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COUNTY COUNCIL

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Planning Policy
South Oxfordshire & Vale of White Horse
District Councils

By email:
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Corporate Director Environment and
Place: Bill Cotton
Director of Planning, Environment and
Climate Change: Rachel Wileman

4th March 2024

Dear Planning Policy,

Regulation 18 Part 2 Consultation
South Oxfordshire and Vale of White Horse Joint Local Plan 2041

Please see our response on the Regulation 18 Part 2 South Oxfordshire and Vale of White
Horse Joint Local Plan attached. Thank you for the extension of time for our comments till
4th March 2024.

These comments build on those we provided in June 2022 on the Joint Local Plan
Regulation 18 Part 1 Issues consultation and should be viewed in conjunction with those
comments. This response also comments on the some of the supporting documents which
have also been published. We look forward to continued involvement as the process
progresses.

We understand that your Joint Local Plan current timetable is:
- Regulation 19 consultation autumn 2024,
- Submission to Secretary of State spring 2025 and
- Adoption late 2025.

Yours sincerely

Rachel Wileman
Director of Planning, Environment and Climate Change

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Contents

Oxfordshire County Council's response to South Oxfordshire District Council & Vale of White Horse District Council Joint Local Plan 2041 Regulation 18 Part 2 consultation and Supporting Documents

1. Introduction

1.1 The County Council has reflected on the content of the Regulation 18 Part 2 Local Plan in relation its own strategies and policy documents, (references to which can be found towards the end of this response on pages 104-105) and to the Oxfordshire Strategic Vision.

1.2 The County Council is the Highways Authority, Lead Local Flood Authority, the Education Authority, the Minerals & Waste Planning Authority, and has lead roles in other areas such as Public Health and Social Care. We also have a Climate Action team which is able to provide advice on the climate change emergency. Teams from the different parts of the County Council have contributed to this response.

1.3 The response has been coordinated by the Strategic Planning and Infrastructure team which has also contributed to this response. From a strategic perspective, the County Council is interested to comment on the Local Plans in Oxfordshire in a consistent way about issues which need to be addressed by all, having regard to the cross-boundary matters between the districts and city.

1.4 Oxfordshire County Council (OCC) supports the preparation of the Joint Local Plan (JLP) and welcomes the opportunity to formally comment. We last commented at the Issues stage (Regulation 18 Part 1) in June 2022.

1.5 We commend the District Councils for producing the comprehensive and well-presented Regulation 18 document and supporting material and website. The interactive digital map showing where different policies and allocations are located with hyperlinks to the relevant policy should be specifically commended.

1.6 Officers at the County Council have worked with colleagues at the District Councils in developing and advising on policy approaches and draft policy wording for this Regulation 18 Part 2 stage. A significant amount of informal officer input has already been captured in the supporting wording, policy approaches and draft policy wording. We support and recognise the value of this on-going working relationship for positively prepared local plans. County Council officers will continue to work closely with District Council Officers in the coming months as this emerging Joint Local Plan progresses toward the Regulation 19 stage (currently scheduled for Autumn 2024). The Joint Local Plan is scheduled to be submitted to Secretary of State in Spring 2025.

1.7 The County Council is the Highways Authority and as such has prepared the Local Transport and Connectivity Plan (LTCP) in accordance with the statutory requirement to do so. The LTCP contains not only the main document adopted in July 2022, but also several supporting strategies, an Innovation Framework and Area Travel Plans, some of which are already complete and available online. The LTCP includes headline targets as follows, and it is expected that the South Oxfordshire and Vale of White Horse Joint Local Plan 2041 will help in the achievement of these by reducing the need to travel, discouraging individual private vehicle journeys and making walking, cycling, public and shared transport the natural first choice. Throughout this Regulation 18 part

2 Joint Local Plan there are relevant proposed policies which will help towards achieving the LTCP targets below, which is welcomed.

1.8 By 2030 our targets are to:

- Replace or remove 1 out of every 4 current car trips in Oxfordshire.
- Increase the number of cycle trips in Oxfordshire from 600,000 to 1 million cycle trips per week.
- Reduce road fatalities or life changing injuries by 50%.

By 2040 our targets are to:

- Deliver a net-zero transport network.
- Replace or remove an additional 1 out of 3 car trips in Oxfordshire.

By 2050 our targets are to:

- Deliver a transport network that contributes to a climate positive future.
- Have zero, or as close as possible, road fatalities or life-changing injuries.

1.9 There is much alignment between the key themes of the Joint Local Plan and the County Councils Vision and our nine Strategic Priorities. The Joint Local Plan's key themes are outlined on page 14. The Oxfordshire County Council's vision is: *Working in partnership to make Oxfordshire a greener, fairer and healthier county.*

1.10 Oxfordshire County Council Strategic Priorities within our 2022 – 2025 Strategic Plan are:

1. Put action to address the climate emergency at the heart of our work.
2. Tackle inequalities in Oxfordshire.
3. Prioritise the health and wellbeing of residents.
4. Support carers and the social care system.
5. Invest in an inclusive, integrated and sustainable transport network.
6. Preserve and improve access to nature and green spaces.
7. Create opportunities for children and young people to reach our full potential.
8. Play our part in a vibrant and participatory local democracy.
9. Work with local businesses and partners for environmental, economic and social benefit.

1.11 Most importantly, climate action is placed at the heart of the new Joint Local Plan and will help ensure that South Oxfordshire and the Vale of White Horse can help lead the way in reaching net zero carbon targets. We support the broad content of the draft net zero policies, although we note there is a degree of overlap between them. Our specific comments on the proposed Vision and Objectives for this Joint Local Plan are detailed elsewhere in this response.

2. Chapter 3: Vision and 12 Objectives

<u>Strategic Planning and Infrastructure team:</u>

2.1 We welcome and strongly support the vision for carbon neutrality for the districts and this being central to the Joint Local Plan. We support the addition of 'countryside' into the vision which we advised in our Issues consultation response in June 2022. It would be helpful to clarify the differences in the climate action targets of the respective district councils and if they are planned to be further aligned in the Regulation 19 iteration of this plan.

2.2 We note both councils declared a climate emergency in 2019. The County Council declared a Climate Emergency in 2020 and created our <u>Climate Action Framework</u>, setting out how we will achieve our three aims:
1) To become a Climate Active Council
2) To operate at net zero by 2030
3) To enable a zero carbon Oxfordshire ahead of 2050 and as early as possible in the 2040s.

2.3 Regionally, the Pathways to zero carbon Oxfordshire (PAZCO) report was published in 2021 to address how Oxfordshire can achieve net-zero emissions by 2050. There are also policy documents on specific sectors including the Oxfordshire Energy Strategy, which outlines how the county will be at the forefront of energy innovation to foster clean growth to reduce countywide emissions by 50 per cent by 2030 (compared to 2008 levels) and set a pathway to achieve zero carbon growth by 2050. As there is no longer an Oxfordshire Plan 2050 being prepared, it is important that all the district councils in Oxfordshire embed climate action within their emerging Local Plans. Mention of the Oxfordshire Strategic Vision on page 106 is welcomed.

<u>Public Health team</u>

2.4 The vision statement on page 24/25 is welcomed and reflects our earlier request in the response to the Issues consultation in June 2022, for the inclusion of creating districts 'Where residents and visitors can live healthy lifestyles and access greenspace'.

<u>Climate Action team</u>

2.5 We particularly welcome the Joint Local Plan's ambition to achieve carbon neutrality across the area. It would be useful to expand on how this will be achieved through the design and construction of new development.

<u>Transport Policy team</u>

2.6 As already highlighted in our response to the Issues consultation in June 2022, the transport part of the vision is supported but it should make clear that walking, cycling, public and shared transport is the first choice in line with OCC's adopted Local Transport and Connectivity Plan (LTCP). The wording: "or by zero-emission and low carbon transport choices" is vague and implies zero-emission private cars could be considered on the same level of importance as walking and cycling, but these modes do not address issues such as inactivity and congestion.

Objectives for the Plan

<u>Strategic Planning and Infrastructure team</u>

2.7   We broadly support the objectives of the Plan. We particularly support proposed Objective 11 regarding planning for infrastructure in the right places and built at the right time. The County Council has a significant role in infrastructure planning and delivery and easily accessible infrastructure in new developments reduces the need for travel.

<u>Public Health team</u>

2.8   We broadly support the objectives of the Plan with one proposed amendment:

Objective 10 proposes: Ensure that new developments create great places. We would suggest that we want new developments to create <u>great communities.</u>

<u>Climate Action team</u>

2.9   In relation to objective 2, it should be explained in the topic paper how the policies align with the carbon budget targets at the district level.

Objective 3 needs to be clarified as follows: "Strengthen resilience to climate change by designing ~~new~~ buildings and infrastructure in our districts ~~for~~ <u>to withstand</u> extreme weather events, such as flash floods and heat waves, <u>and other disruptions</u>". We should also be designing retrofit schemes in this way too. It should not just apply to new builds.

<u>Archaeology team</u>

2.10   Objective 7 of this section should include the <u>historic</u> environment as well as the built and natural environment. We recommend the following amendment:
7. Cherish and protect natural, <u>historic</u> and built heritage, with policies that make sure the location and design of development respects landscape character and the local distinctiveness of towns and villages.

3. Chapter 4: Climate change and improving environmental quality

<u>Climate Action team</u>

3.1   Our recommendations on the net zero policies are as follows:

- The spatial strategy should be more closely linked to the overall vision and objectives of the plan.

- For consistency and clarity, the policies on net zero should be more succinct and focused (e.g. merge CE1-CE2 and CE3-CE4, reduce the number of separate assessments and incorporate policy sub criteria in HOU8, NH13 and DE1).

- References to the joint net zero pathways set out in PAZO and Oxfordshire Net Zero Roadmap and Action Plan should be included in section 4 to help set the scene.

- Carbon impacts of the proposed growth scenarios should be rigorously tested.

- Local energy efficiency policies will need to be considered against the requirements set out in the latest ministerial statement. BREEAM excellent / outstanding status should be the standard of new build developments.

- As a general rule, policy requirements should be mandatory rather than advisory (subject to viability considerations). The district councils should also provide more detail on how the policies will be applied in the decision-making process (including the steps of the energy hierarchy and whole life cycle assessments).

- Innovative design should be more clearly defined in terms of how development should achieve it. Net zero developments should also be designed to reduce risk (e.g. wildfire) and waste.

- Area-based insetting (ABI) should be considered as an alternative to offsetting. Section 106 funds should also be used to scale up retrofit schemes.

- Standalone renewable energy schemes should be assessed against additional criteria and where mitigation is not possible, compensatory measures should be considered.

- The whole building approach to retrofit should relate to refurbishments and the repositioning of existing buildings (in line with PAS2035).

3.2   Overall, we believe that the proposed policies set out in this section (CE1-CE5) provide a clear and positive framework to mitigate and adapt to the impacts of climate change in South Oxfordshire and the Vale of White Horse. These go well beyond existing policies set out in adopted Local Plans and make significant strides towards the net zero transition ahead of the government's 2050 target.

3.3   We do not have specific comments on the Low Carbon Study at this stage as it is not yet complete, but we very much welcome the outputs of Bioregional's work. We think it would be useful if the Plan could replicate figures 1 and 2 (on page 10 of the study) in the Local Plan so that it can demonstrate progress towards its climate change mitigation and adaptation policies. In addition, we would be grateful if the Plan provide links between the topic paper and Bioregional's work and explain how it has used the

recommendations of this study (taking into consideration the latest ministerial statement of December 2023) to inform the development of the revised policies at the Regulation 19 stage.

3.4 In this section, there should be a clear link to Oxfordshire's overall net zero pathway set out in PAZCO and the Oxfordshire Net Zero Roadmap and Action Plan, including the leading the way scenario. The Local Plan should reference how PAZCO has been used to evidence outcomes and the level of investment required to meet net zero obligations, including the roll-out of neighbourhood-scale approaches to local energy systems (like district heating at Bicester Eco Town and the University of Oxford). Using the Project LEO energy mapping platform as a guide, the Plan should identify potential opportunities to develop local smart energy networks (e.g. energy storage, heat pumps and rapid electric charging) in suitable locations across the two districts, especially where there are potential synergies between growth areas, mobility hubs and the roll out of publicly accessible EV infrastructure (for instance, through the identification of district heating priority zones and energy opportunity areas, taking account of cooling and heating demands).

3.5 Where appropriate and feasible, Section 106 funds should be used (as advocated in Oxfordshire County Council's Guide to Developer Contributions) to support the delivery of net zero programmes and local energy efficiency projects, in line with the standards set out in the LETI Climate Emergency Design Guide[1]. This should be referenced within this section of the plan.

3.6 In line with best practice, major developments (including new builds and refurbishments) in South Oxfordshire and the Vale of White Horse should aim to achieve, as a minimum, BREEAM excellent status (which includes whole lifecycle assessments) and, where possible, an outstanding rating[2]. We welcome the use of voluntary quality assurance methods such as Passivhaus certification (as recommended in the Oxfordshire Energy Strategy).

3.7 In addition, the proposed energy efficiency standards set out in policy CE2 will need to be reviewed in light of the latest ministerial statement of 13 December 2023[3]. The Low Carbon Study should also be updated accordingly.

3.8 Carbon and energy offsetting (as summarised in policy CE2) presents many challenges in Oxfordshire, due in part to the lack of certified options and relatively high implementation costs. We would advise the district councils to consider area-based insetting (ABI) as an alternative to offsetting (as advocated in PAZCO and the green finance strategy of the Oxfordshire Local Nature Partnership) as a means of addressing the residual emissions arising from new development, giving priority to carbon reduction and co-benefit opportunities within district boundaries (and close to existing communities).

3.9 As part of OCC's increased focus on the need for Oxfordshire to develop long-term resilience to extreme weather events and a changing climate we have been working with Oxfordshire stakeholders to develop a Climate Vulnerability Assessment, which

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[1] https://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transport-policies-and-plans/GuideToDeveloperContributions.pdf

[2] Case study examples: Bristol Local Plan, City of London Local Plan and Waltham Forest Local Plan.

[3] Local Energy Efficiency Standards Update (Statement UIN HCWS123). Where these standards go beyond current or planned building regulations, local authorities will need to demonstrate a "well-reasoned and robustly costed rationale" at the examination stage that development will remain viable (subject to appraisal) and the impact on housing supply and affordability will be consistent with the National Planning Policy Framework. Any additional requirements will also need to be expressed as a percentage uplift of the target emissions rate. You will also need to adopt a flexible approach where developments cannot meet the higher standards in relation to appropriate energy infrastructure and access to supply chains.

looks to identify key climate vulnerabilities for Oxfordshire across a broad range of key thematic areas. The Climate Vulnerability Assessment will serve as an evidence base to identify priority adaptation and resilience actions that need to be implemented and will inform the development of an Oxfordshire Climate Adaptation and Resilience Strategy as well as a range of other policies and plans. The vulnerability assessment can support the Joint Local Plan by identifying key locations across the district that are particularly vulnerable to flooding and heatwaves, taking into account key variables such as locations of vulnerable population groups, access to greenspace and the urban heat island effect. We hope to publish the finalised report over the coming months.

3.10   Sustainable energy production will accelerate the transition to net zero. This transition will involve shifting from fossil fuels to a decentralised local energy system, focussed on maximising clean and renewable electricity production (as highlighted through the Project LEO) within close proximity of homes and businesses.

3.11   Energy storage is also an important consideration and cost effective, long duration battery storage could reinforce the grid where there are local power inadequacies, which may otherwise influence the size or location of a particular development and contribute to load levelling of power to and from the grid which would reduce the commercial costs for residents.

3.12   The future decarbonisation and electrification of transport and heating places considerable demands on national and regional energy infrastructure, and at the same time local authorities are pushing to meet Net Zero targets. Local Area Energy Planning (LAEP) is a data-driven and whole energy system, evidence-based approach that sets out to identify the most effective route for the local area to contribute towards meeting the national net zero target, as well as meeting its local Net Zero target. All the local authorities in Oxfordshire are working together to produce Local Area Energy Plans (LAEPs) over the coming years. LAEPs identify potential actions and projects from a range of technologies and scenarios. This information is key to stakeholders being able to identify the most cost-effective preferred plan for how energy can be generated, distributed, stored, traded and used to enable a local area to reach its Net Zero target. The Plan should therefore make reference to future LAEPs.

Policy CE1: Sustainable design and construction

Climate Action team

3.13   We support the standards relating to design and sustainable construction set out in policy CE1.

3.14   Clearer and more direct language should be used (parts 1 and 2) to improve clarity and comprehension. For instance, developers should be required to minimise the carbon and energy impacts of development (in line with option A and the NPPF) and include appropriate climate adaptation and mitigation measures.

3.15   Part 1 should be made clear that principles of high-quality design and sustainable construction will need to be addressed over the whole lifetime of the proposed development, including end-of-life phases (as outlined in the LETI Climate Emergency Design Guide).

- The language should also be more consistent (as it shifts tack from advisory to mandatory requirements).

- Part 2 should be amended to ensure that new developments minimise waste production and natural resources, increase resilience to climate change (e.g. mitigate the risk of wildfires) and maximise carbon storage and sequestration opportunities through nature-based solutions (in line with the recommendations of the PAZCO report). In line with best practice, developers should seek to design out waste (in terms of how materials will be reduced, treated as a resource, and managed) from the outset of the scheme to reduce embodied carbon and export of wastes, as far as practicably possible[4].

- Wildfires pose a significant risk to public health and safety in Oxfordshire. During the summer months there is potential high risk of wildfires across Oxfordshire's natural areas, such as heathland, moorlands and grasslands, which threaten rare habitats and species and potentially the loss of life (evidence is available from the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust). Policy CE1 should require development proposals in and around areas of high risk of wildfire to include measures such as shade and water retention (as advised in the recent Future Oxfordshire Partnership meeting[5]) to prevent the ignition and spread of fire over the life of the development, having regard to the risk to public health and potential damage to significant habitats in the districts.

- Sustainable design and construction is also about protecting and enhancing biodiversity and green infrastructure (e.g. green roofs and carbon sinks)[6].

- We particularly welcome the inclusion of the fabric first approach to building design (as advocated in PAZCO and Oxfordshire Climate Action Framework). For clarity, this approach should be defined in the supporting text. Waste, energy and cooling hierarchies should also be defined in diagrammatic form.

- Part a (2) could usefully refer to the use of permeable ground surfaces and retention of water bodies. For clarity, part b could be widened to include 'incorporation of blue-green infrastructure'.

- In relation to the heat island effect, consideration should be given to the potential vulnerabilities of certain groups to extreme temperatures, such as young children and older adults, in line with the Equalities Act.

- Part 4 reads more like a statement than a policy - it goes without saying that outstanding and innovative design will be supported in principle (as already covered in paragraph 139 of the NPPF). To give it more clout and purpose, developers should be encouraged to achieve innovative design using modern methods of construction (e.g. custom-build modular housing) and smart technologies, such as EV infrastructure, energy storage and low or zero carbon district heating systems, in line with the priorities set out in the Oxfordshire Innovation Framework. The district councils could also encourage high quality

[4] The Guildford Local Plan and City of London Plan provide useful case study examples.
[5] https://democratic.whitehorsedc.gov.uk/ieListDocuments.aspx?CId=636&MId=3110
[6] https://www.ricardo.com/en/news-and-insights/insights/incorporating-net-zero-thinking-into-your-local-plan and Good_Practice_Guidance_-_Sustainable_Design_and_Construction.pdf.

and innovative designs through the use of design competitions, design review panels and design codes[7].

- For clarity and effectiveness, developers should demonstrate how the principle of good design and sustainable construction (see policy CE1) and net zero/energy efficiency standards (set out in policy CE2) will be addressed within the same statement. Requiring developers to submit two separate statements (along with a whole life cycle assessment) appears onerous and may delay project planning. Where possible, statements should be combined to address the elements required in relation to planning applications as set out in policies CE1 and CE2.

Policy CE2: Net zero carbon buildings

Climate Action team

3.16   The broad thrust of this policy is supported, subject to clarifications and suggested amendments.

3.17   Developers should be required to follow the steps of the energy hierarchy in the construction of homes, commercial premises and infrastructure (as recommended in the Oxfordshire Energy Strategy) to reduce demand and embodied carbon, in line with best practice. The text should be amended accordingly. The energy statement should clearly set out how the proposed development has been designed in line with the steps of the energy hierarchy to reduce carbon emissions.

3.18   For clarity, the sub-sections of this policy should be linked together in an opening statement along the lines of: "Proposals will be required to set out how energy will be used to reduce demand and emissions within the proposed development in support of the planning application, in line with the energy hierarchy and the following requirements".

OCC Estates

3.19   OCC Property agrees that there is a likely performance gap between a building's operational energy performance and its design intentions, and therefore supports the aspirations for a policy which goes further than the South Oxfordshire Local Plan DES10 policy given the climate emergency.

3.20   The use of an Energy Use Intensity (EUI) metric could be a tool in achieving the aims of this proposed policy/reducing this performance gap. However, the Future Homes Standard should put new developments on the pathway to net zero carbon (as per the electrification of the heating systems will become net zero by the full decarbonisation of the electricity grid which is scheduled by National Grid for 2035).

3.21   OCC Property has concerns around the deliverability of CE2 in every situation and we would welcome the opportunity to further discuss this draft policy and its application and the future evidence base commissioned (Net Zero Carbon Study) ahead of the Plan's Regulation 19 consultation. A point to be further discussed is the application of such a proposed policy to ensure it is feasible and deliverable.

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[7] For instance, reference could be made to specific guidance on preparing design and site codes (see https://www.udg.org.uk/content/design-codes-net-zero-carbon-and-nature-recovery-%E2%80%93-new-rtpi-paper-and-illustrative-codes).

Policy CE3: Reducing embodied carbon

Waste Strategy and Circular Economy team

3.22   We were pleased to see reference to and support the application of Circular Economy principles in Policy CE3 in relation to reducing the embodied carbon in buildings.

Climate Action team

3.23   We welcome the inclusion of a stand-alone policy on reducing embodied carbon within developments (as the transition to the circular economy aligns with our Climate Action Framework and Strategic Plan). We agree that the measure of net zero should consider the whole life carbon performance (including embodied energy as well as operational energy) in line with LETI and UKGBC definitions.

3.24   Part C should also prioritise the use of recycled and secondary waste materials in line with the provisions of the adopted Oxfordshire Waste and Minerals Plan. Part 1 h should also refer to conservation areas, as well as National Landscapes (formerly AONBs) and on historic buildings. Part 2 should say 'construction equipment (e.g. plant)'.

3.25   In line with best practice, it should be made clear that whole life cycle assessments will be required at the pre application, submission and post construction stages of new development[8]. In particular, this assessment should calculate the expected upfront and downtime embodied carbon of new buildings and full life cycle modelling in both outline and detailed planning applications, setting out the actions that will be taken to reduce these emissions as much as possible throughout the development process to ensure mitigation measures are considered in the design and contract stages. Whole life cycle assessments should also relate to both embodied and operational carbon[9].

3.26   We also think that policy CE3 should make it clear that applicants will be required to demonstrate how their proposals will comply with the circular economy principles and reduce embodied carbon.

3.27   To help implement this policy, we would recommend publishing a joint supplementary planning document (or equivalent) to help guide applications in the assessment of whole life carbon emissions. Policy CE3 should also explain how performance of the proposed development will be monitored and reported. New developments should also be expected to provide adequate and easily accessible storage space and collection systems to support recycling and reuse, in line with best practice.

Policy CE4: Sustainable retrofitting

Public Health team

3.28   We strongly support inclusion of the policy as worded in Option A given the health benefits of retrofitting and the need to improve the quality of the current housing stock.

Climate Action team

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[8] https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance
[9] https://www.taylorwessing.com/en/insights-and-events/insights/2023/07/embodied-carbon-and-the-planning-system

3.29   The recently published Oxfordshire Roadmap and Action Plan sets out a target to bring existing homes up to EPC B or above. EPC ratings are strongly linked to the effectiveness of planning policies[10] and place-based approaches[11]. Extensive retrofit will be required to decarbonise Oxfordshire's existing building stock (at least an EPC rating of at least B and above) in line with Oxfordshire Roadmap and Action Plan targets, with a specific focus on low income and fuel-inefficient households. This background context should be added to the supporting text (along with the actual percentage of greenhouse gas emissions that comes from existing buildings in Oxfordshire[12]).

3.30   We support the principles in this policy to guide the retrofitting of existing buildings and structures (subject to further clarifications and amendments).

3.31   Part 1 should include specific retrofitting measures (particularly heat pumps and rooftop solar PV - as Oxfordshire will be reliant on the deployment of these technologies to help reach the net zero target before 2050, as explained in PAZCO).

3.32   The whole building approach to retrofit should relate to refurbishments and the repositioning of existing buildings as well as extensions (under part 3). The whole buildings approach could also be explained by way of a diagram in the supporting text.

3.33   For retrofit schemes, developers should aim to deliver an energy standard of 100 kWh/m2/year (domestic space heating only) as recommended in the PAZCO report.

3.34   For clarity and effectiveness, it is recommended policies CE3 and CE4 should be merged into a single overarching policy covering both embodied carbon and sustainable retrofitting (due to the strong degree of overlap between carbon reduction and circularity during the whole life cycle of development).

Waste Strategy and Circular Economy Team

3.35   We also support the policy to minimise demolition waste by upgrading existing buildings set out in Policy CE4.

OCC Estates

3.36   Oxfordshire County Council (OCC) Property is supportive of this policy but has some suggestions in ensuring that the next version of this draft is sufficiently practical and flexible for different scenarios as appropriate. Specific further consideration of scenarios involving extensions to buildings is required to ensure policy aims are deliverable.

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[10] https://www.savills.co.uk/blog/article/347511/residential-property/epc-ratings-and-planning-policy--a-comparative-analysis-across-london.aspx
[11] Enabling Locally Led Retrofit Reforms to Scale Up Effective Delivery (EP4, 2023)
[12] Around 40% of our annual energy use comes from buildings, which also contribute around a third of Oxfordshire's total emissions.

Policy CE5: Renewable energy

Climate Action team

3.37   There is scope to reduce the length of this policy through minor editorial changes as suggested below.

3.38   For consistency with the remainder of this policy, part 1 could be reworded as follows. "Renewable and low carbon energy generation and associated infrastructure schemes will be supported at all scales and types etc.

3.39   Combine parts 11 and 12.

3.40   The Local Plan should explain how Part 2 will be applied (for instance, gas boilers and direct electric resistive heating will not be supported) in the supporting text.

3.41   In relation to stand alone renewable energy schemes, the criteria list (part 3) should also include:

- water quality and flood risk, in view of the significant challenges facing Oxfordshire;

- highway and pedestrian safety (in line with the priorities of the Oxfordshire Transport and Connectivity Plan);

- the capacity and character of the landscape (sub criterion a) as well as townscapes;

- geodiversity (sub criterion b); and

- archaeological and cultural heritage (sub criterion d).

3.42   We consider that policy CE5 (parts 3 and 13) is too restrictive in the context of paragraphs 32, 147, 163 and 187 of the NPPF.

3.43   Due to the scale and size of nationally important renewable energy schemes, it will not always possible to address environmental impacts on international nature conservation sites via "avoidance, reduction or mitigation alone" and therefore "suitable compensatory measures may be required…. where adverse impacts on site integrity cannot be ruled out"[13].

3.44   Where mitigation is not possible, compensatory measures should be considered in relation to standalone renewable schemes (in line with paragraph 32 of the NPPF).

3.45   When determining planning applications, one of the key tests is whether the impacts of the proposed scheme can be made 'acceptable' (see paragraph 163 of the NPPF). Applicants may be able to successfully argue that the benefits of obtaining planning permission would outweigh the adverse impacts (e.g. loss of the best and most versatile agricultural land) of the planned development (for instance, due to clean energy supply, reductions in greenhouse gas and other polluting emissions, and contributions towards meeting national renewable energy targets).

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[13] https://assets.publishing.service.gov.uk/media/655dc352d03a8d001207fe37/nps-renewable-energy-infrastructure-en3.pdf

3.36   Changes are therefore necessary to ensure policy CE5 more closely reflects the requirements of the NPPF and EN-3.

3.37   For wind energy and solar energy schemes, the Local Plan will need to explain how subsequent planning applications outside of the designated areas shown on the Policies Map will be considered, especially in relation to the locational criteria set out in part 3. In addition, it would be useful for the Local Plan to define an 'affected community' in the context of wind power schemes and what measures will be used to assess community support in the supporting text.

Innovation team

3.38   We note that the consultation document recognises the role electrical energy storage may play in providing renewable energy solutions. There may also be an opportunity to use waste heat from IT infrastructure (e.g. servers used in the Begbroke Innovation Service) for domestic and commercial network heating installations.

Environment team – Countryside Access

3.39   The Preferred option is supported. Draft policy wording D3 h protecting PRoW is also supported.

Policy CE6: Flood risk and drainage

Environment team – LLFA

3.40   It is acknowledged that the Strategic Flood Risk Assessment (SFRA) has not yet been completed and therefore may contain information pertinent to the development and framing of the policy. The SFRA is an important part of the evidence base that should be used to inform spatial location of developments, what should be included in FRAs for development and how developments should be considered.

3.41   The proposed draft policy under point 1) includes that the policy will look to address flooding from all sources, however it does not cover how the sequential testing of sites will occur for other flooding sources other than those associated with Flood zones 3 and 2 (fluvial/main river flooding) as in point 2). This may be included within the SFRA when produced but currently there appears to be a gap in how this will be considered by the Joint Local Plan and therefore implemented at the spatial planning stage. It would be important to consider how this may be undertaken to provide clarity to planners and developers when applying these policies.

3.42   Under point 5) the Oxfordshire Local Flood Risk Management Strategy is currently being updated, whilst it is useful for developers to review this information, the Strategy is not a means to identify or allocate development sites and is not being set out to address those issues. It is also focussed on local sources of flooding rather than flood zones associated with main rivers. Any FRA should review multiple different sources of information including the Local FRM Strategy, flood investigation reports, modelling reports etc. It would be worth considering removing the reference to the Local FRM Strategy in a policy and providing a more comprehensive list of sources of information within the SFRA when completed.

3.43   Under point 6) this is a positive policy however the sentence: 'Higher rates would need to be justified and the risks quantified', needs to be considered in relation to how this

will be justified by those proposing development. Specific criteria should be set out in the SFRA so that this is understood otherwise this will become a protracted discussion.

Policy CE7: Water efficiency

Strategic Planning and Infrastructure team

3.44   We congratulate the councils on this draft policy for all new homes to be designed to high water efficiency standards, with water use not exceeding 100 litres per person per day, or any future tighter standard; a requirement for a water butt in many situations; and community-scale rainwater harvesting and grey water recycling schemes wherever possible on larger sites.

3.45   We are commenting on this partly because reductions in water use, along with a range of other measures and mechanisms, helps reduce the need for strategic water resource infrastructure such as the proposed reservoir near Abingdon.

3.46   The Regulation 19 Oxford Local Plan includes, as part of Policy G9, the following: 'All dwellings (including conversions, reversions and change of use) achieve an estimated water consumption of no more than 110 litres per person per day (proposals are encouraged to go further than this). All non-residential development should demonstrate what measures have been incorporated to reduce water use.' Also, as part of that policy: 'In addition to the above, other measures to conserve water use including rain/grey water harvesting/reuse where appropriate.'

3.47   The County Council did not object to the above Oxford Local Plan draft policy, but nevertheless welcomes that the Joint Local Plan draft policy goes further.

3.48   There is a national target of water consumption to be an average of 110 litres per person per day or less by 2050 in the National Framework for Water Resources produced in March 2020. The latest Water Resources Planning Guideline from April 2023 states that water companies' plans and programmes should be based on that.

3.49   The government published the Environmental Improvement Plan in January 2023, which builds on the national target with interim targets to reduce the use of public water supply in England per head of population by 9% by 31 March 2027 and 14% by 31 March 2032, and a longer-term target of 20% by 31 March 2038. This is to be achieved by reducing household water use, reducing leakage and reducing non-household (e.g. business) water use.

3.50   Water Resources South East (WRSE) released its final draft regional plan on 31st August 2023. This plan includes reducing per capita consumption over time from the current 150 litres per person per day to below an average of 110 litres by 2050, also complying with the interim targets as set out in the government's Environmental Improvement Plan. It is expected that this will require not only new build housing and renovations to be designed to be efficient with water, but also that home occupiers change their ways to use less water. Smart meters are helping companies to better understand how water is used, and data from companies that have installed smart meters shows that many people typically use between 100 and 110 litres per day, but a moderate proportion of very high users exists that causes average usage to be higher. Supporting text to this Local Plan policy CE7 could also encourage the take up of smart meters.

Policy CE8: Water quality and wastewater infrastructure

Climate Action team

3.51   'Green infrastructure' (part 1 and other Local Plan policies) should be rebadged as 'blue-green infrastructure' (in recognition of the extensive network of rivers, streams, lakes, ponds, lagoons and navigable waterways across the plan area). This also reflects best practice.

Environment team - LLFA

3.52   As the LLFA we are not able to comment on the foul water requirements or the wider water quality policy implications. We do welcome the incorporation of the SuDS into this policy wording and the holistic view this policy aims to provide.

Minerals and Waste team

3.53   No comments on the policy, but the title suggests that all wastewater infrastructure would be covered by the policy. The supporting text should include clarification that waste treatment facilities would be a County Matter.

Policy CE9: Air quality

Public Health team

3.54   We support Option A as it will promote clarity and consistency in the assessment and promotion of clean air across development proposals. We support the proposed draft policy.

Climate Action team

3.55   Reference should also be made to the Oxfordshire County Council Air Quality Strategy 2023-2050 in the supporting text. In relation to part 1c, it would be useful to define 'appropriate green infrastructure'.

Policy CE10: Pollution sources and receptors

Public Health team

3.56   We support Option A and the wording of the draft policy as it will ensure that development does not result in adverse impacts on human health.

Innovation team

3.57   The use of green walls and hedges in developments can help improve the built environment including biodiversity as well as capture air and noise pollution.
Successful control of air quality, pollution and noise requires persistent measurement over time. Consideration should be given to the permanent location and mounting of sensors – this might mean the use of 'smart' lamp posts to support and provide the power for, not only air quality and noise measurement, but also:

- Automatic proximity control of lighting to reduce light pollution.

- Counting pedestrians, cycles and vehicles to understand the transition to active travel.

- 5G, and in the future 6G mobile data transmitters that will be necessary, for example, for Connected and Automated Vehicles (CAVs) and other vehicle information systems. These will need to be more densely located than 4G, but the same infrastructure will be compatible between 5G and 6G (small cell).

OCC Estates

3.58   Oxfordshire County Council controls the Harwell Primary School building and play area that lie within the proposed Outer Consultation Zone (OCZ) for the Nuclear Restoration Services (NRS) Harwell.

3.59   OCC Property notes that this draft policy requires development proposals, which are located within the OCZ, to also consult with the Office for Nuclear Regulation (ONR), if the proposal meets certain criteria. One of these criteria (c) states that consultation with the ONR will be required for: "any new non-residential development that could introduce vulnerable groups to the OCZ…"

3.60   OCC Property would require additional clarification on this part, as it is currently difficult to ascertain what groups are meant to be included in the "vulnerable groups" and whether non-residential development proposals should exceed a specific person's limit, before consulting with the ONR. If development proposals for educational institutions are not covered by this draft policy, then OCC Property would wish to see the inclusion of an additional criterion in this draft policy to address this issue for clarity.

Policy CE11: Light pollution and dark skies

Transport Development Management team

3.61   Consideration should be given as to whether the County Council's updated street lighting and illuminated assets policy should be referenced in this supporting text or policy.

<u>Public Health team</u>

3.62   We support Option A given the importance of protecting dark skies for nature conservation.

<u>Environment team – Landscape</u>

3.63   The approach to light pollution is supported (option A) in particular:

- The preparation of a Dark Skies/ Night Impact Assessment is welcomed.
- The protection of dark skies aligns with the special qualities and management plans of the National Landscapes.
- Consideration should be given to the adoption of the North Wessex Down External Lighting Guide for all developments in the districts not only in the National Landscapes.
- Dark Skies are also an objective for OCC who are actively working on reducing light pollution e.g. street lighting.

Policy CE12: Soils and contaminated land

<u>Minerals and Waste Team:</u>

3.64   We are pleased to see the inclusion of the re-use of soil on site and we support the intention of the policy. It should however say "to avoid the need to manage waste off site." If the soil leaves the site, it will become a waste arising and if permanent deposit of the soil on another site takes place on a site that is not restoring a former quarry it would be considered to be landfilling. The management or disposal of the waste off site would be a County Matter.

Policy CE13: Minerals safeguarding areas

<u>Minerals and Waste Team:</u>

3.65   This policy partly replicates policy M8 of the Oxfordshire Minerals and Waste Local Plan which is already in the Development Plan. This could cause possible conflict. It would be helpful to have a reference in supporting text to the Oxfordshire Minerals and Waste Local Plan, . Section 70 of the Town and Country Planning Act 1990 requires that "In dealing with an application for planning permission or permission in principle the authority shall have regard to (a)the provisions of the development plan, so far as material to the application…."

3.66   There does not need to be a policy in the District Local Plan to replicate what is in the legislation, therefore it is <u>recommended this proposed policy is not included in the Regulation 19 Draft Joint Local Plan.</u>

4. Chapter 5: Spatial strategy and settlements

Policy SP1: Spatial strategy

Strategic Planning and Infrastructure team

4.1   We support the Option A approach to the spatial strategy for the Joint Local Plan and consider there is strong synergy between this approach and the Oxfordshire Strategic Vision 2050 and Oxfordshire's Local Transport and Connectivity Plan. Option A seeks to guide new development to Science Vale, to the Garden Villages and to locations in the highest tiers of the settlement hierarchy (Tiers 1, 2 and 3). Whilst we support this Option it is important that the different options have tested appropriately ahead of the next stage of the Plan.

4.2   The benefits of a Joint Local Plan which enables a comprehensive set of planning policies for future development in Science Vale and Didcot are significant. The Science Vale UK area encompasses the towns of Didcot, Wantage and Grove, and the employment centres of Harwell Science and Innovation Campus, Milton Park and Culham Science Centre. Science Vale UK is a national science and innovation centre and is home to two Enterprise Zones.

4.3   The County Council notes the mention on page 105 of no exceptional circumstances to warrant a Green Belt boundary review in this Joint Local Plan and that a review of potential additions to the Green Belt could be made, as part of this Joint Local Plan.

4.4   The County Council supports Neighbourhood Planning as one of the major infrastructure providers, providing and managing many important services that communities use and rely on. We have produced a neighbourhood planning guide which is available [here](#).

4.5   We welcome the sentence on page 110 which states 'We want the Joint Local Plan to contribute towards the delivery of a net zero transport system'. As well as recognising the Plan will review what is needed to ensure we support their integration into a sustainable transport network, we will continue to work with district council colleagues on this matter as the plan preparation progresses. We particularly welcome the importance given to reducing the need to travel by private car by promoting development at well located brownfield locations. This approach is in alignment with the LTCP and is key to delivering a net zero transport system.

4.6   We note the important point made in the supporting text on page 110 that:
'We have already met the housing numbers required over the plan period thanks to the supply of sites in the last local plans, some of which are large strategic sites and new garden communities that will keep delivering well after the end of the last plan period. Option A focusses on making sure that the very difficult decisions to allocate large sites for development in our last local plans are seen through to completion where they remain viable and developable.'

4.7   We support point 8 of the proposed policy which restricts development in the countryside.

4.8   We note point 10 relating to unmet housing need in Oxford in the proposed policy wording and make further comments below on this matter under a separate heading. Specific comments on two new potential brownfield site allocations at Dalton Barracks

and Crowmarsh Gifford are contained in those proposed site allocations section in this response.

<u>Strategic Planning and Infrastructure team</u>

4.9   This comment focuses on the spatial strategy in relation to the proposed reopening of the Cowley Branch Line to passenger traffic. An outline business case for reopening the Cowley Branch Line has been completed and a full business case is being prepared, further to funding agreed by Oxford City Council, with support from Oxfordshire County Council and three local landowner-developers (ARC Oxford, The Oxford Science Park, Ellison Institute of Technology) in December 2022. Passenger services on the Cowley Branch Line will feature as part of the strategy being developed in the County Council's forthcoming rail strategy, OxRail 2040, a supporting strategy of the Oxfordshire Local Transport and Connectivity Plan.

4.10   The Joint Local Plan consultation document says: 'This strategy supports the approach taken in the Oxfordshire Local Transport and Connectivity Plan to promote development where there are the best chances of reducing the need to travel by private car. We want the Joint Local Plan to contribute towards the delivery of a net zero transport system'.

4.11   Opening the Cowley Branch Line to passengers, with two new stations at Littlemore and Cowley, will contribute to the delivery of a net zero transport system. The two stations will transform how many people travel, including some residents of South Oxfordshire and the Vale of White Horse given that the stations will be located close to the southern boundary of Oxford City. New developments in close proximity to the stations will be expected to contribute towards the scheme for reopening, as well as contributing to bringing forward good active travel connections to the stations and facilities nearby such as cycle parking hubs. The contributions that will be sought are discussed in later comments, for example on Draft Policies IN2 and IN3.

4.12   We have not identified a need to specifically reference the Cowley Branch Line in the background text or policy SP1, but it should be done in an appropriate part of this Joint Local Plan. Oxfordshire County Council is willing to provide advice if needed on suitable text to include. Either in this part of this Plan or elsewhere it is recommended that the Joint Local Plan endorse the reopening of the Cowley Branch Line for passenger services as a strategically important project.

4.13   The plans for the reopening of the Cowley Branch Line to passengers, which were not as advanced as they are now in 2024, were recognised within the South Oxfordshire Local Plan 2035 in several places including in Policy TRANS1b: Supporting Strategic Transport Investment, p.148, in which it says, "1. The Council will work with Oxfordshire County Council and others to:…ix) support the delivery of the Cowley Branch Line."

4.14   Page 53 of the 'Issues Regulation 18 Part 1 consultation' for this Joint Local Plan recognised the re-opening of the Cowley Branch Line was an opportunity to plan for enhanced public transport provision and thus the lack of a specific mention to Cowley Branch Line in this Regulation 18 Part 2 consultation document is a significant omission which we strongly recommend is addressed in the Regulation 19 version of this Joint Local Plan.

<u>Strategic Planning and Infrastructure team</u>

4.15   This comment relates to the issue of Oxford's unmet need.

4.16   The strategy included in the consultation document is to continue to address the agreed unmet housing needs of Oxford City. Page 107 includes the following text: 'Our new strategy will include some familiar elements of the previous spatial strategies such as:…reflecting the Duty to Cooperate, by continuing with sufficient sites committed to address the agreed unmet housing needs of Oxford City.'

4.17   We note that there is not currently an agreement to meet any more unmet housing needs. If such an agreement can be reached, then providing for that would not be contrary to the spatial strategy as set out.
Policy SP1 appears a bit less flexible than the strategy text and would benefit from the removal of the word 'existing' as follows: 'We will allocate sufficient sites to meet the ~~existing~~ agreed unmet housing needs of Oxford.'

4.18   We note that the supporting text records that no new sites are proposed to be removed from the Oxford Green Belt. There would need to be exceptional circumstances to warrant the removal of any sites from the Green Belt. In our response on the Cherwell Local Plan Regulation 18 consultation in November 2023 we queried the lack of evidence of exceptional circumstances in respect of a site which is not identified as being for Oxford's unmet need, for removing that site from the Green Belt.

Strategic Planning and Infrastructure team

4.19   This comment relates to the issue of neighbourhood plan targets.

4.20   Draft Policy SP1, sub-section 11, indicates that 'Thame has an outstanding identified housing requirement of at least 143 homes'. It is implied that it is a policy requirement that at least 143 homes are provided in Thame over the plan period. It is noted on page 111 of the consultation document that the neighbourhood plan review in Thame is well underway.

4.21   Option D, an alternative policy option to the preferred one, is a more dispersed pattern of development involving setting development targets for parishes or settlements. Oxfordshire County Council does not favour this policy option, and commented advising against it when it was developed for the last South Oxfordshire Local Plan. We agree with the assessment in this consultation that such an approach is likely to lead to more homes being dispersed to places where there are fewer jobs, services and facilities, and is less likely to support a shift to more sustainable modes of transport including active travel. Given the production of our Local Transport and Connectivity Plan in the last couple of years, we have good policy provisions and evidence about avoiding such a dispersed approach.

Climate Action team

4.22   Alongside the sustainability appraisal process, we would advise that the district councils prepare a detailed climate impact risk assessment to test the impact of spatial options on greenhouse gas emissions over the course of the plan period (based on the baseline data set out in PAZCO and other evidence base documents, such as Project LEO datasets) in line with government guidance[14] and best practice[15].

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[14] Planning Policy Practice Guidance (see paragraph: 004 reference ID: 6-004-20140612 and paragraph: 007 reference ID: 6-007-20140306)
[15] https://www.greatercambridgeplanning.org/media/1389/gclp-strategic-spatial-options-assessment-implications-for-carbon-emissions-nov2020.pdf

Public Health team

4.23   We support Option A and the proposed policy wording as this will support regeneration of brownfield sites and support active and sustainable travel patterns.

Transport Policy team

4.24   We support the proposed spatial strategy and references to supporting the LTCP's aims of reducing the need to travel by private car and delivering a net zero transport system.

Policy SP2: Settlement hierarchy

Strategic Planning and Infrastructure team

4.25   We support the preferred Option A to bring together the settlement hierarchies of both districts into one consistent listing. This is much preferable to Option B of retaining existing hierarchies which would be an inconsistent approach and could lead to more dispersed development. Option C is somewhat attractive in that additional scoring being applied to settlements which are well connected or in close proximity to higher order settlement is reasonable, however we note that some weight is already given to this, and we are not sure how such revised scoring would affect the results.

4.26   The draft policy SP2 itself may need amending. For Tier 1 settlements (the largest ones) 'There is a presumption in favour of sustainable development within the built-up area'. For Tier 2 and Tier 3 settlements, the following 'may be appropriate': 'brownfield development, infill development, backland development, replacement dwellings or subdivision'. For Tier 4 settlements 'development is limited to brownfield sites, replacement dwellings or subdivision where appropriate'. It is not clear whether the policy provisions are in accordance with national policy as the NPPF includes a presumption in favour of sustainable development generally.

4.27   The draft policy map defines the built-up areas only for Abingdon-on-Thames, Faringdon, Wantage and Grove in the Vale of White Horse District. It is somewhat confusing to have a policy which refers to built-up areas only defined in this way. It is not clear that the boundaries are required for those areas specifically but not for others.

4.28   The order of settlements appears as expected. However, we would welcome a discussion on the list, for example so that we can understand the classification of Goring-on-Thames as Tier 2, while Berinsfield and Benson are Tier 3.

Transport Policy team

4.29   We support including a proposed settlement hierarchy defined in terms of proximity and connectivity to support the LTCP's aims.

4.30   It is noted that reference to 20-minute neighbourhoods has been removed following the issues consultation in June 2022. Whilst we recognise the recent challenges around use of the term, it remains an adopted policy in LTCP and we believe it is a useful way to explain 'proximity to connectivity'.

4.31   Recognising the challenges around use of the '20-minute' term, the adopted Central Oxfordshire Travel Plan utilises the term 'liveable neighbourhoods'. These are described as well-connected and compact areas where the basis of people's daily

needs can be found within a 20-minute return walk. It is suggested that using this terminology would be a helpful way to explain the policy and provide consistency across the county.

Policy SP3: The strategy for Didcot Garden Town

Strategic Planning and Infrastructure team

4.32   We recognise there is a strategic advantage gained in having a Joint Local Plan in respect of planning matters in the Garden Town of Didcot, given the district council boundary cuts through Didcot. Through the preparation and future adoption of a Joint Local Plan comprehensive appropriate planning policies for Didcot can be prepared and implemented.

4.33   Thus, SP3 is an important proposed policy and one which County Council officers generally support and will continue to work with district colleagues on developing the detail of and refining this policy as this Plan progresses. Key County Council teams to involve in these discussions will be the Area Travel Plans and Place Planning and Co-ordination.

4.34   Please refer to our Planning Place and Co-ordination Teams comments on the Joint Design Guide SPD on page 37-38 of this response where there is concern on elements of the Joint Design Guide.

Transport Policy team

4.35   Support transport and movement focus of policy SP3 which aligns with the LTCP.

4.36   Support references to Didcot LCWIP, Science Vale Active Travel Network, Strategic Active Travel Network and mobility hubs.

   o   Alongside development of the Didcot Parkway Mobility Hub, we are keen to develop all railways stations as mobility hubs, in line with OCCs adopted Mobility hub strategy. This would also include working with Network Rail and GWR to develop Appleford and Culham train stations as smaller rural mobility hubs, as well as enhancing connectivity to them. The Oxfordshire Community Rail Partnership would have an important role to play here in working with local communities on a range of initiatives e.g. formalising/supporting Station Adoption Groups, producing maps and helping to address social exclusion/rural isolation.

4.37   In support of the LTCP, we are developing a set of supporting area and corridor travel plans. The travel plans will outline how the LTCP policies are applied in different geographic areas and identify transport schemes. Area travel plans will be developed for South Oxfordshire and Vale of White Horse.

   o   The LTCP area and corridor travel plans, in particular the <u>Didcot Area Travel Plan and wider Science Vale Area Travel Plan</u>, should be referenced within policy SP3 to futureproof for these strategies development/approval.

4.38   Suggest consideration of sustainable freight and logistics movement/deliveries, in line with proposals in the Freight and Logistics Strategy.

<u>Place Planning and Coordination team</u>

4.39   Point 2) e) lists active travel and multi-modal sustainable infrastructure that should be supported, please add to this list the <u>Milton Heights Active Travel Bridge and the North East Didcot to DTECH LDO Active Travel Bridge</u>. We also support the Transport Policy team's request that reference should be made to the forthcoming LTCP area and corridor travel plans relevant to the Didcot Garden Town area. We welcome the inclusion of references to the LCWIP, Science Vale Active Travel Network, and the Strategic Active Travel Network.

<u>Public Health Team</u>

4.40   We strongly endorse Option A and the proposed policy wording. Development of the Garden Town needs to consider the impact on the wider community and ensure that development supports healthy living in the wider area of influence. It is important to specify the Didcot Garden Town Principles that development is required to meet, and in particular the need for it to contribute to healthy living and climate change resilience and to create cohesive, vibrant communities.

Policy SP4: Strategy for Abingdon-on-Thames, Policy SP5: Strategy for Faringdon SP6: Strategy for Henley-on-Thames, SP7: Strategy for Thame, SP8: Strategy for Wallingford, SP9: Strategy for Wantage

<u>Strategic Planning and Infrastructure team</u>

4.41   County officers will continue to work with district colleagues on developing the detail of and refining these proposed policies SP4 – SP9.

<u>Transport Policy team</u>

4.42   These comments apply to the proposed policies SP4: Strategy for Abingdon-on-Thames, SP5: Strategy for Faringdon, SP6: Strategy for Henley-on-Thames, SP7: Strategy for Thame, SP8: Strategy for Wallingford, SP9: Strategy for Wantage.

4.43   Support references to cycle parking, enhancing pedestrian and cycle routes, enhancing bus services and providing EV charging which align with the LTCP.

4.44   Suggest adding reference to alignment/delivery of the schemes identified in the LTCP area and corridor travel plans to futureproof for these strategies development and approval.

4.45   Suggest consideration of sustainable freight and logistics movement/deliveries, in line with proposals in the Freight and Logistics Strategy.

4.46   Suggest that the Strategic Active Travel Network and Mobility Hubs should also be referenced as measures to improve accessibility.

4.47   Specific comments regarding SP4 Abingdon-on-Thames:
   o   Suggest that the Strategic Active Travel Network and Mobility Hubs should also be referenced as measures to improve accessibility.
   o   This includes the development of Radley and Culham railway stations as Mobility Hubs, alongside improved access to them.

        o   Reference should also be added to the development of mobility hubs on the A34 (S) and A420 corridors. Work is ongoing to refine proposals for how the peripheral Park and Ride sites identified in the Oxford Transport Strategy (2015) function as mobility hubs. The sites are all included in the adopted Central Oxfordshire Travel Plan (COTP) as mobility hub locations within the proposed Strategic Public Transport Network and we therefore support their continued inclusion in the Local Plan.

<u>Transport Policy team</u>

4.48   This proposed set of policies as drafted reflects earlier input from OCC officers and as such we welcome its current wording. However, we also support the Transport Policy team's request that reference should be made to the forthcoming LTCP area and corridor travel plans relevant to each proposed policy, and the Strategic Active Travel Network.

5. Chapter 6: Housing

<u>Strategic Planning and Infrastructure team</u>

5.1   The County Council has a function in relation to adult social services as described on our County Council website https://www.oxfordshire.gov.uk/residents/social-and-health-care. The strategic approach is known as the Oxfordshire Way Oxfordshire Way strategic vision | Oxfordshire County Council.

5.2   Adult day care facilities https://livewell.oxfordshire.gov.uk/Categories/138 might be sought as a County Council S106 obligation on planning applications. There is ongoing work to identify how to request this, coordinated by the Property team. Over the last few years there are no examples of S106 obligations given that ongoing work.

5.3   In respect of housing, our website: https://www.oxfordshire.gov.uk/residents/social-and-health-care/help-housing advises that in most cases the responsibilities are with the local council, but the county council might help residents with:

- Housing support for care leavers https://www.oxfordshire.gov.uk/residents/children-education-and-families/childrens-services/local-offer-care-leavers

- Services for young people and people with learning disabilities and autism, mental health conditions and complex needs https://www.oxfordshire.gov.uk/residents/social-and-health-care/social-and-health-care-information-professionals/housing-options (There is a link on this page to the Market Position Statement 2019-2022)

- Extra care housing https://www.oxfordshire.gov.uk/residents/social-and-health-care/adult-social-care/adult-social-care-services/living-home/home-first-oxfordshire/extra-care-housing This webpage has details of the 20 affordable extra care housing schemes across the County. (There is a link on this page to the Extra Care Housing Supplement 2019-2022 which includes details of anticipated further extra care housing schemes up to 2031.)

- Finding a care home https://www.oxfordshire.gov.uk/residents/social-and-health-care/adult-social-care/adult-social-care-services/find-and-buy-care-services/finding-care-home

5.4   Comments on the need for affordable extra care housing in relation to the housing policies are below.

<u>Policy HOU1: Housing requirement</u>

<u>Strategic Planning and Infrastructure team</u>

5.5   This draft policy HOU1, derived from the preferred Option A on pp142-143, sets out the proposed housing requirements for the two Councils: 17,050 homes in South Oxfordshire and 14,390 homes in Vale of White Horse. These figures are derived from calculations using the Standard Method, with additional provision reflecting the Oxford unmet need figures included in the extant Local Plans.

5.6   The Housing Requirement and Affordable Housing Topic Paper explains how the standard method is calculated. The National Planning Policy Framework indicates that this method should be used to calculate the housing need, but in exceptional circumstances, an alternative approach to working out housing need can be followed. Planning Practice Guidance gives further advice about what can qualify as exceptional circumstances.

5.7   The annual housing requirements of each of the two Councils are proposed to be stepped down at a point which reflects the time period of the agreements that were contained in the existing Local Plans about Oxford's unmet need. In the case of South Oxfordshire, the agreement about Oxford's unmet need was to provide 4,950 houses between 2021 and 2035; and in the case of Vale of White Horse the agreement was to provide 2,200 houses between 2019 and 2031. The full South Oxfordshire 4,950 is used given that this Local Plan is for a period starting in 2021, but the provision over two years 2019-2021 is not included in the calculations for Vale of White Horse, so the provision is 1,830 rather than 2,200. This means that the annual requirement to address Oxford's unmet need is calculated as 183 for each of 10 years. Another way of understanding the figures as proposed is as per the table below:

Table: Housing Need Figures in Joint Local Plan consultation January 2024

	Standard method per annum	Additional provision per annum for Oxford's unmet need	Total per annum	Totals
South Oxfordshire				
2021/22 to 2035/36	605	330 (4,950 / 15)	935	14,025
2036/37 to 2040/41	605	-	605	3,025
				17,050
Vale of White Horse				
2021/22 to 2030/31	628	183 (1,830 / 10)	811	8,110
2031/32 to 2040/41	628	-	628	6,280
				14,390

5.8   We are not clear whether the reduction of 370 houses from the total calculated Oxford unmet need is significant. We understand that Oxford City Council has been referring to all 14,300 agreed homes going forward. Based on the assertion in this Local Plan consultation, the relevant number that Oxford City Council should be using is 14,117 i.e. 183 houses for one year between 2019 and 2020 in before the start of the Oxford City plan period, which is 2020/21 rather than the 2021/22 for this Joint Local Plan. All other Councils agreed to provide the unmet need housing after 2021 as per below.

Table: Agreement to supply housing for Oxford's unmet need in adopted Local Plans

Cherwell	4,400 to be supplied 2021-2031
South Oxfordshire	4,950 to be supplied 2021-2035
Vale of White Horse	2,200 to be supplied 2019-2031
West Oxfordshire	2,750 to be supplied 2021-2031

5.9   It would help in the understanding of this issue if the Districts' monitoring reports clearly identified the completions for Oxford's unmet need each year, and identified how the affordable housing component was addressed. We recognise that the District Councils have no control over who market housing is sold to, but we would expect that the affordable housing component of the numbers being identified for Oxford's unmet need is clearly documented.

5.10 The current Local Plans have higher annual housing requirements over the periods that they cover (to 2031 and 2035). Those housing figures were derived from the Oxfordshire Strategic Housing Market Assessment in 2014, as discussed in the Option B text on page 144. Option B is said to be not appropriate as it would involve simply rolling over the previous figures for this Local Plan, and instead an up-to-date assessment should be made. We agree that an up-to-date assessment is needed instead. The Housing Requirement and Affordable Housing Topic Paper explains that rolling over the figures would lead to total housing need figures of 20,450 in South Oxfordshire (3,400 more than Option A) and 22,390 in Vale of White Horse (8,000 more than Option A).

5.11 Option C as set out on page 144 would involve not honouring the existing agreement to provide for Oxford's unmet needs. We agree that this would not be appropriate. The existing agreement apportioned 14,300 houses of unmet need across the County as set out in the table above. Furthermore, we consider that the Joint Local Plan strategy should be flexible enough to accommodate any new agreement to address Oxford's unmet needs.

5.12 Option D as set out on page 145 is an option to reflect the Oxfordshire Growth Deal in a new housing needs assessment. This appears as the only option which reflects the possibility of an assessment which would identify a higher number than that derived from the Standard Method. We are aware that Oxford City Council and Cherwell District Council have a jointly commissioned Housing and Economic Needs Assessment (HENA) which has identified a higher number than the Standard Method across the County as being preferred for a range of reasons.

5.13 The County Council has an interest in understanding the total amount of housing need because any new allocations are likely to have transport, education and other implications of particular interest in relation to our statutory functions. In particular, we are concerned about growth leading to more vehicle trips, counter to our targets as set out in the Local Transport and Connectivity Plan (LTCP). We are also concerned about whether the cost of necessary infrastructure to service housing growth can be met as it may be unaffordable to developers and government and therefore lead to a reduction in quality of life or services. The County Council wishes to be involved in future discussions about housing need numbers and can act to support the districts and city in highlighting issues where there are differences in approach and offering a way forward for example in relation to infrastructure needs.

5.14 Although the Joint Local Plan proposes a reduction in the housing numbers from that in the current Local Plans, there is some additional provision being made on sites (e.g. Dalton Barracks) as well as proposed de-allocations (i.e. Chalgrove Airfield, Nettlebed sites, the Sandhills part of the Bayswater Brook site). Our specific comments on those proposals are contained elsewhere in this response.

5.15 The County Council's position has been, and continues to be, that any site allocations should be well located in relation to the people they are intended to accommodate. Therefore, Oxford's unmet housing need should be met on sites close to Oxford, either with good existing walking, cycling and public transport links or the ability to provide such links funded from development.

5.16 The existing South Oxfordshire and Vale of White Horse Local Plans are, to different extents, unspecific on the sites which address Oxford's unmet need. The Vale of White Horse Local Plan refers to providing sites in the Abingdon and Oxford Fringe Sub-Area.

The Inspector's report on the South Oxfordshire Local Plan (paragraph 71) noted that the three allocations on the edge of the City i.e. STRAT11: Land South of Grenoble Road, STRAT12: Land at Northfield, and STRAT13: Land North of Bayswater Brook were intended to meet Oxford's unmet housing need close to where it arises; however the allocated figure of 5,900 houses on these sites did not equate to the 4,950 agreement, leaving the question of whether the additional capacity might meet future unmet need unanswered. We request that the plan specifically identifies which allocations will be providing the housing required to meet Oxford's unmet need. This is needed to ensure that the spatial strategy is promoting the most sustainable patterns of development in line with the Oxfordshire LTCP.

5.17   The County Council encourages cooperation amongst the City and District Councils to address Oxford's unmet need. If this Joint Local Plan makes provision only for the level of housing in the current agreements as proposed, that might be insufficient to address Oxford's unmet need up to 2040 or 2041. Oxford City Council's Regulation 19 Local Plan, using the HENA, and their capacity assessment from the Housing and Economic Land Availability Assessment (HELAA), calculates an additional unmet need of 2,528 houses across the County over the 14,300 of the previous agreement i.e. a total of 16,828 houses. We note, given the position referred to above, that if only 14,117 houses should be counted, then the City would assess the additional unmet need as 2,711 houses. Assuming that Oxford City Council progresses their Local Plan to examination, the assessment of Oxford's unmet need might be made by the Inspector.

5.18   We recognise that South Oxfordshire District Council and Vale of White Horse District Council have objected to the Oxford City Regulation 19 Local Plan. Oxfordshire County Council has also commented on the Oxford City Local Plan and asks to be heard at the examination on this matter of the assessment of housing need. The County Council's comment says that the supporting text to Policy H1 i.e. 'The housing need in Oxford is for 1,322 new dwellings per annum' is not based on adequate evidence, and alternative numbers should be considered through the examination.

5.19   As this Joint Local Plan is at Regulation 18 stage, we hope that the matter of unmet need will be the subject of further cooperative discussions before it is finalised. Regard will need to be had to how the Oxford City Local Plan progresses, and the emerging Cherwell and West Oxfordshire Local Plans.   We note that Cherwell District Council, in its Regulation 18 Local Plan consultation which closed in November 2023, proposed providing for some additional unmet need, but West Oxfordshire in its Regulation 18 consultations to date has not addressed the issue. The County Council's comments on the Local Plan consultations are available online: https://www.oxfordshire.gov.uk/residents/environment-and-planning/planning/council-planning-responses.

5.20   We contend that Local Plans in the Districts should be designed to recognise that existing sites allocated close to the boundaries of Oxford might accommodate additional Oxford unmet need into the future. Additional land should only be taken out of the Green Belt on the edges of Oxford if there are defined exceptional circumstances. There is potential for a greater number of houses on sites allocated close to Oxford than is anticipated in the allocations, and it may be that the sites should be earmarked to address Oxford's unmet need and monitored accordingly in annual monitoring reports.

Policy HOU3: Affordable Housing

Public Health team

5.21   We support Option A and the proposal that 50% of new development should provide affordable homes. We endorse inclusion of standards for specialist elderly accommodation given the increasing proportion of older people living in the Districts.

Strategic Planning and Infrastructure team

5.22   This comment is about the affordable housing provisions in relation to Oxford's unmet need.

5.23   Draft Policy HOU3 sets a proposed requirement for 50% affordable housing on qualifying sites of which 27.5% is to be for rent (25% social rent, 2.5% affordable rent) and 22.5% is to be to buy (12.5% as first homes and 10% intermediate home ownership).

5.24   These policy provisions are quite different to the Regulation 19 Oxford Local Plan provisions for 40% affordable housing on qualifying sites of which 30% is to be for social rent and 10% as other intermediate forms of housing.
There appear to be no special provisions anticipated in relation to Oxford's unmet need. We would welcome greater clarity on how this works in practice. If Oxford City Council makes comments also querying this, we are willing to work with both parties to identify a way forward.

Strategic Planning and Infrastructure team

5.25   This comment is about the affordable housing provisions in relation to specialist housing.

5.26   Oxfordshire County Council has a particular interest in asking for developer contributions for specialist forms of housing related to our social care responsibilities. In general, we seek that affordable extra care housing is provided on suitable sites. Extra care housing is often aimed at the needs of older people, but might also be for people with learning disabilities, autism, mental health conditions or complex needs.

5.27   As a new extra care housing development is likely to only be viable if it incorporates at least 60 units, such contributions are only likely on the largest sites. Our existing Extra Care Housing Supplement 2019-2022 available here identified a number of sites where we anticipated such developments coming forward.

5.28   Draft Policy HOU1 identifies that there will be a requirement for affordable housing on developments of specialist elderly accommodation, at a percentage yet to be defined. While conceivably that could result in a development which is partly a private specialist development and partly an affordable extra care housing development, we think that the policy will need to have further clear requirements if that is the intention.

5.29   Please see our further comments on draft Policy HOU5 on this issue.

Policy HOU4: Housing mix and size

Public Health team

5.30   We support inclusion of this policy and its recognition of the need for a range of size, type and tenure of housing to meet the needs of the community. We would recommend that it also references the need for housing design to be 'tenure blind'. In calculating the number of accessible homes for older people and for those with disability, we recommend that consideration should be given to the changing demographic profile of the populations in South & Vale.

Policy HOU5: Housing for older people

Strategic Planning and Infrastructure team

5.31   This comment is about the affordable housing provisions in relation to specialist housing.

5.32   We support the intention of this currently incomplete draft Policy HOU5 to provide for elderly persons accommodation on the following large strategic sites: Bayswater Brook; Berinsfield; Culham; Grenoble Road; Northfield; Dalton Barracks; Northwest of Valley Park; Northwest of Grove.

5.33   Of the named sites, the only site to proceed to a current planning application stage with provision for elderly persons accommodation is Bayswater Brook, the relevant application being P22/S4618/O. In that case there is a proposal for 120 assisted living units, 60 of those to be affordable.

5.34   In respect of Bayswater Brook, Grenoble Road and Northfield, we consider that the affordable extra care housing provided on those sites should address, at least in part, Oxford's unmet needs for such. We are not aware of any large strategic sites within Oxford City which could provide comparable provision.

5.35   The County Council has a particular interest in affordable housing given our social care role. We want to see provision being made for affordable forms of housing, catering for those who are older or who have specialist needs, particularly in the form of affordable extra care housing.

5.36   The County Council has commissioned its own research on the needs for specialist housing, such as extra care housing, in order to update our current Market Position Statements. The work is not yet complete at the time of writing. We are willing to work with the City and District Councils to provide and review the necessary evidence. Discussions will need to clearly separate out issues about market provision and affordable provision; as well as separating out issues about extra care housing provision for older people and provision for specialist needs such as care leaver homes.

Housing Services team

5.37   Sites proposing 500 or more dwellings should provide a minimum of 60 units of affordable rental extra care housing. Where it's agreed with the County Council and District Council that affordable extra care housing would not be desirable, an amount of alternative affordable specialist supported housing should be provided. Where

demand for affordable specialist housing is already met, a financial contribution in lieu may be agreed.

5.38   As we are currently updating our evidence, we welcome the opportunity to further discuss the evidence base and how to finalise the draft policy.

<u>Public Health team</u>

5.39   We support inclusion of this policy in the Local Plan given that the South and Vale districts have a higher proportion of older people than the national average. We support a policy as drafted that recommends the co-location of homes for older people with services that are accessible through active and sustainable travel.

<u>Policy HOU15: Houses in Multiple Occupation</u>

<u>Transport Development Management</u>

5.40   We recommend the supporting text of this draft policy mentions the car and cycle element of IN5 Parking Standards /Oxfordshire County Council's Parking Standards will need to be met in any proposals.

<u>Public Health team</u>

5.41   We support Option A and the proposed policy wording which reflects the need to avoid clustering of HMOs. We recommend that the policy includes an additional criteria that such development "would not harm the health of the occupants" in order to ensure that there is adequate living space.

6. Chapter 7: Jobs and Tourism

Policy JT2: Protecting our employment sites

Minerals and Waste Team

6.1   This policy as written would preclude any of the site being used for a waste management facility which would be a sui generis use. This would conflict with policy W5 of the Oxfordshire Minerals and Waste Local Plan which gives priority to waste sites on land which is already in an industrial use. We would welcome discussion with Policy Officers at the District on this issue.

Policy JT4: Community Employment Plans

Strategic Planning and Infrastructure team

6.2   OxLEP promotes policies requiring such Community Employment Plans. The hospitality and care sectors suffer acute labour shortages within Oxfordshire and employment plans can support these sectors to develop a local skilled workforce where new development proposals are coming through the planning system. Other industries also experience labour and skills shortages, as identified in the Oxfordshire Local Skills Improvement Plan. In conjunction with OxLEP we therefore support draft policies such as this. We note that OxLEP is asking for an amendment to 'd' aimed at making it more inclusive.

Policy JT5: Supporting the rural economy

Public Health team

6.3   The introductory text recognises the importance of having sustainable food producers to help address the challenge of climate change and to create sustainable food chains but this is not recognised in the proposed policy wording. We recommend its inclusion in the final policy.

7. Chapter 8: Site allocations and Garden Villages

7.1   This comment relates to the list on pages 267-8 of 'allocated sites from previous plans where we need to keep (or save) the policies in an appendix to the Joint Local Plan'.

7.2   The list is very useful in setting out the many allocated sites which have some sort of planning permission and the intention that the site policies will be saved and appear in appendix to the Joint Local Plan.

7.3   In addition to those sites with some sort of permission, the consultation document explains that two other sites – Vauxhall Barracks and North-West of Abingdon-on-Thames will be treated in the same way.

7.4   In respect of North-West of Abingdon-on-Thames, the table explains: 'Majority of the site is completed, no application for the remaining part of the site (west of Dunmore Road, south of the new Aldi)'. We agree that retention of the policy in an appendix as saved is appropriate. The policy was a detailed one and will continue to provide useful advice.

7.5   In respect of Vauxhall Barracks, the table explains: 'No planning application, remains appropriate for redevelopment'.   No detailed policy was included in the South Oxfordshire Local Plan 2035, instead it was noted in the Table 4a of that Plan, that it was previously allocated either in the Core Strategy and/or Local Plan 2011. It is not clear what policy will be kept or saved and given that there has been no planning application to date, this is of concern as a detailed and up to date policy should be included.   The site is of considerable size and the proposal is that it remains allocated for 300 dwellings, therefore detailed policy advice is merited. <u>The Vauxhall Barracks site, along with Rich's Sidings draft policy AS6 and Didcot Gateway draft policy AS7 (see our separate comments on AS6 and AS7), all need detailed policies written into this Local Plan.</u>

Place Planning and Coordination team

7.6   Policies AS1 to AS5 and AS8 to AS10 all state that "Proposals for the development must demonstrate: …that the applicants have prepared a comprehensive masterplan taking into consideration the indicative concept plan and Joint Design Guide.", and a separate point that adds "…a layout that minimises the use and impact of private motor vehicles on the site." (with the exception of AS5, which is an omission which should be corrected). The latter point is very important and accords with OCC's LTCP. However, it is arguable that achieving this aim is made difficult by the Joint Design Guide, which states:

7.7   "p37. Designers are always keen to promote sustainable transport choices. Through design, we can encourage people to make more active and sustainable transport choices. There is often a misconception that the best way to prioritise walking and cycling is by restricting the movement of cars, using cul-de-sacs for example. However, this commonly results in a more engineered, car dominant environment. It is also land inefficient and causes confusion and frustration. Connected environments work best for all users and all modes of transport. In designing, when we refer to all users, we mean everyone who could live, work, or visit the development. This includes people with disabilities, parents, carers, pregnant women, children and older people.

7.8   p38. Prioritising walking and cycling should be addressed as part of the design of the streets rather than simply reducing the connectivity of the development. By avoiding cul-de-sacs, you will provide people choice of movement. By offering options for movement, traffic gets dispersed…"

7.9   The assertion that restricting the movement of cars commonly results in a more engineered, car dominant environment is not substantiated and is arguably a complete non sequitur. It is illogical to suggest that restricting the movement of cars results in a more car dominant environment and it is equally incorrect that restricting car movement has to be achieved through significant engineering. If the permeability and connectivity for cars is exactly the same as it is for walking and cycling, as recommended in the Joint Design Guide, then it is very unclear as to how it is possible to achieve a layout that minimises the use and impact of private motor vehicles as required by the same site policy. Further to this, it would not accord with OCC's Transport User Hierarchy, as required in Policy IN2. Finally, the use of cul-de-sacs as the only example of restricting car movements ignores other means of creating filtered permeability along roads, enabling active travel permeability but restricting cars (through the simple use of bollards, planters, and other means of narrowing the carriageway), this avoids the negative impact of traditional cul-de-sacs such as land-use inefficiency.

7.10   Given that the elements of the Joint Design Guide quoted above are supported by flawed rationale and are at odds with providing layouts that minimise the use and impact of private motor vehicles in accordance with OCC's Transport User Hierarchy, thought needs to be given as to which means of achieving the policy aims of IN2 – Sustainable transport and accessibility will be pursued. We suggest that filtered permeability for active and sustainable modes is considered an effective means of achieving the policy aims and that providing parity of connectivity for private motor vehicles should not be considered suitable.

Place Planning and Coordination / Transport Development Management teams

7.11   Most, if not all, site policies include the following text which we recommend amending (added wording in italics, removed wording struck through), "all necessary transport infrastructure based on up-to-date evidence on the impact of the development. This should reference the latest Infrastructure Delivery Plan, but not be limited to this document. The transport mitigation measures are likely to will include:"

7.12   We note that all new developments are required to follow Oxfordshire County Council's adopted parking standards in Policy IN5 and we very much welcome this inclusion. It should be noted that this will mean that some developments will be required to incorporate (at least) elements of car-free provision in accordance with the stipulations of the parking standards, which are based on local connectivity characteristics.

Environment team - LLFA

7.13   It is very difficult to provide specific comments without the updated SFRA and the evidence that the allocation of the sites has been undertaken in line with the sequential and exception tests and what information is being used to support the site allocations.

7.14   It is also not clear how other sources of flooding are incorporated into the concept plans. For example, under Policy AS3 - Land South of Grenoble Road, where there are surface water flooding areas as indicated on the EA produced flood map for surface water and how are they to be considered within the concept of the site and the overall development.

7.15 We are aware of the proposal for a Development Consent Order for the South East Strategic Reservoir Option (SESRO). This Joint Local Plan may need to consider developments that may be affected by any residual flood risks from SESRO particularly Land at Dalton Barracks.

Education team

7.16 The education paragraphs in the site allocation policies vary slightly, so minor wording changes are suggested in our comments for consistency.

Minerals and Waste team

7.17 All future Polices and Allocations within the South Oxfordshire and Vale of White Horse Local Plan 2042 should be in conformity with the Oxfordshire Minerals and Waste Local Plan 2031.

7.18 In particular for Site Allocations, three policies should be considered. These are Policy M8: Safeguarding mineral resources and M9 Safeguarding mineral infrastructure and W11: Safeguarding waste management sites.

Policy LS1: Proposals for Large Scale Major Development

Strategic Planning and Infrastructure team / Transport Development Management team.

7.19 This appears as a helpful policy, as the option of including it is preferred to relying on other policies and validation checklists because the Councils 'wish to be clear on what the councils expect large scale major developments to include as part of their planning application'. Other teams have some comments below on potential amendments to the policy.

7.20 Draft Policy LS1 e) says: 'ensure that necessary supporting infrastructure is provided, including social and community infrastructure. Developers must engage with relevant infrastructure providers to ensure the implementation of the Infrastructure Delivery Plan.' We generally welcome this all-encompassing sentence aimed at provision of infrastructure.

7.21 The requirement for a Transport Assessment and Travel Plan as set out in g) vi) will need to address the range of transport matters that the County Council is interested in, in accordance with the LTCP and its supporting documents. The requirement under g) xi) for a 'Construction Environmental Management Plan' presumably also includes a Construction Traffic Management Plan. We also seek that the list includes 'a walking, cycling and horse riding assessment in accordance with GG142'.

7.22 We welcome the intent of the policy d) to require information about phasing and the timing of housing delivery, although we note that such is often hard to determine at the early stages of a development.

7.23 We are not clear about g) xiii) which references 'an integrated water management plan to include proposed foul and surface water drainage strategies, incorporating a sewage capacity assessment'. This part of the policy appears to be dealing with many separate things at once and we would be happy to discuss potential rewording of the text.

<u>Public Health team</u>

7.24   We welcome inclusion of the draft policy in accordance with Option A as it is helpful to be specific as to what is expected from large scale development proposals.   We endorse inclusion of a health impact assessment as one of the supporting documents that need to be provided as it is listed as g) v).

<u>Environment team – Countryside Access</u>

7.25   The proposed policy wording for LS1 (g) vi) includes a Transport Assessment and Travel Plan. This should provide for assessment of effects on PRoW.

<u>Education team</u>

7.26   There is no specific reference to education in this draft policy, although we note that e) in its reference to social and community infrastructure is probably all-encompassing.

<u>Innovation team</u>

7.27   The Innovation Framework (IF) is a guidance document setting out the need for developers and planners to consider innovation within planning and development, ideally including putting together Innovation Plans for new developments. It covers developments of all kinds, including residential, commercial, workplace, mixed use and infrastructure development.

7.28   Whilst the Innovation Framework (IF) is mentioned in policy IN8 with respect to digital connectivity and 5G, the IF applies to many more aspects of development planning such as mobility and transport, and energy and helps ensure future proofing by anticipating future innovations over different time horizons that may need to be accommodated in the lifetime of a development.

7.29   For example, how will the scheme be flexible to changing needs? We should note that future-proofing is not an exact science and wherever possible flexibility should be built into solutions to enable the take-up of innovations that may become mainstream in the lifetime of a development. Examples of future innovations and their possible time horizon are given in the Innovations Framework. For example, it would be prudent to build in at the outset the cabling for the predicted expansion of EV use and ownership. The private car-parking of today might become the turning space, pick-up and set down of micro-bus services that are predicted to reduce the use of private cars the future. These may be fully autonomous, on-demand and will be electric.

7.30   We would like to see the Innovation Framework and Innovation Plan referenced more fully in this document as it is an appendix and so part of the LTCP. <u>The requirement for an Innovation Plan should be added to the list under g) in this draft policy.</u>

Residential Focused Allocations:

Policy AS1: Land at Berinsfield Garden Village

Strategic Planning and Infrastructure team

7.31   The South Oxfordshire Local Plan adopted in 2020 allocated this site and removed the land from the Green Belt. Reasons included the exceptional circumstances of unbalanced tenure mix, high levels of deprivation in Berinsfield and the potential to deliver significant regeneration benefits. The details of the regeneration package are set out in Policy STRAT10i and the Infrastructure Delivery Plan (IDP). Point 2) of the proposed policy AS1 – Land at Berinsfield Garden Village and its sub points are important to ensure that any proposal for this allocation is clear on how the necessary regeneration package will be delivered. The proposed policy wording in AS1 clearly referring to the delivery of the regeneration needs of Berinsfield is welcomed.

7.32   The draft policy proposes some changes to the current allocation policy STRAT10i.

7.33   We note the changes in the proposed concept plan which add a thin slice of 'green infrastructure' between Berinsfield and the allocation and wish to highlight the importance of the future provision of multiple bridges for walking and cycling between Berinsfield and the allocation and beyond are needed for effective integration.

7.34   Please see our Place Planning and Coordination and Transport Development Management teams comments on page 38 of our response, which include key recommendations for wording changes required in these proposed site allocation policies.

Education team

7.35   In respect of the part of the policy which currently reads: 'h) sufficient education provision, which is likely to require one additional primary school provided on site, contributions to the enhancement of Abbey Woods Primary School, and contributions to a new secondary school and Special Educational Needs and Disabilities (SEND) provided off site.'   We recommend amend text to read: 'h) sufficient additional education capacity, to be agreed with the local education authority. This is likely to be the provision of one onsite primary school and potential contributions to enhancement of Abbey Woods Primary School, as well as contributions to appropriate off-site secondary school and Special Educational Needs and Disabilities (SEND) provision.

Archaeology team

7.36   This site is located in an area of considerable archaeological interest immediately north of a Neolithic and Bronze Age ritual centre consisting of a henge, Cursus monument and barrow cemetery. Further significant archaeological remains have been found on the northern and southern edge of the proposed site and geophysical survey has confirmed that further archaeological deposits related to this survive within the site. There is the potential for archaeological remains to survive of such significance that they would require physical preservation and a field evaluation will need to be undertaken on this site before it is understood the extent of any such constraints.

7.37   This could have significant implications for the masterplan and the siting of greenspace and as such this evaluation must be undertaken before a masterplan is agreed in order that the masterplan can take this into account. For clarity this should be included in this policy, and we would therefore recommend that the policy be amended to include.

7.38   2) Proposals for the development must demonstrate:
        That any master planning undertaken for the site has been informed by the results of
        an archaeological geophysical survey and trenched evaluation in order that the impact
        of these proposals have taken into account the significance of any heritage assets
        surviving on the site. The masterplan will need to include the physical preservation of
        significant archaeological features and their setting.

Place Planning and Coordination team

7.39   Point 2) j) iv) identifies "contributions towards upgrading the A4074/B4015 junction at
        Golden Balls, the Clifton Hampden bypass, and the Didcot to Culham River Crossing".
        However, we request that instead of referring only to the Clifton Hampden Bypass and
        the Didcot to Culham River Crossing, the following wording is included "The Didcot
        Garden Town HIF1 Scheme, comprised of the A4130 Widening, Didcot Science
        Bridge, Didcot to Culham River Crossing, and Clifton Hampden Bypass", whilst
        retaining the reference to upgrading the A4074/B4015 junction at Golden Balls. This is
        because the four elements that constitute the HIF1 Scheme need to be delivered in
        their entirety as a comprehensive package in order to effectively realise the necessary
        benefits.

7.40   Page 273 Policy AS1 j) i) Amend as follows: 'Specifically (but not limited to) improving
        the existing walking and cycling infrastructure along the A415 from Berinsfield to
        Culham Science Centre, Culham railway station and the proposed secondary school
        at land adjacent to Culham Science Centre… Additional/altered text underlined.

7.41   Page 273 policy AS1 j) v) Amend as follows: '…provision for excellent public transport
        facilities consisting of, but not limited to bus shelters with covered cycle parking as well
        as pump priming… Additional/altered text underlined.

Place Planning and Coordination / Public Transport teams

7.42   Please add the following text (shown underlined) to point 2) j) v) and remove the text
        which has been crossed through: "v) provision for excellent public transport facilities
        including pump priming a scheduled bus services, with a service between Cowley,
        Berinsfield, Culham and Abingdon-on-Thames / Didcot Berinsfield-Cowley, a service
        between Berinsfield, Culham and Abingdon-on-Thames, with options to extend or vary
        services to Didcot" and provision of bus (and active travel) only access connecting the
        A4074 to Fane Drive.'

Transport Development Management team

7.43   We support the Place Planning and Coordination team comments above. We
        understand that subject to further investigations there may be a need to consider
        additional land outside of the allocation in order to deliver suitable all modes access.
        The District Council should consider this matter in detail ahead of the Regulation 19
        stage.

OCC Estates

7.44   Oxfordshire County Council (OCC) Property controls and that lies in close proximity to
        this allocation site. The County land currently contains the school facilities and play
        areas of the Abbey Woods Primary School and a number of leisure, sports and
        community buildings.

7.45   The draft policy sets out a list of criteria that development proposals will need to meet. Criterion (h) in particular, notes that development proposals must demonstrate:
"h) sufficient education provision, which is likely to require one additional primary school provided on site, contributions to the enhancement of Abbey Woods Primary School, and contributions to a new secondary school and Special Educational Needs and Disabilities (SEND) provided off site."

7.46   OCC Property supports the draft policy wording of this criterion for this proposed allocation.

7.47   Oxfordshire County Council has a duty to establish and maintain an accessible and a safe environment for pupils and as a consequence, OCC Property would appreciate it if the draft allocation policy could outline the significance of having all relevant stakeholders, including Oxfordshire County Council, involved in the masterplan process at an early stage. This is considered critical to ensure that any development proposals will seek to position the new school in a location that is easily accessible and in close proximity to important local service buildings.

Minerals and Waste team

7.48   The proposed allocation is within the Thames and Lower Thames Valley – Oxford to Cholsey Safeguarded Area. As this site was in the previously adopted South Oxfordshire Local Plan: Policy STRAT 10i, we have no objection on mineral grounds. However, we would hope to see any viable mineral extracted before development were to take place and for any future proposed development to include mitigation for potential mineral working within the Mineral Safeguarded Area.

Policy AS2: Land adjacent to Culham Science Centre

Strategic Planning and Infrastructure team

7.49   The location of this allocation (currently allocated in STRAT9 in the South Oxfordshire Local Plan adopted in 2020) offers potential for a significant sustainable development. Culham Station and train services to Didcot and Oxford will afford the future residents, employees and visitors to the site the opportunity to use rail services or use planned frequent bus services to Abingdon, Didcot, Berinsfield. The proposed policy AS2 is very similar to the allocation policy STRAT9 and we are pleased to note the provision of a new cycling and walking bridge across the River Thames to connect with Abingdon-on-Thames and beyond to the north of the site is included.

7.50   We note the changes proposed for the employment land at Culham No1 site.

7.51   The comprehensive masterplan for the allocation will be expected to be informed by detailed discussions with the rail industry as to the plans for Culham Station improvements and any supporting future rail infrastructure.

7.52   Point 5 of STRAT9 relating the extraction of minerals prior to non-mineral development taking place where this is practical and environmentally feasible, is not included within the proposed policy – this matter should be further discussed with our Minerals and Waste team prior to the Regulation 19 stage of this plan.

7.53   Please see our Place Planning and Coordination and Transport Development Management teams comments on page 38 of our response, which include key

recommendations for wording changes required in these proposed site allocation policies.

<u>Education team</u>

7.54   In respect of the part of the policy which reads: 'c) sufficient additional education capacity, to be agreed with the local education authority. This is likely to be the provision of two onsite primary schools and one onsite secondary school with sixth form. The development will also need to demonstrate appropriate contributions towards Special Educational Needs and Disabilities (SEND).' We suggest amending this as follows: '<u>sufficient additional education capacity, to be agreed with the local education authority. This is likely to be the provision of two onsite primary schools and one onsite secondary school, as well as appropriate contributions towards Special Educational Needs and Disabilities (SEND) provision</u>'.

<u>Archaeology team</u>

7.55   This site is located in an area of archaeological interest including several areas of probable prehistoric and Roman settlement identified from geophysical survey. An archaeological evaluation has been undertaken on part of the site but this will need to be undertaken across the whole site before the full extent and significance of these sites can be understood.

7.56   We would therefore recommend that the draft policy be amended to include: <u>p) That any master planning undertaken for the site has been informed by the results of an archaeological geophysical survey and trenched evaluation in order that the impact of these proposals have taken into account the significance of any heritage assets surviving on the site. The masterplan will need to include the physical preservation of significant archaeological features and their setting.</u>

<u>Environment team – Countryside Access</u>

7.57   The proposed policy wording AS2 (F) iv – protection and enhancement of PRoW is supported.

<u>Place Planning and Coordination and Transport Development Management teams</u>

7.58   Point 2) f) i) states "provision for excellent sustainable transport facilities including, but not limited to, new and improvements to existing cycle and footways including contributions towards a "Cycle Premium Route" that is proposed between Didcot and Culham". It is suggested that reference to the 'cycle premium route that is proposed between Didcot and Culham' can be removed and instead the policy could say "<u>the high quality walking and cycling provision that forms an integral part of the Didcot to Culham River Crossing element of the Didcot Garden Town HIF1 Scheme.</u>"

7.59   The same point also includes reference to bus service improvements but does not mention public transport facilities. Policy AS1 makes reference to "<u>provision for excellent public transport facilities" and it is requested that this wording or similar is included in all site allocation policies</u> to ensure that not just the services are improved but that high-quality bus stop provision is also required, including bus shelters, Real Time Information displays, and cycle parking.

7.60   Point 2) f) iii) identifies "new junctions onto the A415 and significant contributions towards the Clifton Hampden Bypass, the Didcot to Culham River Crossing, and upgrading the A4074/B4015 junction at Golden Balls". However, OCC requests that

instead of referring only to the Clifton Hampden Bypass and the Didcot to Culham River Crossing, the following wording is included: "The Didcot Garden Town HIF1 Scheme, comprised of the A4130 Widening, Didcot Science Bridge, Didcot to Culham River Crossing, and Clifton Hampden Bypass", whilst retaining the references to junctions on the A415 and upgrading the A4074/B4015 junction at Golden Balls. This is because the four elements that constitute the HIF1 Scheme need to be delivered in their entirety as a comprehensive package in order to effectively realise the necessary benefits.

Place Planning and Coordination / Public Transport teams

7.61   We suggest that the text in this policy on bus service requirements is set out as its own point under point f) for greater legibility. Please add the following text (shown in underlines) to this point and remove the text which has been crossed through: "bus improvements including bus infrastructure and provision of a~~ scheduled bus services between Cowley, Berinsfield, Culham and Abingdon-on-Thames / Didcot~~, with options to extend or vary services to locations such as Cowley and Didcot~~;".

Minerals and Waste team

7.62   The proposed allocation is within and adjacent to the Thames and Lower Thames Valley – Oxford to Cholsey Safeguarded Area and contains a permitted waste site at Culham No 1.
As this site was in the previously adopted South Oxfordshire Local Plan: Policy STRAT 9, we have no objection on mineral or waste grounds. However, we would hope to see any viable mineral extracted before development were to take place and for any future proposed development to include mitigation for potential mineral working within the Mineral Safeguarded Area.

7.63   There is also the permitted recycling/transfer waste site at Culham No1 site within the allocation, that we would wish to see retained as part of the draft policy. We support the inclusion at bullet 2) which aims to retain and optimise the employment use in this area and we hope this includes the recycling site which would come under sui generis use.

Policy AS3: Land South of Grenoble Road, Edge of Oxford

Strategic Planning and Infrastructure team

7.64   Policy AS3 as drafted appears to be suitable for the Land South of Grenoble Road, subject to minor amendments as set out below.

7.65   Please see our Place Planning and Coordination and Transport Development Management teams comments on page 38 of our response, which include key recommendations for wording changes required in these proposed site allocation policies.

7.66   The County Council has been involved in discussions over many years in respect of this site but is currently waiting to hear from the three landowners as to whether they have a joint venture and wish to proceed to preapplication discussion.

7.67   The draft policy is largely the same as in the adopted Local Plan.

7.68   One change that has happened on the ground since the last Local Plan was adopted is the installation of the battery storage containers to the east further to the planning application reference number P20/S4360/FUL which was for "Installation of renewable led energy generating station comprising ground-mounted photovoltaic solar arrays and battery-based electricity storage containers together with substation, inverter/transformer stations, site accesses, internal access tracks, security measures, access gates, other ancillary infrastructure, landscaping and biodiversity enhancements." This development is known as 'Energy Superhub Oxford' and has an industrial appearance. The part of the policy j) appropriately attempts to recognise this change, but it may be that further thought is needed on how best to write the policy to require landscape screening or similar for future residents.

Education team

7.69   In respect of the part of the policy which reads: e) sufficient education capacity, to be agreed with the local education authority. This is likely to be on-site primary school and on-site secondary school provision with the capability to expand to meet future needs. The development will also need to demonstrate appropriate contributions towards Special Educational Needs and Disabilities (SEND); We suggest amending this as follows: 'sufficient additional education capacity, to be agreed with the local education authority. This is likely to be the provision of one onsite primary school and one onsite secondary school, as well as appropriate contributions towards Special Educational Needs and Disabilities (SEND) provision.'

Archaeology team

7.70   An archaeological evaluation has been undertaken on this site which recorded areas of Prehistoric and Roman settlement. A further programme of mitigation will need to be undertaken on the site and the need for a scheme of investigation should be highlighted within this policy as follows:

7.71   'n) a scheme of appropriate archaeological mitigation should be established in accordance with the archaeological evaluation (or a subsequent evaluation where this has been agreed with the council), to include the physical preservation of significant archaeological features and their setting and the preservation by record of less than significant remains, the publication of the results and the deposition of the generated archive.'

Strategic Planning and Infrastructure team

7.72   This comment is focused on the issue of the relationship between the Land South of Grenoble Road and the Cowley Branch Line.

7.73   This Regulation 18 consultation is lacking reference to the project to reopen the Cowley Branch Line to passenger traffic, which is currently unfunded. Together with appropriate bus services, and provision for walking and cycling, the Cowley Branch Line will enable the creation of sustainable neighbourhoods which are not reliant on travel by private car. Workers attracted to the expanded Oxford Science Park on this site will also be able to travel to and from work by rail, and that is likely to be necessary for the successful functioning of the employment area given the existing and potential future road congestion in the area. The proposed railway station adjoining Plot 16 in the Oxford Science Park, near Priory Road, likely to be named 'Oxford Littlemore', provides the opportunity for attractive rail services nearby. Developers of the site acknowledge the importance of the Cowley Branch Line and that the site can help to

support the reopening of the line, as noted on their website: https://www.oxfordsciencevillage.com/.

7.74   Within the South Oxfordshire Local Plan 2035 it was highlighted in paragraph 3.90 page 60 in the supporting text for this allocation that 'Furthermore, the site would also benefit from the potential re-opening of the Cowley Branch Line at the Oxford Science Park." The lack of mention of this strategic transport proposal in this Regulation 18 consultation document, which has significantly advanced since the South Oxfordshire Local Plan was prepared in 2020, is a significant omission.

7.75   As with other infrastructure needs, such as bus services and upgrades to roads, there is a need for contributions towards the funding of the infrastructure. S106 contributions for the Cowley Branch Line will be calculated and sought by the County Council. Further comments about this can be found in our comments on Draft Policies IN2 and IN3. In addition to inclusion in the Infrastructure Delivery Plan and the viability report underpinning the South & Vale Joint Local Plan, specific mention should be made in this policy about how this public transport contribution will be sought. If the District Councils seek further evidence on the need for this infrastructure, making the Cowley Branch Line more necessary to mitigate the effects of development since the previous Local Plan adopted in 2020, the County Council can look to provide that having regard to the policies in the LTCP and our guidance documents.

7.76   In addition, the County Council will require active travel connections between the Land South of Grenoble Road and the future Oxford Littlemore railway station on the Cowley Branch Line, together with required facilities such as cycle parking hubs. A report was produced by consultants PJA in October 2022 setting out recommendations for such which has been shared with site developers and the Councils. There is ongoing work, an 'Infrastructure Place Study' by consultants SLC Rail to progress what is required. It is expected that some active travel connections will be provided by the developer under S278 agreements. Financial contributions under S106 agreements, to be pooled with other contributions, will enable other connections and facilities to be provided by the County Council or City Council at a later date.

7.77   We recommend the following amendments to the policy:

- AS3 2 b): Amend to add the underlined text: 'a high-quality development that is fully integrated and relates closely to The Leys neighbourhoods and Littlemore in Oxford;
- AS3 2 f i): Amend to add the underlined text: 'provision of new, and enhancement to existing, cycling and walking infrastructure and the public rights of way network on and off site ensuring the site is well connected to Oxford City, nearby mobility hubs including the proposed Oxford Littlemore station on the Cowley Branch Line, and appropriate surrounding villages'.
- AS3 2 f vii): Add the underlined text: 'contributions to public transport services in the vicinity such as the proposed Cowley Branch Line'.

Environment team – Countryside Access

7.78   Proposed policy wording AS3 (f) i - protection and enhancement of PRoW is supported.

Transport Development Management team

7.79   The draft policies for Grenoble Road, Northfield and Bayswater Brook include provisions about minimising the use and impact of private motor vehicles on the site. We would welcome further discussion on the possibility of minor amendments to the draft policies to reinforce the intention for innovative approaches aimed at making the development as car-free as possible. As part of this, the County Council intends to establish Controlled Parking Zones on these sites, and developers will be expected to mirror the intent of that by a private mechanism in advance of roads being adopted (or if they are not adopted). The intention to control car parking on site should be included in the policies.

Transport Policy team

7.80   We are supportive of reference to an A4074 mobility hub. Work is ongoing to refine proposals for how the peripheral Park and Ride sites identified in the Oxford Transport Strategy (2015) function as mobility hubs. The sites are all included in the adopted Central Oxfordshire Travel Plan (COTP) as mobility hub locations within the proposed Strategic Public Transport Network and we therefore support their continued inclusion and safeguarding in the Local Plan.

7.81   England's Economic Heartland sub-national transport body is conducting a series of connectivity studies to identify opportunities and solutions to maximise current and future connectivity in defined corridors or areas and build on the policy framework in the EEH Transport Strategy. Oxfordshire County Council supports the outcomes of the Swindon-Didcot-Oxford connectivity study and encourages consideration of the package of measures identified in the Local Plan. This includes reopening of the Cowley Branch Line to passengers which the study highlights would support planned strategic housing sites at Grenoble Road and Northfield (page 50).

Place Planning and Coordination team

7.82   Other site policies reference all of the specific transport-related infrastructure identified in the IDP of the South Oxfordshire Local Plan 2035, which is very much welcomed. However, this has not occurred with the site policy for Land South of Grenoble Road. To ensure consistency with the approach for other site policies, specific reference must also be made in the list at point 2) f) to: the upgrading of the A4074 Golden Balls junction; upgrades to the existing junctions on the Oxford Eastern bypass (A4142), including Heyford Hill and Cowley Interchange junctions; and a new cycle route between Culham Science Centre, Berinsfield and Oxford.

7.83   Please amend point 2) f) i) with the addition additional text underlined, "provision of new, and enhancement to existing, cycling and walking infrastructure and the public rights of way network on and off site ensuring the site is well connected to Oxford City, nearby secondary schools, mobility hubs, and appropriate surrounding villages"

7.84   Most other concept plans include numerous 'green links' crossing each site but none are included in the concept plan for this site. No definition is given for what these links might entail but it is assumed that they would incorporate high-quality active travel provision. As such, green links should be added to this concept plan. County officers would welcome the opportunity to advise where such links should be added.

7.85   Please add the following text (shown underlined) to point 2) f) iii): "improvements to scheduled bus services and infrastructure within the site and along the A4074 and B480 corridors to Oxford City, Eastern Arc, Science Vale, and nearby villages and associated infrastructure;"

Policy AS4: Land at Northfield, Edge of Oxford

Strategic Planning and Infrastructure team

7.86   Policy AS4 as drafted appears to be suitable for the Land at Northfield, subject to minor amendments as set out below. The County Council in its regulatory capacity is a party to discussions with the landowners (Brasenose College and County Estates) and developers L&Q Estates.

7.87   Discussions to date with the landowners and developers have been focused around 1,800 new homes and supporting services and facilities including a primary school, so the provisions of the draft policy requiring such appear to accord with that. We recommend that the draft concept plan is amended prior to the Regulation 19 consultation to take into account the most to up to date understanding of the preferred location for the local centre. We also recommend that the concept plan has a more up to date aerial photo base as the one included still shows the gas holder adjacent which was demolished some time ago.

7.88   The 'missing tooth' creates some issues. However, we note that land was removed from the Green Belt along with the allocated site at the last Local Plan and could potentially come forward for development also. We are not aware of any intention by that landowner to join with those of the allocated site, so the master plan for the allocated site cannot provide a continuous form of development along the Watlington Road B480. The draft policy point j) which expects a 'higher density development (a minimum of 70 dph) along key transport corridors' may not be realistic in relation to the Watlington Road B480. We are aware that there is a strip between the 'missing tooth' and the Watlington Road B480 itself which should allow for consideration of improved pedestrian and cycle infrastructure along this side of the road.

7.89   There may be significant changes to Oxford Road as a result of this strategic site development. We expected that the developers of the site will be commenting on this Local Plan and providing information on their plans in public soon. The latest information on the road network should be used to review the draft policy text and/or concept plan prior to the Regulation 19 stage.

7.90   Please see our Place Planning and Coordination and Transport Development Management teams comments on page 38 of our response, which include key recommendations for wording changes required in these proposed site allocation policies.

Strategic Planning and Infrastructure team

7.91   This comment is focused on the issue of the relationship between the Northfield site and the Cowley Branch Line.

7.92   The Northfield Draft Policy AS4 needs to reference the contributions that will be sought towards the Cowley Branch Line.

7.93   Please see our comment on Draft Policy AS3 (which are also applicable here but not repeated), and related comments on Draft Policies IN2 and IN3 in respect of the need for funding to establish the new Cowley Branch Line service. As with the Land South of Grenoble Road, reopening of the Cowley Branch Line to passengers will enable Northfield to be developed as a sustainable neighbourhood with an excellent rail link. Contributions towards funding the infrastructure will therefore be sought.

7.94   Walking and cycling connections will be needed between this Northfield site and the proposed closest railway station which is proposed to be named 'Oxford Cowley'. At the closest point, the Oxford Cowley station will be only some 800m away as the crow flies. In particular, a bridge across the railway line between Sandy Lane near the Scout Hut and land owned by Oxford City near the proposed platform on the northern side of the line behind the Tesco superstore will help provide a direct connection. Funding towards this bridge will be expected, given that it will avoid people having to walk a long way around along the busy B480 and through the Retail Park area to access the future railway station.   There is current work to define the bridge design being undertaken by consultants.

7.95   We recommend the following amendments to the policy:
- AS4 2 b): Amend to add the underlined text: 'how the proposed development is well integrated with its surroundings <u>including The Leys neighbourhoods and the Oxford Retail Park</u>'.
- AS4 2 d i): Amend to add the underlined text: '<u>provision of new, and enhancement to existing</u>, cycling and walking infrastructure and the public rights of way network on and off site ensuring the site is well connected to Oxford City, <u>nearby mobility hubs including the proposed Oxford Cowley station on the Cowley Branch Line</u>, and appropriate surrounding villages'.
- AS4 2 d vi): Add the underlined text: '<u>contributions to public transport services in the vicinity such as the proposed Cowley Branch Line</u>'.

Strategic Planning and Infrastructure team

7.96   This comment relates to the issue of integration with Blackbird Leys. The amendment sought above referencing 'The Leys neighbourhoods' will be consistent with that reference in the draft Policy AS3 for the Land South of Grenoble Road. The County Council made comments on previous occasions that it is just as important that the Northfield site has regard to Blackbird Leys as it is the Grenoble Road site. On both sites it is likely that contributions will be sought towards facilities in Blackbird Leys which will help regenerate that area.

Education team

7.97   In respect of the part of the policy which reads: 'c) sufficient education provision, to be agreed with the local education authority. This is likely to include an on site primary school, as well as contributions to appropriate off-site secondary school and Special Educational Needs and Disabilities (SEND).' We suggest amendments so that it reads: '<u>sufficient additional education capacity, to be agreed with the local education authority. This is likely to be the provision of one on-site primary school, as well as contributions to appropriate off-site secondary school and Special Educational Needs and Disabilities (SEND) provision</u>.'

Archaeology team

7.98 Part of this site has been subject to an archaeological evaluation which has demonstrated that the site contains below ground evidence of its occupation and use from the early prehistoric to post medieval period, this characterised by transient Mesolithic and Neolithic activity, later prehistoric settlement and land use, Roman occupation and activity likely associated with the Oxford pottery industries of the area and later agricultural land division and management.

7.99 Trenched evaluation conducted to date has not however included areas occupying its western and south-western extents. These areas are shown by previous geophysical survey and the recent results of adjacent trenching to likely contain further below ground archaeological remains, the date, character, extent, complexity, state of preservation and significance of which, and the effects of proposed development on such, remains uncertain.

7.100 We recommend that the policy reads as follows: 'k) That any master planning undertaken for the site has been informed by the results of an archaeological geophysical survey and trenched evaluation in order that the impact of these proposals have taken into account the significance of any heritage assets surviving on the site. The masterplan will need to include the physical preservation of significant archaeological features and their setting.'

Environment team – Countryside Access

7.101 Proposed policy wording AS4 (D) - protection and enhancement of PRoW is supported.

Transport Development Management team

7.102 The draft policies for Grenoble Road, Northfield and Bayswater Brook include provisions about minimising the use and impact of private motor vehicles on the site. Please see our comments above in respect of Policy AS3 – the same comments apply here.

Place Planning and Coordination team

7.103 Other site policies reference all of the specific transport-related infrastructure identified in the IDP of the South Oxfordshire Local Plan 2035, which is very much welcomed. However, this has not occurred with the site policy for Land at Northfield.

7.104 To ensure consistency with the approach for other site policies, specific reference must also be made in the list at point 2) d) to the upgrading of the A4074 Golden Balls junction.

7.105 Please also amend Page 287 AS4 2) d) v) to…Oxford eastern bypass (A4142) including Cowley Interchange junction'

7.106 Please amend point d) i) to "cycling and walking infrastructure (including to proposed and existing secondary schools) and the public rights of way network (including a connection and improvements to the Oxford Greenbelt Way) on and off site ensuring the site is well connected to Oxford City, and appropriate surrounding villages;"

7.107 Most other concept plans include numerous 'green links' crossing each site but none are included in the concept plan for this site. No definition is given for what these links might entail but it is assumed that they would incorporate high-quality active travel

provision. As such, green links should be added to this concept plan. OCC officers would welcome the opportunity to advise where such links should be added.

<u>Place Planning and Coordination / Public Transport teams</u>

7.108   Please add the following text (shown underlined) to point 2) d) iii) and iv) and remove the text which has been crossed through: "~~iii) provision of infrastructure/financial support for Culham Science Vale bus service; and iv) contributions towards improvements to bus services along the B480 corridor and through the site to Oxford City and nearby villages~~ contributions towards <u>improvements to scheduled bus services within the site and along the A4074 and B480 corridors to Oxford City, Eastern Arc, Science Vale, and nearby villages and associated infrastructure</u>".

<u>OCC Estates</u>

7.109   Oxfordshire County Council Property controls 15.6 hectares of land to the north and south of Oxford Road, which forms part of the 'Land at Northfield' strategic Local Plan allocation (Policy STRAT12) in the adopted South Oxfordshire Local Plan. The extent of the OCC land can be seen below.
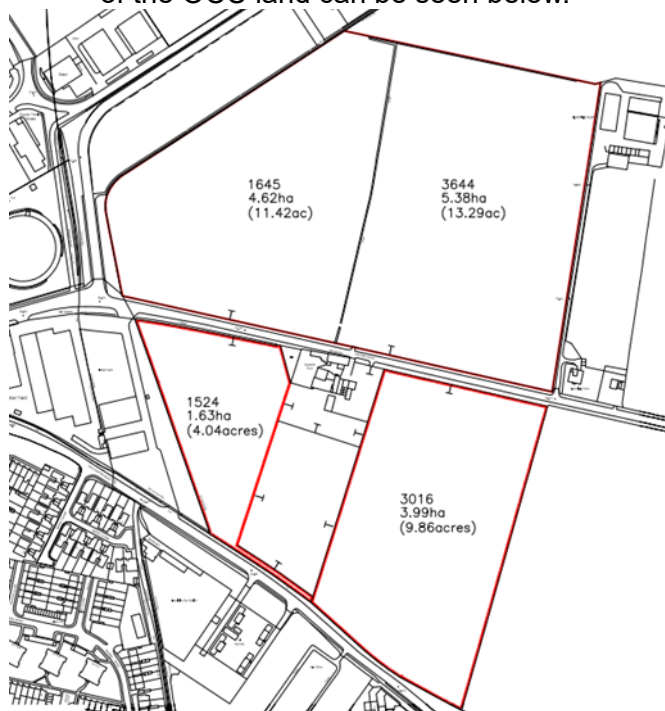
7.110   OCC Property notes that the policy wording of this draft policy largely retains the policy wording that is found in adopted Local Plan Policy STRAT12, albeit with some changes.

7.111   OCC Property is concerned about two of these changes in particular:

   a) a change requiring biodiversity net gain to be delivered on site now rather than the more flexible approach in the adopted policy STRAT12; and
   b) the removal of the average net density figures for the allocation site from the policy wording.

7.112   In relation to the point a) above, whilst it is acknowledged that there is a hierarchy to follow in delivering biodiversity net gain starting with on site enhancements, and then off-site units and finally off-site credits, the removal of flexibility found in policy STRAT12 is unhelpful. The decision about how and where to deliver net gain is a matter that will be determined through the master planning and technical work that takes place as the proposals evolve and therefore OCC Property seeks the reinstatement of the more flexible wording from adopted policy STRAT12.

7.113   In relation to point b) above, by removing the average net density figures from policy AS4, the certainty of delivery of the quantum of development envisaged in the policy could be undermined, leading to a less robust policy as a result.

7.114   OCC Property therefore seeks the reinstatement of the average net density figures to the wording of criterion j) of policy AS4.

Policy AS5: Land at Bayswater Brook, Edge of Oxford

Strategic Planning and Infrastructure team

7.115   Policy AS5 as drafted appears to be suitable for the parcel of land currently the subject of the planning applications including the hybrid application P22/S4618/O, subject to minor amendments as set out below.

7.116   The planning applications have progressed to a point where the County Council is largely satisfied that the case officer can prepare a report for a Planning Committee. The County Council expressed numerous reservations about the allocation of this site during the last South Oxfordshire Local Plan process, and there has needed to be a lot of work to get to this point, particularly because the issue of appropriate transport mitigation was not resolved at the last Local Plan. Indeed, that Local Plan's supporting transport evidence envisaged a new link road to the north, but it has now been agreed that is not the best way to mitigate the effect on the highway network. Supporting transport evidence for this Joint Local Plan will be able to use the transport modelling work undertaken for the planning applications.

7.117   The draft allocation AS5 is to deliver approximately 1,100 new homes and supporting services and facilities. The applications propose 1,450 new homes plus 120 assisted living units as well as supporting services and facilities. Although there is an argument that the housing number could be updated in light of the evidence associated with the planning application, we appreciate that there is also an argument for continuing with the original allocation number for consistency with the adopted allocation. In the same way, it is generally appropriate to continue the policy text unless there is a specific need to change the text.

7.118   Please see our Place Planning and Coordination and Transport Development Management teams comments on page 38 of our response, which include key recommendations for wording changes required in these proposed site allocation policies.

Transport Development Management team

7.119   The draft policies for Grenoble Road, Northfield and Bayswater Brook include provisions about minimising the use and impact of private motor vehicles on the site. Please see our comments above in respect of Policy AS3 – the same comments apply here.

7.120 Amend as follows: Page 292 d) i) …provision of high-quality pedestrian, cycle and public transport access and connectivity to Oxford City Centre, <u>nearby secondary schools</u> and other major employment locations, particularly <u>the universities…</u>'

7.121 The following point is within the other proposed allocation policies but not this one: '<u>a layout that minimises the use and impact of private motor vehicles on the site</u>', this point should be added to the proposed policy wording.

<u>Education team</u>

7.122 In respect of the part of the policy which reads: b) sufficient on-site educational capacity, to be agreed with the local education authority. This is likely to be for on-site primary school provision including early years, and appropriate contributions towards an off-site secondary school and Special Educational Needs and Disabilities (SEND)'. We suggest this is amended as follows: '<u>sufficient additional education capacity, to be agreed with the local education authority. This is likely to be the provision of one on-site primary school, as well as contributions to appropriate off-site secondary school and Special Educational Needs and Disabilities (SEND) provision</u>.'

<u>Strategic Planning and Infrastructure team</u>

7.123 This comment relates to the proposal to remove the parcel of land north of Sandhills from the allocation.

7.124 We agree with the text as set out under 'suitability concerns' on page 290. Please refer to our other text in this response for further advice relating to that parcel and the proposal to remove it from the allocation.

7.125 If the councils decide not to de-allocate the parcel (against our advice), <u>then an entirely new separate allocation and policy will need to be written</u>. Policy AS5 as drafted is only suitable for the parcel of land currently the subject of the planning applications including the hybrid application P22/S4618/O.

<u>Environment team – Countryside Access</u>

7.126 AS5 (D) ii and (N) iv - protection and enhancement of PRoW is supported.

Policy AS6: Rich's Sidings and Broadway, Didcot

<u>Strategic Planning and Infrastructure team</u>

7.127 We consider that there should be policy provisions included for this site. There appears to be no 'carried over' policy provisions so the policy should be a comprehensive one. The policy as drafted provides no guidance on the form of development or infrastructure expected, apart from it involving 'a mixed-use scheme comprising of new jobs and approximately 100 homes'.

Policy AS7: Didcot Gateway, Didcot

Strategic Planning and Infrastructure team

7.128   We consider that there should be policy provisions included for this site. There appears to be no 'carried over' policy provisions so the policy should be a comprehensive one. The policy as drafted provides no guidance on the form of development or infrastructure expected, apart from it involving 'approximately 200 new homes as part of a mixed-use development'.

Policy AS8: North West of Grove, Grove

Strategic Planning and Infrastructure team

7.129   We support the intention to allocate for the full capacity of the 28ha site, compared to the current Local Plan which identified only that 400 new homes were anticipated before 2031 but there was greater capacity over a longer period of time.

7.130   A planning application was lodged for this site in 2020: P20/V3113/O, and the County Council lodged objections on that. There were issues around the provision of the Grove Northern Link Road and a bus service. The site is only deliverable if land outside of the allocation is available to enable completion of the Grove Northern Link Road.

7.131   Another issue was about whether an additional primary school was needed – indeed the application was lodged to cover either eventuality of 531 homes with an on-site school or 624 homes without an on-site school. We indicated in our 2021 response to the application that it was likely that a primary school would not be needed on site.

7.132   Details of the application are still available online and it is said to be under consideration, although there have been no amendments yet made for consultation.

Education team

7.133   We have noted that the number of dwellings has increased in this consultation document from that in the current local plan (400 up to 2031) to 600.

7.134   Part of the policy currently reads:

b) sufficient primary and early years education provision, to be determined in consultation with the local education authority. This will likely require sufficient contributions towards primary education and early years in accordance with the Infrastructure Delivery Plan;

c) sufficient off-site contributions to additional secondary education and Special Education Needs and Disabilities, in accordance with the Infrastructure Delivery Plan;'

We suggest that the above is amended to read as follows:
'sufficient additional education capacity, to be agreed with the local education authority, through contributions to appropriate off-site primary and secondary schools and Special Educational Needs and Disabilities (SEND) provision.'

Archaeology team

7.135 The site is located in an area of archaeological interest, and we have previously advised that an archaeological evaluation be undertaken ahead of the determination of any planning application for the site.

7.136 We would therefore recommend that this policy include the following: 'That any master planning undertaken for the site has been informed by the results of an archaeological geophysical survey and trenched evaluation in order that the impact of these proposals have taken into account the significance of any heritage assets surviving on the site. The masterplan will need to include the physical preservation of significant archaeological features and their setting.'

Environment team – Countryside Access

7.137 The proposed policy wording AS8 (D) iv – protection and enhancement of PRoW is supported.

Place Planning and Coordination / Public Transport teams

7.138 Please add the following text (shown underlined) to point 2) d) ii): "contributions towards improving the bus services and associated infrastructure for the area and new bus services connecting with the neighbouring allocations of Grove Airfield and Monks Farm, and Abingdon, Oxford, Wantage, Harwell Campus, and Didcot."

Place Planning and Coordination team

7.139 Page 301 AS8 2) 'a) i) …including the neighbouring developments at Monks Farm and Grove Airfield and nearby secondary schools'.

7.140 Assuming that the 'green links' in the concept plan incorporate high-quality active travel provision, it is considered that those shown would provide insufficient connectivity with the permitted development to the south of the site. As such, it is recommended that an additional route is shown at the western extent of the concept plan and another between the two north-south green links currently identified in the concept plan.

Minerals and Waste team

7.141 This proposed allocation is in close proximity to a Waste Safeguarded Site as there is a Sewage Treatment Site to the north. As such Policy W11 of the Oxfordshire Minerals and Waste Local Plan 2031 should be considered. The site was originally allocated by Core Policy 15a in Part 2 of the Vale of White Horse Local Plan 2031, therefore we have no objection to this site.

7.142 However, we would hope to see included in the Local Plan draft policy and any future development that consideration of the proximity to the Sewage Treatment works is given and suitable mitigation is provided. We are aware from the Residential Focussed Site Allocations Topic Paper that a planning application has been submitted for this site.

Policy AS9: North West of Valley Park, Didcot

Strategic Planning and Infrastructure team

7.143   There has been little progress on master planning for this site since it was allocated in the current Local Plan.

7.144   The draft policy addresses known issues and appears suitable, subject to amendments as set out in comments below.

Education team

7.145   In respect of the part of the policy which currently reads: 'b) sufficient education provision, to be determined in consultation with the local education authority. This is likely to require a primary school on site, and sufficient off-site contributions to secondary education and Special Educational Needs and Disabilities (SEND);' We suggest this is amended to read: 'sufficient additional education capacity, to be agreed with the local education authority. This is likely to be the provision of one on-site primary school, or an equivalent financial contribution to an appropriate off-site primary school, as well as contributions to appropriate off-site secondary school and Special Educational Needs and Disabilities (SEND) provision.'

Archaeology team

7.146   An archaeological evaluation has been undertaken on this site which has recorded a range of archaeological deposits across the site dating from the Neolithic through to the Roman period and a further programme of archaeological mitigation will be required ahead of any development of the site in line with the NPPF.

7.147   We would therefore recommend that this policy include the following: 'n) a scheme of appropriate archaeological mitigation should be established in accordance with the archaeological evaluation (or a subsequent evaluation where this has been agreed with the council), to include the physical preservation of significant archaeological features and their setting and the preservation by record of less than significant remains, the publication of the results and the deposition of the generated archive.'

7.148   Place Planning and Coordination and Transport Development Management team
For consistency with the site allocations at Land adjacent to Culham Science Centre and Land at Berinsfield Garden Village and consistency with the signed S106 with Valley Park, this site will need to contribute towards HIF1. As such, wording should be added to the list at point 2) c) that reads: "contributions towards the Didcot Garden Town HIF1 Scheme, comprised of the A4130 Widening, Didcot Science Bridge, Didcot to Culham River Crossing, and Clifton Hampden Bypass".

7.149   For consistency with all other sites, improvements to public rights of way should be referenced in this site policy. As such, wording should be added to the list at point 2) c) that reads: "enhancements to the public rights of way network on and off site."

7.150   Page 305 2) c) i) …high quality provisions for active travel modes through this site, and onward connections to key nearby destinations, including Didcot Town, Valley Park, Milton Park, Harwell Campus and nearby secondary schools.

7.151   Page 305 2) c) v) Pedestrian and cycle routes from this site to the Milton Heights development to the west of the A34, namely the Milton Heights active travel bridge.

7.152 Please add the following text (shown underlined) to point 2) c) vii): "an appropriate route through the site for, and contributions towards, new high quality bus services to Didcot town centre / railway station, and to the major employment sites at Culham Science Centre, Milton Park, and Harwell Campus, until such a time that these services can be operated on a fully commercial basis, <u>along with the associated infrastructure</u>'.

Policy AS10: Land at Dalton Barracks Garden Village, Shippon

Strategic Planning and Infrastructure team

7.153 As explained in the supporting text for this proposed allocation, as part of Vale of White Horse Local Plan Part 2, the main area of Barracks buildings on the site was removed from the Green Belt, but this area was not allocated for development at this time. This area of brownfield land is located immediately adjacent to the existing allocation, and we note the proposed increased allocation incorporating this area. It is important to note that the wider Garden Village site (AS14) is much larger still than this proposed allocation boundary of (AS10). This area within the wider Garden Village site boundary of AS14 is within the Oxford Green Belt.

7.154 The Dalton Barracks SPD was adopted in 2022. The County Council provided comments on the consultation draft version of this SPD in November 2021. Within those comments concern was expressed over the quantum of development at 1,200 homes (the allocation size in Core Policy 8a & b of Local Plan Part 2). This concern was focussed on whether that was enough development to support a 'vibrant local centre' and 'excellent public transport services' and other Garden Village principles.

7.155 This proposed policy AS10 increases the land allocated and raises the number of homes allocated to 2,750 homes – more than doubling the size of the proposed development. A further key change is the proposed policy requirement for a new secondary school. The provision of which is essential to achieving a highly sustainable exemplar development in line with Garden Village principles. Increasing the site allocation could allow for comprehensively master planned exemplar sustainable

development to be brought forward, however, we understand that the Defence Infrastructure Organisation is promoting further development, and their view is that the overall capacity may be higher than 4,500 homes. The Dalton Barracks SPD acknowledges in paragraph 7.3 that the wider Garden Village site has capacity for more homes (around, 4,500).

7.156 With this in mind and recognising that the wider area is within the Oxford Green Belt, the master planning exercise should recognise the future full extent Garden Village site in line with Garden Communities Programme aspirations (subject to a future potential Green Belt review). The master planning approach will need to consider how sufficient integration between any longer-term future development to the north of the proposed AS10 site boundary can be achieved whilst meeting the policy requirements of AS10, noting the 'permanent defensible landscaped edge to protect the Oxford Green Belt' required by AS10. Future proofing the masterplan which will emerge for AS10 in line with the potential long term wider Garden Village site will be important for planning a highly sustainable exemplar development with flexibility to a future potential increase in development. Consideration of future possible all modes connections to the north will be important.

7.157 The Dalton Barracks SPD on page 15 makes reference to the characteristics of Garden Villages which includes these points: 'a wide range of local jobs within easy commuting distance of homes' and 'designed to provide affordable homes close to employment'.

7.158 However, proposed Policy AS10 only mentions employment opportunities – this is considered too vague and this needs to be reviewed further before the Regulation 19 consultation stage. The County Council considers it essential that an appropriate level of employment use is part of the allocation to reduce the need to travel off the site, in line with our LTCP targets. This is key to achieving a highly sustainable mixed-use development. County Council officers will continue to work with colleagues of the district councils to consider this suggested policy improvement and others holistically in the preparation for Regulation 19 of the Joint Local Plan.

7.159 Employment use at Dalton Barracks is also mentioned within proposed policy SP1 Spatial Strategy point 4: 'At the garden communities of Didcot, Berinsfield and Dalton Barracks we will support housing and some economic development to achieve holistically planned new or regenerated settlements which enhances the natural environment, tackles climate change and provides high quality affordable housing and locally accessible jobs in beautiful, healthy and sociable communities.' The inclusion of a sizeable quantity of employment use within these allocations is considered a key part of creating Garden Villages and reducing the need to travel.

7.160 Given the future potential development (subject to a future Green Belt Review) in addition to the proposed increase in allocation size to 2,750 dwellings, the use of an Innovation Plan and consideration of future and new technologies, such as autonomous vehicles, needs to be integral in master planning this site.

7.161 It is not clear nor mentioned if the Dalton Barracks SPD is proposed to be updated if this proposed allocation AS10 is eventually adopted as part of the Joint Local Plan. Clarity on this point could be considered in the Regulation 19 consultation of the Joint Local Plan. We would encourage the SPD to be revised in particular to address the education and transport implications of a larger allocation and provide further guidance.

Education team

7.162 We have noted that the Joint Local Plan consultation proposal is that the allocation now provides for 2,750 dwellings, increased from 1,200 in the adopted Local Plan.

7.163 In respect of the text which currently reads: 'g) sufficient education provision, to be agreed with the local education authority, which is likely to require primary school provision (including nursery education) to be provided on site. A site and funding for a new secondary school is also required. Financial contributions will be required for off-site Special Educational Needs and Disabilities (SEND)'. We suggest this is changed to read as follows: 'sufficient additional education capacity, to be agreed with the local education authority. This is likely to be the provision of two on-site primary schools, as well as contributions to appropriate off-site Special Educational Needs and Disabilities (SEND) provision. A suitable site and funding for a new secondary school is also required.'

Environment team – Countryside Access

7.164 The proposed policy text AS10 (H) xiv – protection and enhancement of PRoW is supported.

Place Planning and Coordination / Transport Development Management

7.165 For clarity, we suggest the following amendments (additional text underlined) to point 2) h) ii): "off-site mobility hub (previously known as Park and Ride) sites".

7.166 Please add the following text (shown underlined) to point 2) h) ix): "access to the A34 including the proposed construction of south-facing slips at Lodge Hill Interchange".

7.167 Point 2) h) xv) states "xv) provision of new accesses, including cycle routes and a bridleway to and within the parkland". Please note that it is the view of OCC officers that no vehicular access is feasible to the west of the site at Gozzards Ford and thus any access at that location should be for active travel only. As such, please include wording that states "access to the west at Gozzards Ford should be non-vehicular and for active travel only".

7.168 Page 312 2) xi) …including cycle way and footway connections to Oxford, Abingdon-on-Thames and nearby secondary schools…

7.169 Page 312 2) xii) remove the wording "if possible".

Place Planning and Coordination / Public Transport

7.170 Please remove the text which has been crossed through below from page 312, point 2) h) xiii): "contributions towards a new high-quality bus service to major employment sites at Culham Science Centre, Harwell Campus, and Milton Park, if possible;'

Minerals and Waste team

7.171 The proposed allocation is adjacent to Corallian Ridge – Oxford to Faringdon Safeguarded Area therefore Policy M8 of the Oxfordshire Minerals and Waste Local Plan 2031 should be considered. Part of AS10 was previously allocated in the Vale of White Horse Local Plan 2031, through Core Policy 8a. It is also set out within the Dalton Barracks Supplementary Planning Document (SPD).

7.172 However, AS10 within the Preferred Options consultation has now been extended to the north, alongside Sandford Brook when compared with the original Core Policy 8a and SPD. This results in additional land closer to the Minerals Safeguarded Area.

Having reviewed the proposed Policy AS10, it states that the extended area is to provide larger parkland of around 52 hectares. As such, it is considered that this would not be incompatible development with mineral extraction and would not prevent or hinder future mineral working in the area. Therefore, we have no objection to the inclusion of this additional area of land in allocation AS10.

If any changes to this allocation were to be made, so that it was for different development other than for the proposed parkland, this position would need to be reconsidered.

Currently Allocated Sites Proposed Not to be Retained in the Joint Local Plan

Land at Chalgrove Airfield (3,000 homes)

Strategic Planning and Infrastructure team

7.173 We note the proposed de-allocation of land at Chalgrove Airfield in this Joint Local Plan consultation on page 315. The consultation document on page 315 identifies that the envisaged development of 3,000 homes on the allocated site is not achievable because of the need for a realigned runway to Civil Aviation Authority standards. In reviewing the suitability of an enlarged allocation, the consultation document advises that allocating a larger site would result in the site's greenfield footprint extending further into the countryside. The District Council further states the site does not fit with the proposed social and environmental priorities and emerging spatial strategy which involve delivering planned development within Science Vale, focussing new housing at the garden communities of Didcot, Berinsfield and Dalton Barracks, along with well-located brownfield sites and sites which contribute to addressing Oxford's agreed unmet need close to Oxford.

7.174 The Oxfordshire Local Transport and Connectivity Plan has been adopted since the previous planning application P20/S2134/O was prepared. The LTCP outlines a clear vision to deliver a net-zero Oxfordshire transport and travel system by 2040 and reducing the need to travel. Oxfordshire County Council previously raised concerns about allocating this site during the development of the last South Oxfordshire Local Plan. The site is remotely located a significant distance from Oxford, Abingdon and Didcot.

7.175 A number of transport infrastructure schemes are detailed in the STRAT7 allocation policy and associated Infrastructure Delivery Plan to mitigate the impact of this allocation being developed. If this site isn't developed then those highways schemes are not required, for example Chiselhampton, Stadhampton and Cuxham bypasses.

7.176 In addition, we also note that this Joint Local Plan consultation advises that there is no current need for the 3,000 home Chalgrove Airfield allocation to meet the housing requirement proposed. Appropriate testing of the spatial strategy options for the Joint Local Plan is expected. If the District Councils decide to seek to continue with a strategic site allocation in this location, the County Council would comment further on the implications of any draft policy and the evidence which would support it.

7.177   Policy STRAT7 of the Local Plan 2035 allocated this site for 3,000 homes, with two primary schools and a secondary school. The secondary school incorporated a relocation for Icknield Community School from Watlington. In deallocating the site, these potential schools would no longer be proposed.

7.178   The relocated secondary school would have resolved a number of constraints and challenges faced by Icknield Community College in its current location. Most obviously, it would have provided brand new accommodation for the delivery of education in the 21st century, to replace the school's current aging accommodation which presents condition and suitability concerns.

7.179   Icknield Community College is expected to need to grow even without the Chalgrove allocation, to meet the needs of other local housing developments. Land has been secured, on the opposite side of the planned Watlington Relief Road, to provide for that growth.

7.180   The proposed deallocation of the Airfield site leaves the village with one 1-form entry primary school, which is already operating close to its capacity, with permitted housing development underway.

7.181   Assessment of the potential to expand Chalgrove Primary School has been undertaken and has identified barriers to such expansion. A feasibility study commissioned by the Acer Academy Trust, the responsible body for Chalgrove Primary School, identified that the layout and nature of the school's current site would not facilitate expansion of the school. There is currently no confirmed viable route to expanding Chalgrove Primary School to meet the needs of any local population growth, whether from demographic changes or from housing development. If there were to be any other proposed allocations in the vicinity not providing for a new primary school, the County Council would likely object.

Place Planning and Coordination team

7.182   We note the proposal to remove the allocation for Land at Chalgrove Airfield. As such, subject to the outputs of the Evaluation of Transport Impacts to be undertaken in support of the Joint Local Plan, we expect that the bypasses of Chiselhampton, Stadhampton, and Cuxham; improvements in the villages of Little Milton and Shirburn; improvements to Hollandtide Lane and the B4015 between the A4074 and B480 will no longer be required as these were only identified as being delivered by this allocation and thus are otherwise not required.

7.183   The upgrading of the A4074 Golden Balls junction; the Watlington Relief Road; and the Benson Relief Road are still required as these would still be needed given the cumulative impacts of many other developments in addition (Watlington and Benson relief roads are also required through their Neighbourhood Development Plans).

Land at Nettlebed, two sites - West of Priests Close and Land South of Nettlebed Service Station (26 homes)

7.184   Noted, no specific comments.

Land at Bayswater Brook, Edge of Oxford (Policy AS5) – removal of the Sandhills area of the current allocation

<u>Strategic Planning and Infrastructure team</u>

7.185 This comment relates to the 'Sandhills parcel of Land North of Bayswater Brook'.

7.186 On page 270 of the consultation document, it is noted that it is proposed not to allocate this Sandhills part of the Land North of Bayswater Brook in the Joint Local Plan. This is one of the sites to which the following text relates: 'As a result of the site allocation review, we believe the following sites are no longer suitable for continued allocation in the Joint Local Plan.' The Joint Local Plan proposal to no longer allocate this Sandhills land is consistent with advice we provided prior to the publication of this consultation.

7.187 The status is recorded as 'No planning application'. A planning application has since been lodged, ref: P24/S0133/O. The County Council has provided advice, for example at preapplication stage, indicating concerns with the proposals. At the time of writing, we have not yet provided a response to the planning application, but we expect that will be available shortly so please refer to our responses on the latest planning application for detail.

7.188 The County Council had serious misgivings over the proposal to allocate this site in the last Local Plan which are recorded in our statements of evidence at the time. The proposal also attracted a lot of local objection. What was not entirely clear at that time was the issue with vehicle access to the site. The County Council position provided at preapplication stage is that the site cannot be accessed from Burdell Avenue or Delbush Avenue given the bridleway and the unregistered land upon which it sits. The other possible means of access via Waynflete Road (which has not been put forward by the owner, so we don't know whether rights exist) would not be suitable for any significant level of development either given the geometric constraints and gradients. No 'link road' or other major new road access from the north is currently being considered and would not be acceptable for this site alone.

7.189 This site has not been promoted by the same developer as the remainder of the STRAT13 allocation which has proceeded to current planning applications. Those planning applications propose more houses than the entire STRAT13 allocation numbers. It is therefore not necessary to develop this Sandhills site to meet housing needs.

7.190 The District Councils should also consider a proposal to return this site to the Green Belt as it was only removed at the last Local Plan on the basis that it was to be allocated for development.

Strategic Employment Allocations

Policy AS11: Culham Science Centre

<u>Place Planning and Coordination team</u>

7.191 Please amend point 1) d) to include the following text (shown underlined), "...and increasing the use of public transport <u>through pump-priming of new and improved bus services, provision of bus priority measures (where appropriate) and other bus infrastructure, and</u> walking and cycling both on and off site, <u>including routes identified in Oxfordshire County Council's Strategic Active Travel Network</u>".

7.192   Place Planning and Coordination / Transport Development Management teams
This policy should also stipulate <u>requirements for contributions towards and provision of safeguarded land for the HIF1 scheme; contributions towards Culham train station, public transport services, A4074 Golden Balls upgrade; and direct delivery of off-site walking and cycling improvements to Berinsfield and Abingdon.</u>

Minerals and Waste team

7.193   The proposed allocation is adjacent to Thames and Lower Thame Valley – Oxford to Cholsey Safeguarded Area therefore Policy M8 should be considered.

7.194   This site was in the previously adopted South Oxfordshire Local Plan: Policy STRAT 8 therefore no objection on mineral grounds are raised.

7.195   There is a safeguarded waste site within the proposed allocation which is for waste arisings from the science and technology research carried out at Culham Science Centre. It is good to see that the masterplan will be agreed in consultation with Oxfordshire County Council in relation to infrastructure. It also needs to acknowledge the important waste facility on the site which is a sui generis use and could be included in the Oxfordshire Minerals and Waste Plan. Policy W9 of the Oxfordshire Minerals and Waste Local Plan Part 1 – Core Strategy set out that Part 2 of the Plan would make specific provision for the treatment, storage and disposal of intermediate level legacy radioactive waste at Culham. We would not want the proposals for the site to omit this important waste facility or cause it problems by locating sensitive receptors next to it. We therefore request that this be referenced in policy AS11.

Policy AS12: Harwell Campus

Archaeology team

7.196   The site at Harwell contains a range of archaeological deposits dating from the prehistoric through to the Roman period. In addition to this however the site also contains important and significant remains of later heritage assets relating to the development of the airfield. These are often overlooked as heritage however as the recent issues over the remains of the experimental 1930s catapult which was described by Historic England as just falling short of schedulable quality.

7.197   In order to ensure that such later archaeological deposits are also appropriately assessed we would recommend that the policy be amended to specifically highlight that Second World War remains should also be assessed as heritage assets. We suggest the following: '<u>b) adequately assess and mitigate impact upon areas of archaeological interest including heritage assets relating to the development of the airfield</u>;'.

Transport Development Management team

7.198   Any other future / planned development at the campus should be subject to a comprehensive master plan and traffic modelling exercise. There must be investment into public transport and appropriate decide and provide transport assessments to support future development at this site.

Place Planning and Coordination team

7.199 Please amend point 3) c) to include the following text (shown underlined), "...and increasing the use of public transport <u>through pump-priming of new and improved bus services, provision of bus priority measures (where appropriate) and other bus infrastructure, and</u> walking and cycling both on and off site, <u>including routes identified in Oxfordshire County Council's Strategic Active Travel Network</u>".

7.200 The proposed policy for Culham Science Centre AS11 includes a point which states: "<u>address all necessary infrastructure, to be agreed in consultation with Oxfordshire County Council based on up-to-date evidence on the impact of the development. This should refence [sic] the latest Infrastructure Delivery Plan, but not be limited to this document</u>". For consistency, <u>this should be included in this site policy as well but also include that it is to be agreed in consultation with National Highways as well as Oxfordshire County Council.</u>

<u>Minerals and Waste team</u>

7.201 Harwell Campus is an allocated employment site in the Vale of White Horse Local Plan 2031 Part 1. Core Policy 6, allocates the site for 128 hectares of employment land.

7.202 Policy W9 of the MWLP should also be considered, as permission will be granted for proposals for management of intermediate level radioactive waste produced in Oxfordshire at the Harwell nuclear licensed site.

Policy AS13: Berinsfield Garden Village

<u>Archaeology team</u>

7.203 This site is located in an area of considerable archaeological interest immediately north of a Neolithic and Bronze Age ritual centre consisting of a henge, Cursus monument and barrow cemetery. Further significant archaeological remains have been found on the northern and southern edge of the proposed site and geophysical survey has confirmed that further archaeological deposits related to this survive within the site. There is the potential for archaeological remains to survive of such significance that they would require physical preservation and a field evaluation will need to be undertaken on this site before it is understood the extent of any such constraints.

7.204 This could have significant implications for the masterplan and the siting of greenspace and as such this evaluation must be undertaken before a masterplan is agreed in order that the masterplan can take this into account. For clarity this should be included in this policy, and we would therefore recommend that the policy be amended to include.

7.205 <u>2) Proposals for the development must demonstrate:</u>
<u>That any master planning undertaken for the site has been informed by the results of an archaeological geophysical survey and trenched evaluation in order that the impact of these proposals have taken into account the significance of any heritage assets surviving on the site. The masterplan will need to include the physical preservation of significant archaeological features and their setting.</u>

<u>Property team</u>

7.206 Oxfordshire County Council Property own the Abbey Woods Primary School and the adjoining playing field and recreation ground that is proposed to be designated as a

Local Green Space (LGS) and protected in line with the relevant paragraphs of the NPPF.
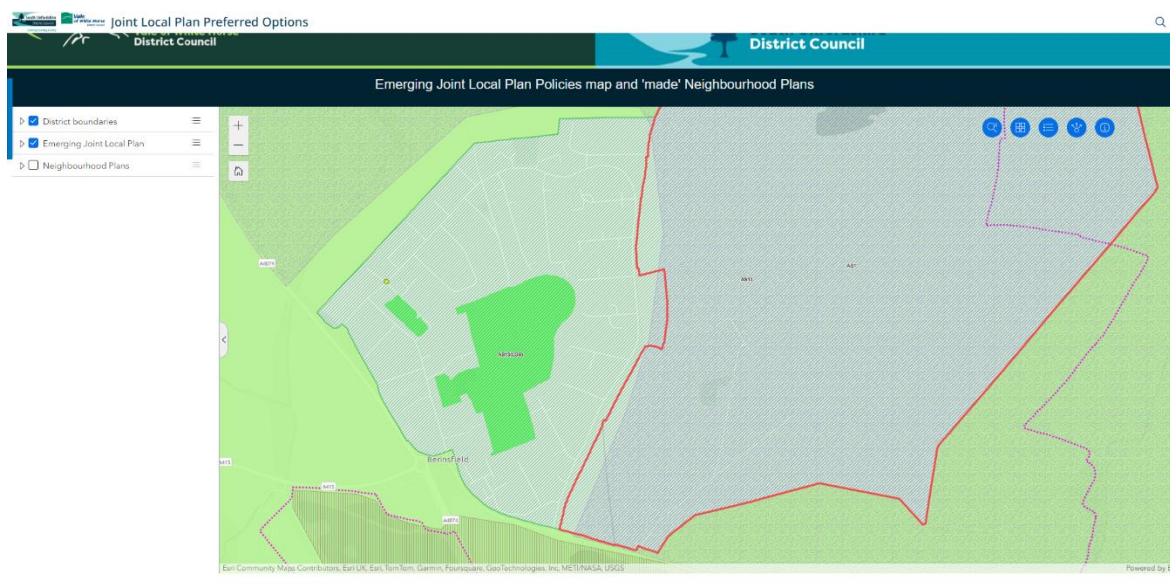
7.207 OCC Property would like to highlight that Sports England has a statutory duty to protect playing fields and this, coupled with the protection afforded by the public ownership of the site, means that it is unnecessary to provide a further layer of protection in this Emerging Joint Local Plan.

7.208 Furthermore, if the possible future relocation of the existing Primary School with a proposed new school as part of the draft allocation policy AS1, is not realised, then the proposed draft policy AS13 would impose unnecessary measures to protect the land from future development, which could potentially prevent the Primary School from fulfilling its educational functions, including its expansion on this land, where justified or as may be required.

7.209 Draft policy AS13 should not prevent the existing Primary School from expanding or limit where it is able to be relocated, provided that such a relocation is compliant with all other relevant policies of this Emerging Joint Local Plan, existing Local Plan and the relevant paragraphs of the NPPF.

7.210 As a consequence, OCC Property strongly objects to this Local Green Space designation, and therefore recommend that the 3rd bullet point of draft policy AS13 is deleted and the Emerging Policies Map is accordingly amended to remove any reference to the land being designated as a Local Green Space.

Place Planning and Coordination team

7.211 This policy states that all development within the defined site "will meet the Garden Village principles as set out by the Town and Country Planning Association (TCPA)". It is essential that the specific part of a specific document from the TCPA is referenced. Are these principles those set out in 'Understanding Garden Villages: An Introductory Guide' (2018) on p.3, which lists "A wide range of local jobs in the Garden City within easy commuting distance of homes" or does it refer to the scaled-down version at pp.14-17, which instead says "Homes should be designed for flexible working, as well as being located a short distance from a range of employment opportunities and local facilities."? There are other significant differences between the two sets of principles,

and it is important to make a distinction between them in order to better understand what the expectations are for this particular garden village.

<u>Minerals and Waste team</u>

7.212　The proposed allocation is within and adjacent to the Thames and Lower Thame Valley – Oxford to Cholsey Safeguarded areas. This is a new proposed policy but does includes part of AS1 which was in the previously adopted South Oxfordshire Local Plan: Policy STRAT 10ii. This draft policy identifies the principles for all new development within Berinsfield Garden Village and incorporates the land allocated at AS1 with the existing village.
As it is an existing settlement and has no additional implications on the Minerals safeguarded area, than those that are already in place, and the area within AS1 was allocated in a previous plan, we have no objections to this allocation.

7.213　However, we would hope to see any viable mineral extracted before development were to take place and to any future proposed development to include mitigation for the potential for mineral working in close proximity.

**Policy AS14: Dalton Barracks Garden Village**

<u>Strategic Planning and Infrastructure team</u>

7.214　There is no mention with the proposed policy wording or supporting text that a significant part of this Garden Village remains in the Oxford Green Belt. Text introducing proposed policy SP1 - Spatial Strategy on page 105 highlights where Green Belts are defined, they should be altered only in exceptional circumstances when preparing a local plan. The statement is then made that there are no exceptional circumstances in South Oxfordshire and Vale of White Horse currently but the potential for any additions as to the Green Belt could be made in this Joint Local Plan.

7.215　Extract from Emerging Proposals Map for this Joint Local Plan consultation showing the Oxford Green Belt and AS14 Dalton Barracks Garden Village boundary and a proposed AS10 allocation boundary in red outline, is shown below:

Garden Village Boundary
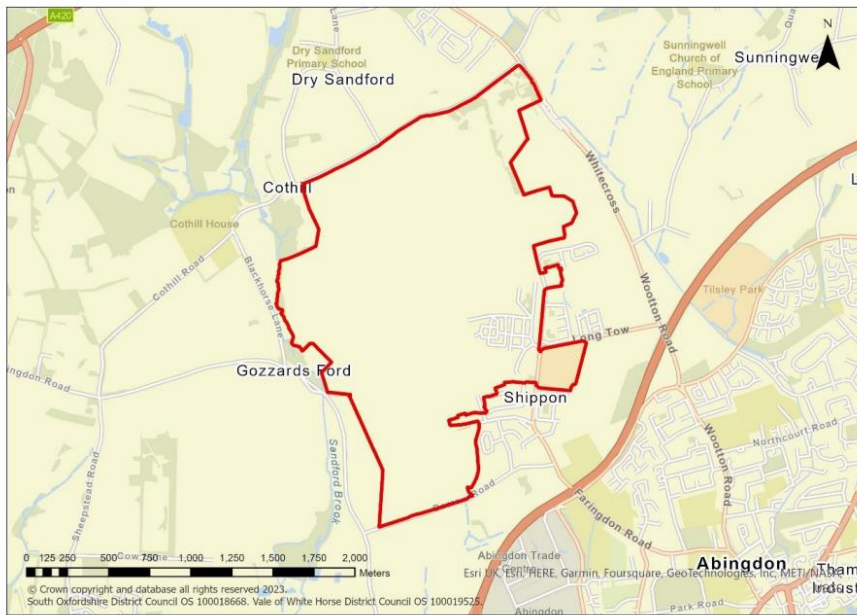
© Crown copyright and database all rights reserved South Oxfordshire District Council 2023 OS 100018668.

7.216   It is suggested the Green Belt status of the majority of AS14 is mentioned within the policy or highlighted in the accompanying plan showing the proposed Garden Village boundary to reinforce development is not proposed for the Green Belt part of proposed AS14. For completeness the proposed parkland in AS10 in the Green Belt should be highlighted also (this is noted as 'Green Belt compatible development on page 311 of the plan).

7.217 For consistency with the proposed policy wording for the Berinsfield Garden Village AS13, <u>points a)-g) in that policy</u> should be included in this policy as well. The wording provided in this policy is much less clear, for example at point 1) e) it simply says "an accessible garden village" but does not clarify that priority should be given to walking, cycling, and public transport, as is stipulated for the Berinsfield Garden Village proposed policy wording.

7.218 This policy states that all development within the defined site "will meet the Garden Village principles as set out by the Town and Country Planning Association (TCPA)". It is essential that <u>the specific part of a specific document from the TCPA is referenced</u>. Are these principles those set out in 'Understanding Garden Villages: An Introductory Guide' (2018) on p.3, which lists "A wide range of local jobs in the Garden City within easy commuting distance of homes" or does it refer to the scaled-down version at pp.14-17, which instead says "Homes should be designed for flexible working, as well as being located a short distance from a range of employment opportunities and local facilities."? There are other significant differences between the two sets of principles, and it is important to make a distinction between them in order to better understand what the expectations are for this particular garden village.

Minerals and Waste team

7.219 The proposed allocation of the Dalton Barracks Garden village policy boundary AS14 falls within very close proximity to a Metal Recycling Facility, which is on the other site of Wootton Road.

7.220 Therefore, the proposal should be considered against Policy W11 Safeguarding waste management sites, of the Minerals and Waste Local Plan as the proposed AS14 has the possibility to hinder or prevent the working of the waste site due to its proximity. The Proposal is not currently a site allocation for development in an adopted local plan or neighbourhood plan nor has the equivalent waste management capacity has not been appropriately and sustainably provided elsewhere. Lastly it has also not been demonstrated that the site is no longer required for waste management. Therefore, proposed Policy AS14 is not in accordance with Policy W11.

7.221 Thus, we have concerns with proposed Policy AS14. We will work with the districts on the proposed policy AS14 to ensure that the waste facility be maintained.

Policy AS15: Harcourt Hill Campus

Transport Development Management team

7.222 Any other future / planned development at the campus should be subject to a comprehensive master plan and traffic modelling exercise. As referred to in the draft policy if proposing significant change, the landowner is required to work proactively with the County Council in developing any masterplan for the site There must be investment into public transport, pedestrian / cycle infrastructure, and appropriate decide and provide transport assessments to support future development at this site.

7.223 Amend Page 334 AS15 1) d) '…sustainable site access including a network of <u>high-quality</u> footways and cycle routes…'

Policy AS16: Land at Crowmarsh, Benson Lane (site of former district council offices)

Strategic Planning and Infrastructure team

7.224   We will continue to work with our district council colleagues on advising on this potential allocation, with input from other teams as appropriate.

8. Chapter 9: Town Centres and Retail

Policy TCR2: Strategy for town and local service centres

Public Health team

8.1   We support Option A and the proposed policy wording which seeks to promote the vitality of town centres through a 'Town Centre First' approach whilst allowing flexibility in how they develop. Thriving town centres that can meet a diverse range of community needs are important to promoting health and wellbeing and healthy place shaping.

New Policy Sought: Hot Food Take Aways

Public Health team

8.2   We recommend that this chapter includes a policy restricting new hot food takeaways. This is crucial to reducing health inequalities due to the growing problem of childhood obesity and the need to create healthier food environments (particularly in proximity to schools).

8.3   Robust data from the National Childhood Measurement Programme, where nearly all children in Reception Year and Year 6 are weighed and measured, shows South and Vale have geographical areas with consistently high levels of childhood excess weight (higher than the Oxfordshire average and in some cases also the England average). The Local Plan should reflect this.

8.4   A number of Councils in England have put a policy which restricts new hot food takeaways in their plans.   Our recommendation is that a policy is included that has a standard restriction on any new hot food takeaways within 400m radius of a school and/or by not allowing new hot food takeaways in geographical areas with consistently high levels of excess weight in children. Both of these are approaches that have been taken successfully elsewhere across the Country.

8.5   Data to support this approach is readily available from the public health team and we can provide supporting information. The below example shows geographical areas with levels of excess weight consistently higher than the Oxfordshire and in some cases also England average.

8.6   Table 1: Overweight and obesity proportions in Reception and Y6 children in SODC and VDC highlighting rates higher than the Oxfordshire average.

	Proportion of overweight and obesity in Reception children (%)	Proportion of overweight and obesity in Y6 children (%)
England	22.1	36.6
Oxfordshire County	19.3	31.5
Vale of White Horse (VWH)	20.1	30.3

Abingdon South	22.2	37.5
Grove	23.2	37.1
Radley, Wootton & Marcham	16.4	35.3
Wantage Town	19.6	33.3
Shrivenham, Watchfield & Uffington	22.0	32.5
Sutton Courtenay, Drayton & Steventon	19.5	31.7
South Oxfordshire	17.6	27.9
Didcot South East	21.9	41.4
Didcot South West	18.9	39.0
Thame North	17.2	38.5
Didcot Ladygrove	20.0	32.7
Berinsfield & Wittenham	20.0	32.4
Chalgrove, Stadhampton & Dorchester	16.2	32.4

Source: 'Child prevalence small area data', OHID, NCMP, NHSE[16]

*MSOA level data is a three-year combined average for 2020-23 whilst larger geographical area data (England, County, district council areas) is 2022-23 data

Obesity Profile - Data - OHID (phe.org.uk)

[16]Obesity Profile - Data - OHID (phe.org.uk)

9. Chapter 10: Well-designed places for our communities

Policy DE1: High quality design

Public Health team

9.1   Policy Option A and the proposed policy wording cover a wide range of elements that will contribute positively to the design of future developments, including a subsection on climate and sustainability. While we welcome the inclusion of flood-resilience, the policy should also make reference to buildings (and those inhabiting them) being resilient to the effects of future hotter summers.

Transport policy team

9.2   There should be reference to OCC's adopted Street Design Guide and emerging Walking and Cycling Design Guidance in this policy wording.

9.3   There is no reference to designing for low speeds. Residential streets should have a 20mph design speed with an associated Traffic Regulation Order for enforcing a 20mph speed restriction. This aims to make streets safer, encourage residents to walk or cycle, and reduce noise and air pollution. It is key that places are designed for inherently low speeds. Shared space is key as is passive calming in terms of planting, parking and amplified landscaping.

Policy DE3: Delivering well-designed new development

Transport Development Management

9.4   There should be reference to OCC's adopted Street Design Guide and emerging Walking and Cycling Design Guidance in this policy wording.

Public Health team

9.5   We welcome Policy Option A and its requirement for design reviews to be undertaken for nominated residential and non-residential developments as this provides an opportunity to consider whether master plans will create a health enabling environment. We also support the inclusion of community engagement as this is an essential strand we assess when reviewing Health Impact Assessments of new developments. It is good to see that engagement methods will be innovative so to ensure that people of all ages and abilities are encouraged to get involved.

Environment team - LLFA

9.6   Under this policy section 1) d) it may be more appropriate to consider terminology that refers to blue/green infrastructure rather than specifically SuDS and incorporates an element of climate adaptation within the policy.

Policy DE6: Outdoor Amenity Space

Public Health team

9.7   We recognise that the introductory text contains a comprehensive list of reasons why the policy is required, although the draft policy itself fails to incorporate some of the specifics that we'd wish to see developers committing to in future. For example, opportunities for food growing and clothes drying are listed as important and yet not explicitly mentioned in the policy. Both factors are important, with space for residents to dry clothes outside of their homes crucial in preventing health issues associated with interior damp/mould where people are forced to air clothes indoors. We recommend that the draft policy wording is revised to include reference to both opportunities for food growing and the need for space for clothes drying.

Policy DE7: Waste collection and recycling

Strategic Planning and Infrastructure team

9.8   Point 5 of this proposed policy should be amended in also reference the County Council's Waste and Circular economy team in terms of early engagement to discuss potential innovative waste collection and recycling proposals.
It is suggested that a reference to the <u>Housing Waste and Recycling Centres and the need to ensure there is sufficient capacity</u> could be added to this policy.

Waste and Circular Economy team

9.9   Policy DE7 covers in detail the collection requirements for the district council but also mentions innovative waste collection systems. We will provide a copy of the Oxfordshire Resources and Waste Partnership statement on how developers should engage with the collection authorities and also Oxfordshire County Council as the Waste Disposal Authority to ensure that any proposals are future proofed and consistent with wider joint policy aims.

10.   Chapter 11: Healthy Places

<u>Public Health team</u>

10.1   It is pleasing to see that this chapter garnered the fewest disagreeable responses in the last consultation, thereby suggesting a consensus of support for the ideas present in this chapter. We recommend that the introductory section references the importance of using planning to address the health inequalities experienced by residents living in areas of deprivation in the Districts.

Policy HP1: Healthy place shaping

<u>Strategic Planning and Infrastructure team</u>

10.2   Proposed Policy LS1: Proposals for large scale major development requires a Health Impact assessment for large scale major development on pages 263- 65. A Large-Scale Major Development is one where the number of residential dwellings to be constructed is 200 or more or 1,000sqm of industrial, commercial or retail floor space. Where the number of residential dwellings or floor space to be constructed is not given in the application, or where there is a combination of employment and residential uses on site, a site area of 4 hectares or more should be used as the definition of a large-scale major development. For all other uses a large-scale major development is one where the floorspace to be built is more than 10,000sqm, or where the site area is more than 2 hectares.

10.3   To help achieve this aim, the plan will require Health Impact Assessments (HIAs) to be submitted for all new major development proposals in the districts. Through carefully evaluating the design of new developments, we can help to deliver a high quality of life in our districts, address health inequalities, improve accessibility, and maximise the health and wellbeing of residents. Currently HIAs are only required to be submitted for housing site allocations in Vale of White Horse, and for all strategic development in South Oxfordshire. Requiring HIAs to be submitted for all major development in the districts will ensure that health and wellbeing is considered and optimised in planning decisions more widely. We also acknowledge that health and wellbeing considerations will need to be integrated, not only in this policy, but throughout the plan. We support the Councils undertaking a Health Impact Assessment of the Joint Local Plan itself to ensure all plan policies have thoroughly considered their health and wellbeing impacts, and where possible, have a positive impact on the health and wellbeing of the districts residents. This assessment will be published at the next stage of consultation (Regulation 19).

<u>Public Health team</u>

10.4   We welcome inclusion of this policy and the reflection of the NPPF's use of the term 'promoting healthy and safe communities'. It is vital that Health Impact Assessment (HIA) becomes routine practice for any major development. and as such we support Option A which commits to ensuring that HIAs are to be submitted for all major development in the districts. With regard to the proposed policy wording, we recommend that the word rapid is omitted prior to HIA as for some large-scale developments we might require a comprehensive HIA. We suggest that the wording that the methodology should be in line with the HIA Toolkit and undertaken at a scale that is proportionate to a proposed development addresses this point.

10.5   There are several ways innovation may contribute to healthy communities:
- Digital connectivity including provision for 5G and later mobile data networks will help to facilitate the use of monitoring for carbon monoxide and carbon dioxide inside buildings to alert for health issues.
- Medication may be delivered by drones, so provision should be considered for less intrusive flight paths and landing zones. These could be designed into a new development.
- Using timber as a construction material can create housing and spaces that promote mental wellbeing.
- CAVs might provide greater access to medical services for the less mobile.
- Measurement of Active Travel take-up and vehicle usage using machine learning cameras will help design better AT solutions and fine tune their operation and effectiveness.

Transport Policy team

10.6   See comments on draft policy IN2.

Policy HP2: Community facilities and services

Strategic Planning and Infrastructure, Property and Pupil Place Planning teams

10.7   This policy includes schools within the definition provided of a community facility. This may include primary schools, secondary schools, SEND schools and potentially sixth form and further education facilities (though this is not clear).

10.8   Given our local education authority responsibility, we require a local plan policy which is fit for purpose in terms of applying to the different education scenarios which may arise in the plan period, for example; new schools, extending schools, relocating school, closing schools.

10.9   The supporting text on pages 402-3 should recognise that there is a need for the education estate to be restructured as required and the mention of assessment and independent assessment within the policy are points of concern.

10.10 The proposed wording in Policy HP2 may limit our ability to restructure the education estate and dispose of redundant education land and buildings, such as the relocation of Shrivenham Primary that is currently underway. The County cannot be restricted by a Local Plan policy if we require redevelopment of existing school sites as part of the countywide education strategy. This is a point of concern with the current proposed wording of the policy.

10.11 Whilst the County Council supports the aspiration that school facilities are available for community use, any policies would need to be carefully worded to ensure they are deliverable. Any school's primary function must be the education and safeguarding of their pupils, which will provide constraints on the type of facilities provided, and when they can be available for external use. Strict school safeguarding requirements mean that any community use has implications for school building and site design, and where these increase the costs of building new school accommodation, there may be viability constraints; there may also be limits to how far an existing school's accommodation can be adapted without excessive cost. Management of community use is an additional

resourcing requirement for school management, and in particular small schools may not have the capacity to provide this.

10.12   In addition, increasing numbers of schools are now academies, and any new schools would be expected to be academies, and these operate independently of council control, meaning that they cannot be required to deliver community use by the council. Dual use of new school facilities cannot therefore be required by the planning system at S106 stage because at the point of a new school being planned, the academy trust which will be the responsible body for the school is not yet known; and the County Council cannot enforce community use upon an academy.

10.13   There are three points of concern with this proposed policy:
- Independent assessment of evidence,
- Impeding the ability to restructure the education estate as required,
- Community use of new school facilities cannot be required at planning application nor S106 stage as the academy trust who will be the responsible body for the school is not yet known.
Therefore, we recommend that a specific 'Education facilities and provision' policy is created and included within the Regulation 19 version of the Joint Local Plan. This would allow for the different needs and requirements of Education facilities/provision compared to other community facilities to be adequately considered and addressed. We would welcome the opportunity to work with district colleagues on the drafting of such a policy.

Public Health team

10.14   We support Option A and the proposed policy wording which seeks to safeguard and enhance community facilities including the need for accessibility through the provision of cycle and scooter parking for its users.   Community facilities play an important role in enabling people to feel connected with each other, addressing the growing problem of loneliness and isolation, which is particularly problematic for our older and more rurally located residents. We recommend that this is referenced in the supporting text to this policy.

Environment team – Countryside Access

10.15   HP2. Preferred Option – supported
Policy Text, point (3) could suggest that PRoW are open to deletion if an alternative exists. It needs to be made clear that all PRoW are protected, regardless of the number and location of them.   3) A community facility or service may be essential, either because it is one of a limited number of that nature in a settlement or area or is fundamental to the quality and convenience of everyday life in a settlement. This includes the protection of Public Rights of Way, including bridleways and by-ways. If suitable alternative provision already exists, any facility or service will not be considered essential.

OCC Estates

10.16   Oxfordshire County Council manages several buildings that provide local services to both Districts. If a need arises to relocate the services these type of buildings provide to a different location, or in the event that they may be deemed to no longer be needed for their original purpose, then it would be essential to ensure that this draft policy would not impose unnecessary restrictions on them to do this.

10.17 OCC Property notes the requirement for "appropriate, detailed and robust evidence" to be demonstrated by all development proposals, which would result in the loss of a community facility.

10.18 Whilst any such proposals would of course be assessed on a case-by-case basis, the draft policy wording does not provide sufficient details or clarity, as to what form of evidence should be included to demonstrate that non-commercial community facilities are no longer needed, or viable. As a consequence, OCC Property requires further clarification on this matter in order to make any further comments.

Policy HP3: Health care provision

Public Health team

10.19 We support Option A and the proposed policy wording that refers to support for new, replacement, expanded or upgraded health care facilities which are accessible through active, sustainable travel. We welcome reference to the need for any change or loss of provision to be determined to the satisfaction of the LPA in consultation with Public Health and the ICB etc.

Policy HP4:
Existing open space, sport and recreation facilities

Public Health team

10.20 We support Option A and the proposed policy wording that seeks to protect existing open space, sport and recreation facilities from development. It is particularly important that open space is included in this policy as it provides opportunities for informal play, essential to children's health and wellbeing.

Archaeology team

10.21 The creation and enhancement of such facilities can impact on the historic environment particularly with drainage for sports pitches and foundations for recreational equipment and as such the impact of such proposals on the historic environment should be considered at the application stage. This should therefore be included in this policy as suggested below:

10.22 Add an additional point in proposed Policy HP4 as follows: 'adequately assess and mitigate impact upon areas of archaeological interest'.

Environment team – Countryside Access

10.23 Page 410, Amend the text to   "In line with government guidance, this policy is required to protect all greenspaces, open spaces, sport and recreational spaces of value including (but not limited to); playing fields, parks and play spaces, gardens and communal green spaces within housing areas, natural and semi-natural greens spaces, cemeteries and churchyards, Local Green Spaces, common land, town and village greens and green corridors, including public rights of way.'

10.24 The preferred option is supported, especially if PRoW are included within definitions.

10.25   The policy text is supported but needs to ensure PRoW are included in definitions.

Policy HP5: New facilities for sport, physical activity and recreation

<u>Strategic Planning and Infrastructure /Pupil Place Planning/Property teams</u>

10.26   Whilst the County Council supports the aspiration that school facilities are available for community use, any policies would need to be carefully worded to ensure they are deliverable. Any school's primary function must be the education and safeguarding of their pupils, which will provide constraints on the type of facilities provided, and when they can be available for external use. Strict school safeguarding requirements mean that any community use has implications for school building and site design, and where these increase the costs of building new school accommodation, there may be viability constraints; there may also be limits to how far an existing school's accommodation can be adapted without excessive cost. Management of community use is an additional resourcing requirement for school management, and in particular small schools may not have the capacity to provide this.

10.27   In addition, increasing numbers of schools are now academies, and any new schools would be expected to be academies, and these operate independently of council control, meaning that they cannot be required to deliver community use by the council. Dual use of new school facilities cannot therefore be required by the planning system at S106 stage because at the point of a new school being planned, the academy trust which will be the responsible body for the school is not yet known; and the County Council cannot enforce community use upon an academy.

<u>Public Health team</u>

10.28   We support Option A but suggest that the policy wording in para 1 needs to include as an additional criterion for the location of new/enhanced facilities <u>g) are accessible and affordable for deprived communities.</u> This would recognise that higher rates of obesity are found in lower income households which experience greater accessibility and affordability barriers to using sports facilities.

<u>Archaeology team</u>

10.29   The creation of such facilities can impact on the historic environment particularly with drainage for sports pitches and foundations for recreational equipment and as such the impact of such proposals on the historic environment should be considered at the application stage. This should therefore be included in this policy as suggested below: '<u>adequately assess and mitigate impact upon areas of archaeological interest</u>.'

<u>Environment team – Countryside Access</u>

10.30   The preferred option approach and policy text is approach is supported; however, it is questioned if this policy is intended to or should also apply to commercial/industrial developments as well as residential.

Policy HP6: Green infrastructure on new development

Strategic Planning & Infrastructure

10.31 Tree planting should follow the principle of 'the right tree in the right place' and should also include the ongoing management of trees, so that they can fulfil their full potential. This requires developments to allow sufficient space for large tree planting in the right locations. Reference should be made to OCC's Tree Policies which include a requirement to achieve at least 30% canopy cover on strategic development sites and are aimed to help achieve the broader objectives of flood alleviation, climate adaptation, landscape resilience, carbon sequestration, noise and air pollution, wildlife corridors (both urban and rural), health and wellbeing, and traffic speed reduction.

10.32 The long-term management and monitoring of HP6 is considered essential to ensure that long-term benefits are being achieved.

Public Health team

10.33 We support Option A and the proposed policy wording as it is sufficiently flexible whilst emphasising the importance of ensuring easy access to high quality green/blue space.

Environment team – Landscape

10.34 The update of the Green Infrastructure Strategy is welcomed.

10.35 The preferred option (A) is supported. However, the options don't necessarily need to be exclusive of each other and it might be possible to integrate elements of some of the other options into the policy. E.g. depending on the outputs of the proposed update of the Councils' Green Infrastructure the wording could potentially include a reference for developments to link to identified GI assets.

10.36 It is recommended that the use of the Urban Green Factor (option D) is not ruled out at this stage but informed by further work as it might offer opportunities for the delivery of GI at different development scales.

10.37 The policy wording is supported overall. It would be helpful if more direction could be provided as to what information is expected and how compliance with this policy might be assessed.

10.38 Considerations should also be given as to whether the use of 'Building with Nature' framework and standards should be adopted or promoted.

10.39 Consideration should be given as,to whether the policy could include information/guidance that GI needs to be of the appropriate scale so that it can function successfully, e.g. sufficiently wide corridors and sufficient space for the planting of large trees (latter is covered in policy NH3).

Environment team – Countryside Access

10.40 Preferred option – supported
Policy para (4) amend to meet needs identified in relevant council and County Council plans and strategies including the updated Green Infrastructure Strategy, Didcot Garden Town Delivery Plan, AONB Management Plan, Habitats Regulations

Assessment, the leisure studies and neighbourhood plans, County Green Infrastructure and Rights of Way Improvement Plans.

Policy HP7: Open space on new development

Public Health team

10.41   We support Option A and the proposed policy wording and particularly welcome the reference to the need for the long-term maintenance and management of open space to be secured as part of a planning application.

Policy HP8: Provision for children's play and space for young people

Public Health team

10.42   We support Option A but suggest that the policy wording emphasises that play provision should meet the needs of teenagers as well as younger children. Play spaces rarely cater for teenage needs and as a result young people have reported that they do not feel welcome in parks and green spaces, depriving them of the opportunity to be physically active and to feel connected to nature.

Policy HP9: Allotments and community food growing

Public Health team

10.43   We welcome Option A and the proposed policy wording as this will result in a wider range of food growing space which includes community orchards and planters, in addition to protecting and promoting allotment space.

Policy HP10: Watercourses

Environment team - LLFA

10.44   We support this policy in relation to watercourses at this point in the planning process.

11.   Chapter 12: Nature recovery, heritage and landscape

Policy NH1: Nature recovery

Environment team - Biodiversity

11.1   Oxfordshire County Council are the Responsible Authority for production of the Oxfordshire Local Nature Recovery Strategy (LNRS) and we are engaging widely as we develop the strategy with relevant groups across the County, including Vale and South Oxfordshire District Councils as Supporting Authorities.

11.2   LNRSs are a statutory requirement under the Environment Act 2021, they will be spatial strategies that establish priorities and map proposals for specific actions to drive nature's recovery and provide wider environmental benefits.

11.3   It is anticipated that the LNRS will be published in Spring 2025, and we would encourage Council officers and members to engage through workshops which will inform the strategy during February-March this year. For more information please visit our LNRS webpage. In the interim, the Oxfordshire Nature Recovery Network 2023 mapping can help inform the development of Local Plan policies by identifying zones for nature recovery.

11.4   The Thames Valley Environmental Records Centre (TVERC) have recently completed a piece of work commissioned by all the Districts, City and Oxfordshire County Council to produce the Interim Oxfordshire Nature Recovery Network 2023. It is intended that this mapping can help inform development of Local Plan policies across the County by identifying zones for nature recovery, however the Interim NRN will be succeeded by the Oxfordshire Local Nature Recovery Strategy (LNRS) once it has been published.

11.5   We are supportive of Option A, which will look to deliver greater than the mandatory minimum 10% biodiversity net gain, with the percentage determined by outcomes of viability testing.

11.6   All Oxfordshire Local Planning Authorities signed up to the OxCam Environment Principles, which agreed to a 20% BNG requirement. OCC have committed to deliver >10% BNG with an ambition to achieve 20% for our own planning applications (Climate and Natural Environment Policy Statement). The Oxfordshire Local Nature Partnership has compiled information to help support development of >10% BNG policy, as well a set of Oxfordshire BNG Principles which it could be useful to reference in developing policy.

11.7   We are also supportive that offsite BNG should be delivered in a way that prioritises offsite delivery where it will have the greatest benefits for nature – and we welcome use of the forthcoming LNRS to do this within the proposed policy. The Biodiversity Metric is designed to give a slightly higher score to offsite BNG delivered within areas of Strategic Significance, and once adopted the LNRS will define these areas. However, policy to help guide offsite delivery to appropriate areas identified in the LNRS would help to ensure offsite delivery achieves the greatest benefits for nature. Recent amendments to the Levelling Up and Regeneration Act will mean that all local planning authorities will have a duty to take account of their relevant LNRS, and directing offsite BNG towards LNRS is a key way in which this can be demonstrated. Information about the link between LNRS and planning has been outlined by DEFRA in this blog.

11.8 With regard the proposed wording for the policy we suggest that NH1 5) should consider a further step in the sequential approach before reaching the last resort of purchasing national biodiversity credits, which would allow an applicant to identify a specific site for BNG outside of the Joint Local Plan area.

Public Health team

11.9 We support Policy Option A and the proposed policy wording. We strongly endorse that development should deliver more than the bare national minimum of 10% BNG and support delivery of the maximum assessed as deliverable being established through the JLP Viability Assessment.

Policy NH2: Biodiversity designations

Environment team - Biodiversity

11.10 We are supportive of the proposed policy with regard to biodiversity designations but seek clarity with regard 7) on the proposed process for assessing potential Local Wildlife Sites (pLWS) against LWS criteria, whether it is proposed that the applicant undertake this step and how this relates to the process for selecting LWS which is undertaken by the Oxfordshire Wildlife Sites Project Selection Panel.

Policy NH3: Trees and hedgerows in the landscape

Environment team – Landscape

11.11 There is an overlap between this policy and the policies on landscape and green infrastructure.

11.12 The inclusion of a specific tree and hedgerow policy is welcomed but would benefit from being strengthened. Consideration should be given to more specific, measurable requirements, e.g. the loss of high-quality trees (e.g. Category A).

11.13 The policy would benefit from further detail on what information should be submitted and how the compliance against the policy will be assessed; e.g. how will 'every effort to retain trees' be judged.

Policy NH4: Chilterns and North Wessex Downs Areas of Outstanding Natural Beauty

Environment team – Landscape

11.14 The preparation of evidence base studies i.e. updated Landscape Character Assessment, Tranquillity Assessment and Renewable Energy Sensitivity Assessment is welcomed. The landscape policies should be informed by the findings of these.

11.15 The policy will afford the National Landscapes and their Management Plans great protection, which is in line with the policy guidance.

11.16 Care will need to be taken not to create conflict with the requirements of the NPPF.

11.17 It would be helpful if further detail could be provided on what is expected under 3) which requires that all of the listed criteria to be met. It also sets no threshold for when adverse impacts are unacceptable. The requirements listed here, whilst supported overall, have the potential to stop development in the National Landscape altogether.

Policy NH5: Landscape

Environment team – Landscape

11.18 The planned update of the districts' landscape character assessments is welcomed.

11.19 Policy wording: some of the terminology would benefit from being defined, e.g. 'harmful development '.

11.20 The policy would benefit from providing additional detail on what information is required and how compliance will be assessed.

Policy NH6: Valued Landscapes

Environment team – Landscape

11.21 It should be noted that central government required local authorities to discard their local landscape designations some years back. The inclusion of such a policy therefore will need to be supported by further information and justification.

11.22 The appropriateness and scope of the policy will need to be informed by the ongoing landscape work and not conflict with the NPPF

11.23 The draft requirements are similar to the requirements mentioned in policy NH5 – there might be an overlap but it's difficult to determine without the background information.

Policy NH7: Tranquillity and tranquil areas

Public Health team

11.24 We welcome inclusion of a policy that refers to the need to provide tranquil spaces; this is especially important in our urban environments. We welcome the fact that the Covid-19 pandemic is quoted as having emphasised the importance of this requirement for mental health and wellbeing. We support Option A and the proposed policy wording.

Environment team – Landscape

11.25 The preparation of a tranquillity assessment is welcomed. This will also be helpful when considering impacts on tranquillity, especially in relation to the 'special qualities' of the National Landscapes.

11.26 The policy wording and associated mapping will need to be defined by the ongoing tranquillity assessment work.

11.27 The policy should also take account of existing guidance on tranquillity, e.g by the Landscape Institute and the LUC White Paper on Tranquillity Assessments. 'Relative tranquillity' (2) needs to be explained and defined.

Policy NH8: The historic environment

Archaeology team

11.28 We support the policy set out in Option A. Option B would not set out a positive strategy for the conservation and enjoyment of the historic environment and we agree this would not be in line with the NPPF.

11.29 The statutory County Historic Environment Record is the main source for information on undesignated heritage assets of archaeological interest which is required under the NPPF to be consulted as a minimum. This should be highlighted in section 4 of this policy so that it is not overlooked when assessing the presence of non-designated heritage assets. We suggest the following: 4) Non-designated heritage assets, where recorded on the Historic Environment Record, identified through local or neighbourhood plan-making, Conservation Area Appraisal, or review or through the planning application process.'

Policy NH9: Listed Buildings

Archaeology team

11.30 Our Archaeology team have already contributed to this policy and will continue to work with district colleagues in the preparation for Regulation 19 version of the Joint Local Plan, as appropriate.

Policy NH10: Conversation Areas

Archaeology team

11.31 Our Archaeology team have already contributed to this policy and will continue to work with district colleagues in the preparation for Regulation 19 version of the Joint Local Plan, as appropriate.

Policy NH11: Archaeology and Scheduled Monuments

Archaeology team

11.32 We support the policy as set out in option A. Option B would require a far more complex and lengthy policy to achieve the stated aims which has the potential to cause confusion in what is required.

11.33 We would however suggest the following amendments:
'3) Applicants must agree the scope of assessment and field evaluation with the County (or Historic England in the case of scheduled monuments) Council through a written scheme of investigation and in advance of any assessment or trial trenching/groundworks. '

8) For clarity we would recommend that this is changed to: 'The archive generated from any archaeological assessment or investigation will need to be deposited with the county museum store.'

Policy NH12: Historic Battlefields, Registered Parks and Gardens and Historic Landscapes

Archaeology team

11.34   Our Archaeology team have already contributed to this policy and will continue to work with district colleagues in the preparation for Regulation 19 version of the Joint Local Plan, as appropriate.

Policy NH13: Historic environment and climate change

Archaeology team

11.35   Our Archaeology team have already contributed to this policy and will continue to work with district colleagues in the preparation for Regulation 19 version of the Joint Local Plan, as appropriate.

12. Chapter 13: Infrastructure, transport, connectivity and communications

<u>Central Place Planning and Co-ordination team</u>

12.1 The Central Oxfordshire Travel Plan covers the city and surrounding area including parts of South Oxfordshire and Vale of White Horse. The strategic transport schemes (Traffic Filters, Zero Emission Zone and Workplace Parking Levy) are expected to create a step change in Oxfordshire's travel behaviour. We expect more people choosing to access Oxford by sustainable modes of transport as a result. The mention of this Central Oxfordshire Travel Plan should be considered.

<u>Place Planning and Coordination team</u>

12.2 In the 'facts and figures' infographic is not a sufficient explanation as to the sources of the various data. No information has been provided as to how the journey times have been calculated, and this should be explained. Critically, the work from home and travel to work data must be removed as this is misleading as it is taken from the 2021 Census. Further to this, a note in the next draft should be prepared to explain this matter. As is stated in Section 4.4 of the Existing Transport Conditions Report, there are significant limitations in this data due to the Census being taken during the Covid pandemic, paragraph 4.4.3 notes "The 'stay at home' rule was still in force until the end of March 2021. As such, only 'key workers' were able to travel for work, while many others were on furlough and working from home."

Policy IN1: Infrastructure and service provision

<u>Strategic Planning and Infrastructure team</u>

12.3 Wording improvements/changes are recommended to the draft policy text.

12.4 Point two of the proposed policy should be amended, with new text to be added to the policy underlined, to read:
"Planning permission will only be granted for developments where the infrastructure and services needed to meet the needs of the new development are already in place or will can be provided. to an agreed timescale. Where appropriate, and agreed with the council, financial contributions, payable to an agreed timetable, will be sought to enable the delivery of infrastructure and/or services to an agreed timetable by another party or infrastructure and/or services maybe required to be delivered by the developer to an agreed timetable. Infrastructure and/or services includes the requirements set out in the councils' Infrastructure Delivery Plan, the Developer Contributions Supplementary Planning Document, the safeguarded schemes listed in Policy IN3 - Transport Infrastructure and Safeguarding, Local Cycling and Walking Infrastructure Plans, leisure facilities assessment and playing pitch strategy, green infrastructure strategy, any relevant made Neighbourhood Development Plans, and/or infrastructure and services needed to mitigate the impact of the new development to make it acceptable in planning terms.

12.5 Point three of this draft policy includes repetition which should be removed. Section 106 agreements contain planning obligations. Further amendments to point 3 of this proposed policy are detailed:

3) Infrastructure and services required as a consequence of development, and <u>if required</u> provision for their maintenance, will be sought from developers, and secured through <u>S106</u> planning obligations, conditions attached to a planning permission, other agreements, and funding through the council's Community Infrastructure Levy (CIL)~~,~~ ~~Section 106,~~ or other mechanisms. This applies equally where external funding for infrastructure necessary for development has been secured (including where the infrastructure is delivered ahead of development), on the expectation that funding shall be recovered from development.

<u>Transport Development Management</u>

12.6   Proposed rewording of point 3 of this proposed policy:
'infrastructure and services required as a consequence infrastructure and services required as a consequence of development, and provision for their maintenance, will be sought from developers, and secured through planning obligations, conditions attached to a planning permission, or other agreements. ~~and funding through the~~ ~~council's Community Infrastructure Levy (CIL), Section 106, or other mechanisms~~. This applies equally where external funding for infrastructure necessary for development has been secured (including where the infrastructure is delivered ahead of development), on the expectation that funding shall be recovered from development.'

<u>Place Planning and Coordination team</u>

12.7   The supporting text on page 492 explains that infrastructure may be delivered directly by development, which is very helpful. However, this reference is not carried through into the proposed draft Policy IN1. Reference should be included in point 2), we recommend that wording is added (shown in italics) to the second sentence to read: "Where appropriate, and agreed with the council, financial contributions <u>and/or direct</u> <u>delivery of new or improved facilities</u> will be sought to deliver infrastructure to an agreed timetable."

<u>Public Health team</u>

12.8   We welcome the inclusion of Local Cycling and Walking Infrastructure Plans within the list of documents which developers will need to comply with when setting out their proposals in both these policies.

<u>Transport policy team</u>

12.9   As previously outlined, OCC is developing a set of area and corridor travel plans to support the LTCP. The LTCP area and corridor travel plans should be referenced within policy IN1 as the schemes identified will help to support delivery of the Local Plan and financial contributions will be required for the delivery of infrastructure.

<u>Waste and Circular Economy team</u>

12.10   We welcome and support the reference to waste facilities as essential infrastructure in policy IN1. We will continue to request S.106 and CIL contributions (where appropriate) for the expansion and efficiency of Household Waste Recycling Centre (HWRC) capacity to deliver the council's agreed HWRC strategy. [Agenda for Cabinet on Tuesday, 19 September 2023, 11.00 am | Oxfordshire County Council](#) item 114/23 [HWRC Annex 1.pdf (oxfordshire.gov.uk)](#)

Policy IN2: Sustainable transport and accessibility

<u>Place Planning and Coordination team</u>

12.11 As noted in comments made in respect of Policy IN1, LTCP area and corridor travel plans are not referenced sufficiently in these draft policies. Although the supporting text on p.497 states "The policy specifically supports a number of the LTCP policies, through promotion of Local Cycling and Walking Infrastructure Plans (LCWIPs), and the Strategic Active Travel Network (SATN), as well as the Area Travel Plans (formally *[sic]* Area Transport Strategies) and Transport Corridor Strategies.", no mention of the area and corridor travel plans is made in either Policy IN1 or IN2. We suggest that wording is included in point 2) of IN1 (additional wording underlined): "Infrastructure includes the requirements set out in the councils' Infrastructure Delivery Plan, the Developer Contributions Supplementary Planning Document, the safeguarded schemes listed in Policy IN3 -Transport Infrastructure and Safeguarding, Local Cycling and Walking Infrastructure Plans, <u>LTCP area and corridor travel plans</u>…".

12.12 It should also be noted that the Science Vale Area Strategy within LTP4 remains adopted policy until it is superseded by the forthcoming update to the area travel plans in the Local Transport and Connectivity Plan (see <u>here</u>).

12.13 Point 4) of IN2 states "Where travelling by modes other than a private car is challenging, initiatives and infrastructure provision should facilitate electric, or other fuelled vehicle use.", however electric vehicle charging facilities are required for all residential and non-residential developments as set out in paragraphs 4.17-4.19 of OCC's Parking Standards for New Developments document, regardless of location. As such, we suggest the following amendments (text to be removed is crossed through and additional text is underlined): ~~Where travelling by modes other than a private car is challenging,~~ "Initiatives and infrastructure provision should facilitate electric, or other fuelled vehicle use, <u>in line with OCC's Parking Standards for New Developments</u>." This would also ensure consistency with IN5, which requires that new developments accord with the County Council's adopted parking standards.

12.14 Page 496 – we are not clear as to why this policy is needed. If it is to include the wording underlined: '…transport infrastructure <u>should</u> include additional <u>high-quality</u> footways and cycleways…'.

And

~~Travel improvements and infrastructure can be delivered as part of a development or be provided off-site as agreed with Oxfordshire County Council, as Highway Authority.~~ Instead use the following: <u>Travel improvements and infrastructure should be delivered as part of a development, but could be provided off-site as agreed with Oxfordshire County Council, as Highway Authority</u>.

12.15 Page 497 a spelling mistake has been made in the word prioritise.

12.16 Page 497 …priority for space will ~~initially~~ be given to walking and wheeling… remove the strike through word as the sentence reads that it can be reduced when considering other forms of transport.

12.17 Page 498 Option A '…use good design principles from relevant guidance <u>and standard</u> documents. Include words underlined.

<u>Transport policy team</u>

12.18   We support references in the supporting text to the LTCP and policies covering vision zero, transport user hierarchy, decide and provide, LCWIPs, SATN and area travel plans. We suggest also referencing mobility hubs and OCCs adopted Mobility Hub Strategy which is supported through the Local Plan.

12.19   We suggest that OCC's adopted Active Travel and Mobility Hub strategies and emerging Bus and Rail strategies and Walking and Cycling Design Guidance are also referenced within the Local Plan. These strategies will outline our priorities around the respective modes and overall public transport network. The Local Plan will support delivery of all three strategies.

12.20   The Vision Zero wording should be updated to read "zero road fatalities or <u>serious</u> injuries".

12.21   We support the wording of Policy IN2 and the specific references to the LTCP. We suggest Policy IN2 2(f) includes the full name of the adopted decide and provide document - "Implementing 'Decide & Provide': Requirements for Transport Assessments".

12.22   Our response to the Issues consultation in June 2022 highlighted that the Local Plan should provide ambitious and clear place shaping requirements within new strategic site policies including a consideration of smaller blocks and shorter streets to maximise permeability for pedestrians, cyclists, and public transport and designing street networks to be less permeable for private vehicles.

12.23   Whilst walking and cycling permeability is referenced within some strategic site policies, overall, there is little reference to the role of healthy place shaping to support active and sustainable transport infrastructure.

12.24   As outlined in the LTCP, delivering infrastructure alone is not sufficient and we also need to consider the wider role of how we design our neighbourhoods as this can influence levels of physical activity, travel patterns, social connections, and physical and mental wellbeing.
The LTCP includes a number of policies in the Healthy Place Shaping chapter to help deliver this which are not reflected in the Local Plan. The plan should place more emphasis on the role of place shaping to support active travel infrastructure and include concepts from the LTCP healthy place shaping chapter such as the Healthy Streets Approach, Safe Streets/filtered permeability, 20-minute neighbourhoods and guidance for new developments.

12.25   Similarly, it is considered that whilst the plan refers to the location and proposed layout of developments, it could more strongly promote liveable neighbourhoods / mixed use development which is essential to influencing physical activity and travel patterns.

12.26   The LTCP includes a number of innovation policies and is supported by the Innovation Framework. The Innovation Framework is a supporting document of the LTCP and sets out a series of principles which should be applied to the integration of innovation into new development and infrastructure, so that innovation is used to further policies and strategies such as those within the LTCP. The Local Plan should include consideration of integrating the Innovation Framework and futureproofing developments for innovations such as Connected and Autonomous Vehicles.

12.27 With regard to rail, as part of the LTCP Part 2, OCC is working on an emerging rail strategy 'OxRail 2040' which will cover rail development, new stations, de-carbonisation and climate resilience. This is expected to be adopted in Spring 2024.

Public Health team

12.28 We support Option A and the proposed policy wording. We welcome the inclusion of the transport user hierarchy within this policy to ensure that the ability to actively travel is seen as the most convenient option for residents.

Innovation team

12.29 Reference to the Innovation Framework should be included. The use of connected and autonomous vehicles (CAVs – or driverless vehicles) may open up new options for transport making it cost effective to obtain shared vehicles on-demand and so improving accessibility for less densely populated areas where previously a private car may have been the main solution to accessibility. CAVs could contribute to providing a 'lifetime' solution for non-drivers like the young and elderly (Ref. SO 10).

Strategic Planning & Infrastructure team

12.30 This comment focuses on the potential impact of the Cowley Branch Line opening for passenger services.

12.31 Draft Policy IN2 (e) is supported as it references the need to 'contribute to and enhance the provision of active and sustainable transport infrastructure (both on and off site) and, where feasible, implement new travel and transportation technology and services necessary to support that development, either through direct delivery or developer contributions'. In order to progress the plans to open the Cowley Branch Line, a substantial local contribution will be needed to convince the Department for Transport to fund the rest of the anticipated £131m cost of the stations and track improvements. It is therefore anticipated that developments close to the Cowley Branch Line will provide a S106 financial contribution as part of the local contribution pot. In addition, there will need to be contributions to related works such as the provision of cycle parking hubs near the stations.

12.32 Contributions are already being sought within Oxford City. An example was an application for a new laboratory and office building on the ARC Oxford Business Park, ref 22/03067/FUL. The text of the relevant S106 contributions is that it will be used for the Cowley Branch Line or equivalent transport infrastructure, therefore providing some future flexibility.

12.33 The anticipated contributions for the Cowley Branch Line need to be added to the Infrastructure Delivery Plan and included in the viability report underpinning the South & Vale Joint Local Plan.

12.34 We note that there is accompanying policy provision in the Regulation 19 Oxford City Local Plan. Oxfordshire County Council made some comments on those provisions. As this is a cross-boundary issue, it will be good for all the Councils to work together to produce consistent policy approaches going forward.

Policy IN3: Transport infrastructure and safeguarding

Place Planning and Coordination team

12.35 We note the following passage in the supporting text for this policy, which reads "Should new safeguarded schemes be needed, such as routes related to the County Council's emerging Strategic Active Travel Network, these will be included in the next consultation stage of the Joint Local Plan". We welcome the opportunity to add further schemes or update existing schemes if required and we thank the council for the positive working relationship established with OCC officers on this matter.

12.36 In this policy it states that, "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…k) the delivery of safeguarded and identified transport infrastructure which are required to support the development required in the plan period and beyond". Although theoretically covered by point k), this policy omits an explicit reference to the HIF1 scheme. Given the absolutely critical role that the HIF1 scheme plays in enabling the planned growth allocated in the Joint Local Plan (as acknowledged in the Proofs of Evidence submitted by South Oxfordshire and Vale of White Horse district councils), including the vital provision for active travel and public transport which form fundamental elements of the scheme, we request that this is acknowledged in this policy.

12.37 Please note that if the HIF1 scheme does not come forward, Oxfordshire County Council could not support the plan in its current form.

12.38 Given its significance, we recommend that a separate heading is provided for the scheme, which reads (or similar):

"**Didcot Garden Town HIF1 Scheme**

12.39 The Councils recognise the critical importance of the role that the Didcot Garden Town HIF1 Scheme (comprised of the A4130 Widening, Didcot Science Bridge, Didcot to Culham River Crossing, and Clifton Hampden Bypass) plays in enabling the sustainable growth allocated in this plan. The need for this scheme has been identified through the transport evidence produced for the Vale of White Horse Local Plan 2031 and South Oxfordshire Local Plan 2035 and thus it remains necessary to facilitate the growth that is planned in the Joint Local Plan.

12.40 The scheme plays a fundamental role in ensuring the bus network can function successfully and will enable it to be improved and expanded in order to support the allocated growth in the plan. The scheme also forms a significant role in the growth of the active travel network by providing high quality walking and cycle connections between a number of key locations in the Science Vale area, including Milton Park, Valley Park, Great Western Park, Land adjacent to Culham Science Centre, and Culham Science Centre itself.

12.41 Finally, the completion of the scheme and the Northern Perimeter Road Phase 3 (NPR3) will provide a strategically important alternative route for Didcot, helping to reduce congestion and providing sustainable travel options by improving walking and cycling connectivity and improving bus journey times within the town, thus helping to realise the aspirations of the Didcot Garden Town

12.42 Under point 5) the policy states, "The current list of safeguarded schemes can be found below and in the emerging Policies Map. If not already incorporated, active and sustainable transport infrastructure improvements should be incorporated into the transport infrastructure scheme at the detailed design stage." Although somewhat moot as for any scheme promoted by Oxfordshire County Council the presumption would always be to include active and sustainable transport improvements from the outset of its development regardless of this policy, it would be better to reword this to remove the reference to 'detailed design stage' (which is a later stage of design) and instead say 'earliest stage of design'.

12.43 In the list of safeguarded schemes it might be helpful to add 'with A420' to Great Coxwell Road Junction to avoid potential ambiguity.

12.44 Page 501 …existing transport infrastructure is improved, that there are ~~opportunities~~ direct, safe and convenient provisions for walking, wheeling and cycling…' Include underlined words and remove the word in strikethrough.

12.45 Page 503 policy IN3 1) a) 'maintaining and improving walking and cycling infrastructure, including, for example, through developments…' Add words underlined.

12.46 Page 504 policy IN3 2) '…the scheme has been delivered, or an equivalent scheme is delivered and subsequently proven to mitigate the highway network'. Include the words underlined.

Transport policy team

12.47 Delivery of schemes included in the LTCP area and corridor travel plans should be included within policy IN3 1(a) to futureproof for their development and approval.

12.48 We support references to delivery of Wantage and Grove Railway Station, improvements to Culham Railway Station and delivery of East West Rail through to Didcot and the safeguarded Wantage and Grove Railway Station, as part of policy IN3 1.

12.49 The delivery of Cowley Branch Line needs to be clearly highlighted in the Local Plan, including contributions towards its delivery. Please see the response from Strategic Planning and Infrastructure team for further detail on this topic.
As well as delivery of Cowley Branch Line itself, the Local Plan should consider potential active and sustainable transport infrastructure that would facilitate access to stations on the line.

12.50 Redevelopment of Culham railway station should include safeguarding for four tracking and this should also be reflected in policy IN3 and AS2. The Oxfordshire Rail Corridor Study identified the need for rail capacity enhancement on the Didcot to Oxford corridor, focused on the section between Radley and Oxford as this is where benefit would be greatest and easiest to achieve owing to land in rail ownership. In addition to this, opportunities should be taken to safeguard other land on this corridor for potential future rail use – for example to enhance capacity or improve network resilience. The area of land to the north/west of Culham Station falls into this category, however, there is no current aspiration nor live project requiring Network Rail to acquire land for a four-track railway through Culham.

12.51 As previously highlighted, the Local Plan should include an ambition to develop all railways stations as mobility hubs, in line with OCCs adopted Mobility hub strategy.

12.52 The Local Plan should also reflect proposals to develop a Strategic Public Transport Network and new mobility hub locations on the A420, A4074 and A34 (S) corridors. The Central Oxfordshire Travel Plan includes a proposed Strategic Public Transport Network which includes the peripheral Park and Ride site locations identified in the Oxford Transport Strategy (2015). Work is ongoing to refine proposals for how the peripheral Park and Ride sites function as mobility hubs and we support their continued inclusion in the Local Plan.

12.53 As previously highlighted, OCC supports the outcomes of England's Economic Heartland Swindon-Didcot-Oxford connectivity study and encourage consideration of the package of measures identified in the Local Plan.

12.54 The following paragraphs provide information about wider rail context for awareness and consideration as part of the Local Plan.

12.55 We are working closely with the rail industry and key regional partners e.g. EEH/the Western Gateway Alliance on new and improved rail services that could serve Didcot/Culham and the proposed new Grove for Wantage station. A seven-day a week Bristol-Oxford service has a positive business case and would greatly enhance connectivity from the South Midlands, through Oxfordshire to the West.

12.56 We have advised the East West Rail Company that as part of East-West Rail Connection Stage 1 (services from Oxford to Bletchley), these two trains per hour cannot terminate at Oxford railway station and at least one should be extended to Didcot.

12.57 We are also working with Network Rail and Great Western Railway (GWR) to review the business case for Didcot-Oxford 25kv AC overhead electrification. This would see the line through Culham wired.

Strategic Planning & Infrastructure team

12.58 Part of the Cowley Branch Line skirts into the Vale of White Horse District between Kennington Junction on the mainline and the Oxford City boundary. An outline business case has been completed aimed at reopening the line to passengers, with two new railway stations located within Oxford City close to the border of South Oxfordshire District.

12.60 Draft Policy IN3(c) provides for development to contribute to the delivery of various infrastructure schemes and transport priorities. The draft policy mentions 'protecting former rail facilities and lines for re-use as public transport corridors for the purpose of active travel' however, additional provision needs to be included in the policy to provide clear recognition of the plan to reopen the Cowley Branch Line for passengers, along with its current use providing for freight from the BMW MINI plant. We recommend additional text as a new provision perhaps before the current (f) (g) and (h) which refer to the proposal for a new Wantage and Grove railway station, improvements to the Culham railway station and the delivery of East West Rail. This suggested text which would be a new (f) with subsequent provisions renumbered as follows: 're-opening the Cowley Branch Line to passenger traffic with two new stations within Oxford City'.

12.61　The case for contributions to the delivery of the Cowley Branch Line is set out in our comments above on Draft Policy IN2.

12.62　Draft Policy IN3(a) provides for contributions to 'maintaining and improving walking and cycling infrastructure'. In anticipation of the reopening of the Cowley Branch Line, it is necessary to take development contributions to provide for walking and cycling infrastructure associated with it. A study was produced by consultants PJA in October 2022 identifying ways to improve the walking and cycling infrastructure and can be used to guide proposals alongside other documents such as the Oxford LCWIP. Further, a detailed study on a possible bridge across the line within Oxford City is almost complete and a more in-depth study entitled an Infrastructure Place Study is currently underway.

<u>Innovation team</u>

12.63　It is anticipated that early adoption of Connected and Automated Vehicles (CAVs) may be provided by small but shared, on-demand services. Consideration could therefore be given to providing the flexibility to convert space in developments originally for communal parking of private vehicles, to that for waiting and turning of CAVs. These CAVs will be electric, therefore installing the backbone of appropriate capacity charging infrastructure within a flexible parking space should also be a consideration.

<u>Environment team – Countryside Access</u>

12.64　Preferred option and proposed policy text is supported.

Policy IN4: Wilts and Berks Canal safeguarding

<u>Environment team – Countryside Access</u>

12.65　Preferred option and proposed policy text is supported.

Policy IN5: Parking standards

<u>Strategic Planning and Infrastructure team</u>

12.66　We support option A policy approach and the draft policy wording which requires new development to provide cycle and car parking in accordance with Oxfordshire County Council's adopted parking standards. These parking standards are different for Oxford City and edge of Oxford developments compared to developments in the rest of the County.

<u>Place Planning and Coordination team</u>

12.67　Please include a reference to the Local Transport Note: 1/20 Cycle Infrastructure Design's guidance on the positioning and spacing of cycle parking 11.4.6-11.4.8 and identify this as a requirement of cycle parking provision.

12.68　Page 510 Policy IN5 … with the phasing out of sales of new petrol and diesel cars by ~~2030~~ 2035 (https://www.gov.uk/government/news/government-sets-out-path-to-zero-emission-vehicles-by-2035). Include the new year for phasing out.

12.69   Page 510 Policy IN5 '…welfare facilities, such as showers, lockers, <u>drying room</u> and cycle maintenance stations… Include words underlined.

12.70   Page 511 Policy IN5 Option A '…identifies where ~~district~~ <u>county</u> parking standards can be found'. Remove strike through and include underlined wording.

12.71   Page 512 Policy IN5 2) c) '<u>…an air pump and multi-tool facility to be provided at every business cycle parking area</u>'. This is to change the draft policy as there is not a reasonable explanation as to why there needs to be 15 or more spaces. This number will exclude many businesses and therefore the potential cyclists. Further discussion on point 2 subpoints a-d are requested.

<u>Public Health team</u>

12.72   We support inclusion of Option A and the proposed policy wording. Easy access to cycle parking and storage as well as welfare facilities is important to promote active travel and we fully endorse their inclusion in the policy.

Policy IN6: Deliveries and freight

<u>Transport policy team</u>

12.73   We are supportive of the policy's aims and references to rail freight, consolidation, cargo bikes and rest facilities which align with delivery of OCC's adopted Freight and Logistics Strategy. Reference should be added to OCC's adopted Freight and Logistics Strategy and supporting delivery of its objectives and key principles.

12.74   Policy IN6 1 would benefit from being expanded and being made more holistic or an additional policy added to address other options for new developments that will help to reduce the impacts of deliveries and contribute towards freight decarbonisation. These options include consolidation locations and parcel delivery lockers. It would also be helpful for the policy to consider construction deliveries and the potential for new developments to be rail served.

<u>Place Planning and Coordination team</u>

12.75   Page 514 IN6 '…through supporting and consolidation of goods and transfer to rail <u>and pedal</u> freight…' Please include wording underlined.

12.76   Page 516 IN6 1) 'access and loading arrangements suitable for cargo bikes ~~should~~ <u>must</u> be considered for all developments…' Include underlined word and remove strikethrough word.

Policy IN7: South East Strategic Reservoir Option (SESRO) safeguarding

<u>Strategic Planning and Infrastructure team</u>

12.77   Draft policy IN7 and the consideration of the alternatives in this consultation document is well thought through and we welcome the detailed consideration.

12.78   A safeguarding notation of this site for a reservoir near Abingdon between East Hanney, Drayton and Steventon was first proposed by Thames Water during the

preparation of the Vale of White Horse Local Plan Part 1. The Part 1 Plan was adopted December 2016. Subsequently the Part 2 Plan, adopted in October 2019 updated the area safeguarded to reflect Thames Water's plans.

12.79   The safeguarding has alerted landowners and future landowners to the potential for a reservoir to be built, and in some cases prevented development being built given the reservoir proposal.

12.80   Thames Water does not propose to make an application to Vale of White Horse District Council for the reservoir, instead, given its proposed size, it is identified as a Nationally Significant Infrastructure Project to go through a Development Consent Order (DCO) process, run by the government. That process has not yet commenced but public consultation is planned this year. In recent years, Thames Water and other local water companies have been investigating options and preparing plans, notably a plan covering the whole South East, and individual water company management plans.

12.81   It is important to note that the safeguarding in the adopted Part 1 and Part 2 Local Plans relates to Core Policies 14 and 14a indicating that the safeguarding shall end if it is not included in the finalised Water Resources Management Plan or is refused development consent. The County Council in its previous comments on the Part 1 and Part 2 Plans, and in these comments now, accepts that it is prudent to safeguard the land, subject to the caveat that the safeguarding will fall away if the reservoir plan falls away. Oxfordshire County Council, in its comments on the draft regional Water Resources South East plan and Thames Water's Water Resources Management Plan (WRMP), and in agreed Council motions, has indicated its opposition to the reservoir proposal. Vale of White Horse District Council is also in opposition. At the time of writing, there is no decision on the Thames Water WRMP24, which we understand is with the Secretary of State for Environment, Food and Rural Affairs. We support the inclusion of sub-sections 2 and 3 of draft Policy IN7 which say that the Vale of White Horse District Council objects to the proposed reservoir and that the safeguarding will be removed if a development consent order for the reservoir is refused. Further, we would like to see sub-section 2 state that the safeguarding will be removed if the reservoir is not included in Thames Water's Water Resource Management Plan either now, when the WRMP24 is finalised, or in future when there is a revision, as expected in five years.

12.82   The draft Policy IN7 is more detailed than the policies of the adopted local plan. This reflects the additional research and investigation that has taken place over recent years. The policy sets out 23 policy expectations for the DCO under the headings of Design, Construction, Infrastructure, Environment, Measures to Reduce Carbon Emissions and Recreation. We think that all these policy provisions are soundly based and encourage the District Councils to pursue this policy, subject to amendments as set out below.

Environment team - LLFA

12.83   The LLFA would like to see included within this policy a requirement to undertake an assessment of flooding from all sources, including where required detailed hydraulic modelling to assess the impacts of flood risk within and downstream of the area.

Environment team – Countryside Access

12.84   We support the inclusion of a policy as suggested in the preferred option. Please amend v) to 'include proposals for a jetty to support water sports uses on the reservoir,

cycle, <u>horse riding</u> and walking trails around the reservoir <u>and supporting infrastructure</u> and interpretation boards for visitors'.

<u>Transport Policy team</u>

12.85 As highlighted in our response to Policy IN6, the possibility of a rail freight spur should be developed with the relevant stakeholders to enable construction materials to be delivered or removed by rail. We note that the policy requires this in 'i' which we support.

<u>Place Planning and Coordination team</u>

12.86 Page 524 Policy IN7 infrastructure 'h) …to include provisions for an off-road <u>segregated footway and cycleway</u> and improved…' Include words underlined.

<u>County Cabinet Member</u>

12.87 Consideration should be given to adding a provision, under the sub-heading of design that the councils consider that the applicant must '<u>have scenario planning in place for rapid drawdown under flood conditions</u>' and under the sub-heading of environment indicate that the applicant must '<u>directly invest in flood mitigation to address the impacts of the rapid drawdown scenario at all points along the River Thames</u>'.

12.88 Consideration should also be given to adding a provision, under the sub-heading of design that the applicant must '<u>be able to demonstrate safety in the event of a terrorist attack on either the reservoir or the input / output pipes</u>'.

12.89 The proposed provision m) should be amended to include a requirement to demonstrate no local increase in flood risk as a direct result of the reservoir being built.

Policy IN8: Digital connectivity

<u>Strategic Planning and Infrastructure team</u>

12.90 We support option A and welcome the reference to the Digital Infrastructure Strategy in the supporting text. We would also encourage provision to be future-proofed not only for 5G connectivity but later generations of mobile data connectivity.

13.   Gaps and Omissions

1. Wording changes are recommended via underlined text throughout this response.

2. Cowley Branch Line – please see our comments on pages 19-20, 42-46 and 84-88.

3. Didcot Garden Town HIF1 mention in IN chapter and specifically in policy IN3 – identified in our comments on page 85-86.

4. 20 minute neighbourhoods/ proximity to connectivity (see below comments).

5. Innovation Framework and Innovation Plans for developments (see below comments).

6. Mention of the Central Oxfordshire Travel Plan and its schemes (see below comments).

7. Hot food takeaway – see comments made on page 65 of this response.

8. There appears to be an absence of a specific policy on the DTECH LDO. The Plan proposes to replace CP28 (New Employment Development on Unallocated Sites) from the Vale LPP1 with policy JT1 'Meeting employment needs'. Given that the DTECH LDO site is within the Didcot Growth Accelerator Enterprise Zone clarity on the policy position should be included in policy JT1 the Regulation 19 Plan.

9. Addition of a new Education facilities and services policy is recommended – see our comments on proposed policy HP2.

Public Health team

13.1   We suggest that this section includes a policy on 20-minute neighbourhoods to ensure that new developments are well-designed so that people are able to walk, wheel and cycle to all essential amenities within a 20-minute journey. A policy that could be drawn on is included within the Local Transport and Connectivity Plan.

13.2   There is no reference to the important role of cycling for school children in any of the transport policies.

Transport Policy team

13.3   It is noted that reference to 20-minute neighbourhoods has been removed following the issues consultation in June 2022. Whilst we recognise the recent challenges around use of the term, it remains an adopted policy in LTCP and we believe it is a useful way to explain 'proximity to connectivity'.

13.4   Recognising the challenges around use of the '20-minute' term, the adopted Central Oxfordshire Travel Plan utilises the term 'liveable neighbourhoods'. These are described as well-connected and compact areas where the basis of people's daily needs can be found within a 20-minute return walk. It is suggested that using this

terminology would be a helpful way to explain the policy and provide consistency across the county.

Transport Policy Team

13.5   Our response to the Issues consultation in June 2022 highlighted that the plan should provide ambitious and clear place shaping requirements within new strategic site policies including a consideration of smaller blocks and shorter streets to maximise permeability for pedestrians, cyclists, and public transport and designing street networks to be less permeable for private vehicles.

- Whilst walking and cycling permeability is referenced within some strategic site policies, overall there is little reference to the role of healthy place shaping to support active and sustainable transport infrastructure.

- As outlined in the LTCP, delivering infrastructure alone is not sufficient and we also need to consider the wider role of how we design our neighbourhoods as this can influence levels of physical activity, travel patterns, social connections, and physical and mental wellbeing.

- The LTCP includes a number of policies in the Healthy Place Shaping chapter to help deliver this which are not reflected in the Local Plan. The plan should place more emphasis on the role of place shaping to support active travel infrastructure and include concepts from the LTCP healthy place shaping chapter such as the Healthy Streets Approach, Safe Streets/filtered permeability, 20-minute neighbourhoods and guidance for new developments.

- Similarly, it is considered that whilst the plan refers to the location and proposed layout of developments, it could more strongly promote liveable neighbourhoods / mixed use development which is essential to influencing physical activity and travel patterns.

13.6   As part of the LTCP, OCC has produced an Innovation Framework which sets out how innovation can be integrated to new development and infrastructure. We suggest that the Innovation Framework is referenced in the draft Local Plan and we would seek for Innovation Plans to be prepared for new developments. We welcome the mention of innovation in theme 7 of page 14 but wish to further discuss with district colleagues how innovation can be best integrated in planning future developments and the value Innovation Plans can add to the consideration of long term strategic development sites. Reference to a requirement for Innovation Plans on larger developments is required within the Local Plan.

Central Place Planning and Co-ordination Team

13.7   Mention of Central Oxfordshire Travel Plan and its relevant actions for which the Joint Local Plan should have regard to – these include:
- Action 1 – Expanding upon the pilot scheme, develop proposals for a Zero Emission Zone (ZEZ) for Oxford city centre.
- Action 2 – Develop proposals for a set of strategic traffic filters for locations across Oxford.
- Action 3 – Develop proposals for a Workplace Parking Levy to cover businesses with 11 or more staff parking spaces in Oxford City Council's administrative area, within the Oxford ring road.

- o Action 4 – Develop proposals for further Controlled Parking Zones (CPZ) across the city and to review eligibility and quantity of permits in existing CPZ areas.
- o Action 6 – Remove on-street public parking where necessary on corridors identified in the plan as either being active travel Primary Routes (Quickways) or situated on core bus routes.
- o Action 9 – Deliver a central Oxfordshire cycle network, consistent with the Oxfordshire Strategic Active Travel Network and the latest LCWIP plans.
- o Action 13 – Deliver:
  - bus priority measures along key inter-urban bus routes and on key orbital routes in the Oxford area; and
  - upgrade bus infrastructure (including at bus stops and to Real Time Information)
- o Action 14 – Alongside partners, deliver a zero emission local bus fleet across the Oxford Smartzone area by 2024/25 and deliver a fully zero emission bus fleet across the COTP area at the earliest possible opportunity thereafter
  - o Action 15 – Alongside partners, deliver:
    - a) Oxford Station enhancements;
    - b) a passenger rail service and two new passenger stations on the Cowley Branch Line; and
    - c) local rail capacity and service frequency enhancements.
- o Action 16 – Deliver a mobility hub strategy for a network of mobility hubs across Oxfordshire.
- o Action 17 –
  - Deliver a freight transfer / consolidation feasibility study and first / last mile delivery pilot.
  - Support modal shift to cargo bikes and the electrification of freight deliveries
- o Action 20 - Alongside partners, deliver a Central Oxfordshire Movement and Place Framework.

Climate Action Team

13.8 Planning Advisory Service's Route Planner states that Local Plans *"should avoid repetition of policies (and national planning policy) wherever possible and wordiness in your drafting style. Cross referencing to policies within other policies is very rarely a necessary or useful move….because the plan should be read as a whole and introducing cross-referencing can have the unintended consequence of raising the important of specified linkages over others which are not specified. Statutory consultees and officers in other council departments can have a particular role not just in ensuring that the policies update takes the right approach but in supporting the development of concise and clear policies that avoid repetition"*. In this context, we consider that the following policies should be amended (although the list below is not exhaustive and other policies should be reviewed too).

- Combine/merge part 6 (policy DE1) into policy CE1 (due to the degree of overlap between the principles of net zero design and climate mitigation and adaptation, which is potentially confusing and repetitious). You only need to cover the principles in one place.

- Delete policy NH13 and incorporate provisions (including prioritising the retention and reuse of existing historic buildings as a sustainable resource and maximising opportunities to improve the energy efficiency of historic buildings) into the relevant net zero policies in chapter 4.

- Delete part 1 (a) of policy HOU8 as it unnecessarily repeats policy CE3. The supporting text could include a link to policy CE3 (as the plan should be considered as a whole).

13.9   Policy HP6 (part 4 a) should refer to the deficiencies and surpluses identified in Natural England's latest green infrastructure standards. The strategic blue-green infrastructure network in the plan area (including river corridors) should ideally be illustrated on a diagram.

13.10   Policy NH3 - Trees and hedgerows in the landscape could also seek to steer trees to the right locations through reference to the Oxfordshire Treescape Opportunity Map.

13.11   Regarding section 2 about the districts - As well as highlighting the key issues facing the districts, this section should be more positive about the potential opportunities to reduce emissions through the use of renewable energy and other interventions (e.g. EV infrastructure and carbon sequestration) as identified through PAZCO.

Errors

13.12 Berinsfield Local Green Space not shown on PDF of policies map.

13.13 Page 536 remove reference to Oxfordshire Plan 2050. As recognised on page 537 work on this plan has ceased.

13.14 References to planning applications to be reviewed as appropriate as pertinent applications have been submitted since the Regulation 18 consultation started.

Transport Evidence

13.15 There is work ongoing to model transport scenarios and prepare the necessary transport evidence to support the Regulation 19 Joint Local Plan. Consultant work is being prepared jointly for the County and the District Councils.

Interim Duty to Cooperate Statement

13.16 One of the supporting documents produced for this Regulation 18 Part 2 consultation is the Interim Duty to Cooperate Statement.

13.17 The Oxfordshire Strategic Vision referred to in paragraph 1.6 has been agreed by six Oxfordshire Councils; Cherwell District Council, Oxford City Council, West Oxfordshire Council, South Oxfordshire and Vale of White Horse Council and Oxfordshire County Council. Therefore, the paragraph 1.6 requires amendment to also include reference to Oxfordshire County Council.

13.18 Paragraph 1.13 page 6, contains a typo – an additional Council after Oxfordshire County Council should be removed.

13.19 Para 2.19 refers to the Oxfordshire Infrastructure Strategy (OXIS). The wording is not accurate and should instead read: The Oxfordshire Infrastructure Strategy (OxIS) 2017 was commissioned by the Future Oxfordshire Partnership, involving the county's six local authorities and Oxfordshire Local Enterprise Partnership, intending to help prioritising our infrastructure requirements to 2040 and beyond.

Infrastructure Delivery Plan

13.20 Informal officer work on the preparation of the IDP to support the Reg 19 JLP in Autumn 2024 is likely to start in March 2024. Relevant County officers will be involved in this work as it continues. The Infrastructure Delivery Plan is a key document and we will work positively and collaboratively with the aim of addressing the important infrastructure needs in the districts.

14.   OCC Guidance and Resources

Please note that this is not an exhaustive list and those listed below are subject to change, in cases where guidance is updated, the most recent version should be referred to.

Document(s)	URL
OCC Strategic Plan 2022-25	https://www.oxfordshire.gov.uk/council/our-vision-0
Adopted and Emerging Minerals and Waste Local Plan	https://www.oxfordshire.gov.uk/residents/environment-and-planning/planning/planning-policy/minerals-and-waste-policy/core-strategy
Pupil Place Plan	https://www.oxfordshire.gov.uk/residents/schools/our-work-schools/planning-enough-school-places
Childcare sufficiency assessment	https://www.oxfordshire.gov.uk/residents/children-education-and-families/childrens-services/delivering-services-children/childcare-market-assessment
Flood Management • Oxfordshire Local Flood Risk Management Strategy • Local Standards and Guidance for Surface Water Drainage on Major Development in Oxfordshire	https://www.oxfordshirefloodtoolkit.com/planning/flood-management/
Oxfordshire's Rights of Way Management Plan 2015-25	https://www.oxfordshire.gov.uk/residents/environment-and-planning/countryside/countryside-access/rights-way-management-plan
Oxfordshire Market Position Statement, Extra Care Housing	https://www.oxfordshire.gov.uk/residents/social-and-health-care/housing-options-and-care-homes/extra-care-housing/information-providers
Local Transport and Connectivity Plan and supporting papers • Active Travel Strategy • Mobility Hub Strategy • Freight and Logistics Strategy • Innovation Framework • Area and Corridor Travel Plans	https://www.oxfordshire.gov.uk/residents/roads-and-transport/connecting-oxfordshire/ltcp https://www.oxfordshire.gov.uk/residents/roads-and-transport/connecting-oxfordshire/ltcp-area-and-corridor-plans
Travel Plans	https://www.oxfordshire.gov.uk/residents/roads-and-transport/transport-policies-and-plans/transport-new-developments/travel-plans-and-statements
Active Travel • Cycling Design Standards • Walking Design Standards • LCWIPs	https://www.oxfordshire.gov.uk/residents/roads-and-transport/connecting-oxfordshire/active-travel-0
Transport Development Management • Street Design Guide • Parking Standards for New Developments • Implementing 'Decide & Provide'	https://www.oxfordshire.gov.uk/residents/roads-and-transport/transport-policies-and-plans/transport-new-developments/transport-development
Oxfordshire's Resources and Waste Strategy (2018-23)	https://www.oxfordshire.gov.uk/residents/environment-and-planning/waste-and-recycling/our-role-waste-management
Oxfordshire Electric Vehicle Infrastructure Strategy	https://www.oxfordshire.gov.uk/residents/environment-and-planning/energy-and-climate-change/electric-vehicles

Climate Action Framework	https://www.oxfordshire.gov.uk/residents/environment-and-planning/energy-and-climate-change/net-zero-2030
Oxfordshire Energy Strategy	https://www.oxfordshirelep.com/energystrategy
Joint Health and Wellbeing Strategy (2018-2023)	https://www.oxfordshire.gov.uk/residents/social-and-health-care/health-and-wellbeing-board/health-improvement
Oxfordshire Health Impact Assessment Toolkit	https://futureoxfordshirepartnership.org/projects/oxfordshire-health-impact-assessment-toolkit/
Digital Infrastructure Strategy	https://www.oxfordshire.gov.uk/residents/community-and-living/digital-infrastructure
Tree Policy for Oxfordshire	https://www.oxfordshire.gov.uk/residents/environment-and-planning/countryside/trees-and-woodland
Developer Contributions Guide	https://www.oxfordshire.gov.uk/residents/roads-and-transport/transport-policies-and-plans/transport-new-developments/developer-contributions
Neighbourhood Planning Guide	https://www.oxfordshire.gov.uk/residents/environment-and-planning/planning/neighbourhood-planning-guide
Oxfordshire Rail Corridor Strategy	https://www.networkrailmediacentre.co.uk/news/future-of-oxfordshire-rail-network-mapped-out-in-new-study
Future of Transport	https://assets.publishing.service.gov.uk/media/651c266bbef21800156decb0/future-of-transport-helping-local-authorities-to-unlock-the-benefits-of-technology-and-innovation-in-rural-transport.pdf
Oxfordshire Environmental Principles	https://mycouncil.oxfordshire.gov.uk/documents/s62860/CA_NOV1522R08%20Appendix%202.pdf
Pathways to a Zero Carbon Oxfordshire (PaZCO)	https://www.eci.ox.ac.uk/sites/default/files/2022-09/PazCo-final.pdf
Project LEO (Local Energy Oxfordshire)	https://project-leo.co.uk/
Community Activation	https://www.oxfordshire.gov.uk/residents/social-and-health-care/public-health-and-wellbeing/healthy-place-shaping/community-activation
Oxfordshire Way Strategic Vision	https://www.oxfordshire.gov.uk/residents/social-and-health-care/adult-social-care/oxfordshire-way
Adult Social Care Workforce Strategy	https://letstalk.oxfordshire.gov.uk/adult-social-care-workforce
OCC Vision Zero	Cabinet June 2022 (agenda item 14) https://mycouncil.oxfordshire.gov.uk/ieListDocuments.aspx?CId=115&MId=6882
OxCam Environmental Principles	CA_NOV1522R08_Appendix_1_Arc_Environment Principles.pdf (oxfordshire.gov.uk)
OCC Air Quality Strategy	Clean Air Routemap 2023 (oxfordshire.gov.uk)