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23 February 2024

Dear Planning Team,

Joint Local Plan Preferred Options consultation – CPRE Response

CPRE South Oxfordshire and Vale of White Horse Districts welcome the opportunity to make a joint response to this consultation.

We respond in the format of the full consultation survey and a copy of this response is below. As our response includes formatting such as bold, bullet points, colours and diagrams to highlight points we have been unable to enter our response as comments on the survey, as such formatting is not permissible, but we have uploaded this document as an attachment on the portal.

We highlight that we are still absorbing some of the detail in the extensive supplementary documentation to this consultation and would welcome the opportunity to feed through any additional comments as the Plan progresses.

Do contact us if there is any aspect of our response you wish to discuss.

Yours faithfully,

Lynda Moore
CPRE Oxfordshire, Planning Co-ordinator

1 Introduction	
2 About the Districts	
3 Vision and objectives	
4 Climate change and improving environmental quality	
General comment on CE1-CE5	<p>Some of the policies in CE1-CE5 are very technical in nature. CPRE is concerned to make sure that;</p> <ul style="list-style-type: none"> a) The intent of the policy is made clear with explanatory notes, e.g. it must be clear to every reader that CE5 means that, in general, all new houses should have solar panels, and b) The policies are written in such a way that they are future proof and will not become null and void if new (and better standards) are produced.
Policy CE1	<p>Sustainable design and construction CPRE South Oxfordshire and Vale Districts (referred to as CPRE throughout the rest of this document) support this policy.</p> <p>We would prefer to see <i>should</i> replaced with must to prevent any uncertainty. e.g. Policy CE1 - Sustainable design and construction 1) <i>All new development MUST (not should) seek to minimise the carbon and energy impacts of their design and construction. Proposals must demonstrate that they are seeking</i> 2) <i>All new development MUST (not should) be designed to improve resilience to the anticipated effects of climate change. Proposals should incorporate measures that address issues</i></p>
Policy CE2	<p>Net zero carbon buildings CPRE support this policy.</p> <p>We caveat this by proposing that the wording should be strengthened and altered to specifically reference Rooftop solar, & heat pumps.</p> <p>Where '<i>proposals must demonstrate that the amount of on-site renewable energy generation equates to at least 120 kWh/m² building footprint/year.</i>' This would in most cases have to be solar panels on roofs and equates to about 6kWp for a moderate sized house. It should explicitly say this should be solar.</p> <p>The focus in the draft policy and wording of Preferred Option A is that new building should match its energy needs, but there is little encouragement to exceed the needs if and where possible.</p> <p>The preferred Option A says buildings should "generate the same amount of renewable energy as they demand"</p> <p>The policy goes a bit further: "<i>All new housing and non-domestic building proposals should generate at least the same amount of renewable energy (preferably on-plot) as they demand over the course of a year</i>"</p> <p>CPRE propose the policy wording should give more explicit encouragement to delivering additional energy where possible e.g. '<i>should generate the same amount or more of renewable energy</i>'.</p>
Policy CE3	<p>Reducing embodied carbon CPRE support this policy.</p>

	<p>Reducing Greenhouse Gas emissions is national policy (from the Climate Change Act 2008 and subsequent 2019 amendment). The imperative to build zero carbon housing is also specifically identified in the County’s strategy (it is specifically identified in the PaZCO report). It is also supported by a large majority of the previous consultation respondents.</p> <p>We understand the policies were developed by the Bioregional Group at the Council’s request and is well supported by evidence. It is ambitious but shows how Oxfordshire can lead the way and we fully welcome this.</p>
<p>Policy CE4</p>	<p>Sustainable retrofitting</p> <p>CPRE support the Preferred option in principle but are concerned it does not specifically refer to sensitive sites/buildings and implies any and all retrofit proposals will be supported. This policy should be caveated with additional wording <i>‘in principle and subject to other policies in this Plan’</i>.</p> <p>It also seems this policy is aimed at housing rather than businesses. The council should consider incentives to encourage businesses to retrofit. Utilised office buildings/warehousing and barns should be included in this policy with , for example, an offer of discounted business rates for 3 years after retrofitting.</p>
<p>Policy CE5</p>	<p>Renewable energy</p> <p>CPRE call for this policy to have a clearly stated “ Rooftops and brownfield sites first” approach to solar energy. Such a policy prevents the unnecessarily sacrificing of viable agricultural land of any grade and landscapes.</p> <p>The plan itself recognises this, stating on p58 “<i>Adverse impacts can arise if renewable energy schemes are not suitably located, i.e., this can result in adverse visual and landscape impact</i>”. A clearly stated, rooftops and brownfields first approach would mitigate this.</p> <p>Rooftop solar must be decreed on all new buildings (except in exceptional circumstances).</p> <p>Installation on fields should only be considered when it can be demonstrated that there is no suitable roof capacity available.</p> <p>We note that “<i>The council encourages schemes for renewable and low carbon energy generation and associated infrastructure at all scales, including domestic schemes and innovative schemes.</i>” We question that an all scales approach is appropriate.</p> <p>We ask that renewable energy installations on greenfield sites should only be supported in very exceptional circumstances and only after a sequential test be applied which prioritises brownfield land and rooftops. Potential adverse impacts of developments on food production, landscape and nature should be given high weight.</p> <p>CPRE strongly welcome the commitment to produce a spatial strategy but require detail on how this will be undertaken.</p> <ul style="list-style-type: none"> • How can stakeholders/communities engage? • Will it quantify the amount of solar energy they are aiming for? • Will it quantify rooftop/brownfield potential? <p>By not specifying any quantifiable target for solar energy for South and Vale (although it exists in Pathways for Oxfordshire as a whole) this puts no limit on the amount that might be applied for and granted.</p> <p>The phrase in paragraph 3 ‘<i>or reversed at the end of the life of the renewable energy installation</i>’ should be deleted. This would allow renewable energy no matter how much</p>

	<p>damage it caused for forty years as long as it ended when the renewable energy was removed (if it ever was).</p> <p>The current SODCLP policy says that installation would not be allowed in the first place if it had the listed significant adverse effects.</p> <p>Permission should not be granted if there would be significant adverse effects AND the site should be completely cleared including the foundations when permission no longer exists.</p> <p>CPRE would also be opposed to wind turbines within our districts due to their extreme visual impact on the landscape. Vale and South are too “crowded” for turbines to be acceptable except ,at most, at the minimal height farmers use for their own needs. Subject to consideration of specific local impacts, CPRE strongly supports measures to improve insulation, ground/air/water source heat pumps, and biomass.</p>
Policy CE6	Flood risk and drainage
Policy CE7	<p>Water efficiency CPRE believes this policy should be strengthened to encourage developers to achieve a lower per capita water use than 100 lt/person/day. This policy should also apply to houses which want extensions and renovations.</p> <p>We particularly support para 7: <i>‘The council will apply Grampian conditions, where appropriate, to ensure that adequate sewerage capacity is in place before new homes are occupied in order to protect water quality.’</i></p> <p>Option D is more ambitious, but unproven and would make rainwater harvesting and grey water recycling mandatory on site allocations/major developments. We support further technical feasibility work being undertaken to support this option in the future.</p>
Policy CE8	Water quality and wastewater infrastructure
Policy CE9	<p>Air quality CPRE support this policy, however, it will only work in tandem with an integrated and upgraded road and public transport policy.</p>
Policy CE10	Pollution sources and receptors
Policy CE11	<p>Light pollution and dark skies CPRE strongly welcomes this policy in principle, as we have long argued in favour of a positive policy on maintaining dark skies as well as a reactive one of minimising light pollution.</p> <p>Nonetheless, we would like the wording to be stronger:</p> <p>Policy CE11 - Light pollution and dark skies 1) <i>All proposals for development should be designed to minimise light pollution, from both external lighting and as a consequence of light leakage (i.e. visible light transmittance) from the interior of buildings.</i></p> <p>External lighting should include both fixed, security and mobile lighting. For example, to address the issue of mobile flood lights promoted for horse arenas & sports. (Also to be referenced in the Healthy Spaces sports facility policy.)</p>

	<p><i>'principles to reduce internal light spill through glazing'</i> in para 5 should not only apply to area E1.</p> <p>We also require further time to fully assess the policy map in the supplementary documentation and wish to reserve the ability to comment further as the plan progresses.</p>
Policy CE12	<p>Soils and contaminated land CPRE welcome this policy.</p> <p>In 1d <i>'respire'</i> should be replaced by <i>'develop and thrive'</i>. We also request the policy should state that development should be avoided on 3b agricultural land.</p> <p>However, we seek a new, separate policy on Peat and soil carbon. Peat must be recognised and protected as a carbon store for combatting climate. The Oxford Local plan 2040 includes a brand new policy R6 on Soil and Carbon, where peat is specifically mentioned. South and Vale should include policy and mapping within this plan.</p>
Policy CE13	Minerals safeguarding areas
	<p>CPRE CONSIDER POLICIES RELATING TO NATURE RECOVERY, HERITAGE & LANDSCAPE (Section 12) SHOULD BE MOVED HERE- GIVING THEM A GREATER PRORITY IN THE PLAN</p>
<p>5 Spatial strategy and settlements</p>	
Policy SP1	<p>Spatial strategy CPRE welcome paragraph 2 on the Green Belt. Where the policy states it will <i>'maintain the openness of the Green Belt'</i> we ask that the Council includes working to enhance the beauty and accessibility of the Green Belt</p> <p>On page 105 it is stated that: <i>'We are reviewing the potential for any additions to the Green Belt'</i>. We agree that there is no need for a Green Belt review as there are no exceptional circumstances to justify this. Any review in terms of Green Belt extensions should include a review of the potential for a Didcot Green Belt.</p> <p>We would also call for consideration to be given to the extension to the Chilterns National Landscape boundary. https://www.chilternsaonb.org/news/chilterns-aonb-boundary-review-project-update/</p> <p>We suggest the removal of some wording: <i>8) Development in the countryside, including areas outside of existing built-up areas, will not be appropriate unless specifically supported by other relevant policies as set out in the development plan or national policy, for example we will support rural exceptions site housing and rural workers' dwellings to come forward.</i> These Rural Exception sites & rural workers' dwellings are addressed within specific policies, they do not need promoting in the spatial strategy.</p>

Policy SP2	<p>Settlement hierarchy CPRE require further clarity and information to be able to comment on this policy. We seek :</p> <ul style="list-style-type: none"> • the published survey information supporting the settlement assessment, • sight of the settlement maps, • the definition of 'backland' development, • understanding of why SODC Tier 2 settlements seem to be completely different types of settlement to VoWH Tier 2 settlements and • understanding on why Tier 3 settlements shouldn't have backland development or sub-division of a building. <p>Additionally, CPRE note that Western Valley parish is not listed as a settlement. As this parish is in the Vale, it makes sense to list it separately, rather than include it within Didcot.</p>
Policy SP3	<p>The strategy for Didcot Garden Town CPRE consider the 'revised Didcot Garden Town Delivery Plan' referenced here as inadequate in detail. The policy references a 'Didcot Garden Town Masterplan' which it says 'will' do this and 'will' do that. We need to see this plan before commenting further.</p> <p>We seek paragraph 3 , points (g) and (h) to also include the use of public bridleways, or upgrading public footpaths, and opportunities to link current Public Rights of Way. Safe routes for equestrians must be considered and equestrian friendly surfaces used.</p>
Policies SP4 to SP9	<p>Strategies for Abingdon-on-Thames, Faringdon, Henley-on-Thames, Thame, Wallingford and Wantage CPRE do not consider these policies make adequate provision for equestrians. Where cycleways include the use of public bridleways, or upgrading public footpaths, & opportunities to link current Public Rights of Way, safe routes for equestrians must be considered and equestrian friendly surfaces used.</p>
6 Housing	
Policy HOU1	<p>Housing requirement CPRE:</p> <ol style="list-style-type: none"> a. Welcome no expansion of the housing requirement or strategic sites. We consider the current high levels of growth have placed a huge burden on our communities and countryside and need time to be absorbed. b. Support the Council in not taking any more of Oxford's 'unmet need'. c. We still consider the requirement for an additional 17,000 homes in South Oxfordshire, with a further 14,390 in the Vale of the White Horse excessive and that Oxford could do more to manage its own need. We therefore urge a constrained approach be adopted and that further consideration is given to Option C on Policy HOU1– reversion to the Standard Method only, without the Oxford overspill previously agreed. d. Welcome the removal of the Chalgrove site which would have been an unsustainable location for major development. We would like to see a similar review of the sites that were allocated inside the Oxford Green Belt in the previous plan and potential redesignation as Oxford Green Belt.
Policy HOU2	Sources of housing supply

	<p>CPRE welcome the removal of the Chalgrove site which would have been an unsustainable location for major development. The previous Local Plan includes sites previously in the Oxford Green Belt, namely:</p> <ol style="list-style-type: none"> 1. Berinsfield Garden Village 2. Land adjacent to Culham Science Centre 3. Land south of Grenoble Road 4. Land at Northfield 5. Land north of Bayswater Brook <p>We seek review of all these sites, and potential re-designation as Oxford Green Belt.</p> <p>CPRE find the numbers and tables in this policy confusing. We would like to see an additional table with allocated sites, without planning permission (presumably carried forward from the previous plan).</p> <p>The housing delivery trajectory for South Oxfordshire seems strange; the housing trajectory goes down but the housing requirement goes up! We question this and require clarity.</p> <p>Specifically, CPRE requests clarification that the full complement of permitted housing at Valley Park is included in the new plan: Table 3) lists Valley Park as a site saved from the existing Local Plan 2031 with 2550 allocated houses. The Outline Planning permission is for 4254 houses, and it not clear if the additional 1794 houses are accounted for anywhere. Presumably the Valley Park allocation is included in table 2) of HOU2, either as 2550 or as 4254 houses, and as a Site with Permission or as an allocation. Can clarification be provided in relation to the “extra” 1794 houses, are they included as a windfall?</p>
Policy HOU3	<p>Affordable housing CPRE support the target of 50% affordable housing (and 25% social rent). However, we require more detail to comment further on this policy.</p>
Policy HOU4	<p>Housing mix and size CPRE require numbers to be given to comment. We welcome the research into extensions & the possible link to the dwindling stock of smaller properties and would support a policy if needed to reverse the trend.</p>
Policy HOU5	<p>Housing for older people CPRE require numbers to be given to comment.</p>
Policy HOU6	<p>Self-build and custom-build housing</p>
Policy HOU7	<p>Affordable self and custom-build housing</p>
Policy HOU8	<p>Replacement dwellings in the countryside CPRE welcome this policy and support this wording: <i>2) Replacement dwellings outside the built-up areas of settlements must not have a greater impact on the character of the site and its surroundings than the existing dwelling due to its scale, height, size and form. Light coloured materials that are more visible in the landscape should be avoided. Consideration must be given to the amount of glazing used in any replacement dwelling, and the impact of glazing on reflectivity and light pollution. In the National Landscapes</i></p>

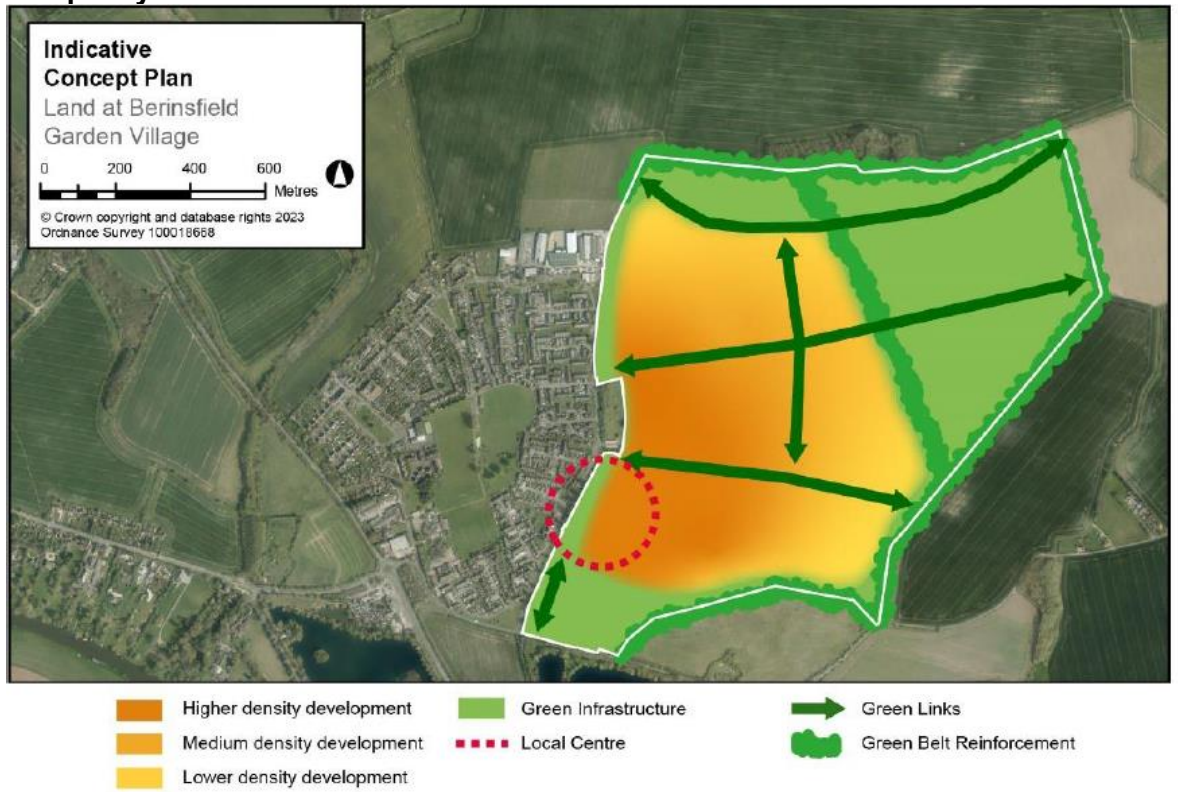
	<i>(formerly AONBs), the councils will give great weight to conserving and enhancing the natural beauty of the area, wildlife and cultural heritage.</i>
Policy HOU9	Sub-division of houses
Policy HOU10	Meeting the needs of Gypsies, Travellers and Travelling Showpeople There is a proposal for a site in Berinsfield. CPRE seek clarity on whether this requires a loss of Green Belt land, or is this expected to be delivered within the Berinsfield Garden Village scheme?
Policy HOU11	Proposals for/affecting Gypsies, Travellers and Travelling Showpeople's sites
Policy HOU12	Rural and First Homes exception sites CPRE seek this policy to specifically reference and consider the cumulative impact on a community and facilities (remembering that 1ha could contain 20-40 houses). We are concerned that this policy, unlikely that in the current SODC LP makes no mention of small scale . This policy should retain the current SODC LP wording: Policy H10 1. <i>Small-scale affordable housing schemes will be permitted outside settlements, provided that:</i> Policy H10 1.i) <i>it can be demonstrated that all the proposed dwellings meet a particular local need that cannot be accommodated in any other way;</i>
Policy HOU13	Community-led housing development CPRE support this policy in principle , but: <ul style="list-style-type: none"> • the cumulative impact must be considered on a community and its facilities (remembering that 1ha could contain 20-40 houses) and • constraints in relation to landscapes must be included in the wording We seek clarity over whether this policy is this replacing the current SODC policy H8 of development in " <i>smaller & other</i> " villages coming through the Neighbourhood Plan process?
Policy HOU14	Build to Rent proposals
Policy HOU15	Houses in Multiple Occupation
Policy HOU16	Residential extensions and annexes CPRE support this policy with the caveat that it should be stated that all extensions and annexes should come up to the high energy and water standards outlined previously, and, wherever possible, the existing building. We note the wording " <i>within the Green Belt, and within the countryside, the extension or the alteration of a building would be no greater than 40 percent of the volume of the original dwelling</i> ". We seek clarity on the source of this 40% figure.
Policy HOU17	Rural workers' dwellings CPRE consider a limit to the number should be imposed and some guarantee that these will be retained for the use of rural workers in perpetuity.

	<p>This policy needs to be much clearer. We suggest wording from the current SODC LP H19: Rural Workers' Dwellings be reinstated:</p> <p>Policy HOU17 - Rural workers' dwellings</p> <p>1) <i>Applications for rural workers' dwellings within the countryside will be permitted where:</i></p> <p>a) <i>the applicant has demonstrated that there is an essential existing need for a rural worker to live at, or in close proximity to their place of work in order to be readily available at all times to enable the effective, safe and viable operation of the rural enterprise;</i></p> <p>b) <i>the applicant has demonstrated that the rural enterprise is economically and environmentally sustainable and has been established for at least 3 years is likely to remain financially viable for the foreseeable future;</i></p> <p>c) <i>the number of properties dwellings provided is proportional to the proven needs of the rural enterprise; and</i></p> <p>d) <i>the proposed dwelling respects the landscape, rural character and dark skies.</i></p> <p>e) the size and scale of the dwelling is proportional with the needs of the rural enterprise; and</p> <p>2) <i>If a rural workers' dwelling is essential to support a new rural enterprise that has been operating for less fewer than 12 months, planning permission will only be provided for the first three years for temporary structures such as a caravan, a low-impact wooden structure, or other temporary accommodation which can easily be dismantled or removed.</i></p> <p>The inclusion of point e) is in our opinion vital as properties with an agricultural tie, when they are sold in the future, they must be marketed at a substantially reduced price to agricultural workers. A large dwelling could make its continued restriction to agricultural occupancy in the future unaffordable. CPRE have seen applications for Rural Workers' Dwellings with 4 bedrooms and a basement gym (later withdrawn) and other applications for large dwellings amended to be reduced in size based on current policy point (e), which must be retained.</p>
<p>7 Jobs and Tourism</p>	
<p>Policy JT1</p>	<p>Meeting employment needs</p> <p>CPRE support the view: <i>'Our evidence so far indicates that our requirements can be met on our existing allocations and we don't need to allocate any new sites.'</i></p>
<p>Policy JT2</p>	<p>Protecting our employment sites</p> <p>CPRE support this policy but there is no mention of building sustainable office/ warehousing space and we consider this an omission. There is a lack of clarity on use of solar panels and other improved environmental strategies (like roof gardens/beehives etc) for office/warehousing locations which needs to be addressed.</p> <p>Existing 'employment space' either unused or no longer fit for purpose should be prioritised for rebuilding/ extending/ modernising before any new 'future sites' are considered.</p>
<p>Policy JT3</p>	<p>Affordable workspace</p> <p>CPRE would like to see this policy strengthened. <i>"Proposals for commercial uses are encouraged to include an element of affordable workspace"</i> are not likely to be included unless mandatory.</p> <p>Affordable office space can and should be delivered both in town centres and in <u>existing</u> out of town locations (within out of town shopping centres for example). The principle of 'hot-desking' and other shared office space possibilities to make it affordable should be considered. Just as with housing developments with affordable housing, the mandatory</p>

	creation of smaller or shared office space within larger developments or redevelopments is a feasible and realisable goal.
Policy JT4	Community Employment Plans
Policy JT5	<p>Supporting the rural economy CPRE support diversification for farmers, in principle, but this should be for an underlying agricultural basis only. This would prevent an open door for farmers to 'diversify' for a year or so, then use 'new buildings' for an alternative set of uses.</p> <p>CPRE are concerned that a blanket acceptance of equestrian activities for which there is limited demand gives license to construct buildings on that pretext and then claim other uses for redundant buildings. We support point 1f) <i>"it is supported by a business plan demonstrating that it is viable into the future, especially where such proposals include the erection of new buildings."</i> We seek clarity on how this will be evaluated and enforced.</p> <p>CPRE consider this policy fails to address the needs of equestrians, and harm that can be caused to PRowWs. We propose the following additional wording in red on points 1 (d) and (e) :</p> <p><i>d) it has minimal impact on local communities, particularly in relation to levels of disturbance from increased traffic movements, and vehicle parking, and damage caused to Public Rights of Way;</i></p> <p><i>e) it maximises opportunities to access the site by sustainable modes, including via public transport, walking cycling or equestrians.</i></p> <p>We propose the following additional wording in red on points 4 (b):</p> <p><i>b) the proposal does not unacceptably impact upon the landscape character, highways (including Public Rights of Way), and the amenity of its neighbours.</i></p>
Policy JT6	<p>Supporting sustainable tourism and the visitor economy CPRE have reviewed this policy against the current SODC LP Policy EMP11: Tourism . On this basis we recommend the following wording in red should be added on para 2 and 5:</p> <p><i>2) In locations outside existing settlements*, new small-scale tourist-related development, will be supported which:</i></p> <p><i>a) respects the landscape character, visual quality, biodiversity, dark skies and tranquillity of the countryside, particularly within the National Landscapes;</i></p> <p><i>5) Support will be given to development proposals that improve public access via public footpaths, public bridleways & restricted byways to nature green spaces & the countryside via walking or cycling routes and trails (including the National Trails, National Cycle Routes and the Strategic Active Travel Network), or through restoration of the local canal network or navigable sections of the local river network.</i></p> <p>We seek that the whole of Policy EMP11: Tourism para 2 from the current SODC LP is included as this would cover the use of land for equestrian purposes – show jumping, cross country & dressage arenas, not associated with an actual equestrian centre.</p> <p><i>"2. Outside the above locations, small-scale development to support the visitor economy, including farm diversification and equine development, will be supported provided that proposals are in keeping with the scale and character of the locality and</i></p>

	<p><i>would not adversely affect heritage assets or their setting. Larger developments will only be supported in exceptional circumstances, for example to sensitively re-use a historic building, or to proportionally support or enhance enjoyment of a significant and established visitor attraction where this cannot reasonably be achieved from a town or village location.</i></p> <p>This policy mentions “<i>rural areas</i>” and we require clarification of which settlements these are.</p>
Policy JT7	<p>Overnight visitor accommodation</p> <p>Clause 3) is in favour of small scale developments, but is silent about large scale developments. CPRE suggest that the footnote is expanded to say: *** For example, <i>small scale</i> camping or touring caravan sites, eco-lodges, shepherds’ huts. <i>Large scale sites which include a proportion of permanent facilities, will not be supported.</i></p> <p>Alternatively, the wording from CP31 of LPP1 should be adapted for inclusion: “Larger developments will only be supported in exceptional circumstances, for example to sensitively re-use a historic building, or to proportionally support or enhance enjoyment of a significant and established visitor attraction where this cannot reasonably be achieved from a town or village location.”</p> <p>Additionally, there should be a reference to avoiding harm to National Landscapes (formerly AONB) and other protected sites such as SSSI, either by modification to 3a) or an additional subclause to 3).</p> <p>Alternatively, we ideally seek it is made clear that the provisions in the new policy HOU5 clause 3) also apply to developments allowed under JT7 clause 3)</p> <p>We seek clarity whether clause 8) refer only to existing sites with seasonal planning restrictions, or might it apply to new sites. If it is meant to cover new sites, then it would be better expressed as a sub-clause to 3).</p> <p>Either way, CPRE questions how such restrictions would be monitored, and suggests that it would be better not to allow such relaxation at all.</p>
8 Site allocations and Garden Villages	
Policy LS1	<p>Proposals for Large Scale Major Development</p> <p>CPRE query why the allocation on the site ‘west of Wallingford’ is included when the development to the south of Wallingford (550 houses which is just beginning) is not mentioned at all?</p>
Residential Focused Allocations:	
Policy AS1	<p>Land at Berinsfield Garden Village</p> <p>CPRE question why about half of the proposed area is designated ‘green infrastructure’, figure 2. We consider this redesignation from Oxford Green Belt in the previous Local Plan make this land vulnerable to development in the future. This comment also applies to all the large-scale sites proposed for the Green Belt.</p>
Policy AS2	<p>Land adjacent to Culham Science Centre</p> <p>CPRE S& V flag up a discrepancy between the policy plan map and the developers plan map.</p>

The policy shows this:



But the developer shows this:

https://berinsfieldgardenvillage.com/wp-content/uploads/2024/01/01478_Berinsfield-MFD-Public-Exhibition_Exhibition-Boards.pdf



	It is clear that the developer is showing development in the area classified as Green Infrastructure in this policy and this must be rectified to protect the Green Infrastructure.
Policy AS3	Land South of Grenoble Road, Edge of Oxford
Policy AS4	Land at Northfield, Edge of Oxford
Policy AS5	Land at Bayswater Brook, Edge of Oxford CPRE seek clarification on the parcel of land north of Sandhills that is being removed from the allocation. Can you confirm that this will be re-classed as Green Belt land?
Policy AS6	Rich's Sidings and Broadway, Didcot
Policy AS7	Didcot Gateway, Didcot
Policy AS8	North West of Grove, Grove
Policy AS9	North West of Valley Park, Didcot
Policy AS10	Land at Dalton Barracks Garden Village, Shippon
Currently Allocated Sites Proposed Not to be Retained in the Joint Local Plan	
Strategic Employment Allocations	
Policy AS11	Culham Science Centre CPRE require the wording on this policy to be more robust <i>"mitigate as far as possible the impact on the character and appearance of the surrounding countryside and the Registered Parkland associated with Nuneham House;"</i> Ideally, "must avoid" should replace <i>"mitigate as far as possible"</i> . Failing this, consideration must be given to what happens if mitigate cannot occur, how do they recompense?
Policy AS12	Harwell Campus CPRE propose the following amendment: Point 3 states: 3) Proposals must demonstrate how they contribute towards a comprehensive approach to development and that they: e) ensure any external lighting scheme has a minimal impact in terms of light pollution. Point e) should be included in all industrial areas.
Policy AS13	Berinsfield Garden Village
Policy AS14	Dalton Barracks Garden Village
Policy AS15	Harcourt Hill Campus
Policy AS16	Land at Crowmarsh Gifford, Benson Lane
9 Town Centres and Retail	

Policy TCR1	Centre hierarchy CPRE call for greater clarity in relation to classifications. These Tiers seem to be contrary to the settlement hierarchy For example, Watlington and Wheatley are both categorised as Tier 2, yet Watlington as a Local Service Centre and Wheatley as a Village/Local Centre.
Policy TCR2	Strategy for town and local service centres CPRE require clarity on the specific centres being referenced to comment further.
Policy TCR3	Retail floorspace provision (convenience and comparison goods)
Policy TCR4	Retail and service provision in villages and local centres CPRE would like to see the comment “ <i>Farm shops will be supported</i> ” caveated with relation to consideration for landscape and transport impacts and we would point to Diddly Squat Farm in West Oxfordshire as an example of the need for this.
10 Well-designed places for our communities	
Policy DE1	High quality design CPRE seek the following additions: Movement and connectivity Where a development includes current PRoWs, this policy should seek to link current PRoWs and seek to upgrade the PRoWs status e.g. FP to Bridleway and use an equestrian suitable surface and create multi-user paths to encourage Active Travel & use for leisure purposes (all good for health). Built form <i>5) All development must achieve high quality design that: f) is designed to take account of possible future development in the local area within the plan period, including providing links to neighbouring land (without development preventing ransom strips) where they may be needed in future;</i> Climate and sustainability A bullet point in section 6 to say the build should minimise domestic and commercial water use. Additional in 6(c) <i>‘and maximises renewable energy generation through rooftop solar panels’</i> .
Policy DE2	Local Character and Identity
Policy DE3	Delivering well-designed new development
Policy DE4	Optimising densities CPRE feel that this policy is unambitious and “optimising” density on a case by case basis is open to manipulation. We seek a quantified target density for each category of development. 125 d.p.h. in built up areas as ITRC recommended (and where Lord Rogers said 68 d.p.h. was an absolute minimum), and 70 in the countryside, only falling below in exceptional circumstances . There are many examples of well designed high density developments. For example, within Tier 3 & 4 settlements e.g. rows & clusters of former farm workers dwellings.

	This policy needs to be more ambitious in its targets and we reference the PaZCo 2021 report, P149: “ <i>Minimising the footprint of all new development by optimising housing density while also building in connected green and blue spaces. In typical urban extensions, housing densities of 60 dwellings per hectare should be possible with good design, use of mid-rise 3 and 4-storey dwellings, compact developments with a variety of services and amenities, and a shift away from private car ownership towards more active travel, public transport and shared car use to minimise land needed for car parking.205 Much higher densities are possible in urban centres.</i> ”
Policy DE5	Neighbouring amenity CPRE fully support, but ask point f is amended to read: f) external & security lighting.
Policy DE6	Outdoor Amenity Space CPRE are concerned that this policy will require a lot of work to enforce from already overstretched officers. This policy seems to go against the Optimising densities policy and more detailed guidance is needed. When a house is extended and a 2-bedroomed property becomes a 3 or 4 bedroomed place, the size of green space doesn't expand, if anything it's likely to decrease. Not all people want big gardens and this policy is likely to increase the cost of a property and lead to the proliferation of unaffordable executive homes. The insistence on an outdoor seating space, whether the occupant wants it or not, is likely to result in wasting land and difficulties in upkeeping properties.
Policy DE7	Waste collection and recycling
11 Healthy Places	
Policy HP1	Healthy place shaping
Policy HP2	Community facilities and services
Policy HP3	Health care provision
Policy HP4	Existing open space, sport and recreation facilities CPRE feel this policy is omitting protection for PRoWs. It should state that if development will include current PRoWs they are enhanced and opportunities must be taken to improve them, upgrade their status, and if bridleways use an equestrian friendly surface.
Policy HP5	New facilities for sport, physical activity and recreation CPRE support this policy in principle but caveat that Green Belt considerations must be specially included.
Policy HP6	Green infrastructure on new developments
Policy HP7	Open space on new developments
Policy HP8	Provision for children's play and spaces for young people

	<p>Whilst CPRE support this policy in principle it should give consideration to current provision to prevent overprovision resulting in the chance to optimise density being missed.</p> <p>We sight Chinnor as an example: Three adjacent sites came forward at different times the last one (situated between the other two) did not need to provide a play area due to the proximity of the play areas in the two adjacent developments.</p>
Policy HP9	Allotments and community food growing
Policy HP10	Watercourses
<p style="text-align: center;">12 Nature recovery, heritage and landscape</p> <p style="text-align: center; color: red;">CPRE would like to see a policy here which specifically states the aim to protect the general countryside (not just designated areas). We consider this an omission in this section.</p>	
Policy NH1	<p>Nature recovery There are three major headings here, all slightly different. We propose consideration should be given to separating BNG from Features to Support Wildlife.</p> <p>BNG CPRE would prefer the BNG target to be 25%, but as a minimum it should be in line with the Oxfordshire Local Nature Partnership's recommendation of 20% or above.</p> <p>Features to Support Wildlife CPRE supports the policy "Features to Support Wildlife", and notes:</p> <p>Swift bricks are a universal nest brick for small bird species and should be installed in all new-build developments including extensions, in accordance with best-practice guidance such as BS 42021 or CIEEM. This is supported by national planning guidance NPPG Natural Environment 2019 paragraph 023, which in particular mentions the value of swift bricks. Artificial nest cups for House Martins may be proposed instead of swift bricks where an ecologist specifically recommends it.</p> <p>Existing nest sites should also be protected and retained, as these are not given any value by the DEFRA biodiversity net gain metric calculation so also need their own policy. Building-dependent species return to traditional nest sites year after year and find it difficult to locate a new site if they lose it.</p> <p>Swifts are an important species in Oxfordshire with a substantial number of older buildings and suitable areas for foraging, and the RSPB Swift Mapper website (https://www.swiftmapper.org.uk/) demonstrates that they are recorded nesting throughout the county. Other birds which will inhabit swift bricks are also present, such as House Sparrows.</p> <p>Other local authorities are bringing through Local Plan policies which support swift bricks, such as Wiltshire Regulation 19 stage which requires two swift bricks per dwelling (policy 88 on page 246: Wiltshire Local Plan Pre-Submission Draft 2020-2038 (Regulation 19))</p>

	Some of the detail in the Wiltshire policy Biodiversity in the built environment could be used to strengthen the proposed Features to Support Wildlife
Policy NH2	Biodiversity designations
Policy NH3	Trees and hedgerows in the landscape CPRE fully support and welcome this policy.
Policy NH4	Chilterns and North Wessex Downs National Landscapes (formerly AONBs) CPRE propose this policy should include wording “protect the intrinsically dark skies of the National Landscapes”.
Policy NH5	<p>Landscape CPRE support this policy. We particularly support the mention of cumulative landscapes. We would like to see this policy positioned higher up the Local Plan to give it more emphasis and propose the whole section of NH policies should be moved to a higher position and propose after the CE policies.</p> <p>We would like this policy to have additional wording which specifically refers to <i>“the views to and from the National Landscapes (AONBs) should be protected along with the tranquillity and character of the river corridors.”</i></p> <p>The policy should recognise that road traffic noise is the major threat to tranquillity and effort should be made to minimise the effect of traffic and . Additional wording should be included: <i>3) In determining planning applications in or affecting locally designated tranquil areas, the following factors will be considered: c) impacts on users of the public right of way network and other publicly accessible locations.</i></p> <p>Noise reducing road surfaces should also be used where appropriate.</p>
Policy NH6	<p>Valued landscapes CPRE support this policy subject to seeing the detail. We consider this policy to be “ strategic” and would like it to be reclassified as such. We would also like “ settings” to be mentioned in the wording.</p> <p>The policy should recognise that road traffic noise is the major threat to tranquillity and effort should be made to minimise the effect of traffic. Additional wording should be included: <i>3) In determining planning applications in or affecting locally designated tranquil areas, the following factors will be considered: c) impacts on users of the public right of way network and other publicly accessible locations.</i></p>
Policy NH7	<p>Tranquillity and tranquil areas CPRE strongly support this policy in principle, subject to seeing the detailed mapping. We consider this policy to be “ strategic” and would like it to be reclassified as such.</p>

Policy NH8	The historic environment
Policy NH9	Listed Buildings
Policy IN1	Infrastructure and service provision CPRE seek a requirement that new proposals take into account the cumulative impact of new developments in the area – for example traffic flows, health facilities etc.
Policy IN2	Sustainable transport and accessibility CPRE seek a requirement that new proposals take into account the cumulative impact of new developments in the area – for example traffic flows, health facilities etc.
Policy IN3	Transport infrastructure and safeguarding CPRE point out the emerging policy maps only show D’Arcy Dalton Way, the Ridgeway National Trail and the Thames Path. They omit, the Oxford Green Belt Way, the Oxfordshire Way, the Chiltern Way (including the Berkshire Loop – Henley – Crowsley Bottom) and the Shakespeare Way. CPRE propose Pipeline Transport Schemes and Transport Priorities should include: <i>1) The council, working with Oxfordshire County Council and relevant stakeholders, will support the following infrastructure schemes and transport priorities. Development should contribute to the delivery of these schemes and priorities where appropriate: c) protecting former rail facilities and lines for re-use as public transport corridors or for the purpose of active travel and multi-user leisure use (to include equestrians where possible)</i>
Policy IN4	Wilts and Berks Canal safeguarding CPRE welcome this policy and especially the inclusion of equestrian needs.
Policy IN5	Parking standards
Policy IN6	Deliveries and freight
Policy IN7	South East Strategic Reservoir Option (SESRO) safeguarding CPRE propose an amendment to wording of point (h) of this policy: Infrastructure <i>h) include a new route for the diverted Hanney to Steventon road, to include provision for an off-road cycle path multi-user path including equestrian if can link bridleways and improved connectivity to public rights of way;</i>
Policy IN8	Digital connectivity CPRE welcomes this policy in principle. We fully support : <i>2) All proposals for new development must ensure appropriate infrastructure is provided during development, sufficient to enable all properties to be connected to full fibre broadband without any post-development works. Applicants will also be encouraged to demonstrate that there is flexibility in the ducting to future-proof additional connectivity.</i> We seek an additional policy stating where digital connectivity is being introduced, all existing developments with no overhead wires must be connected with underground

cables to protect the visual appearance of the existing development. The shared use of existing poles should be encouraged and new poles must only be used as a last resort.

We seek strengthening of wording on point 7 criteria to recognise and avoid landscape and visual impact.