



## Oxfordshire 2050 Plan Consultation – August to October 2021

### Chiltern Society Comments

#### Paras 27-32 Oxfordshire's Strategic Vision for Long-Term Sustainable Development

- The Vision 2050 and Guiding Principles need to be more punchy and to include more visual presentation. Whilst the elements of the vision are very good, they are a bit lost in some wordy text. The Vision should be capable of being used as a stand-alone statement to promote the Plan and its key purposes. It needs to be a Vision of what Oxfordshire will look like in 2050 and the actions in the Plan should work back from that.
- The Society supports the ambition to be carbon neutral and then carbon negative. The Plan needs to incorporate sustainability principles throughout, particularly focussing on the design of new development, the provision of infrastructure and reducing the need to travel.
- The current wording relating to enhancing the natural environment / improving environmental quality is not strong enough. The Plan needs to tackle the twin emergencies of nature loss and climate change head-on.
- The draft vision needs to include a much more proactive approach to nature recovery, enhancing the landscapes of the AONBs and addressing climate change. There needs to be a step change. This needs to provide access to nature and recognise that the Chilterns AONB designation needs strengthening, and the Chilterns has potential National Park status. We would like to see a specific reference in the Vision to the conservation and enhancement of the 3 AONBs in the County to ensure the relevant authorities comply with their duties under the Countryside and Rights of Way Act 2000.
- At the heart of the Vision is the all-pervading ambition for growth, reflected in the forecast growth of housing-led population numbers that bear little resemblance to historical and actual population increases. The focus needs to be on sustainable growth, integrating with environmental protection.
- The Plan has a pronounced urban bias to the detriment of rural Oxfordshire, exacerbated by the dominance of the City of Oxford and other major towns in Oxfordshire. This is a serious flaw in the consultation as it appears to attach little importance to the challenges of what is a predominantly rural county.
- The Society supports a reduction in road transport to help to address carbon emissions and climate change. The Plan needs to seek to change commuting patterns by encouraging home working and local work hubs.
- We note that there appears to be no reference to those voluntary organisations as 'strategic influencers' that have a close and direct interest in how Oxfordshire develops between now and 2050, such as CPRE, National Trust, Open Spaces Society, and the Chiltern Society. It is essential that these organisations are fully recognised as stakeholders to the Plan.

#### Paras 42-47 Oxford-Cambridge Arc

- The Plan needs to provide further explanation as to how it will operate in conjunction with the emerging Spatial Framework for the Arc. Both documents state that they are overarching plans that will oversee the individual Local Plans proposed in the County. There needs to be clear co-ordination between the plans and the development of shared purposes. Approaches to the environment, climate change and sustainable transport are important areas for collaboration.

- Whilst planning on a regional basis provides an ideal opportunity to direct development away from sensitive areas such as the Chilterns AONB, there is still a need to fully assess the potential impacts of increased road traffic through the Chilterns in order to access London. The Plan should seek to maximise use of the East-West Rail Link by locating housing and employment developments along the rail corridor.

### **Policy Option 01 Sustainable Design and Construction**

- The Society supports ‘zero carbon ready’ homes under the Future Homes Standard. The Plan needs to incorporate overarching principles which can then be adopted by individual local planning authorities in developing their own Local Plans and associated Design Codes.
- Any new builds should be fully compliant with latest developments in construction technology, insulation, energy generation and storage systems in terms of future proofing. The focus of attention being on furthering cutting edge research and development in new technologies, whilst not ignoring the character of the natural and built environment.
- References to the “circular economy” are welcome in addressing climate change. Where possible new development should be used to retrofit sustainable energy measures and resource recovery systems to serve existing communities and households.

### **Policy Option 02 Energy**

- All energy generation is to come from renewable sources whilst maintaining competition between suppliers and avoiding monopolies in order to maintain proportionate costs in the marketplace. This will incentivise refining existing technologies and developing new ones in order to produce more efficient and cost-effective methods of generating energy, eg incinerators, anaerobic digesters, solar panels, wind farms, waste and recycling centres, hydropower, etc. for large-scale energy generation, and, on a small scale for all households to be able to generate their own power/electricity and store any unused electricity. eg solar panels, wind turbines and chargeable storage batteries.

### **Policy Option 03 Water Efficiency**

- Water efficiency is crucial for all new development in and around the Chilterns. It is one of the areas with highest pressure on water resources in the country.
- Water resource management needs to consider harmful impacts on the Chilterns Chalk Streams through over-abstraction of water. These are internationally important habitats that are declining in their biodiversity value. The Chalk Streams and their corridors need to be specifically addressed in the Plan.

### **Policy Option 05 Protection and Enhancement of Landscape Characters**

- The Plan needs a clear policy on conservation and enhancement of the 3 AONBs and their settings. There needs to be a strong emphasis and commitment to enhancing the landscape and delivering nature recovery in these areas.
- The issue of the settings of AONBs needs to be added in as it is now a requirement under paragraph 176 of the National Planning Policy Framework.

### Policy Option 07 Nature Recovery

- The Society supports the development of a Nature Recovery Network for Oxfordshire and the establishment of Core, Recovery and Wider Landscape Zones. The proposed pro-active approach to nature recovery is essential to maximise opportunities for enhancement in the Chilterns.
- We would like to see significant nature recovery projects undertaken within the Chilterns AONB, which presumably forms part of the Wider Landscape Zone. The Chilterns Chalk Streams should be included in the Core or Recovery Zones.
- The Society has prepared its own 'Manifesto for Chilterns Wildlife' to promote nature recovery within the Chilterns. Further details are available at <https://chilternsociety.org.uk/chiltern-manifesto/>

### Policy Option 08 Biodiversity Gain

- The Society supports the proposal for a 20% biodiversity net gain target across the county and a 25% target in Green Belt and AONBs. A robust process is required to avoid developers seeking reductions to these targets on viability grounds. In all cases, there must be a long-term management plan to ensure that those gains are sustained in the long term.

### Policy Option 15 High Quality Design for New Development and Garden Town Standards for New Settlements

- The Society generally supports the adoption of Garden Town and Garden Village standards across the County, although there may be situations in the more tightly knit rural villages and existing urban areas that this is not appropriate. Processes are also required, through local Design Codes, to embed local distinctiveness into new developments.

### Policy Option 24 Town Centre Renewal

- It is essential to focus on brownfield land, urban renewal and building at higher densities in urban areas to reduce the need to develop greenfield land.

### Policy Option 28 Homes: How Many? Commitments and Locations

- As 30,000 homes are already allocated for South Oxfordshire, it should not be a priority area for additional development up to 2050.
- Even though many of the homes would be located outside the Chilterns, around the existing towns and in the Oxford-Cambridge Arc, there is a significant risk to the Chilterns from additional traffic for commuting and leisure use. This needs to be addressed by providing opportunities for home working or local work hubs, and sufficient sustainable modes of transport where movement is necessary.
- The total number of homes proposed for Oxfordshire is excessively high and the numbers may need to be reviewed as the new Government policy and housing methodologies are developed. The numbers seem to be based on a notional growth figure rather than based on an assessment of need. The development of so many houses in the south east appears at odds with the Government policy of levelling-up. Should the Government bring in the proposed zoning method for planning then it will be essential that the Chilterns AONB is included in the 'protected' category and full planning applications are required as at present.

### **Policy Option 29 Urban Renewal**

- The Society supports the Preferred Policy Proposal relating to urban renewal. It is essential to concentrate new development in urban areas and on brownfield sites in order to protect the countryside, including the AONB and Green Belt, from development. Increased densities in the towns can also help to take pressure off the countryside.

### **Policy Option 30 Affordable Housing**

- The Society recognises the importance of providing affordable housing and a mix of tenures. We support the Preferred Policy Option that requires each Local Plan to identify their own policies and targets. The South Oxfordshire part of the Chilterns is very rural and requires a different approach to urban areas in Oxford.

### **Spatial Strategy Options**

- Para 485 – The criteria should include, under point 3, a specific reference to conserving and enhancing the county's Areas of Outstanding Natural Beauty (AONBs).
- Of the 5 Spatial Strategy Options, the Society is likely to prefer Options 1 and 2 which focus development in and around Oxford and the county's larger settlements. This would take pressure off the villages in and around the Chilterns. Dispersing development in rural areas (Option 5) would be the least favoured option.

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