. Approximately one-half of greenhouse gas emissions in the district come from transport. Therefore, placing development in existing high-density areas with a **full range of facilities** (more than those required on a daily basis) will reduce both car travel and that of delivery and other service vehicles. We refer to facilities such as doctors, dentists, opticians and a wide range of shops and other services; all of which serve existing high-density areas.
- ii. The district has a housing stock that is poorly insulated and, given that some 25% of greenhouse gas emissions are produced by households, significant reductions will not be achieved unless there is a major programme to support the reduction of emissions from the domestic sector.

- iii. It should also be noted that, on average, the construction of a new dwelling produces around 100 tons of greenhouse gases, primarily CO₂.
- iv. The Local Plan should require all new developments, domestic, commercial or public sector to install solar panels with minimum nominal capacities. For a three bedroomed dwelling this could be set at 3kWh. A policy should be included that relates the nominal power output to the roof area.
- v. The natural world is a substantial absorber and fixer of CO₂. The IPPC recognises that forests alone could absorb between 15 and 25% of CO₂ emissions. The two districts are fortunate in having extensive wooded areas and open countryside and the plan needs to recognise and protect their role as essential CO₂ removers and storers.
- vi. The plan also omits to mention support for companies that devise carbon free carbon-free energy sources or employing technology to capture CO₂ emissions and permanently store it.
- vii. All new development should insist on limiting loss of light energy & light spillage by minimising large expanses of glazing and/or insisting on light emission reducing glazing on all types of building.
- viii. All new development should insist on more energy efficient building designs using the building of terraces, high density developments across a whole development site, limit the number of garages and do not allow garage conversions.
- ix. Plan for increasing hedgerow cover.
- x. Renovation over demolition & rebuild should be promoted.
- xi. Look at energy recovery in big buildings – new schools, offices, industry.
- xii. Look at bio-methane capture from sewage works.

Nature Recovery and Landscape

9. Please select the THREE opportunities that are most important to you.

1. Respect landscape character, dark skies and the natural beauty of the countryside in development decisions
2. Research and map effective nature recovery networks
3. Restrict the amount of development in and around our top biodiversity areas
4. Require developments to generate a net gain in biodiversity
5. Ensure a net gain in biodiversity takes place where it's most effective
6. Require improvements to air and water quality
7. Protect trees and recognise the value of nature, giving us clean air, flowing water, soils to grow food in, and enjoyment
8. Support farmers, foresters and landowners committing to restore nature
9. Minimise the use of greenfield land by increasing the density of developments

10. Do you disagree with any of these opportunities? Tick all that apply.

- None

11. If you have any other thoughts on how we could use the Joint Local Plan to protect the natural environment, please write them here.

We have felt restricted by identifying three factors here and would support all these opportunities.

1. We consider the most important ONE which we feel should be heavily weighted is "Minimise the use of greenfield land by increasing the density of developments".
2. It is essential that biodiversity (and landscape impact) is assessed by genuinely independent authorities not appointed by developers, landowners or others with an interest in the development proceeding.

3. Avoid development in the AONBs, the Green Belt and other open countryside and woodland.
4. The Plan needs to include a flood map for Ground Water surface flooding.
5. Do not allow development where water abstraction/stress causes damage to the water courses/habitats & environment
6. The Plan needs to include a flood map for Ground Water flooding. Do not allow development where ground water surface flooding leads to sewage discharge into the water courses.
7. Promote hedgerow planting
8. Increase the generation of electricity from solar power by utilising domestic and commercial roof space to avoid loss of natural habitat and landscape.
9. Control and reduce light pollution. Insist on limiting loss of light energy & light spillage by minimising large expanses of glazing and/or insisting on light emission reducing glazing on all types of building.

Protecting and Enhancing Local Heritage

12. Please select the THREE opportunities that are most important to you.

1. Protect heritage assets from harm or loss
2. Empower communities to research and protect their own heritage through Conservation Area Character Appraisals
3. Utilise enabling development where this can secure heritage assets and their settings
4. Plan development at a scale appropriate to market towns and villages
5. Require beauty in design for all new buildings and places
6. Keep alive traditions of local building materials, palettes and building styles
7. Encourage retention and reuse of historic buildings/ heritage assets as a sustainable resource
8. Embrace our cultural heritage
9. Ensure energy efficient and renewable energy measures for historic buildings adequately safeguard their heritage significance

No response

13. Do you disagree with any of these opportunities? Tick all that apply.

No response

14. If you have any other thoughts on how we could use the Joint Local Plan to protect and enhance local heritage please write them here.

We have chosen not to rank our top three of these statements as we consider them all to be vague and “nice to have”. They are imprecise and need substance and factual detail in order to comment further.

We would highlight that preserving heritage must not be an excuse for loss of countryside or landscape, or for intrusion into or destruction of areas of high biodiversity.

Thriving Inclusive Communities

15. Please select the THREE opportunities that are most important to you.

1. Plan for housing that is genuinely affordable for our communities
2. Require developers to build a mixture of housing types to help first time buyers, key workers, and those on lower incomes to live in the districts
3. Retain a proportion of homes that will remain affordable forever, not just for the first buyer
4. Support affordable housing on sites we'd normally protect from development
5. Promote alternative housing models like self-build, custom and community-led housing
6. Continue to support neighbourhood plans so housing meets local needs
7. Require high quality, beautiful and sustainable design for new buildings and places
8. Plan new developments, town centres and buildings to be accessible for those with disability or dementia, be places for children and young people to enjoy, and to be gender neutral
9. Include plans for communities with specific needs including older people, those needing supported living, students, and Gypsies and Travellers

No response

16. Do you disagree with any of these opportunities? Tick all that apply.

- No response

17. If you have any other thoughts on how we could use the Joint Local Plan to tackle housing inequality and affordability, please write them here.

- i. Much of this is desirable but, in practice, unachievable. Average house prices in the district are around 3 times what is generally accepted as being affordable. As development is delivered by private sector companies using land for which the owners wish to obtain the maximum price then genuinely affordable housing can only be delivered through a combination of compulsory purchase and public sector construction. Failing that then smaller houses in high density developments in towns and locations that are more affordable, cheaper to heat, and do not impact on the designated landscapes of the districts will be needed.
- ii. Option 4 suggests allowing affordable housing on sites normally protected from development. This option should be removed. This is likely to be abused by developers and produce dwellings that intrude into designated landscapes and, furthermore, that are poorly serviced thus adding to local vehicle traffic and CO₂ emissions.
- iii. Option 6 must be supported and Neighbourhood Plans need to be genuinely allowed to reflect local needs and not expected to slavishly follow a Local Plan covering two districts.
- iv. Relatively affordable, smaller, dwellings become unaffordable as the properties are enlarged. The Local Plan should protect smaller dwellings by removing permitted development rights when granting planning permission.

18. We'd like to hear your ideas for how we could adapt our town centres and high streets to meet our changing needs. Are there any improvements, new facilities or uses that you would like to see in the locations marked on the map?

- We remain supportive of the need for a new train station at Wantage/Grove.

Which location(s) does your answer to question 18 above apply to?

- Abingdon

- Botley
- Didcot
- Faringdon
- Grove
- Henley
- Thame
- Wallingford
- Wantage

Transport and Facilities

19. Please select the **THREE** opportunities that are most important to you.

1. Focus new development in settlements where the facilities for everyday living are available within 20 minutes' walk or cycling distance
2. Restrict development in locations which are not able to function as 20 minute neighbourhoods
3. Safeguard shops, community facilities and services from redevelopment to new uses
4. Plan for new infrastructure alongside development, especially in Garden Communities at Didcot, Berinsfield and Dalton Barracks and on strategic allocation sites
5. Plan a transition to sustainable transport modes by walking and cycling, shared transport, electric and alternative fuel cars, driverless cars, and plan for enhanced public transport including re-opening of the Cowley Branch line and a station at Grove
6. Plan for safe routes for walking and cycling, new quietways, new routes between settlements, secure bike parking, cargo bikes, electric bikes and scooters, electric vehicle charging
7. Plan for sustainable travel that is reliable, integrated and accessible
8. Plan for new technological innovation in transport and communications technologies

20. Do you disagree with any of these opportunities? Tick all that apply.

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21. If you currently drive, what would encourage you to drive less and/or walk, cycle or take public transport more?

Choosing to walk or cycle rather than use a car requires the following to be overcome:

- i. Road safety. Cycling and walking is often dangerous in locations where there are no pedestrian footpaths, cycle paths or busy roads connecting communities.
- ii. Properly surfaced footpaths suitable for those with walking disability, requiring a mobility scooter, or pushing a pram with young children.
- iii. Full local services (including a dentist, optician, hardware store) within safe walking distance.
- iv. A reliable and inexpensive bus service. Superficial settlement assessments note the published frequency of bus services but fail to consider the number of different service routes and fail to note the poor reliability of services to settlements outside the district's towns.
- v. Inability to park the car and/or very high car parking fees.

22. If you have any other thoughts on how we could use the Joint Local Plan to ensure people have easy access to the services they need to use on a day-to-day basis, please write them here.

We consider all these are all good objectives for new developments, but don't address problems of existing settlements. Whilst we support the two objectives which refer to 20 minute neighbourhoods in principle, we cannot support these objectives as written; they will merely increase private vehicle use between settlements as public transport options are not available and everyday living needs to reflect the **real, full** everyday needs of an aging population who cannot cycle and have difficulty walking. It is readily apparent even in those settlements classed as larger villages that the car is used to travel from home to local shop, surgery or community facility. This is why we feel new development is best placed within existing high-density areas where a **full range** of facilities already exist.

“Plan for new technological innovation in transport and communications technologies” is merely hoping for a miracle. The plan must operate on current and known technology that can be reliably seen as being widely adopted within the plan period.

Healthy Lifestyles and Safe Communities

23. Please select the **THREE** opportunities that are most important to you.

1. Provide opportunities for active travel, exercise, social interaction and recreation
2. Enhance opportunities for exercise and enjoying high-quality open spaces and the countryside
3. Plan places for people to grow their own food
4. Avoid inappropriate development in flood risk areas
5. Limit and control new sources of air, water, noise and light pollution
6. Require building designs to be adapted to be resilient to climate change impacts like overheating

24. Do you disagree with any of these opportunities? Tick all that apply.

- No response

25. If you have any other thoughts on how we could use the Joint Local Plan to give residents and visitors the opportunity to live healthy lifestyles, please write them here.

- No response

26. If you have any other thoughts on how we could use the Joint Local Plan to keep residents and visitors safe from pollution, flooding and the effects of climate change, please write them here.

- No response

Jobs and Opportunities for Innovation

27. Please select the THREE opportunities that are most important to you.

1. Plan jobs near homes and homes near jobs
2. Support working from home and community based work hubs/ facilities
3. Provide employment opportunities for innovation in Science Vale
4. Work to support innovation in Science Vale like the fusion work at Culham Science Centre, and space technology and vaccine manufacture at Harwell
5. Support the 'circular economy' and businesses working towards a greener future
6. Support rural land-based businesses, the local food economy and rural tourism

28. Do you disagree with any of these opportunities? Tick all that apply.

- No response

29. If you have any other thoughts on how we could use the Joint Local Plan to cater for future working styles and patterns, please write them below.

Whilst we support "Plan jobs near homes and homes near jobs" we would caveat this support by pointing out providing homes near employment centres is **only** effective if those homes are occupied by those working in the centres and there are effective, cheap, low-carbon shuttles or other public means of travelling between work and home.

30. If you have any other thoughts on how we could use the Joint Local Plan to help ensure there are valuable and rewarding jobs in the districts, please write them here.

- No response

Any other thoughts?

31. Have we correctly summarised the issues, challenges and opportunities for the Joint Local Plan?

- Yes
- No
- Don't know

If you've said no, what do you think we've missed?

Whilst we have responded with a qualified yes. However, two 'super' issues need explicit recognition:

- Some issues are more important and urgent than others – how will they be prioritised?
- The land area of the two districts is too small to accommodate the competing requirements of land for (a) actions to reduce the net CO₂ emissions from the district, (b) land for off-setting the CO₂ impact of constructing new homes, and (c) maintaining the countryside with its essential contribution to food security, biodiversity and amenity.

32. Finally, do you have any other comments?