OXFORDSHIRE
COUNTY COUNCIL

Planning Policy
West Oxfordshire District Council

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Corporate Director: Bill Cotton
Environment and Place

25 October 2023

Dear Planning Policy Team,

Oxfordshire County Council's Response to the West Oxfordshire Local Plan 2041 Focused Consultation: Ideas and Objectives (closing date 25th October 2023)

Oxfordshire County Council (OCC) continues to support the preparation of the West Oxfordshire Local Plan 2041 and welcomes the opportunity to formally comment on this consultation. OCC responded to the initial consultation on the plan in October 2022 in which we expressed our support for the proposed six areas of focus which relate well to the nine priorities of OCC's Strategic Plan.

The current Local Plan consultation covers:

- **Draft local plan objectives** – a series of draft objectives which are intended to guide the future evolution of the plan in terms of its overall approach and anticipated policy content;

- **The future pattern of development in West Oxfordshire** – different scenarios for how and where future growth in the period up to 2041 might be focussed;

- **Call for sites, ideas and opportunities** – an opportunity for stakeholders to put forward thoughts on how land in the district might be used in the future such as new housing, employment, infrastructure, community use, green space, nature recovery and renewable energy.

We understand that the consultation does not include any housing numbers or sites at this stage, and that WODC will be producing a Housing and Economic Needs Assessment (HENA) in due course.

Draft Local Plan Objectives

The draft local plan objectives are set out under six areas of focus:

- Tackling the climate and ecological emergency
- Healthy, safe, strong and inclusive communities
- An enhanced natural and built environment

- Attractive, accessible and thriving places
- Meeting the housing needs of all
- A vibrant, resilient and diverse local economy

Tackling the climate emergency

We continue to strongly support climate action being central to the Local Plan. OCC has committed to bring our own buildings and operations to net zero by 2030 and enabling Oxfordshire to be carbon neutral by 2050. Objective 1 could be strengthened to specifically reference the aim to achieve net zero by 2050.

We note many of our previous comments have been incorporated into the draft objectives and welcome reference to Pathways to a Zero Carbon Oxfordshire (PaZCO), the Circular Economy, net zero carbon in new build homes and 20 minute neighbourhoods.

The policy themes under Objective 1 (minimise the impact we are having on our changing climate) are supported. Policies should:
- require net zero carbon homes, specifically through construction and design standards that reduce energy demand in line with the energy hierarchy, and the phasing out of gas boilers;
- enable the transition to a zero-carbon energy system;
- enable greener, more inclusive strategic infrastructure provision, including energy and transport networks;
- include provision for climate adaptation as well as mitigation;
- make provision for tree planting in urban areas as part of healthy place-shaping, urban design, biodiversity net gain, climate adaptation and climate resilience;
- require a whole life cycle approach to new developments (including the preparation of whole life cycle carbon assessments);
- require the preparation of energy masterplans to deliver Energy Use Intensity targets and emission reductions; and
- require the preparation of detailed waste and resource audits at the pre-application stage to inform the design and layout of new development.

The County Council would like to see policy that ensures net zero developments. The measure of net zero should consider the whole life carbon performance including embodied energy (as well as operational energy). Minimising energy use through design and energy efficiency measures should be prioritised in line with the energy hierarchy.

Energy policy on new developments should set metrics not only for carbon, but for total energy use so that new developments do not put added strain on an electricity grid which is coming under pressure from the electrification of vehicles and heating. Renewable energy data is available through Project Local Energy Oxfordshire (LEO).

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 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 West Oxon Local Plan by identifying key locations across West Oxfordshire 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 with agreement with district councils and local stakeholders.

We would like to see reference to the Oxfordshire Local Transport and Connectivity Plan (LTCP) and the adopted and emerging Local Cycling and Walking Infrastructure Plans (LCWIPs) included within this area of focus. Making walking, cycling, public and shared transport the first choice would support reducing carbon emissions and be closely aligned with LTCP.

We also suggest further consideration is given to how innovation can be utilised to support climate action and that reference should be made to the Innovation Framework adopted under the LTCP. We would also encourage the inclusion of energy storage as a topic for consideration.

Further detail could be added under Objective 3 (responding and adapting to climate change) to recognise how green infrastructure and nature recovery networks can be used in adaption and resilience to climate change, for example carbon sequestration through protection and expansion of semi-natural habitats, cooling and shading through tree planting within developments, and flood alleviation from restoration of naturally functioning floodplains. Reference should be made to OCC's Tree Policies which include a requirement to achieve at least 30% canopy cover on strategic development sites.

Objective 3 should also consider how existing flood risk impacts could be addressed through the plan. The background text as to why this is important alludes to the 'locked in' impacts, but not the current risks and how these could be mitigated through the planning process.

The proposed policy topics for Objective 4 on natural capital, development densities, efficient use of resources, re-use of previously developed (brownfield) land/buildings, and embedding circular economy principles in new development (waste seen as a resource with a focus on keeping resources in use for as long as possible) are supported. We would recommend reference to OCC's adopted and emerging Minerals and Waste Local Plan.

Healthy, safe, strong and inclusive communities

We welcome the reference to the use of Health Impact Assessments (HIA), the Oxfordshire Health Impact Assessment Toolkit, local healthy place shaping principles and 20 minute neighbourhoods under Objective 5 (achieving thriving communities).

Please revisit our comments on community activation from our initial response to the consultation. Community activation measures are key to supporting healthy place shaping and should be incorporated.

Objective 5 and Objective 6 (create communities and environments that support and encourage healthy lifestyles) could be further strengthened by additional policy themes to address access to active and sustainable travel options and including reference to approved and emerging LCWIPs, Area Travel Plans, Mobility Hub Strategy and the Strategic Area Travel Network (SATN) to ensure that residents, and planned development, have access to active and sustainable travel options. The Healthy Streets Approach should also be included in policies to deliver this objective (see LTCP Policy 8) and its use promoted in any work related to active design principles or healthy place shaping.

Both green and blue spaces are important to promoting physical activity and wellbeing and we suggest Objective 6 should reflect this.

In relation to transport and safety, we would welcome reference to OCC's Vision Zero:

"Eliminate all fatalities and severe injuries on Oxfordshire's roads and streets, to have a safer, healthier, and more equitable mobility for all. Work closely with partners and stakeholders to take a whole system approach, working together on infrastructure, behaviour, technology and legislation to achieve this change".

OCC has set interim targets of a 25 per cent cut in casualties by 2026 and a 50 per cent reduction by 2030 before aiming to reach zero by 2050 (see Vision Zero report to Cabinet June 2022 here (agenda item 14)).

As part of the work on Vision Zero, OCC is seeking to promote the Construction Logistics and Community Safety (CLOCS) standard for construction traffic. We will be engaging with the district and City councils to establish a process for requiring Construction Logistics Plans (CLP) as part of planning consents.

An enhanced natural and built environment

The environment is dealt with in a great level of detail and we welcome the emphasis given to the conservation and enhancement of the natural environment.

Access to the countryside is important for health and wellbeing and should be included within the objectives of this area of focus.

We support the concept that policies should seek to protect all of the countryside and not just the Cotswolds National Landscape (NL) and the Green Belt, and that a landscape-led approach to development should be adopted. We also agree that the approach to character and beauty for the Cotswolds NL should be in line with the Cotswolds NL Conservation Board's Management Plan and guidance documents.

Policies should highlight the importance of the WODC landscape and should seek to conserve and enhance the overall character and beauty of the countryside. An

update to the District Landscape Character Assessments (LCAs) should be considered to support policies, design and decision-making processes, and to make the information more accessible to interested parties, developers and the general public. Vale of White Horse District Council and South Oxfordshire District Council are updating their LCAs; consistency with neighbouring authorities should be considered.

The multi-functionality of green infrastructure and the countryside is recognised and supported; however, care will have to be taken when developing policies that uses are compatible with each other, or appropriate zoning is applied. For example, areas important for nature conservation might need to be kept separate and buffered from areas of activity (e.g. recreational areas, new residential areas) if they support habitats and species that are sensitive to disturbance.

It is welcomed that policies will be seeking the creation of high-quality infrastructure into schemes in line with Natural England's Green Infrastructure Standards and local standards/requirements such as the Accessible Natural Greenspace Standard, (ANGSt). It is recommended that consideration is also given to the adoption of the Building with Nature benchmark for larger developments, and the Homes for people and wildlife guidance by the Wildlife Trust.

We strongly support that policies should take account and support landscape-scale initiatives related to nature's recovery and environmental improvements, such as strategic green infrastructure networks, the Oxfordshire Local Nature Recovery work, Farmer Cluster initiatives, river catchment work, the Wychwood Forest project and the Lower Windrush Valley Project, latter of which is being hosted by Oxfordshire County Council.

We would welcome a local approach to biodiversity net gain (BNG) which would require a higher percentage net gain. All Oxfordshire Local Planning Authorities have signed up to the OxCam Environment Principles, which agrees to a 20% BNG requirement.

Core to achieving BNG and nature recovery is the need to protect existing valuable biodiversity. In developing policy for the Local Plan, it will be important to ensure the hierarchy of designated sites (Habitats Sites, SSSIs, Local Wildlife Sites) is recognised and appropriately addressed, as well as irreplaceable habitats, and species of principal importance.

A natural capital approach to biodiversity conservation and enhancement, with a focus on valuing nature's services and achieving nature-based solutions is strongly supported. We welcome reference to the Local Nature Recovery Strategy (LNRS), for which OCC are the Responsible Authority. It is anticipated the LNRS will be published in 2025. The Natural Capital mapping for Oxfordshire produced by Alison Smith from the Environmental Change Institute, University of Oxford, offers good baseline information for this approach.

The development of policies that seek to minimise light pollution and the protection of the dark skies is supported. The Cotswolds NL Management Plan 2023-25 also includes a policy and position statement on dark skies, and it is recommended that this is taken into account when developing the policy.

Objective 12 looks to address healthy water environments, however the text suggests a strong bias towards flooding and surface water drainage. There is limited information on what policies might come forward to address areas around water quality and improving the health of watercourses. Flood risk related policies would benefit from a local focus; this could be addressed through providing an evidence base within the Strategic Flood Risk Assessment (SFRA) where areas need to consider specific flood related issues so that development can look to address these.

Objective 14 (conserve and enhance the character and significance of the historic and cultural environment) sets out an appropriate objective for the protection and enhancement of the historic environment. To increase the public enjoyment of the historic environment the rationale for this section should emphasise that new development and assessment should identify ways of increasing public understanding of the historic environment to increase the public benefit from new research and investigations.

<u>Attractive, accessible and thriving places</u>

We welcome the reference to the six key themes of LTCP and would support policies on 20 minute neighbourhoods. The policies in the LTCP must underpin the Local Plan policies for transport. In preparing the next stage of the plan, reference to all relevant guidance, requirements, and standards should be made including OCC's [Street Design Guide](), [Manual for Streets (1&2),]() [LTN 1/20 Cycle Infrastructure Design](), OCC's [Implementing 'Decide & Provide': Requirements for Transport Assessments](), OCC's [Parking Standards for New Developments](), OCC's [Freight and Logistics Strategy (2022 – 2050)](), [Mobility Hub Strategy]() and others as appropriate.

Consideration should also be given to the [Central Oxfordshire Travel Plan]() which covers the area out to and including Eynsham, and the strategic transport schemes central to it (Traffic Filters, Zero Emission Zone and Workplace Parking Levy) are expected to create a step change in Oxfordshire's travel behaviour.

Additional policy themes to Objective 15 (a framework within which communities and businesses can thrive across a network of attractive, safe and inclusive, vibrant and well-connected market towns and villages) should include:

- Mobility Hubs: promote the establishment of sustainable mobility hubs in market towns and villages, integrating various transport options such as buses, bikes, car-sharing, and electric vehicle charging stations to encourage eco-friendly transport choices.
- Active Travel Infrastructure: encourage the development of safe and well-maintained walking and cycling infrastructure, including pavements, cycle lanes, and cycle tracks, to facilitate active travel and enhance the attractiveness of walking and cycling, including for business trips.
- Interconnected Public Transport: advocate for an interconnected public transport system that efficiently connects market towns and villages, making public transport a viable and convenient choice for residents and visitors.

When considering digital connectivity, provision should be future-proofed not only for 5G connectivity but later generations of mobile data connectivity.

Objective 16 (design) refers to an innovative approach to design. We suggest that a policy requiring planning applications to include an Innovation Plan would support this objective. Additional transport related design considerations for inclusion under this objective include:

- Transport-Integrated Urban Design: encourage urban design that integrates transport planning, ensuring that new developments consider accessibility to public transport, pedestrian infrastructure, and cycle routes in their layouts.
- Smart Mobility Solutions: promote the adoption of smart mobility solutions, such as real-time public transport information, integrated ticketing systems, and transport apps, to enhance the overall user experience and convenience.

In landscape and green infrastructure terms one of the issues that affect design quality in site allocations is the development density, which often results in limited space being available for green infrastructure within the developments. In light of climate change the integration of large trees that provide shade, improve air quality, mitigate flooding and increase biodiversity is particularly important.

It is recommended that the principle of the right tree in the right place should be adhered to in new developments. New site allocations should factor in sufficient space for tree planting for a variety of trees including large trees when calculating capacity.

OCC considers ongoing management of new planting including trees to be of particular importance to ensure that trees reach their full potential and deliver long-term benefits. It is recommended that management considerations and requirements are integrated into policies in the new Local Plan.

Consideration to policy requiring new buildings to be designed to have lower water consumption would also be welcomed.

Objective 17 (create a safe, welcoming and accessible environment) would benefit from consideration of parking management strategies.

As part of meeting Objective 18 (equality and inclusivity through access to core services and facilities), OCC considers it essential that the Local Plan includes policies to require that new development and existing local communities are supported by effective and timely investment in school infrastructure.

Under Objective 18 a policy requirement is suggested for 'dual-use school facilities and green/public spaces' where possible. OCC supports the aspiration that school facilities are available for community use but notes practical constraints on the extent to which this can be ensured. 'Where possible' is supported, but it is important to note that policies should not require joint use. 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. Whilst for large secondary schools community use of facilities may be a valuable source of income, the management of community use is also an additional resourcing requirement for school management, and in particular small schools may not have the capacity to provide this. Increasing numbers of schools are now academies, and any new schools would be expected to be academies. Academies operate independently of council control, meaning that they cannot be required to deliver community use by OCC. Dual use of new school facilities cannot therefore be required by the planning system and signed up to at S106 stage because as 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.

Suggested additional policy themes under this objective include:

- Accessible Transport for All: ensure that transport options cater to the needs of all individuals, including those with disabilities, by integrating accessible public transport, pedestrian-friendly pathways, and facilities that are inclusive and accommodating to diverse needs.
- Transportation Equity: advocate for equitable distribution of transport resources, focusing on providing equal access to public transport, active transport options, and other essential transport services for all members of the community.
- Mobility Hubs - OCC adopted a mobility hub strategy in July 2023 setting out proposals to develop a network of mobility hubs across the county. Mobility hub proposals will support delivery of the objective and many of the policies already included.

Meeting the housing needs of all

Objective 20 (meeting housing needs) seeks to enable the delivery of a continual supply of new homes to meet the identified housing need. It is proposed that the housing requirement will be addressed by a policy following appropriate evidence gathering.

OCC would like to work closely with WODC to understand the transport, education and other implications for any new housing allocation to support the needs of West Oxfordshire and any unmet need from Oxford.

We would support policies which seek to meet the need for affordable and extra care housing and which support people to live well within their community. Reference to the Oxfordshire Way would be supported.

We would also welcome the inclusion of key worker housing allocation policies within the Local Plan following the recent publication of our draft Adult Social Care Workforce Strategy. The strategy clearly highlights higher than national average housing costs within Oxfordshire as an obstacle to the recruitment and retention of social care professionals. Recruitment into the sector remains a significant challenge within Oxfordshire; we see key worker housing provision as a key enabler in ensuring we can attract and retain a talented pipeline of social care professionals to meet the current and projected workforce capacity. It is worth highlighting that we

would like to see key worker definitions that recognise the multiple roles within social care and not just NHS employees.

A vibrant, resilient and diverse local economy

We support the planned development of employment land in locations that are on strong resilient transport networks to aid economic growth. Equally, there is a role for planned development to contribute to developing a resilient transport network. The Oxfordshire Freight and Logistics Strategy supports this objective.

OCC will support WODC in developing justification to safeguard land for transport infrastructure required through the Local Plan process.

We welcome the potential requirement for Innovation Plans in new developments and reference to broadband in Objective 28 (responding to future trends and technological changes). However, we would seek full-fibre broadband in line with the Digital Infrastructure Strategy.

The inclusion of a policy on Community Employment Plans (CEPs) linked to new development would be supported.

Future Pattern of Development in West Oxfordshire

The consultation presents eight potential development scenarios and notes it may be that a combination of these approaches may be preferred as the Local Plan moves forward. The eight scenarios are:

- Scenario 1 – Hierarchal approach (in order of preference: main service centres, rural service centres, villages, and the rest of the district)
- Scenario 2 – Main Service Centre Focus (Witney, Carterton and Chipping Norton)
- Scenario 3 – Witney Focus
- Scenario 4 – Carterton Focus
- Scenario 5 – Dispersed Growth
- Scenario 6 – Village 'Clusters'
- Scenario 7 – New Settlement
- Scenario 8 – Public Transport Focus

Once housing numbers are confirmed this will make assessment of the pattern of development more tangible, for example if the housing number is relatively low, this may rule out a new settlement as being viable.

A 'decide and provide' approach should be taken to the transport assessment of development scenarios. This approach decides on the preferred future scenario and then provides the means to work towards that which can accommodate uncertainty. This offers the opportunity for more positive transport planning and helps implement a transport user hierarchy by considering walking and cycling up-front (see LTCP Annex 3 for further guidance). The 'decide and provide' approach applies not only to planning applications, but also the preparation of local plan transport evidence.

The crucial starting point for adopting a 'decide and provide' approach to transport planning is to ensure that development is allocated in locations where there are the best opportunities for limiting the need to travel by co-locating residential and employment uses, or where exists the best opportunities for providing high-quality active and sustainable transport infrastructure improvements. These opportunities will need to be thoroughly explored and identified through the associated plan-making processes.

We also recommend considering a transport accessibility assessment for any potential preferred patterns of development to understand the relative merits.

It should be noted that the LTCP will be supported by [area and corridor travel plans](#) which will outline how the LTCP vision and outcomes are delivered in locations across the county. Where developed, [Local Cycling and Walking Infrastructure Plans (LCWIPs)](#) will be incorporated into area travel plans to identify walking and cycling schemes. Area travel plans are being developed across the West Oxfordshire district including Witney, Carterton, Woodstock, Chipping Norton and Eynsham.

Scenarios 1, 2, 3, 4 and 8 are likely to make the best use of existing transport infrastructure and already planned infrastructure improvements. We would support Scenario 8 – Public Transport Focus and this aligns with our ambitions to encourage modal shift and could utilise transport corridor improvements on A40 and A44.

Reference to the potential Oxford, Witney and Carterton rail line in and consideration of future development along it is supported in connection with Scenario 8.

In terms of education provision, development around the main service centres of Witney, Carterton and Chipping Norton would allow some flexibility for absorbing population growth through the use of existing school capacity. The [Pupil Place Plan](#) sets out the expected demand for, and supply of, school places across the county.

OCC is unlikely to support Scenario 5 – dispersed growth or Scenario 6 – village clusters as this is likely to create additional traffic and demand on existing services such as education, which would require mitigation and is unlikely to be in accordance with the aims of LTCP and Climate Action ambitions.

Any development proposed under Scenario 7 – New Settlement would need to be in a sustainable location. Environmental, social and economic impacts are likely to be significant and appropriate mitigation for any impacts would need to be identified. We recognise that there would likely be considerable challenges to make a new settlement viable.

Call for Sites, Ideas and Opportunities

A submission has been made by OCC's Property and Estates Department under separate cover in relation to the call for sites, ideas and opportunities.

Detailed Officer Comments

In addition to the points above, please see the detailed officer responses in Annex 1.

Next Steps

We look forward to continued involvement as the Local Plan is prepared. We understand your current timetable is:

- Consultation on preferred policy options/approaches (Regulation 18): Winter 2023
- Pre-submission draft Local Plan (Reg 19) - Summer 2024
- Submission of draft Local Plan - Autumn 2024
- Examination and adoption - 2025

Yours sincerely

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Annex 1

Detailed Officer Comments on West Oxfordshire Local Plan 2041 Focused Consultation: Ideas and Objectives

Team	Comment
Strategic Planning	**Strategic Planning comments on Oxford's unmet need** The draft Objective 20 in the consultation document is 'To enable the delivery of a continual supply of high quality, well-designed and sustainable new homes to meet identified housing needs in the period 2021 – 2041.' We support this objective, which we note will cover not only West Oxfordshire's housing needs, but also any unmet need from Oxford. Chapter 5 of the consultation document addresses the question of the future pattern of development. The County's key interest in the issue of housing numbers is in understanding that the need for more housing and other uses is well evidenced as any new allocations are likely to have transport, education and other implications of particular interest in relation to our statutory functions. The County Council can also 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. Oxfordshire County Council responded on the Oxford City Council Regulation 18 consultation on housing need in March 2023. We indicated concern about the Housing Needs Assessment (HENA) and the implications of Oxford City choosing firstly a scenario for Oxfordshire's housing with higher figures than the Standard Method then a distribution scenario which results in a high proportion of the total being attributed to Oxford City. We are aware that while Oxford City and Cherwell are using this HENA, that the HENA is not accepted by South Oxfordshire, Vale of White Horse and West Oxfordshire Districts. A copy of our response can be found online: Council responses to consultations about planning | Oxfordshire County Council. If Oxford City Council's Local Plan covering the period 2020-2040 is adopted prior to the other Local Plans in Oxfordshire, then it will establish not only its own level of need but a level of unmet need. This is because Oxford City Council's capacity 2020-2040 is currently assessed through the HELAA as less than the level of need under any scenario. Local Plans are 'sound' if they are, inter alia, positively prepared which means (para 35, NPPF) 'providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development'. Given paragraph 35 of the NPPF it may not be necessary for any particular quantum of unmet need to be addressed in each district if it is not practical to do so. There is agreement in the Districts' local plans to make provision for 14,300 homes towards Oxford's unmet need as below: 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 219-2031

West Oxfordshire – 2,750 to be suppled 2021-2031

West Oxfordshire District Council should identify completions for Oxford's unmet need up to a current date e.g. to 1 April 2023 as part of its Local Plan evidence.

The current West Oxfordshire Local Plan records that 550 houses out of the 1,000-house allocation at West of Eynsham and all 2,200 houses at the Garden Village are identified for Oxford's unmet need.

If there can be agreement that all houses on the West of Eynsham and Salt Cross Garden Village sites are for Oxford's unmet needs, that would be helpful, as it would provide for additional levels of unmet need into the future.

If a decision is made to identify that completions on windfall sites in certain areas are to be for Oxford's unmet needs, then this should be clear.

If a decision is made to allocate new sites in the forthcoming Local Plan, the County Council seeks that it be clear whether those sites are for Oxford's unmet needs. The County Council may raise concerns if new proposed site allocations for Oxford's unmet needs are not well related to Oxford, for example by means of active travel and public transport. We may also query proposals to allocate new sites for Oxford's unmet needs further from Oxford than other proposed allocations which are closer.

We recognise that the level of affordable housing required in a Local Plan depends not only on the level of housing need identified but also issues of viability.

The current Oxford City Local Plan requires all qualifying sites to provide 50% affordable housing and some, but not all, of the allocated sites near to Oxford also require that. If possible, there should be agreement between the City and West Oxfordshire District as to the level of affordable housing to be required on sites addressing Oxford's unmet need.

The County Council would appreciate clarity on the process of housing nominations that has been agreed between West Oxfordshire Districts and the City in respect of affordable housing on sites which are identified for Oxford's unmet need.

The County Council has an interest in affordable housing provision in respect of its social care functions, as well as more general objectives and policies. The County Council has commissioned its own research on the needs for specialist housing for older people, such as extra care housing, in order to update our current Market Position Statements on that. Some affordable housing on sites might be for specialist housing.

Strategic Planning comments on Development Scenarios

Eight potential development scenarios are identified in Chapter 5 of the consultation document as follows:
    Scenario 1 - Hierarchal approach
    Scenario 2 - Main Service Centre Focus (Witney, Carterton and Chipping Norton)
    Scenario 3 - Witney Focus
    Scenario 4 - Carterton Focus
    Scenario 5 - Dispersed Growth
    Scenario 6 - Village 'Clusters'
    Scenario 7 - New Settlement
    Scenario 8 - Public Transport Focus

The County Council is unlikely to support a scenario based on dispersed or fairly dispersed growth such as suggested in scenarios 5 and 6. Our key concern would be as Highway Authority, given that such dispersed growth would likely lead to additional traffic and demand for that to be mitigated through expensive new infrastructure. We think that such a scenario is unlikely to be in accordance with the County Council's Local Transport and Connectivity Plan.

The commentary in the consultation document indicates that the existing Local Plan strategy is based around Scenario 1 i.e. focused primarily at the three main towns, followed by the rural service centres and then the larger villages. The downside of continuing this approach is identified as being that many larger settlements have already absorbed a significant amount of growth in recent years and/or have future growth already committed.

Whichever scenario (or combination of scenarios) is identified by West Oxfordshire District as the basis for the next consultation document for the Local Plan, the County Council would want to be involved in providing advice on the relative merits of any locations for future growth.

Strategic Planning comments on key document sources

We support the reference throughout the document to various key documents which cover the county or wider areas such as:
- Oxfordshire Strategic Vision 2021
- Oxfordshire Local Transport and Connectivity Plan 2022 (LTCP) and related documents such as the Central Oxfordshire Travel Plan, Innovation Framework, Active Travel Strategy, Freight and Logistics Strategy.
- Pathways to a Zero Carbon Oxfordshire (PazCo) 2021
- UK's national growth strategy, Build Back Better 2021
- UK's net zero strategy, Build Back Greener 2021
- Oxfordshire Food Strategy 2022
- UK's 25-year Environment Plan, A Green Future, updated 2023
- National Design Guide 2019
- National Model Design Code 2021
- Oxfordshire Local Industrial Strategy 2019

We recommend that in developing the next consultation document for the Local Plan appropriate reference is made to OCC guidance, see Annex 2 for a suggested list. Please also review the various other documents and websites that we provided links to in our October 2022 consultation response on West Oxfordshire District Council's first Local Plan issues consultation.

Oxfordshire Transport Strategy	**Objective 1**
	- Support focus on reducing carbon emissions from transport.
	- Objective does not reference OCC's Local Transport and Connectivity Plan (LTCP) and target to deliver a net-zero transport system by 2040. Suggest this is added to the rationale.
	- There are other policies that will help to deliver the objective from a transport perspective, notably:
	    ○ Public transport
	    ○ Vehicle electrification
	
	Objective 5
	- Support focus on improving health and references to healthy place shaping.

- Previous OCC comments regarding community activation have not been included. Community activation measures are key to supporting healthy place shaping and should be incorporated.
- Encourage WODC to consider the LTCP healthy place shaping policies when developing policies in this area, particularly policy 12 regarding guidance for new developments.

Objective 6
- Support focus on promoting walking, cycling and public transport and reducing car dependency.
- Question the source and accuracy of physical activity data. It is stated that "79% of children and young people do not meet guidelines of 60 minutes daily activity".
  - This does not align with the latest data from Sport England's Active Lives Survey which identifies that 45.8% of children and young people in West Oxfordshire are active for 60 minutes per day or more.
- Welcome references to working with the county council to deliver transport related improvements.
  - There should also be reference to supporting delivery of the LTCP as OCCs statutory Local Transport Plan. The LTCP will be key to delivering the objective.
- There is an opportunity to reference the LTCP transport user hierarchy and clear priority to consider walking and wheeling, cycling and riding, public transport and shared transport before the private car.
- Suggest that the Healthy Streets Approach is included in any policies to deliver this objective.
  - The Healthy Streets Approach is included as a policy in the LTCP (policy 8) and OCC promote its use for any work related to active design principles or healthy place shaping
- The policy approaches in this area should consider and support those identified in OCC documents such as the LTCP, Active Travel Strategy, Mobility Hub Strategy and emerging updated design guidance for walking and cycling.

Objective 15
- Support the objective and references to improved active travel connectivity.
- Welcome reference to the LTCP and key themes.
  - The '5' has been dropped from the LTCP title and so should be referred to as 'LTCP'.
- Adopting a decide and provide approach will be an important policy to consider to deliver this objective from a transport perspective.
- Embedding healthy place shaping principles should be considered as a policy for this objective.

Objective 18
- Support the objective and references to 20-minute neighbourhoods.
- Suggest that mobility hubs should also be included as a policy to help deliver the objective.
  - OCC adopted a mobility hub strategy in July 2023 setting out proposals to develop a network of mobility hubs across the county.
  - Mobility hub proposals will support delivery of the objective and many of the policies already included.

Objective 26

	• Important to consider the importance of freight and logistics throughout the local plan. This includes the need for employment land and potential new land uses such as consolidation centres. • Consideration of freight should also include how homes and businesses are served, opportunities to reduce emissions from freight and how freight contributes to broader goals such as the accessibility and inclusivity of places. **The Future Pattern of Development in West Oxfordshire** • Encourage WODC to incorporate a 'decide and provide' approach to the development and assessment of development scenarios.
Place Planning (North)	This response is from the Place Planning (North) team, (formerly known as Cherwell and West Infrastructure Locality Team). **Tackling the Climate and Ecological Emergency** **Objective 1** This objective could be strengthened to specifically reference the aim to achieve a 50% reduction in carbon emissions by 2030 and net zero by 2050 in Oxfordshire, to ensure West Oxfordshire is fully contributing to the UK target to reach net zero emissions by 2050. Additional policies/policy topic areas that may help deliver this objective are approved and emerging Local Cycling and Walking Infrastructure Plans (LCWIPs), and Area Travel Plans to ensure that residents have access to viable walking and cycling routes throughout the area in which they live, including planned development. **Objective 2** No Comment **Objective 3** No Comment **Objective 4** No Comment **Healthy, Safe, Strong and Inclusive Communities** **Objective 5** Additional policy themes for this objective should include emerging Local Cycling and Walking Infrastructure Plans (LCWIPs), and Area Travel Plans to ensure that residents, and planned development, have access to active and sustainable travel options. **Objective 6** Additional policy themes for this objective should include approved and emerging Local Cycling and Walking Infrastructure Plans (LCWIPs), Area Travel Plans, Mobility Hub Strategy and the Strategic Area Travel Network (SATN) to ensure that residents, and planned development, have access to active and sustainable travel options. **Objective 7** No Comment **Objective 8**

No Comment

Objective 9
No Comment

An Enhanced Natural and Built Environment

Objective 10
No Comment

Objective 11
No Comment

Objective 12
Timely communication at pre-application stage with the County's Drainage Team and Flood Risk Management Team should be required for all new developments.

Objective 13
Additional policy themes for this objective should include emerging Local Cycling and Walking Infrastructure Plans (LCWIPs), Area Travel Plans, and the Strategic Area Travel Network (SATN) to encourage behaviour change and a greater shift to sustainable travel modes.

Objective 14
Access to affordable transport can play a part in quality of life of people and the economic wellbeing of businesses. Additional policy themes around active travel should be considered for this objective.

Attractive, Accessible and Thriving Places

Objective 15
Additional policies/policy topic areas that may help deliver this objective include the approved and emerging Local Cycling and Walking Infrastructure Plans (LCWIPs), Area Travel Plans, the Strategic Active Travel Network (SATN), Mobility Hub Strategy, and conservation area design codes, or other design codes that inform the existing streetscape as well as new streetscapes in new developments.

Mobility Hubs:
Promote the establishment of sustainable mobility hubs in market towns and villages, integrating various transport options such as buses, bikes, car-sharing, and electric vehicle charging stations to encourage eco-friendly transport choices.

Active Travel Infrastructure:
Encourage the development of safe and well-maintained walking and cycling infrastructure, including pavements, cycle lanes, and cycle tracks, to facilitate active travel and enhance the attractiveness of walking and cycling, including for business trips.

Interconnected Public Transport:
Advocate for an interconnected public transport system that efficiently connects market towns and villages, making public transport a viable and convenient choice for residents and visitors.

Objective 16
Transport-Integrated Urban Design:

Encourage urban design that integrates transport planning, ensuring that new developments consider accessibility to public transport, pedestrian infrastructure, and cycle routes in their layouts.

Smart Mobility Solutions:
Promote the adoption of smart mobility solutions, such as real-time public transport information, integrated ticketing systems, and transport apps, to enhance the overall user experience and convenience.

Objective 17
Suggest inclusion of events (rather than just markets) as these bring people into town centres and need investment to be well managed or procured.

Also consider if more detailed plans such as SPD, AAP or masterplans are needed for specific town centres to bring about positive change and respond to the changes in how people use town centres.

Accessible Transport to Town and Village Centres:
Ensure that transport services are easily accessible and well-connected to town and village centres, encouraging residents and visitors to opt for public transport or other sustainable modes of transport.

Parking Management Strategies:
Implement effective parking management strategies, such as designated parking zones and smart parking systems, to optimise parking spaces and discourage excessive car use while maintaining accessibility to the town and village centres.

Objective 18
Additional policies/policy topic areas that may help deliver this objective include the approved and emerging Local Cycling and Walking Infrastructure Plans (LCWIPs), Area Travel Plans, the Strategic Active Travel Network (SATN), Mobility Hub Strategy.

Accessible Transport for All:
Ensure that transport options cater to the needs of all individuals, including those with disabilities, by integrating accessible public transport, pedestrian-friendly pathways, and facilities that are inclusive and accommodating to diverse needs.

Transportation Equity:
Advocate for equitable distribution of transport resources, focusing on providing equal access to public transport, active transport options, and other essential transport services for all members of the community.

Objective 19
Community-Driven Transport Initiatives:
Encourage local communities to actively participate in the planning and decision-making processes related to transport, allowing them to voice their needs and preferences and shape transport plans accordingly.

Community Transport Forums:
Establish community-led transport forums that facilitate dialogue between local residents, transport authorities, and planners, encouraging collaborative efforts to enhance transport services and infrastructure. Some towns have Traffic Advisory Committees but not all.

Meeting the Housing Needs of All

Objective 20
No comments

Objective 21
No comments

Objective 22
No comments

Objective 23
No comments

Objective 24
Consideration of where land with a previous use is reused that the new purpose is in fitting with the surrounding uses (e.g. placing new residential above bars/restaurants/music venues creates conflict over noise etc.).

A Vibrant, Resilient and Diverse Local Economy

Objective 25
This objective could be strengthened by widening out to include an element of education and training.

Objective 26
Support the planned development of employment land in locations that are on strong resilient transport networks to aid economic growth. Equally, there is a role for planned development to contribute to developing a resilient transport network. The Oxfordshire Freight and Logistics Strategy supports this objective.

Objective 27
OCC will support WODC in developing any justification to safeguard land for transport infrastructure required through the local plan process.

Objective 28
Following the COVID-19 pandemic commuting and travel patterns associated with working have changed dramatically and many more people work at home. Consider inclusion in housing design policy which requires a specific work space within a dwelling.

Objective 30
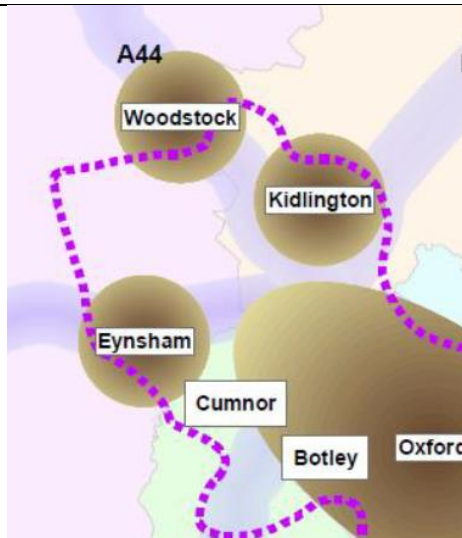The Mobility Hub Strategy supports this objective.

The Future Pattern of Development in West Oxfordshire

We recommend considering a transport accessibility assessment for any potential preferred patterns of development to understand the relative merits.

Once housing numbers are confirmed this will make assessment of the pattern of development more tangible, for example if the housing number is relatively low, this may rule out a new settlement as being viable.

In transport planning terms the following approaches are likely to make best use of existing transport infrastructure, be closely aligned with already planned infrastructure improvements, and have the greatest levels of accessibility for future residents.

|	
	- Scenario 1 - Hierarchal approach - Scenario 2 - Main Service Centre Focus (Witney, Carterton and Chipping Norton) - Scenario 3 - Witney Focus - Scenario 4 - Carterton Focus - Scenario 8 - Public Transport Focus In transport planning terms the following approaches are likely to have more challenging transport and carbon implications, due to being further away from core transport networks and the costs, both financial and environmental, of building new transport infrastructure. - Scenario 5 - Dispersed Growth - Scenario 6 - Village 'Clusters' - Scenario 7 - New Settlement Additionally, understanding at the earliest opportunity how a potential allocation may be served by public transport should also be a key consideration. Development proposals that are unlikely to be served by sustainable commercial public transport should be avoided. Scenario 6 - Village 'Clusters' possibly seeks to create a rural version of 'living locally/20 minutes neighbourhoods", which may have positive outcomes if supporting infrastructure and services as focussed on this aim. **Call for Sites, Ideas and Opportunities** No comments. **Relevant Links:** - Local Transport and Connectivity Plan | Oxfordshire County Council - https://www.oxfordshire.gov.uk/residents/roads-and-transport/connecting-oxfordshire/active-travel-0 - https://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transport-policies-and-plans/MobilityHubStrategy.pdf - https://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transport-connecting-oxfordshire/FreightandLogisticsStrategy.pdf - Oxfordshire County Council - Active Travel Strategy - net-zero-strategy-beis.pdf (publishing.service.gov.uk) - Future of Transport: helping local authorities to unlock the benefits of technology and innovation in rural transport (publishing.service.gov.uk)
Central Oxfordshire Travel Plan	Reference should be made within the plan and its emerging policies to the Central Oxfordshire Travel Plan which covers the area out to and including Eynsham, and the strategic transport schemes central to it (Traffic Filters, Zero Emission Zone and Workplace Parking Levy) are expected to create a step change in Oxfordshire's travel behaviour, so much wider impacts than just Oxford. We expect more people choosing to access Oxford by sustainable modes of transport as a direct result, which will only increase further with the schemes and measures that could be delivered with the revenue generated, amongst other sources.

Not exhaustive, but some of the relevant Actions from COTP that West Oxfordshire should be taking account of in the emerging plan making 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.

Proposed travel demand management measures
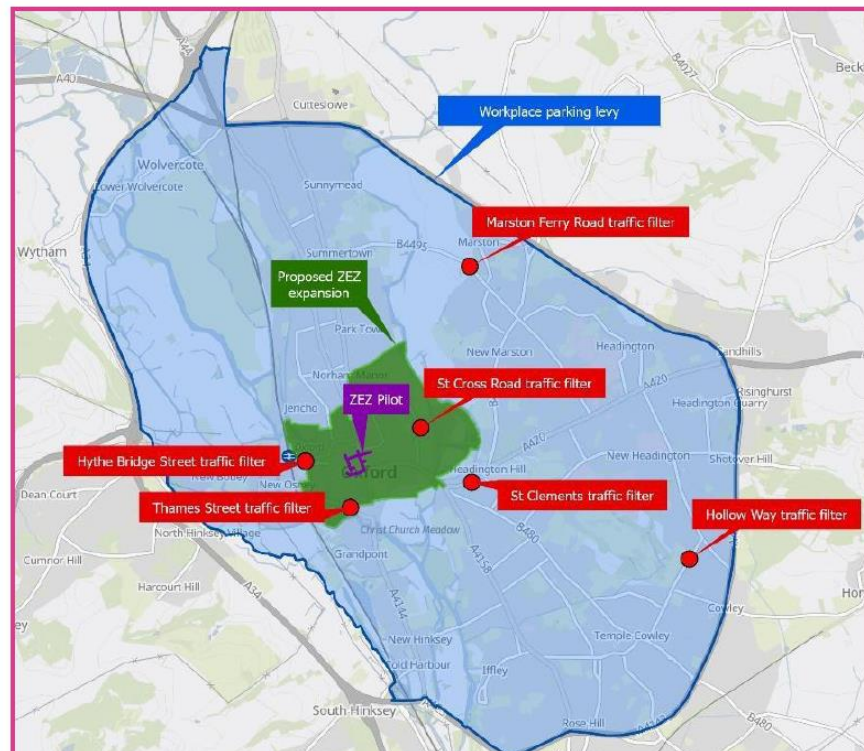
*Mapped extents subject to further technical work and engagement*

Action 9 – Deliver a central Oxfordshire cycle network, consistent with the Oxfordshire Strategic Active Travel Network and the latest LCWIP plans.

Proposed central Oxfordshire active travel network
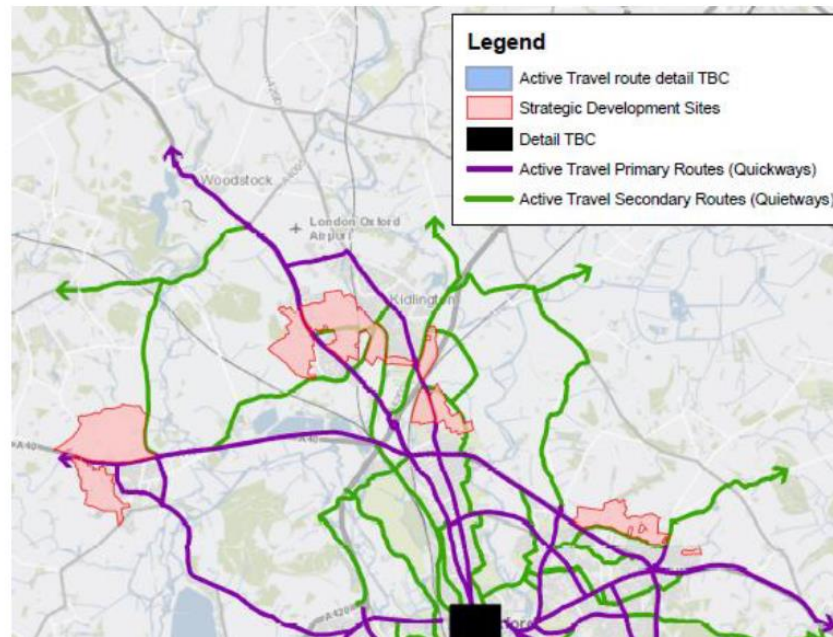
Action 13 – Deliver:
• bus priority measures along key inter-urban bus routes and on key orbital routes in the Oxford area; and
• upgrade bus infrastructure (including at bus stops and to Real Time Information)

Proposed central Oxfordshire public transport and mobility hub network
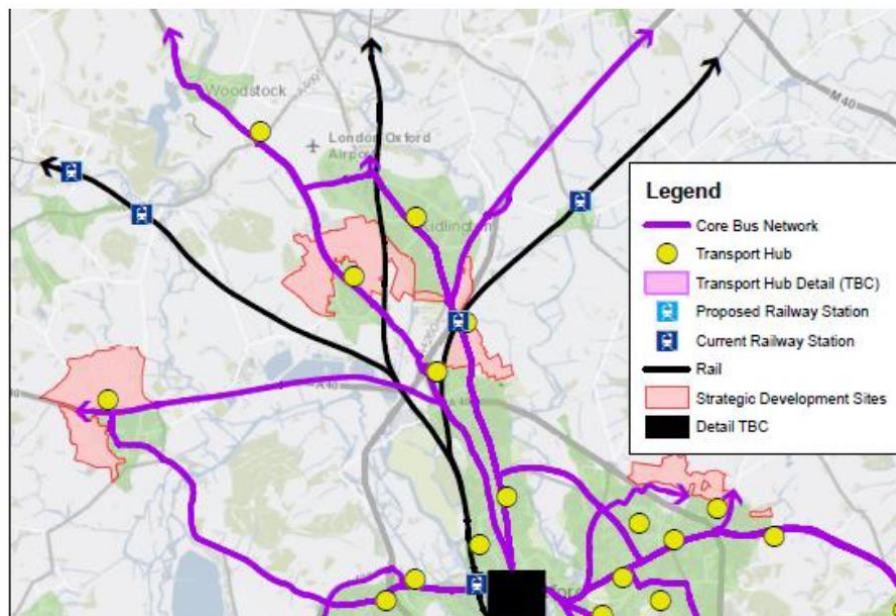
Action 14 – Alongside partners, deliver a zero emission local bus fleet across the Oxford Smartzone area by 2024/25 and deliver a fully zero emission bus fleet across the COTP area at the earliest possible opportunity thereafter

Action 15 – Alongside partners, deliver:
a) Oxford Station enhancements;

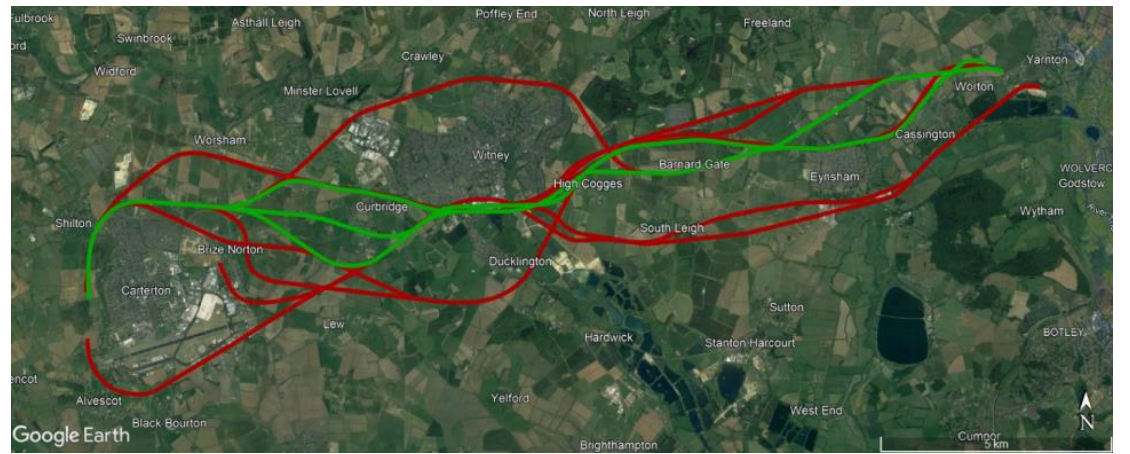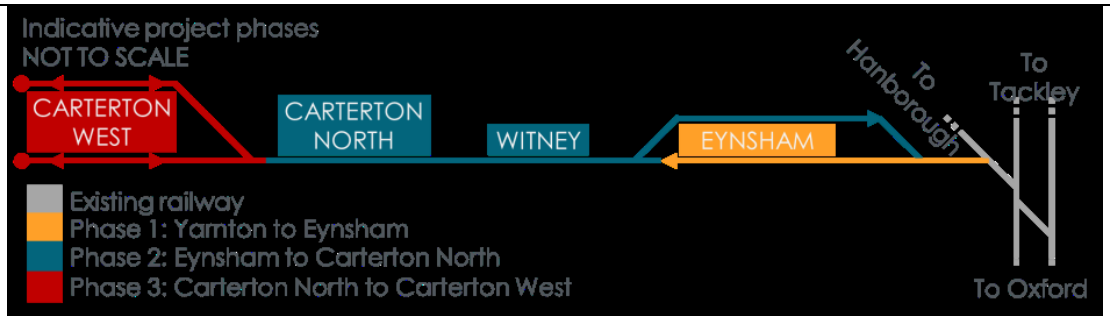|	
	b) a passenger rail service and two new passenger stations on the Cowley Branch Line; and c) local rail capacity and service frequency enhancements. **Action 16** – Deliver a mobility hub strategy for a network of mobility hubs across Oxfordshire. **Action 17 –** • Deliver a freight transfer / consolidation feasibility study and first / last mile delivery pilot. • Support modal shift to cargo bikes and the electrification of freight deliveries **Action 20** - Alongside partners, deliver a Central Oxfordshire Movement and Place Framework.
Rail	**Rail considerations** A local special interest group known as the Witney Oxford Transport Group (WOTG) recently developed a proposal for a railway route connecting Carterton, Witney and Eynsham to Oxford. Oxfordshire County Council commissioned Cadenza Transport Consulting Ltd - a railway consultancy specialising in rail feasibility studies, to investigate this proposal further. A study on the potential construction and operation of a railway line connecting Carterton and Witney with Oxford was undertaken by Cadenza consulting and completed in late-spring 2023. While no actual decision on any route has been taken, a range of potential routes were considered and the more likely route corridors shortlisted (see map below) to help understand the likely costs and benefits of a new railway. However, it must be stressed that it was not the purpose of this study to select or recommend any one particular route. The study concluded that the full scheme would consist of four stations: Carterton West, Carterton North, Witney and Eynsham, though these would be likely to be delivered in phases (see track diagram below) as funding was secured.

Indicative project phases NOT TO SCALE

Existing railway
Phase 1: Yarnton to Eynsham
Phase 2: Eynsham to Carterton North
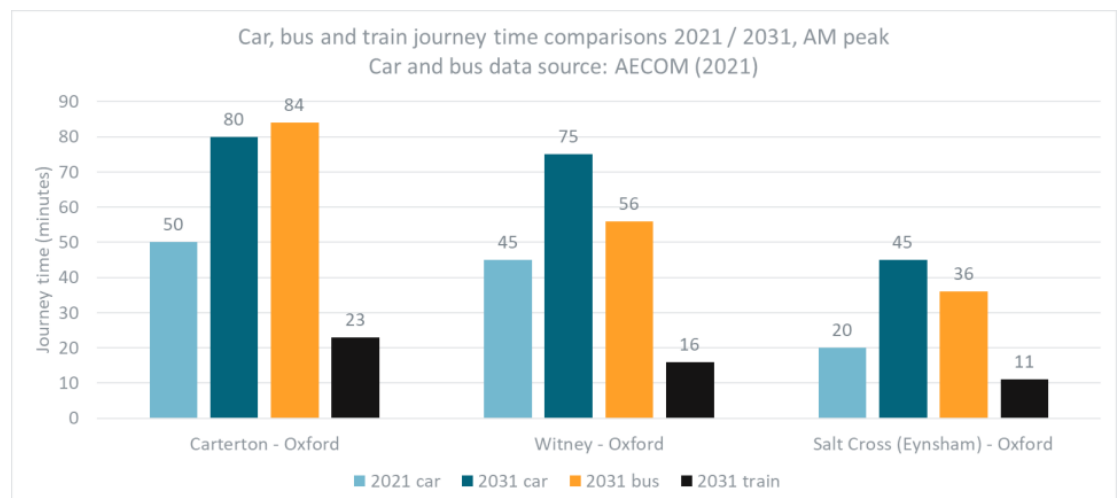Phase 3: Carterton North to Carterton West

Cadenza are currently updating the report to factor in more reliable operating costs, setting out a revised approach/proposal to better capture the wider benefits of the project (including employment creation) and confirming the next stages of developing the proposal. Network Rail will also be providing additional feedback.

It has been assumed that trains would be two-car length battery trains, recharging at Oxford and running every half-hour (in the peaks).

Initial assessment suggests the journey would take approximately 23 minutes from Carterton, 16 minutes from Witney and only 11 minutes from Eynsham.

The journey time savings compared to anticipated bus and car journey times in 2031 are considerable, with nearly an hour saved against the relevant car journey from Carterton and Witney and more than half an hour from Eynsham. Compared with buses, the time savings are about an hour from Carterton, 40 minutes from Witney and 25 minutes from Eynsham (see bar chart below).

Car, bus and train journey time comparisons 2021 / 2031, AM peak
Car and bus data source: AECOM (2021)

An optimistic view could see the first phase of the railway being delivered by late 2031, at roughly the same time when the A40 reaches capacity. The timescales for delivery are dependent on a broad range of assumptions about the time taken to develop the designs, the extent and length of consultation, planning and procurement strategies and the availability of funding for new rail projects (mainly from Central Government).

The range of estimated costs at current prices for each phase is shown in the Table 1 (Annex 3) with an estimated entry into service date. Assumptions and exclusions apply.

	Once the whole railway is in operation it is expected to handle a very significant number of journeys every year saving more than one million car miles, five-six full-time person-years, 100 tonnes of carbon emissions from car use, and generating an annual operating profit (see Table 2, Annex 3) of about £1.5 million. There will be greatly improved access to jobs, leisure, learning and wider travel opportunities. The intention is to publish the full report during November 2023. This will help provide a steer for the way forward and text that can be incorporated in the new Oxfordshire Rail Strategy to be adopted in Spring 2024. We are re-engaging with the North Cotswolds Line Task Force to understand the current position in respect of proposals for increased service frequencies and associated infrastructure improvements e.g. double-tracking that would benefit stations in Oxfordshire, including Hanborough. The Hanborough station working group will be re-constituted and a review undertaken of the extant Fereday-Pollard report and how it could be updated. Discussions are being held with GWR and Network Rail in respect of ambitions for double-tracking, construction of a new platform and other station infrastructure and the scope for electrification. There may be scope to increase the frequency of services to/from the station by extending services past Oxford. There are potential links to the new Eynsham Park and Ride site, modal shift for visitors to Blenheim Palace and confirmation of the scope for designation as a 'Mobility Hub'. The new Oxfordshire Community Rail Partnership will engage with local partners to help prepare and publish an 'active travel and connectivity map' and examine the scope for other local interventions, including supported youth visits. These projects will be developed further with Network Rail and Great Western Railway and will include the full involvement of West Oxfordshire District Council and any other relevant local partners. (Maps and graphics credit: Cadenza consulting and AECOM)
Lead Local Flood Authority	**Draft Local Plan Objectives** Objective 3 provides for impacts associated with future flood risk and whilst this is important it does not say that the objective will also look at how existing or current flood risk impacts may be addressed through the plan. The background text as to why this is important alludes to the 'locked in' impacts but not the current risks and how these could be mitigated through the planning process. Objective 12 looks to address healthy water environments, however the text suggests a strong bias towards flooding and surface water drainage. There is limited information on what policies might come forward to address areas around water quality and improving the health of watercourses. The flood risk related policies need to consider bearing in mind what WODC want to achieve, whether they need to be more stringent or locally address areas of flooding rather than repeating national policy. This could be addressed through providing an evidence base within the Strategic Flood Risk Assessment (SFRA) where areas need to consider specific flood related issues so that development can look to address these. **Future pattern of development**

	Any development scenario should consider how it would impact on flood risk and how opportunities might be generated. This would come from the evidence base and an assessment of the existing flood risk from all sources, where there may be opportunities for improvements to the existing risk and for future resilience. At this stage it is difficult to consider this in any detail but it is also important to consider all sources of flooding including those that have a contribution from existing infrastructure capacity and the suitability of these being improved.
Education	**Page 22 – policies anticipated to help deliver objective 9** **Page 35 - policies anticipated to help deliver objective 18** **Page 46 – policies anticipated to help deliver objective 29** Oxfordshire County Council considers it essential that the Local Plan includes policies to require that new development and existing local communities are supported by effective and timely investment in school infrastructure. Oxfordshire County Council supports the aspiration that school facilities are available for community use, but notes practical constraints on the extent to which this can be ensured, and considers that any policies would need to be carefully worded to ensure they are deliverable. Policies should encourage rather than require joint use. 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. Finally, 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, as 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. **Future pattern of development** <u>Scenarios 1-4</u> The main service centres – Witney, Carterton, Chipping Norton - all include a choice of primary schools and at least one secondary school. This provides more flexibility for absorbing population growth through use of existing school capacity and expansion of existing schools where necessary. If development is of a scale large enough to require a new school, the school planning situation moves through three phases: 1. Housing and population growth starts, and the new school is not yet open: families moving in are dependent on existing spare school places. 2. The new school opens, adding capacity faster than the population is growing: the short-term impact is to create spare places, which if excessive can be destabilising to schools. 3. Population growth gradually fills the additional capacity bringing the local system back towards equilibrium.

This process is more easily absorbed when there are a number of local primary schools, i.e. in larger towns.

Smaller scale development, which does not bring forward a new school, is reliant either on there being existing spare school places, or on the local school(s) being able to expand. Again, these scenarios are more likely in a town where there are several schools.

Scenarios 5-6

Smaller towns and villages, with just one primary school, are very diverse in how their schools could accommodate population growth. In recent years there has been a general fall in births, and many schools, particularly in rural areas, have some degree of spare places. Modest scales of housing growth in these towns and villages could help sustain the local school, and indeed in the absence of new family housing, some small village schools may experience declining pupil population to the extent that the school becomes unviable. The type of housing permitted will also be relevant to pupil generation, and should be taken into account when assessing the impact of housing proposals on school sustainability.

However, this demographic pattern is subject to change for reasons beyond local control, and therefore it is difficult to be certain about the existence of spare capacity on the timescale required for the Local Plan. In other villages and small towns, schools remain full and may be on sites which do not support expansion. A generalised approach to identifying which small town and village schools could accommodate housing development is therefore difficult. The Local Plan should allow for flexibility such that proposals for housing development in villages can be assessed based on the latest available data.

Some of the villages listed in Scenario 5 have no state primary school, and therefore should only be considered sustainable locations for new family housing if it can be demonstrated that children would not require vehicular transport to school. These are:
- Ascott-under-Wychwood – nearest school in Milton-under-Wychwood
- Churchill – nearest school in Kingham
- Curbridge – nearest school in Witney
- Filkins & Broughton Poggs – nearest schools in Langford and Alvescot
- Fulbrook – nearest school in Burford
- Over Norton – nearest school in Chipping Norton

Village clusters as a planning concept may provide more flexibility for school planning, but again it would need to be demonstrated that safe walking routes to school of no more than 2 miles are available to families.

Scenario 7

Any new settlement would need to be of a scale to make at least a new 2 form entry primary school sustainable. This is likely to be in the order of 1,500-2000 new homes.

Because new settlements have no existing education market, in some ways they are easier to plan for, as existing schools are less affected; however, timely provision of the new school is difficult, as before the population reaches a critical mass, there are not enough children to support the opening of a new school, and children will need to be transported. Planning for new settlements should also ensure that once a new school is opened, it can be easily accessed, and is not subject to excessive noise from ongoing construction works.

	New settlements are of a scale to generate a concentration of additional secondary school pupils, which can be difficult for existing schools to absorb. Settlements large enough to make a new secondary school viable address this, while also meeting need generated by developments in the surrounding areas; although again the early viability of a new school is challenging.
Specialist Housing	Adult social services are described on our County Council website https://www.oxfordshire.gov.uk/residents/social-and-health-care. We are guided by an approach known as the Oxfordshire Way described here: Oxfordshire Way strategic vision | Oxfordshire County Council. 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 (There is a link on this page to the Extra Care Housing Supplement 2019-2022) • 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 There are various documents available at a national level which provide some evidence of specialist housing needs for example: https://www.cushmanwakefield.com/en/united-kingdom/insights/housing-for-an-ageing-population. Oxford City Council and Cherwell District Council have had a joint Housing and Economic Needs Assessment (HENA) prepared. In our comments in March 2023 to Oxford City Council's consultation the following are relevant points: • 'Oxfordshire County Council's particular interests are in seeking enough housing to meet specialist needs, in accordance with our social care functions…' • 'As stated in our response to the last consultation… the County Council is supportive of providing for more one and two-bedroom dwellings to provide for those moving out of supported accommodation and for residents who are down-sizing.' • 'In respect of older and disabled persons housing need, the assessment is that there remains a significant future need. However, the consultation document indicates that there is more than enough 'housing with support' in Cherwell and Oxford City, but the quality of the stock is not known. Relatively small numbers of 'housing with care' and 'care bedspaces' are identified as being needed in these two authorities. The County Council has waited to see this HENA in advance of commissioning its own research into future social care needs. The County Council has an existing market position statement and extra care housing supplement, but it is recognised that the timeframe in those documents is only to 2031. A meeting was held with staff at the city and districts in December 2022 to discuss the brief for evidence. We would like to have further

| | meetings to discuss the need and opportunity for various forms of housing catering for those with specialist needs, particularly extra care housing, prior to the Reg 19 local plan being finalised. In the meantime, we do not accept the figures in the HENA as correctly reflecting the scale of affordable need in respect of those forms of housing that Oxfordshire County Council has a key interest in. In particular, we have queries about how some existing schemes are classified and note that if either existing housing specifications and/or housing provider priorities do not align with what we consider is required for modern extra care housing, this will result in a higher number of new extra care housing units being needed.'

We have also made other comments on recent Local Plan consultations. For example in November 2021 on a Cherwell Local Plan consultation:
• 'We welcome the inclusion of key objective 20 in meeting the housing needs of all sectors of Cherwell's communities. We suggest that further iterations of the Local Plan should explore policies to encourage the development of good quality lifetime homes and create dementia friendly environments to support active, independent, and healthy lifestyles to improve their quality of life and community integration.'

The above comments provide an indication of what the County Council is likely to continue to seek in all the Local Plans. We will also continue to seek provisions in Local Plans requiring affordable extra care housing on certain sites which are large enough.

OCC is commissioning evidence to enable an update of both the County Council's current market position statement and extra care housing supplement.   Please contact the Strategic Planning Team for further information or if you would like to be involved in this work. |
|---|---|
| **Archaeology** | <u>Objective 14</u>

This objective sets out an appropriate objective for the protection and enhancement of the historic environment.

To increase the public enjoyment of the historic environment the rationale for this section should emphasise that new development and assessment should identify ways of increasing public understanding of the historic environment to increase the public benefit from new research and investigations.

This should then be carried into the policy topic section. |
| **Healthy Place Shaping** | The Public Health team welcomes the opportunity to provide comment on this stage in the West Oxfordshire Local Plan 2041 consultation. The following comments relate to the document's proposals regarding Healthy, Safe, Strong and Inclusive Communities chapter.

Objective 5
We welcome the recognition of the importance of healthy communities as a core national planning principle, as well as the acknowledgement of widening health inequalities in the district. Healthy life expectancy is also alluded to with the emphasis that 'for men and women everywhere the time spend in poor health is increasing'. This is something that is likely to increase in an ageing population and increased demand on health services.

We strongly support the inclusion of a policy that requires adoption of healthy place shaping principles. |

We concur that the use of Health Impact Assessment (HIA) is vital for strategic developments and for the Local Plan itself.

We also support the policies/policy topics anticipated to help deliver this objective.

Objective 6
We strongly support this objective but wish to note the provision of both green and blue spaces as being of importance for promoting physical activity and a sense of wellbeing.

Objective 7
We welcome the acknowledgement of some of the factors influencing poor mental health in this predominantly rural district, including the isolation and loneliness experienced by an increasing amount of people. We also agree that certain vulnerable minorities experience these things to a greater extent, including disabled and minority ethnic people.

It is welcomed that the use of Planning to influence mental health is included in this objective. Well-designed spaces and linking communities with active travel and public transport networks will help to promote social cohesion and reduce the factors influencing isolation.

Objective 8
We support the inclusion of healthier food environments as an objective. We would expect a policy to address restrictions on hot food takeaways and their proximity to schools as well as places where young people congregate.

We welcome the fact that guidance on growing spaces will help to deliver this objective, but stress that these should include a variety of types of growing space, including but not limited to, allotments, street planters and orchards.

Objective 9
This objective includes measures for the prevention of health-related problems, and this is crucial to protecting and future-proofing the care system. By creating environments which promote healthy behaviours and make physical inactivity or the reliance on the private car less desirable, this will in turn reduce incidences of preventable health problems in the district.

It is essential that access to health services is conditioned within the Planning system to ensure that the creation of new development is supported by new or expanded health services such as GP surgeries and dentists. We also agree that clear details of phasing will help to ensure that services are delivered at appropriate stages in any new development.

Biodiversity	**Objective 11:** We welcome the inclusion of this objective. **Biodiversity Net Gain** We are supportive of a policy approach which seeks greater than 10% BNG. In terms of justifying such an approach, the LNP BNG working group are compiling information to help support >10% BNG. Additionally, it is relevant that all Oxfordshire LPAs 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). We are also supportive of policy which prioritises local delivery of BNG.

	Local Nature Recovery Strategy (LNRS) We welcome reference to the LNRS; OCC are Responsible Authority for production of the Oxfordshire LNRS and will be engaging widely with relevant groups across the County, including WODC as a Supporting Authority, as we develop the strategy; it is anticipated that the LNRS will be published in 2025. In the interim, the Thames Valley Environmental Records Centre have recently completed a piece of work commissioned by all the Districts, City and OCC 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 across the County, and we would advocate it's use in considering any areas for nature recovery through your 'Call for Sites'. However, policy should be clear that the Interim NRN will be succeeded by the Oxfordshire LNRS once it has been published. Core to achieving BNG and nature recovery is the need to protect existing valuable biodiversity. In developing policy for the Local Plan, it will be important to ensure the hierarchy of designated sites (Habitats Sites, SSSIs, Local Wildlife Sites) is recognised and appropriately addressed, as well as irreplaceable habitats, and habitats and species of principal importance.
Landscape/ Green Infrastructure	**Topic: An Enhanced Natural and Built Environment** <u>Objective 10:</u> *To conserve and enhance the intrinsic character and beauty of West Oxfordshire's countryside, at both a strategic level (e.g. the Cotswolds) and a local level, recognising its contribution to people's quality of life and the area's social and economic wellbeing.* We strongly agree that policies should seek to protect all of the countryside and not just the Cotswolds National Landscape and the Green Belt, and that a landscape-led approach to development should be adopted. We strongly support that the approach to character and beauty for the Cotswolds NL should be in line with the Cotswolds Conservation Board's Management Plan and guidance documents. Policies should highlight the importance of the WODC landscape and should seek to conserve and enhance the overall character and beauty of the countryside. This requires a good understanding of the intrinsic character and beauty of the countryside, and the challenges it faces. Local Landscape Character Assessments such as the WODC LCA and the CNL LCA assist with this process. However, with the WODC LCA dating back to 1998, an update to the District Landscape Character Assessments should be considered to support policies, design and decision-making processes, and to make the information more accessible to interested parties, developers and the general public. In this context it is worth noting that VoWHDC and SODC have commissioned an update of their landscape character assessments to ensure consistency in approach and output across the two districts. Consideration should be given whether a potential update to the WODC LCA could use the same approach to ensure cross-border consistency.

The multi-functionality of green infrastructure and the countryside is recognised and supported; however, care will have to be taken when developing policies that uses are compatible with each other, or appropriate zoning is applied. For example, areas important for nature conservation might need to be kept separate and buffered from areas of activity (e.g. recreational areas, new residential areas) if they support habitats and species that are sensitive to disturbance.

We welcome policies will be seeking the creation of high-quality infrastructure into schemes in line with Natural England's Green Infrastructure Standards and local standards/requirements such as the Accessible Natural Greenspace Standard, ANGSt (https://www.oxfordshire.gov.uk/residents/environment-and-planning/countryside/natural-environment/environmental-policy-and-planning/green-infrastructure). We recommend that consideration is also given to the adoption of the Building with Nature benchmark for larger developments Building with Nature, and The *Homes for people and wildlife* guidance by the Wildlife Trust.

We strongly agree that policies should take account and support landscape-scale initiatives related to nature's recovery and environmental improvements, such as strategic green infrastructure networks, the Oxfordshire Local Nature Recovery work, Farmer Cluster initiatives, river catchment work, the Wychwood Forest project and the Lower Windrush Valley Project, latter of which is being hosted by Oxfordshire County Council.

Objective 11
To conserve and enhance biodiversity, supporting resilient habitats for species and robust and valued environments for people, where natural capital and the benefits of ecosystem services are recognised, valued and invested in over the long term and measurable net gains in biodiversity are achieved locally.

Notwithstanding any comments by the county ecologist, a natural capital approach to biodiversity conservation and enhancement, with a focus on valuing nature's services and achieving nature-based solutions is strongly supported from a landscape point of view. The Natural Capital mapping for Oxfordshire done by Alison Smith from the Environmental Change Institute, University of Oxford, offers good baseline information for this approach Natural-capital-mapping-in-Oxfordshire.pdf.

Objective 13
Protect and enhance the quality of environmental assets by avoiding harmful impacts of all forms of pollution, especially on local amenity, health, landscape character and biodiversity

We strongly support the development of policies that seek to minimise light pollution and the protection of the dark skies. The Cotswolds NL Management Plan 2023-25 also includes a policy and position statement on dark skies, and it is recommended that this is taken into account when developing the policy.

Objective 16
To ensure that all new development in West Oxfordshire is underpinned by a high quality, innovative and inclusive approach to design.

	The approach to raising the quality of designs (e.g. local standards, design codes etc) outlined in the document is welcomed and supported.
	The West Oxfordshire Design Guide (2016) already provides guidance on how to achieve high-quality design that is in keeping with the character of West Oxfordshire's landscape. We believe that this guide and others are helpful tools to raise the design quality in developments.
	Green Infrastructure is a cross-cutting theme that should be considered in connection with a number of the objectives. It works at different scales and is fundamental to achieving better quality outcomes. (Please also see response under objective 10.)
	In landscape and green infrastructure terms one of the issues that affect design quality in site allocations is the development density, which often results in limited space being available for green infrastructure within the developments. In light of climate change the integration of large trees that provide shade, improve air quality, mitigate flooding and increase biodiversity is particularly important.
	It is recommended that the principle of the right tree in the right place should be adhered to in new developments. New site allocations should factor in sufficient space for tree planting for a variety of trees including large trees when calculating capacity.
	We consider ongoing management of new planting including trees to be of particular importance to ensure that trees reach their full potential and deliver long-term benefits. We recommend that management considerations and requirements are integrated into policies in the new Local Plan.
	Development scenarios Under Section 85 of the CROW Act (2000) WODC have a 'duty of regard', i.e. must make sure that all decisions have regard for the purpose of conserving and enhancing the natural beauty of the AONB. As such the decision on the scenario should consider the potential effect it could have on the NL, and take the Cotswolds NL Management Plan and position statements into account.
Waste Management	Reference to the circular economy and waste minimisation in Objective 1 is welcomed. We would support this becoming a theme throughout. Objective 13 could include a reference to waste minimisation and proper waste management (including recycling etc) to help reduce the impact of pollution on the environment. Whilst we appreciate allocation of waste sites is a matter for the MWLP, please consider as part of your call for sites that there is potentially a need for waste sites in West Oxfordshire. Please contact the Strategic Planning Team if you wish to discuss further.
Climate Action	**Specific comments on climate action and net zero**

In general, we agree with the suggested topics set out under each objective but some of the explanations are light on detail (e.g. active and healthy travel). Based on the priorities identified in OCC publications, we have also identified some additional policy areas applicable to net zero that should be included in the new Local Plan (see Table 3, Annex 3).

Key learnings from the national demonstrator projects (Energy Superhub Oxford and Project Local Energy Oxfordshire) should be used to influence and shape the spatial strategies of Local Plans, including the distribution of development and investment in infrastructure that can support smart and resilient local energy systems.

General Comments

Evidence Base

In paragraph 1.5, the document makes it clear that because the Oxfordshire Plan 2050 is no longer progressing, WODC will need to collate its own additional evidence, but other than housing need, the consultation is silent on what evidence will be prepared to inform the next stage of the process: preferred approaches. We look forward to working with you on the development of your evidence base and where possible share best practice (e.g. area-based energy planning).

Vision

The importance of developing a long-term vision to guide future growth and physical change across the district is highlighted (emphasis added) at the start of the consultation document.

> *"1.2 Having an up-to-date plan in place is vital because it provides a **vision** and framework to guide decisions on how, where and when development can come forward and how we can protect and enhance our surroundings for current and future generation"*

At this stage, the high-level Oxfordshire Strategic Vision provides the basis of much of the emerging direction of travel set out in this consultation. However, a locally derived spatial vision has not yet been proposed.

Strategic objectives

Consideration should be given to whether the plan should have a more limited number of strategic objectives. There is scope to combine some of the plan objectives (e.g. 1-3 and 7-9) or reduce duplication (e.g. objective 12 mentions management three times and is quite wordy).

In addition, the objectives should clearly set out how the spatial vision of the district will be achieved in line with net zero targets. The draft Local Plan will need to demonstrate how it will contribute to the government's net zero and emission targets set out in the Climate Change Act.

Some of the proposed objectives could be made more locally distinctive or place specific. Where applicable, references to local features such as the Lower Windrush Valley, Oxford Meadows Special Area of Conservation, Blenheim Palace World Heritage Site, Cotswolds Area of Outstanding Natural Beauty and the main town centres (Witney, Carterton and Chipping Norton) should be included within the strategic objectives. For instance, climate-based objectives should be aiming to achieve net zero in West Oxfordshire ahead of the government's 2050 target, in line

	with the leading the way scenario, as agreed through the Oxfordshire Net Zero Roadmap and Action Plan.
	The protection and enhancement of townscape character/streetscape could be added to the list (to be consistent with the West Oxfordshire Design Guide).
	We particularly welcome the jargon-free language, but the Local Plan will need to provide explanations of the terms used in this consultation at future stages – examples include "Town and Village Centre Network, Hierarchy and Strategy; Village Design Statements; Design Coding; Outstanding Universal Value; Building with Nature; Healthy Homes Principles etc.
	The commentary text is particularly useful in aiding our understanding of the relevant issues identified under each topic. There is relevant baseline information which is available from county council publications (some of which are listed in the table above) that should inform the development of the vision and supporting objectives, which could have been specifically identified in the consultation.
	We also think you should use the evidence from settlement studies, characterisation assessments and area profiles to paint a clearer picture of how the district and its places will develop in spatial terms over the course of the plan period, including the links to and from adjoining areas.
	Future pattern of development in West Oxfordshire
	The proposed growth options should be subject to sustainability appraisal/strategic environmental assessment, even at this early stage. A compatibility test of the proposed objectives against the objectives of sustainable development which are identified through the appraisal process will also be required under the regulations. Government guidance makes it clear that sustainability appraisals should be undertaken at the outset of the process and should be used to help assess and refine the emerging growth options.
	Clear, simple diagrams of the proposed options setting out the broad locations and existing allocations would have been helpful, particularly at this early stage in the plan process. We assume that future interactions (e.g. preferred approaches) will include digitised versions.
Water	Consideration to policy requiring new buildings to be designed to have lower water consumption would be welcomed.
	The standard of 110 litres per person per day is in line with government advice. The then Secretary of State for Defra wrote to local authorities in July 2021 asking them to adopt this as a building standard where there is a local need, such as in water stressed areas like the South-East.
	The standard envisages that new development will be designed with efficient fixtures and fittings. Water butts and innovative solutions such as grey water recycling will also help drive down mains water consumption.
	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 (WRPG) from April 2023 states that the water companies' plans and programmes should be based on that.

	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. 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. Local Plan policy could also encourage the take up of smart meters. Reduced demand, together with the reduced leakage targets in the final draft regional plan will together reduce the need for new infrastructure and abstractions as the population grows. At present, nearly 16% of the water that is treated and put into supply in the South East is lost through leaks from water companies' and customers' pipes. Thames Water is the company that provides water to most of Oxfordshire. Its individual Water Resource Management Plan 24, also [released in final draft form](#)on 31st August 2023, has an initial focus on delivering ambitious programmes of demand management. The WRSE and Thames Water plans envisage a need for a 150 Mm3 South East Strategic Reservoir by 2040, even with the demand management proposed. Thames Water is therefore progressing work towards a Development Consent Order application for the reservoir. Oxfordshire County Council and Vale of White Horse District Council, along with others, have opposed the reservoir proposals, but support the demand management measures.
Innovation	**Tackling the Climate and Ecological Emergency** **Objective 1** To minimise the impact we are having on our changing climate by reducing carbon emissions across all sources, with a particular focus on transport, housing, industry and energy. • As well as by reusing materials, embedded carbon can be reduced using timber as a construction material. Further carbon can be saved through its lower weight requiring less substantial foundations of concrete, making it particularly useful on difficult ground. Wood is of course recyclable and reusable. • Wooden buildings have also been found to improve the wellbeing of occupants. • As well as reduction of concrete used, low carbon concrete is increasingly available as is low temperature asphalt for road surfaces. • In the longer term, electrification of heating using heat pumps may be more effective if centralised. Centralised or community heating has the advantage that the source of heat can be more easily changed as new technologies are

developed in the future, rather than switching out appliances in hundreds of houses.

Objective 2
To facilitate the roll out of clean, renewable energy at a range of different scales in suitable, appropriate locations across the District.

- We welcome the policy topics presented and would add that energy storage is also an important consideration. Cost effective, long duration battery storage is in the early stages of use and could help in a number of ways including:
  - Providing 24hr power for local generation schemes
  - Reinforcing the grid where there are local power inadequacies, which may otherwise influence the size or location of a particular development if in one of these areas
  - Load levelling of power consumed and so reducing the commercial cost of power for residents.

Objective 3
To respond and effectively adapt to the consequences of climate change that are already happening, building resilience and wherever possible, reversing harmful impacts, including nature's decline.

- This objective could also be supported with the use of green walls and green roofs in new developments and retrofitting to existing developments. As well as capturing some carbon, green walls also absorb pollutants.

Healthy, Safe, Strong and Inclusive Communities

Objective 6
To create environments that support and encourage healthy lifestyles through promoting physical activity for people of all ages and abilities, including maximising safe and convenient opportunities for walking, cycling and the use of public transport and the provision of sport, recreation and play facilities and high quality green space.

- With reference to Active Design principles, appropriate quality provision for active travel is important for take-up including:
  - Addressing the perception of safety with lighting and separation from the vehicular carriageway if possible
  - Width for cyclists to pass each other
  - Secure parking for cycles, including for larger/longer passenger and load carrying cycles that can replace the need for a car
  - Charging for electric cycles and e-scooters
  - Integration with other transport at 'mobility hubs'.
- The timing of the availability of Active Travel infrastructure from the outset of a new development is also important, as it has been shown that a change of habit (from car to cycle for example) is often triggered by a change in lifestyle, such as moving house or starting a new school.

Objective 7
To deliver integrated and inclusive environments that promote good mental health and wellbeing for those living, working and visiting West Oxfordshire and help tackle mental health issues.

- Please see our comments on objective 6 relating to take-up of Active Travel.

Objective 9
To identify and secure the timely investment in infrastructure needed for health and wellbeing and the care system, including measures for the prevention of health related problems.

- See also our comments on objective 6

An Enhanced Natural and Built Environment

Objective 13
Protect and enhance the quality of environmental assets by avoiding harmful impacts of all forms of pollution, especially on local amenity, health, landscape character and biodiversity.

- With reference to noise assessments, the Innovation Service and partners have experience in proving low-cost sound sensors that record not only the volume of sound but also the quality: i.e., whether man-made or nature-made.

Attractive, Accessible and Thriving Places

Objective 15
To provide a framework within which West Oxfordshire's resident communities and businesses are able to thrive across a network of attractive, safe and inclusive, vibrant and well-connected market towns and villages.

- With reference to Digital connectivity, provision for not only 5G but later generations of mobile data connectivity should be considered in new developments along with the benefits and provision of connected sensors, for example:
    o Outside air quality especially in key areas such a schools
    o Inside air quality for health monitoring using carbon monoxide and carbon dioxide sensors
    o Pedestrian, cycle and traffic counts using machine learning sensors.
    o And smart lamp posts on which to locate and power these external sensors.

Objective 16
To ensure that all new development in West Oxfordshire is underpinned by a high quality, innovative and inclusive approach to design.

- Please see the Innovation Framework for information on innovation in development.

Objective 19
To empower and enable local communities to positively shape and influence the future of their area from the 'grass roots' up.

- With reference to community-led initiatives for renewable and low carbon energy, we would refer to our comments on objective 2.

Meeting the Housing Needs of All

- No comments

A Vibrant, Resilient and Diverse Local Economy

Objective 27
To support West Oxfordshire's existing and future economic assets by providing the right infrastructure, land and premises, enabling them to improve, expand and adapt as appropriate and ensuring they are not lost to other uses where they have an important economic, social and environmental role to play.

- Suggestions on innovation and future proofing infrastructure can be found in the Innovation Framework.

Objective 28
To provide flexibility to be able to respond to future trends and technological changes to support working practices such as increases in remote, hybrid and co-working

- We are pleased to see that this plan embraces the need for innovation in planning and development through reference to the Innovation Service's Innovation Framework document.

- Also, the important role of an 'Innovation Plan', produced by the developer or infrastructure planner, setting out how a particular development or scheme will both integrate and plan for innovation.

- We support the use of re-purposable space and would extend this to include flexibility of design wherever possible because although change is inevitable, exactly the form it will take is not certain particularly in the medium to long term which is in the lifetime of any new development. For example, it is anticipated that early adoption of Connected and Automated Vehicles (CAVs) may be from shared, on-demand services of minibus size. Consideration should therefore be given to converting space for communal parking of private vehicles, to that for waiting and turning of CAVs. These CAVs (and private vehicles) will be electric, therefore installing the backbone of appropriate capacity charging infrastructure within a flexible parking space should also be a consideration.

- Infrastructure relating to the use of unmanned arial vehicles (UAVs or drones) will be required as and when the use of drones for delivery (especially for urgent medical items) and even personal transport grows. This will involve consideration of air corridors, lines of sight and privacy as well as noise abatement and take-off and landing sites. High-capacity electrical charging will also be required.

- See also our comment on digital connectivity under Objective 15.

The Future Pattern of Development in West Oxfordshire

Connected and Autonomous vehicles are anticipated to be in use within the timeframe of this plan. Widespread availability of these vehicles may have a bearing on the pattern of development considered, particularly relating to dispersed growth or village cluster plans.
- A greater availability of 'call to ride' small bus services or cars to pick-up and drop-down door to door. Extended journeys arising from multiple pick up and

	drop-offs can be mitigated using dynamic optimising software and keeping vehicle size small – which is likely to become cost effective without the need for a driver. • Use by those currently unable to drive such as school children and the elderly. • Reducing the strain on village and hamlet infrastructure by facilitating conveniently accessible transport to schools, hospitals etc.
Minerals and Waste Policy	No comments
OxLEP	We have identified the below objectives which would be supported by inclusion of a Community Employment Plan policy. **Objective 1:** 'To minimise the impact we are having on our changing climate by reducing carbon emissions across all sources, with a particular focus on transport, housing, industry and energy.' This objective aligns with objectives set in the Future Oxfordshire Partnership Vision and themes from the emerging Strategic Economic Plan produced by OxLEP. We recommend including a policy relating to employment and skills to support this objective as learning and training initiatives are essential to build a local capability to achieve the overarching objective. Community Employment Plans can support this objective by developing green skills (principally within Construction however, not exclusively) within the local workforce. **Objective 25** 'To provide the framework within which the West Oxfordshire economy can thrive and diversify, building on its inherent strengths and capitalising on future growth potential to increase economic productivity, well-being and resilience.' Community Employment Plans are a tool for supporting this overall objective. Community Employment Plans aim to maximise training and employment opportunities and identify activities that a developer can implement during the construction and/or end-use to create more inclusive and resilient economies within Oxfordshire. This can be achieved through working relationships with local charities, social enterprises and purposeful businesses (VCSEs) which play a critical role in supporting a diverse economy within Oxfordshire. **Objective 29** 'To ensure that all residents of West Oxfordshire are able to benefit from improved education, training and skills opportunities to enhance their economic and social well-being to strengthen the local economy and benefit small and start-up businesses.' We support the inclusion of a Community Employment Plan policy to help deliver this objective.

Annex 2

List of References and OCC Guidance and Resources

References

Document(s)	URL
OCC's Strategic Plan	https://www.oxfordshire.gov.uk/sites/default/files/file/about-council/OCCStrategicPlan2022.pdf
Oxfordshire Environmental Principles	https://mycouncil.oxfordshire.gov.uk/documents/s62860/CA_NOV1522R08%20Appendix%202.pdf
Pathways to a Zero Cabon Oxfordshire (PaZCO)	https://www.eci.ox.ac.uk/sites/default/files/2022-09/PazCo-final.pdf
Project LEO	https://project-leo.co.uk/
Oxfordshire Local Transport and Connectivity Plan (LTCP)	https://www.oxfordshire.gov.uk/residents/roads-and-transport/connecting-oxfordshire/ltcp
Local Cycling and Walking Infrastructure Plans (LCWIPs)	https://www.oxfordshire.gov.uk/residents/roads-and-transport/connecting-oxfordshire/active-travel-0
Innovation Framework	https://www.oxfordshire.gov.uk/residents/roads-and-transport/connecting-oxfordshire/ltcp#paragraph-13545
OCC's Tree Policy for Oxfordshire	https://www.oxfordshire.gov.uk/residents/environment-and-planning/energy-and-climate-change/tree-policy-oxfordshire
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
Oxfordshire Health Impact Assessment Toolkit	https://futureoxfordshirepartnership.org/projects/oxfordshire-health-impact-assessment-toolkit/
Community Activation	https://www.oxfordshire.gov.uk/residents/social-and-health-care/public-health-and-wellbeing/healthy-place-shaping/community-activation
Cotswolds National Landscape Management Plan	https://www.cotswoldsaonb.org.uk/planning/cotswolds-aonb-management-plan/
Accessible Natural Greenspace Standard	https://www.oxfordshire.gov.uk/residents/environment-and-planning/countryside/natural-environment/environmental-policy-and-planning/green-infrastructure
Building with Nature	https://www.buildingwithnature.org.uk/
Homes for People and Wildlife	https://www.wildlifetrusts.org/sites/default/files/2018-05/homes_for_people_and_wildlife_lr_-_spreads.pdf
Lower Windrush Valley Project	https://www.oxfordshire.gov.uk/residents/environment-and-planning/countryside/lower-windrush-valley-project
OxCam Environmental Principles	https://mycouncil.oxfordshire.gov.uk/documents/s62859/CA_NOV1522R08%20Appendix%201%20Arc%20Environment%20Principles.pdf
Natural capital maps in Oxfordshire	https://www.biodiversity.ox.ac.uk/wp-content/uploads/2023/08/Natural-capital-mapping-in-Oxfordshire.pdf

Street Design Guide	https://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transport-policies-and-plans/DesignGuidePublication.pdf
Manual for Streets	https://www.oxfordshire.gov.uk/residents/roads-and-transport/transport-policies-and-plans/transport-new-developments/transport-development
LTN 1/20	https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120
Decide & Provide: Transport Assessment Requirements	https://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transport/ImplementingDecideandProvideTARequirements.pdf
Parking Standards for New Developments	https://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transport-policies-and-plans/PARKINGS.PDF
Freight and Logistics Strategy	https://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transport-connecting-oxfordshire/FreightandLogisticsStrategy.pdf
Mobility Hub Strategy	https://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transport-policies-and-plans/MobilityHubStrategy.pdf
Central Oxfordshire Travel Plan	https://www.oxfordshire.gov.uk/residents/roads-and-transport/connecting-oxfordshire/central-oxon-travel-plan
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
Digital Infrastructure Strategy	https://www.oxfordshire.gov.uk/residents/community-and-living/digital-infrastructure
LTCP Area and Corridor Travel Plans	https://www.oxfordshire.gov.uk/residents/roads-and-transport/connecting-oxfordshire/ltcp-area-and-corridor-plans
Pupil Place Plan	https://www.oxfordshire.gov.uk/residents/schools/our-work-schools/planning-enough-school-places
OCC Vision Zero	Cabinet June 2022 (agenda item 14) https://mycouncil.oxfordshire.gov.uk/ieListDocuments.aspx?CId=115&MId=6882

OCC Guidance and Resources

We recommend that in developing the next consultation document for the Local Plan the following key documents are referenced. 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
Digital Infrastructure Strategy	https://www.oxfordshire.gov.uk/residents/community-and-living/digital-infrastructure
Tree Policy	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

Annex 3

Supporting Tables

Table 1 - Estimated Costs for Delivery Phases of Carterton to Oxford Railway Line

Potential Phase	Least cost route	Greatest cost route	Estimated delivery
Phase 1: Yarnton to Eynsham	£180m	£250m	2031 H2
Phase 2: Eynsham to Carterton North	£420m	£540m	2035 H1
Phase 3: Carterton North to Carterton West	£100m	£100m	2035 H1

Table 2 – Estimated Passenger Trips, Car Miles Saved, Travel Time Savings and Operating Profit

	Passenger Trips	Car Miles Saved	Value of Travel Time Savings	Operating Profit	BCR*
Units	'000/yr	Millions/yr	£Millions/yr	£Millions/yr	Ratio
2031 base	570,000/yr	1.4M/yr	£1.2M/yr	£1.5M/yr	0.17

* The Benefit to Cost Ratio assumes a 'do nothing' option is viable, though if compared against a highway alternative, the net BCR becomes 1.6.

Table 3 – Additional Policy Areas and Supporting Sources

Suggested policy area	Source (e.g. joint strategies/partnership documents/county council publications)
• Whole life cycle approach to new developments (including the preparation of whole life cycle carbon assessments)	• West Oxfordshire Net Zero Carbon Toolkit • PAS 2080
• Space standards within extra care housing generous (internal and external)	• OCC Oxfordshire Market Position Statement Extra Care Housing
• Net zero fabric-first standards such as super-high insulation, optimum solar gain and natural ventilation (in both new build and retrofit) with renewable energy maximised on site • Adoption of recognised assessments (e.g. BREEAM	• Oxfordshire Energy Strategy (new builds should achieve Passivhaus standards) • PAZCO • OCC Climate Action Framework • OCC Oxfordshire Innovation Framework

excellent/outstanding status and Passivhaus Plus)	
• Preparation of energy masterplans to deliver EUI targets and emission reductions (renewable heat, like rooftop solar, should be the default in new builds)	• Cotswold Garden Village in West Oxfordshire • LETI Climate Emergency Design Guide and Embodied Carbon Primer • PAZCO
• Preparation of investment plans/strategies to guide the investment and delivery of blue-green infrastructure	• Making the case for investment in green infrastructure in Oxfordshire • Natural England's new national green infrastructure standards • Oxfordshire Wildlife and Landscape Study
• Preparation of detailed waste and resource audits at the pre application stage to inform the design and layout of new development.	• OCC Oxfordshire Resources and Waste Strategy (2018-2023) • OCC Oxfordshire Innovation Framework – provision of repurposed/co-worker space; shared facilities; flexible spaces; maximise reuse/repair/recycling etc
• Modern methods of construction (e.g. modular housing and industrial spaces)	• Oxfordshire Strategic Vision for Long Term Development • OCC Oxfordshire Innovation Framework
• Retention and planting of trees and hedgerows in appropriate locations	• OCC Tree Policy for Oxfordshire - 'right tree, right place, right reason' approach • Climate Action Framework and OCC Strategic Plan – double tree and woodland cover in Oxfordshire
• Area-based energy planning – use evidence to develop a West Oxfordshire approach to energy masterplanning	• Oxfordshire Net Zero Roadmap and Action Plan • PAZCO – identification of appropriate sites in Local Plans • OCC Climate Action Framework (develop smart and resilient local energy systems)
• Develop specific locational criteria to steer renewable energy facilities (e.g. direct solar farms to previously developed sites and avoid mineral safeguarding areas)	• Project LEO mapping tool • OCC Minerals and Waste Core Strategy • Co-locate renewable infrastructure (e.g. solar and biofuel feedstock) and agricultural production (e.g. crops)
• Design and location of EV charging infrastructure (e.g. rapid charging points should be provided at park and ride sites, interchanges, council-owned car parks etc)	• OCC Oxfordshire Electric Vehicle Infrastructure Strategy • Oxfordshire Net Zero Roadmap & Action Plan
• Seek higher levels of biodiversity net gain on major strategic sites and	• OCC Oxfordshire environmental principles - 20% biodiversity net gain

core zones of the nature recovery network (where feasible)	aspirational target (as set out in the Environmental Policy Statement) • Oxfordshire baseline assessment of natural capital assets and ecosystem services
• Approach to carbon offsetting (e.g. financial contributions)	• OCC Climate Action Framework (offsetting should be a last resort once other options have been exhausted)