

Section	Policy	CPRE Oxfordshire comments
Core Policies	CP1: Climate Change	<p>CPRE are supportive of the intent of this policy but would like to see the wording strengthened.</p> <p>CPRE believes that all new development must actively support renewable energy generation—such as rooftop solar panels and heat pumps wherever suitable. This applies to both:</p> <ol style="list-style-type: none"> 1. New Building Developments, and 2. Small-Scale, Community-Based Solar and Wind Energy Projects <p>1. Renewable Energy in New Building Developments</p> <p>Solar Energy Integration: Rooftop solar panels or other climate-positive features (e.g. green roofs) must be installed on all new residential and commercial buildings. Solar energy generation can either be building-specific or contribute to a shared (district) energy network.</p> <p>Design for Solar Efficiency: Site layout, building orientation, and architectural design must prioritise solar energy production wherever feasible. Geographic conditions and heritage context may influence implementation but should not preclude it where possible.</p> <p>Passive Solar Design: Passive design techniques that reduce energy consumption such as maximising natural heating, cooling, and lighting also contribute to climate resilience and must be incorporated where appropriate.</p>

		<p>Green Roofs: Green roofs help regulate heating and cooling loads in buildings and should be encouraged as part of a wider sustainability strategy.</p> <p>Energy Efficiency Standards: High, measurable standards for energy conservation including space heating, water heating, and thermal insulation must be adopted. Cost-effective technologies should be employed, including (but not limited to):</p> <ul style="list-style-type: none">– Ground or air-source heat pumps– Point-of-use water heating– Induction cooktops <p>Retrofit and Renovation: Renovations and alterations to existing buildings should also be subject to energy efficiency and renewable energy requirements, where practical and sensitive to visual or historic contexts.</p> <p>2. Community-Based Renewable Energy Projects Dual-Use Land for Solar and Wind: Small-scale, community-owned solar and wind projects must be designed for multi-use.</p> <ul style="list-style-type: none">– Solar: Sites can be combined with agricultural use (e.g. grazing or crops) or integrated into commercial spaces (e.g. car parks, roadways).– Wind: Similar co-uses should apply, such as agricultural fields or commercial zones like industrial estates and retail car parks. <p>Visual Protections: Renewable energy installations must include safeguards to protect natural landscapes and heritage areas from visual impact.</p>
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		<p>Noise Considerations: Permitting for wind energy projects must take noise into account, including operational time restrictions where appropriate.</p> <p>With regard to strengthening the policy wording, we recommend replacing weaker terms such as “should” with stronger, more directive language such as “must”. For example : Nature Based Solutions: New development <i>MUST</i> prioritise nature-based solutions to address climate change by enhancing biodiversity, improving water management, and increasing carbon sequestration.</p> <p>And</p> <p>Renewable and Low Carbon Energy, New developments <i>MUST</i> support and facilitate, replace should with must and provide guidance on solar panels, heat pumps, and district heating schemes. In addition, guidance needs to be provided to residents for solar panels, heat pumps, and district heating schemes.</p> <p>Finally, we would welcome more detail on what Nature Based Solutions are and what this entails.</p>
	CP2 – Settlement Hierarchy	CPRE would like to raise concerns Chipping Norton is classed as main service centre along with Witney and Carterton as the size of the population and services available is considerably larger in both Witney and Carterton compared with size and scale of Chipping Norton.
	CP3 – Spatial Strategy	<p>The Policy states, “ Due to the location of Burford and Charlbury, within the Cotswolds National Landscape, the scale and extent of development at Burford and Charlbury will be limited in accordance with national policy. We also feel Chipping Norton’s growth should be limited due to the location within the Cotswolds National Landscape.</p> <p>We support the principle within this policy to continue to protect the Oxford Green Belt</p>

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	CP4 – Delivering New Homes	<p>CPRE note that the new method advised in the December 2024 NPPF will be used to assess the unmet housing need within the district.</p> <p>We are concerned that the level of unmet need in Oxford City which West Oxfordshire may be asked to take remains uncertain, although welcome the view from WODC that this can be accommodated on allocated sites. We have raised this concern in our recent response to the Oxford City Local Plan, where we are especially concerned that no further clarity or consultation is proposed prior to Reg19.</p> <p>We welcome the further Spatial options consultation which should only be undertaken when clarity on Oxford City unmet need has been agreed.</p>
	CP5 – Supporting Economic Growth and Local Prosperity	<p>CPRE support the Grampian conditions proposed; that new development can only come forward if all infrastructure requirements are in place and delivered in advance.</p>
	CP6 - Delivering Infrastructure In-Step with New Development	<p>Allow no new developments that rely on draining water into rivers and watercourses.</p> <p>We support the plan approach of Grampian Clauses and ask for wording on this to be reviewed to ensure that no new development is granted permission and allowed to start until the supporting infrastructure is in place, including wastewater capacity and surface drainage to protect new and existing residents and businesses .</p> <p>Wastewater capacity is already inadequate in most areas. Increased need for wastewater treatment can be drastically reduced by requiring greywater recycling and treatment systems.</p> <p>Greywater recycling is already practical to include in all buildings and must be incorporated into many residential and commercial renovations.</p> <p>Requiring attention to greywater in building standards will stimulate further development of household and commercial treatment effectiveness and options.</p>

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		<p>As surface drainage/runoff is exacerbated by impermeable surfaces, primarily paving and roofs, require permeable paving in all developments.</p> <p>Mandate roof water collection systems that are tied into residential or commercial irrigation facilities/devices and/or larger capacity dry wells</p> <p>Water collection/diversion can also be facilitated by shared facilities such as sumps or artificial wetlands (and thereby incorporated into green spaces) in a development.</p> <p>Green roofs can absorb more total rainfall than conventional roofing materials as moisture is used over time by the plants growing there and should be encouraged.</p>
	CP7 – Water Environment	<p>Strongly support greywater reuse and rainwater harvesting.</p> <p>Support wording “ All new development must incorporate measures which address both water supply and demand...”. The proposal is to limit 90L per person per day achieved through water efficient fixtures and fittings and grey water reuse. CPRE strongly support this.</p> <p>Also see comments on CP6 Infrastructure.</p>
	CP8 – High Quality and Sustainable Design	<p>Strengthen wording and change from should to must, “Developments <i>should</i> incorporate renewable energy technologies, sustainable drainage systems (SuDS), and provisions for sustainable transport, such as walking and cycling and electric vehicle infrastructure”.</p> <p>We also refer to our comments in DM21 on density; with good design high densities can be achieved without detriment to the character of the District.</p>
	CP9 – Healthy Place Shaping	<p>We are supportive of this policy. Food production on communal sites / allotments should also be encouraged. We also would suggest the wording “ <i>Fostering a sense of community</i>” precedes the elements listed.</p>
	CP10 – Sustainable Transport	<p>CPRE are supportive of this Policy. Bridleways should not be overlooked and provision for their maintenance and enhancement should be stated, either here or elsewhere in the Plan.</p>

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	Core Policy 12 – Natural Environment	Supportive of the alignment of with the emerging Oxfordshire Local Nature Recovery Strategy
Plan Based policies	Policy PL1 – Cotswolds National Landscape	We support this policy and would refer to any response from Cotswolds National Landscape in relation to any amends.
	Policy PL2 – Oxford Green Belt	CPRE would support an updated Green Belt review, as the most recent survey dates back to 2015. Ideally, this should be undertaken collaboratively with the other district councils. It is essential that any definition of ‘Grey Belt’ is not left open to interpretation by developers. Instead, it must be clearly defined, led by the council, and subject to consultation with all relevant stakeholders.
	Policy PL3 - Conservation and Management of the Windrush Valley	We are generally supportive of the proposal; however, the policy lacks detail on how the proposed development and land management activities will incorporate the recommended conservation and management practices.
	Policy PL5 – Carterton – Witney – Oxford Rail Corridor (CWORC)	CPRE is encouraged by the forward-thinking approach in promoting a Carterton–Witney–Eynsham–Oxford railway. This would not only benefit local communities by improving sustainable transport options but also offer strategic value by linking the major military base at RAF Brize Norton to Oxford and, subsequently, the wider UK rail network, enhancing national defence connectivity.
	Policy PL6 – Blenheim Palace World Heritage Site (WHS)	We are generally supportive of the policy and welcome the emphasis on early stakeholder engagement. The success of this policy will depend heavily on active involvement from officials at Blenheim Palace.
Settlement Strategies	General Comment which	CPRE are generally supportive of the policy and vision but without the identification of specific sites it’s difficult to ascertain what the likely impact will be.

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	applies to all Settlement strategies	
	WIT1 Witney Settlement Strategy	North Witney already experiences significant congestion throughout the day, particularly along the Woodstock Road, Bridge Street, Newland, and West End Road corridor. However, the proposed West End Link Road (WEL2) is unlikely to resolve these issues and, as such, should be removed from the plan. Consequently, the North Witney Strategic Development Area (SDA) should also be reconsidered and withdrawn. (Note the WODC's comments at 7.2.29 & 7.2.31 – 11 years of no progress in getting these two linked projects approved or built).
	CA1 Carterton Settlement Strategy	Expanding Carterton by building a modern town centre, employment parks within the advanced science field (e.g. military) as well as increased housing for the aforementioned, would enable less house building pressure to be imposed on the already over-expanded Witney.
	CN1 –Chipping Norton Settlement Strategy	<p>The plan states there is a high proportion of social housing (17.3%) relative to other parts of the District, though demand remains strong. Affordability remains a key issue, therefore CPRE would strongly encourage WODC to set a higher target for genuinely affordable and socially rented houses in the town to accommodate the growing need for affordable housing.</p> <p>One of the key issues facing Chipping Norton is the volume of HGV traffic passing through the town. This concern is not addressed in the plan, which instead focuses on mitigation measures such as: “Reducing the dominance of vehicular traffic by enhancing pedestrian crossings, exploring further traffic calming, and improving accessibility across gradients and pinch points.”</p> <p>While these measures are welcome, they do not tackle the root cause of the problem. We strongly urge WODC to propose clear solutions to reduce HGV access through the town. One practical option would be the introduction of a weight restriction to divert heavy vehicles away from the town centre. Referring to our earlier points in core policy 3 we wish development to be restricted in Chipping Norton due to its location within or adjacent to the Cotswolds National Landscape.</p>

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<p>Healthy, safe, strong and Inclusive communities</p>	<p>DM1 Key principles for development</p>	<p>CPRE support the intent of this policy but feel that there is too much vagueness and exception built into the wording for it to produce results.</p> <p>We strongly support point 3, Preservation of settlement identity.</p> <p>On point 6, protection and enhancement of the Local Landscape we seek retraction of the wording “as far as is reasonably possible”.</p> <p>On point 7, we strongly support the wording in place; Local green spaces MUST be protected. Exceptional must be truly exceptional and only if development could not be undertaken elsewhere on other sites within the district, which we consider highly unlikely to ever be the case.</p>
<p>Tackling the climate, ecological emergency</p>	<p>DM6 - Renewable and Low Carbon Energy Development</p>	<p>CPRE acknowledge the need to move away from our reliance on fossil fuels and transition to renewable energy, but this cannot be at the expense of our countryside. CPRE is calling for 60% of all solar energy to be generated on rooftops and for all ground mounted solar panels to be banned on Grade 1 & 2 Best and Most Versatile agricultural land. Whilst supporting small scale community energy projects.</p> <p>Therefore, in the Policy DM6 we would like to see greater emphasis on rooftop solar and be clearer on the wording about Best and Most Versatile land.</p> <p>In this paragraph “ Commercial-scale solar developments will be supported in ‘more suitable’ areas, subject to the protection of high-grade agricultural land and biodiversity. In relation to Grade 3 agricultural land, applicants will be expected to confirm whether the land is Grade 3a or 3b. Proposals that 18 incorporate dual land use - such as agrivoltaics or pollinator-friendly planting - will be particularly encouraged. Proposals in areas identified as ‘less suitable’ will need to be robustly justified, including with reference to the criteria used to identify the ‘more suitable’ areas.”</p> <p>The definition of suitable needs to be explained. The wording about high grade agricultural land is not clear and could go further to say no solar panels on Grades 1 and 2 land.</p>

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		CPRE point WODC to the evidence base mapping work undertaken by South and Vale district councils, where sensitivity for renewable energy use, as well as other factors such as tranquillity and dark skies are assessed. We consider such assessments as best practise.
	DM8 - Biodiversity Net Gain (BNG) and Nature Recovery	CPRE welcome the alignment with the emerging Oxfordshire Local Nature Recovery Strategy (LNRS) and are pleased to see policy DM8 is intended to be a key mechanism for delivering the ambitions of the emerging LNRS. However, we would like to see all development, both major and minor, deliver a 20% Biodiversity Net Gain, not just major development sites.
An Enhanced Natural, historical and built Environment	DM12 Light pollution and Dark skies	<p>CPRE are encouraged by policy DM12 but feel it could go a step further by implementing best practice solutions and making the wording stronger from changing ‘should’ to ‘will’.</p> <p>We point the City council to the wording in the Joint South and Vale Local Plan and ask for consideration of this wording in this Plan</p> <p><i>“protect landscape character, dark skies and the natural beauty of the countryside in development decisions”</i></p> <p>Best Practice examples include:</p> <ul style="list-style-type: none"> - Use of LED or maximum energy conserving technologies and fixtures to reduce power consumption with leeway when special conditions suggest otherwise - For localised areas such as paths, roads, walkway, use ground illuminating fixtures to facilitate downlighting - Duration of street and access lighting to be regulated, lighting to be turned off from 12pm to 5am. Sensors could be used to detect vehicles, cyclists, and pedestrians - Reduction in commercial sign night lighting by reduce brightness or turn off completely during night hours.
	DM11 trees and Hedgerows	CPRE acknowledge that WODC feel they could do more in this area and support linkage of policy to LNRS guidance and policies and BNG and Green Infrastructure.

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		<p>Policy must mandate tree and hedgerow inclusion in new developments to the effect of not only replacing destroyed instances but actually INCREASING the net amount of tree and hedgerow cover overall with the goal of a 40% national increase by 2050. Projected tree canopy and hedgerow canopy area can be calculated for 15 years' growth (for instance) when site development plans are submitted. Success is enhanced by requiring developers to maintain the trees, hedgerow plantings, and other mandated green space plantings for a five-year period from completion of the development. Green roofs are another way to increase plant cover and thus affect climate change and must be encouraged, though not mandated, as maintenance may not appeal to all (residential) owners.</p> <p>This should apply to ALL development; not just housing but commercial, retail, leisure, short-term etc.</p>
Attractive, accessible and thriving places	DM21 - Previously Developed Land and Development Densities	CPRE supports the prioritisation of previously developed (brownfield) land for new development and strongly encourages its re-use. New development should also make the most efficient use of land, with a focus on achieving appropriate and sustainable density levels. However, CPRE would like to see housing density targets being introduced to ensure efficient use of land. We consider density target of 70-100 dwellings per hectare can be achieved with good design.
	DM24 - Active and Healthy Travel	We welcome the repeated emphasis on improved provision for walking and cycling. But the plan needs to be clearer on how this will be achieved. For example, in Bampton if you wish to walk or cycle to Aston, the next village, you are forced to use a fairly narrow (and currently potholed) road which carries quite a lot of heavy traffic as well as private cars. There are no pavements outside the village limits. The plan needs to be realistic about what can realistically be achieved.
Meeting the Housing Needs of all	DM27 Mixed and balanced communities	CPRE would like a focus on smaller one and two bedroom homes.
	DM28 Affordable Housing	In general, we are supportive of this policy and are pleased to see a figure of 68% of homes being social rented housing. To enhance this policy there needs to be a definition of 'affordable' we cannot continue with an arbitrary 20% reduction in market rate as this is still unaffordable to many WODC residents. CPRE Oxfordshire are calling for the cost of new affordable homes to be directly linked to average local

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		<p>income, with a mortgage lending ratio being no more than four times the annual income for a two-person household, and affordable rent at no more than 35% of average local income.</p> <p>We would also like the provision of affordable homes in the Cotswold National Landscape to be increased from 40% to 50%, for all development over 5 dwellings, to align with the Green Belt as there is an acute need for more affordable homes within the Cotswold National Landscape.</p>
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