Introducing the Oxfordshire Plan Part 2

Oxfordshire Plan 2050
Regulation 18 Consultation (Part 2)

Consultation Report

January 2022

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Introduction

1.1 The city and district councils in Oxfordshire[1] are working together, in partnership with Oxfordshire County Council and the Oxfordshire Local Enterprise Partnership, to produce a Joint Statutory Spatial Plan (known as 'the Oxfordshire Plan'). The Oxfordshire Plan will provide a strategic planning framework for Oxfordshire to 2050, setting out housing, employment and infrastructure needs, whilst seeking to protect and enhance the natural environment and to improve quality of life for all.

1.2 The Oxfordshire Plan Statement of Community Involvement (July 2021) explains how the Oxfordshire Plan will be prepared with community and stakeholder engagement. It makes a commitment to early, proportionate and meaningful engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and statutory consultees.

1.3 As part of this commitment to early, proportionate and meaningful engagement, a second Regulation 18 public consultation called 'Introducing the Oxfordshire Plan (Part 2)' took place from 30 July - 8 October 2021. The purpose of this consultation was to ask for views on proposed policy and spatial strategy options.

1.4 The second Regulation 18 consultation followed an earlier Regulation 18 consultation (Part 1), which took place in 2019 and sought views on the Oxfordshire Plan's vision, objectives and aspirations, as well as some high-level spatial typologies.

1.5 The purpose of this report is to document the Introducing the Oxfordshire Plan (Part 2) consultation process, to provide information on the number of responses received, and to provide a summary of the responses received.

1.6 The responses received through the consultation process will be used to shape and inform the development of the Oxfordshire Plan.

[1] Cherwell District Council, Oxford City Council, South Oxfordshire District Council, Vale of White Horse District Council and West Oxfordshire District Council.

What we consulted on

Regulation 18 (Part 2) Consultation

2.1 The Introducing the Oxfordshire Plan (Part 2) consultation set out different approaches that the Oxfordshire Plan might take in two ways:

i) Policy Options

2.2 Policy options were set out, based around five key themes:

- Addressing Climate Change
- Improving Environmental Quality
- Creating Strong and Healthy Communities
- Planning for Sustainable Travel and Connectivity
- Creating Jobs and Providing Homes

2.3 Two types of policy options were presented:

Preferred Policy Options – This is what we think the Oxfordshire Plan should do, based on the evidence that we have and the engagement that we have undertaken with communities and stakeholders so far.

Alternative Policy Options – This is a different approach that the Oxfordshire Plan could take, that we also need to consider.

2.4 Some policy options were high-level and set out a broad approach that we might take. Other policy options were more detailed and suggested specific requirements for new development.

ii) Spatial Options

2.5 Five high level options for how new development in Oxfordshire could be distributed to 2050 were presented.

2.6 The five spatial options were:

- Option 1 - Focus on opportunities at larger settlements and planned growth locations
- Option 2 - Focus on Oxford-led growth
- Option 3 - Focus on opportunities in sustainable transport corridors and at strategic transport hubs
- Option 4 - Focus on strengthening business locations
- Option 5 - Focus on supporting rural communities

Call for Ideas

2.7 A second 'Call for Strategic Location Ideas' (Call for Ideas) was also undertaken alongside the Regulation 18 (Part 2) consultation. The Call for Ideas sought submissions of broad locations to be considered through the plan-making process. These could be locations for large-scale housing development, employment development, infrastructure schemes or social or environmental schemes/designations.

How we Engaged with Communities and Stakeholders

3.1 Engagement with communities and stakeholders was undertaken in accordance with the Oxfordshire Plan Statement of Community Involvement (July 2021), which set out how engagement would be undertaken during the COVID-19 pandemic.

3.2 A range of engagement methods were used:

Email Notifications

3.3 Emails were sent to people registered as wanting to receive notifications of Oxfordshire Plan consultations (approximately 1,700 people). This includes members of the community, local organisations, businesses, infrastructure providers and statutory consultees.

3.4 The emails provided notification that the Regulation 18 (Part 2) consultation had started, explained the purpose of the consultation, and provided signposts to help people find out more about the proposed options (via the Oxfordshire Open Thought website). The emails also explained how people could submit comments and the deadline for submitting responses.

3.5 The emails also provided notification that the Call for Ideas had started. The emails explained the purpose of the Call for Ideas, provided signposts to further information and explained how submissions could be made.

Social Media

3.6 Social media platforms were used extensively throughout the consultation. An Instagram account was created alongside existing Facebook, Twitter and LinkedIn accounts. There were approximately three posts a week during the consultation period, which aimed to increase awareness of the consultation and how to participate. Posts also promoted the general webinar sessions.

3.7 Five Facebook posts were 'boosted'. These are paid for posts to target specific demographics. They are very effective and result in a higher reach and engagement. The five posts were boosted to reach residents of Oxfordshire.

Summary of Social Media Reach		
Platform	**Number of Posts**	**Reach**
Facebook	31 (Standard) 5 (boosted)	• 15,647 people reached. • 479 engagements.
Twitter	32 (standard) 1 (boosted)	• 44,000 impressions over 90 days (approximately 497 impressions a day). • 2,839 impressions from boosted post. • 597 engagements. • 64 engagements from boosted post.
LinkedIn	30	• 3,938 impressions. • 85 clicks.
Instagram	13	• 1,466 people reached. • 60 engagements.

3.8 Social media posts were shared and liked by the partner authorities.

Press Releases/Adverts

3.9 A press release was issued to all local print, online and broadcast media on Friday 2 July 2021 to announce the forthcoming launch of the Regulation 18 (Part 2) consultation. A second press release was issued on Friday 16 July 2021 announcing that the consultation was opening on Friday 30 July 2021 for 10 weeks and encouraging people to take this opportunity to have their say on the plan.

3.10 The press releases were shared with 33 media recipients. They were also posted to the Oxfordshire Growth Board (now Future Oxfordshire Partnership) website and were shared with all councillors across the six Oxfordshire authorities, as well as all Oxfordshire parish councils. Press releases were also shared with the six Oxfordshire authorities' communications teams for sharing within each organisation and on public websites.

3.11 Councillor Emily Smith, Leader of the Vale of White Horse District Council and Chair of the Oxfordshire Plan Member Advisory Group, undertook a number of local radio interviews to explain and promote the plan including a specific interview on Jack FM to discuss the climate change theme.

3.12 The consultation was advertised in the print edition of the Oxford Mail and its subsidiary titles detailing a short summary of the plan and how people could respond, including a list of deposit locations of where a hard reference copy of the full consultation document could be viewed and hard copies of the response forms could be collected. This advertisement was also placed on the Oxford Mail online and their corresponding Facebook page.

Oxfordshire Open Thought Website

3.13 The Oxfordshire Open Thought website (www.oxfordshireopenthought.org) was the primary online platform used to present the Regulation 18 (Part 2) consultation in an attractive and accessible way.

3.14 The Oxfordshire Open Thought website set out:

- Why the Oxfordshire Plan is being produced and the purpose of the Regulation 18 (Part 2) consultation (including a short introductory video);
- The content of the Regulation 18 (Part 2) consultation document, including preferred and alternative policy options and the five spatial strategy options, with links for responses to be submitted via the Oxfordshire Plan Consultation Portal (Inovem);
- Supporting evidence and background documents that informed the Regulation 18 (part 2) consultation;
- Details of the consultation webinars that took place (including providing a recording of the first public webinar for those unable to attend); and
- How people could contact the Oxfordshire Plan team with any questions or to request further information.

3.15 During the Regulation 18 (Part 2) consultation there were approximately 4,900 visits to the Oxfordshire Open Thought website.

Oxfordshire Plan Consultation Portal (Inovem)

3.16 The Oxfordshire Plan Consultation Portal (Inovem) was the primary online platform for submitting responses to the Regulation 18 (Part 2) consultation. General responses could be submitted via a general response form. There were also options for comments to be submitted against specific policy or spatial options.

3.17 When submitting comments against specific policy or spatial options, respondents were asked to indicate the type of comment that they wanted to make, with the ability to select from four options

- support, support with caveats, object or observation. Respondents were then provided with a free text box to submit a detailed comment. Respondents also had the opportunity to upload documents to support their response.

3.18 When submitting a comment using the general response form, respondents were asked to indicate which part of the consultation document they wanted to comment on, with the ability to select from four options - general comment, paragraph, policy option or spatial option. A free text box was provided where paragraph numbers or policy options could be specified. Respondents were also asked to indicate the nature of their comment, with the ability to select from three options – support, object or observation. Respondents were then provided with a free text box to submit a detailed comment. Respondents also had the opportunity to upload documents to support their response.

3.19 The Oxfordshire Plan Consultation Portal (Inovem) was also the primary online platform for making Call for Ideas submissions. Respondents could complete an online form or download WORD and PDF versions of the form. A guidance note was provided to assist people in making submissions.

3.20 All Call for Ideas submissions were asked to provide as much information as possible in relation to:

- The geographical location (including a map);
- The type and scale of proposal;
- Why this is considered a good location for the suggested use (including highlighting any social, environmental and/or economic benefits);
- Any challenges that might need to be addressed in order to deliver the proposal; and
- Any other information that might be useful in assessing the location through the plan-making process.

3.21 Submissions made by planning agents, landowners and developers were also asked to include further detail in relation to:

- Site size (hectares);
- Developable area (hectares);
- Current land use;
- Current planning status and relevant planning history;
- Any master planning or technical studies undertaken to date;
- Landownership; and
- When the site is likely to become available for the proposed use.

3.22 Respondents to the Call for Ideas also had the opportunity to submit additional documents to support their response.

Oxfordshire Plan Website

3.23 The Oxfordshire Plan website (www.oxfordshireplan.org) provided information on the Regulation 18 (Part 2) consultation. The Regulation 18 (Part 2) consultation document and all supporting documents were made available on this website. The Oxfordshire Plan website also provided links to the Oxfordshire Open Thought Website, the Oxfordshire Plan Consultation Portal (Inovem) and the recording of the first public webinar.

Online Events

3.24 On Thursday 19 August, a discussion on the Oxfordshire Plan Regulation 18 (Part 2) consultation was held at an online webinar hosted by the Oxfordshire branch of the Campaign to Protect Rural England (CPRE) and the Oxfordshire Neighbourhood Plans Alliance. The speakers at this event were:

- The Leader of the Vale of White Horse District Council & Chair of the Oxfordshire Growth Board's Oxfordshire Plan Sub-group;
- The Chief Executive of West Oxfordshire District Council & lead responsible officer for the Oxfordshire Plan; and
- The Director of CPRE Oxfordshire.

Each speaker gave a presentation on the Oxfordshire Plan Regulation 18 (Part 2) consultation. This was followed by an interactive question and answer session. Attendees were advised where information on the Regulation 18 (Part 2) consultation could be found and how to submit comments.

3.25 A separate business engagement event was hosted by Oxfordshire Local Enterprise Partnership on Thursday 29 July 2021 from 8.30 until 9.45am. The purpose of the event was to explain why the business voice needs to be heard as part of the Oxfordshire Plan making process.

3.26 The event was organised around a question and answer session to determine;

- Following the pandemic, is there in-fact no better time for Oxfordshire businesses to engage in the county's future to ensure that we are able to create a future that is vibrant for us all?
- How vital is it for Oxfordshire businesses to emphasise the importance of affordable, more sustainable living options if we are to attract the world's best talent and companies?
- How critical is it for the county to be a pioneer of new technologies? How can our communities feel the benefit of emerging transformative technologies where Oxfordshire leads the world?
- How critical is it for the Plan to inspire young people? What stands out in Oxfordshire that will say to young people: 'You need to be here'.

Interactive Webinars - General

3.27 Four general interactive webinars took place online using Zoom:

General Webinars		
Date	**Time**	**Number of Participants**
Wednesday 25 August 2021	12:00-13:30	81
Thursday 26 August 2021	18:00-19:30	29
Wednesday 8 September 2021	12:00-13:30	80
Thursday 9 September 2021	18:00-19:30	39

3.28 These webinars were widely publicised via email, social media, press releases/adverts, the Oxfordshire Plan website and the Oxfordshire Open Thought website.

3.29 Each of the four general webinars followed the same format. A presentation on the Regulation 18 (Part 2) consultation was given (approximately 1 hour), which provided an overview of the policy options under each of the five core themes and the spatial options. This was followed by a question and answer session (approximately 30 minutes). Participants had the opportunity to submit questions throughout.

3.30 A recording of the first consultation webinar was made available on YouTube[2] to ensure that the information was accessible to those who were unable to attend on the scheduled dates/times. The recording of the webinar posted on YouTube has received 291 views.

Interactive Webinar – Environment Focused

3.31 An interactive environment focused webinar took place on Wednesday 15 September 2021 from 12:00 to 13:30. This webinar was advertised to groups and organisations with a particular interest/focus on matters related to the natural environment. There were 34 participants at this webinar.

3.32 The environment focused webinar had the following aims:

- To draw upon participants' specialist knowledge and experience;
- To highlight additional evidence that may be required to support the Oxfordshire Plan;
- To understand potential barriers to the implementation of policies and strategies; and
- To supplement the ongoing consultation and help to provide a focus for the next phase of plan-making.

3.33 This webinar focused on Theme 1 (Addressing Climate Change) and Theme 2 (Improving Environmental Quality) of the Regulation 18 (Part 2) consultation. An overview of the policy options under each theme was provided. Participants were presented with questions on each policy area and were asked to submit their views using their computers or mobile phones via an engagement tool (Menti). Responses where automatically shown on screen and were recorded.

3.34 The responses to the Menti questionnaire and slide pack can be found at Appendix 1.

Interactive Webinar – Developer Focused

3.35 An interactive webinar targeted at the development industry took place on Thursday 30 September 2021 from 12:00 to 13:30. This webinar was advertised to planning agents, developers, landowners/mangers and local authority property teams. There were 27 participants at this webinar.

3.36 The development industry focused webinar had the following aims:

- To draw upon participants' specialist knowledge and experience;
- To highlight additional evidence that may be required to support the Oxfordshire Plan;
- To understand potential barriers to the implementation of policies and strategies; and
- To supplement the ongoing consultation and help to provide a focus for the next phase of plan-making.

3.37 This webinar provided an overview of the policy and spatial options. Participants were presented with questions on various policy areas under each of the fiver key themes and were asked to submit their views using their computers or mobile phones via an engagement tool (Menti). Responses where automatically shown on screen and were recorded.

3.38 The responses to the Menti questionnaire and slide pack can be found at Appendix 2.

Focus Group

3.39 A company called M.E.L Research was commissioned to facilitate a focus group session on the Oxfordshire Plan Regulation 18 (Part 2) consultation. The focus group was held virtually, via Zoom,

[2] https://www.youtube.com/watch?v=L3gfISRcu00

and took place on Saturday 18 September 2021 between 10:00 and 13:00. There was a total of 23 participants who were residents of Oxfordshire.

3.40 The focus group session involved an introduction to the Regulation 18 (Part 2) consultation provided by the interim project lead. Initial views on the key themes were captured. The participants were then split into two smaller groups to discuss the five themes in more detail. Towards the end of the workshop, the participants were invited to give their views on the five spatial options.

Documents made available in Libraries and Council Offices

3.41 During the consultation period the following were made available at council offices and public libraries:

- The Regulation 18 (Part 2) consultation document
- Sustainability Appraisal (July 2021)
- Habitats Regulations Assessment Distance Based Risk Zones Report (November 2019)
- Habitats Regulations Assessment High Level Risk Assessment of Spatial Options (June 2021)
- Duty to Co-operate Statement (July 2021)
- Statement of Common Ground (July 2021)
- Equalities Impact Assessment (July 2021)
- Oxfordshire Growth Needs Assessment – Executive Summary, Phase 1 Report, Phase 2 Report, Covid Addendum (July 2021)
- Statement of Community Involvement (July 2021)
- Leaflets summarising the Regulation 18 (Part 2) consultation purpose, proposals and how to participate
- Hard copy consultation response forms
- Hard copy posters advertising the Regulation 18 (Part 2) consultation

3.42 It should be noted that a number of council offices and public libraries were closed or operating reduced opening hours during the consultation period due to the Covid-19 pandemic.

Posters

3.43 Posters advertising the consultation were produced and sent to all libraries and Parish Councils in Oxfordshire in PDF format to either print or share via email.

Who responded to the consultation?

3.44 The consultation process was successful in reaching communities across Oxfordshire and beyond, with responses submitted from individuals and organisations from most parts of the county.

3.45 The Oxfordshire Plan team maintains a stakeholder database which includes basic information about the location and age of stakeholders, as well as whether they represent any particular organisations. However, the stakeholder database does not hold this information on all stakeholders as it is not mandatory to provide such information to successfully participate the consultation. Personal information is held securely in accordance with Oxfordshire County Council's Privacy Policy.[3]

3.46 It is possible to obtain some high level information to give an indication on the type of respondents that participated in the consultation, e.g. whether stakeholders represent an organisation or are responding on behalf of themselves, the age of respondents and whereabouts in Oxfordshire stakeholders are registered. This only reflects those respondents who provided this information and may not be an accurate reflection of the whole picture. The charts and map illustrated below are based on information provided to the Oxfordshire Plan team by registered stakeholders.

3.47 The type of respondent can be broken down into a range of different categories as illustrated by Chart 1 below. The majority of responses to the consultation were made by individuals, and not by those responding on behalf of an organisation or group. The second largest respondent category was promoters / agents/ developers, and these responses often correlated with promoted sites.

3.48 The consultation was successful in generating responses from Towns and Parish Councils as well as Charity and Action Groups.

[3] Oxfordshire County Council Privacy Policy

Chart 1 – Respondent types for Regulation 18, part 2 consultation

3.49 It is also interesting to note the age of stakeholders that responded to the consultation, where this information was provided. Efforts were made to reach out to young people during the consultation, particularly through increased usage of social media, including Instagram, throughout the consultation period, in order to stimulate greater interest amongst young people in Plan making.

3.50 Despite these efforts, the level of responses amongst younger age groups remained low as illustrated by Chart 2 below.

3.51 The greatest level of response was amongst respondents aged 45 and over, with significant response from those aged 65 and over.

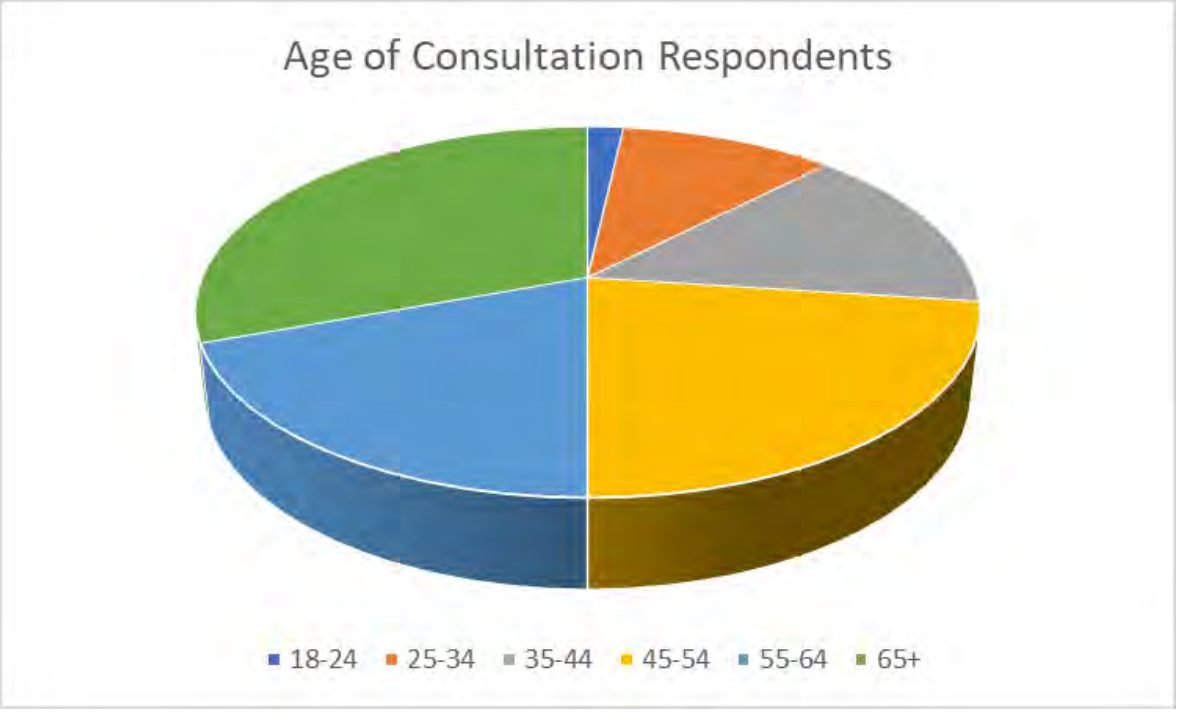
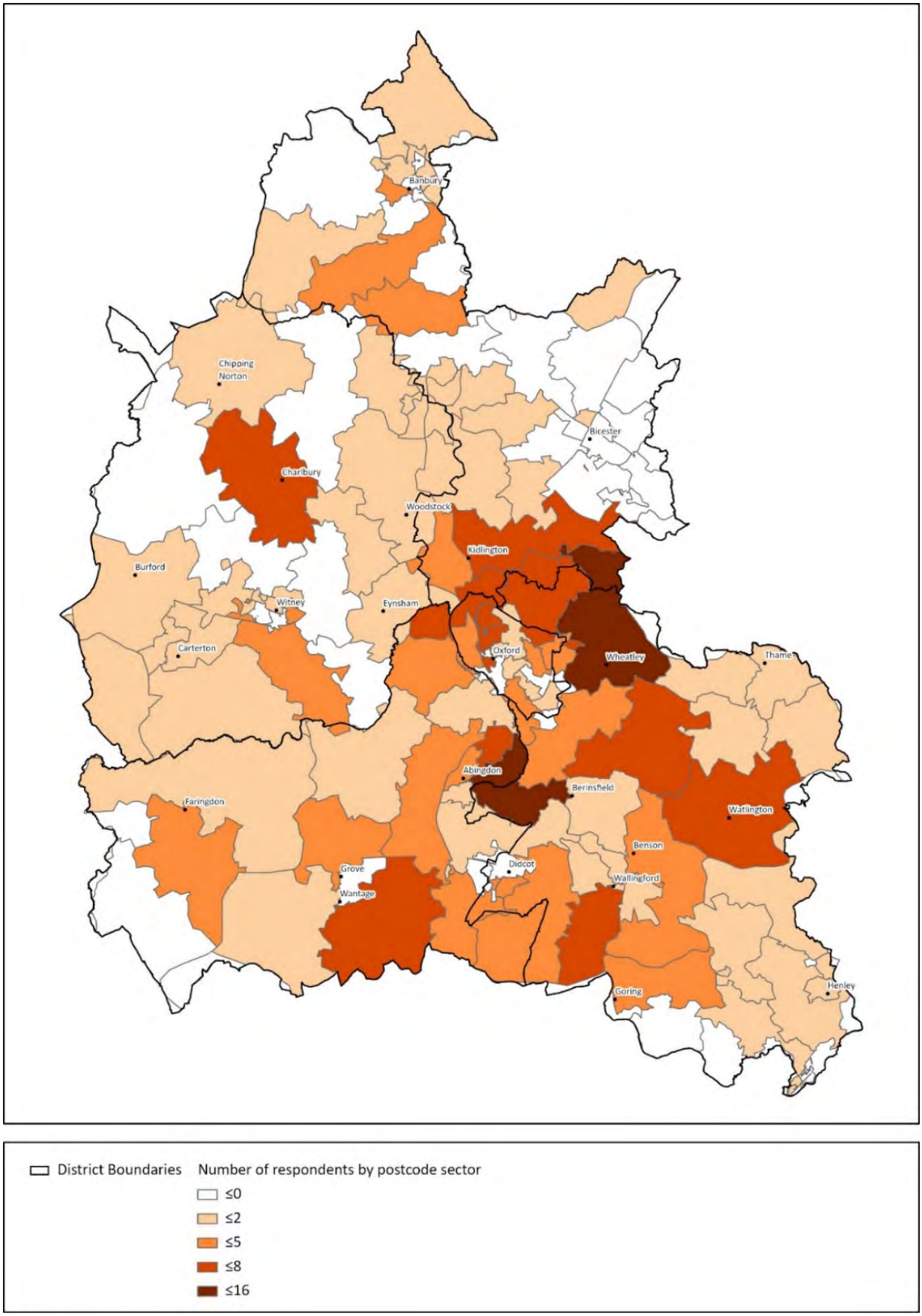


Chart 2 – Age of consultation respondents

3.52 Map 1 overleaf shows the geographical distribution of consultation respondents. It should be noted that the mapping only reflects those respondents that provided their postcode. As many stakeholders only registered an email address, or an incomplete postal address, it is not possible to provide a complete picture of the distribution and density of consultation responses across Oxfordshire.

3.53 Map 1 is also only limited to Oxfordshire. It is important to note that a number of responses received, particularly those made by agents and site promoters were submitted from addresses outside of Oxfordshire. The density and distribution of responses illustrated on Map 1 only shows figures for Oxfordshire where these are known.



Map 1 – Distribution of consultation responses across Oxfordshire

Number of Comments Received

3.54 A total of 3,723 individual comments were received. The number of comments received in relation to each section of the Regulation 18 (Part 2) consultation document are set out below.

3.55 Responses were received from approximately 422 individuals and organisations.

Regulation 18 (Part 2) Consultation Section		Number of Comments Received
Intro	Introduction and overview	168
	Vision and objectives	92
Theme 1	Theme 1 – Addressing Climate Change (General)	95
	01 - Sustainable design & construction	141
	02 - Energy	90
	03 – Water efficiency	72
	04 – Flood risk	83
Theme 2	Theme 2 – Improving Environmental Quality (General)	103
	05 – Protection and enhancement of landscape characters	73
	06 – Protection and enhancement of historic environment	44
	07 – Nature recovery	110
	08 – Biodiversity gain	131
	09 – Natural capital and ecosystem services	73
	10 – Green belt	110
	11 – Water quality	67
	12 – Air quality	61
Theme 3	Theme 3 – Creating Strong and Healthy Communities (General)	40
	13 – Healthy place shaping and health impact assessments	56
	14 – Health infrastructure	36
	15 – High quality design for new developments	88
	16 – Leisure, recreation and community facilities	40
Theme 4	Theme 4 – Planning for Sustainable Transport and Connectivity (General)	72
	17 – Towards a zero-carbon transport network	99
	18 – Sustainable transport in new development	73
	19 – Supporting sustainable freight management	31
	20 – Digital infrastructure	27
	21 – Strategic infrastructure priorities	59
Theme 5	Theme 5 – Creating Jobs and Providing Homes (General)	113
	22 – Supporting the creation of jobs	74
	23 – Protection of economic assets	52
	24 – Town centre renewal	40
	25 – Visitor economy	25
	26 – Culture and arts	22

Regulation 18 (Part 2) Consultation Section		Number of Comments Received
	27 – Meeting skills and education needs	29
	28 – Homes - how many?	326
	29 – Urban renewal	85
	30 – Affordable homes	97
	31 – Specialist housing	39
	32 – Gypsies and travellers	17
Spatial Options	Spatial Options (General)	159
	Option 1 - Focus on opportunities at larger settlements and planned growth locations	106
	Option 2 - Focus on Oxford-led growth	69
	Option 3 - Focus on opportunities in sustainable transport corridors and at strategic transport hubs	87
	Option 4 - Focus on strengthening business locations	81
	Option 5 - Focus on supporting rural communities	77
	Monitoring framework	7
	Next Steps	17
	Sustainability Appraisal	3
	Habitats Regulations Assessment	2
	Viability	9
	Comments proposing additional policies	53
Total Comments:		**3,723**

What Stakeholders told us

4.1 This section of the report provides a summary of the consultation responses received as part of the Regulation 18 (Part 2) consultation.

4.2 Consultation response summaries are arranged under the same headings as the consultation document as follows

- Introduction and Overview
- Oxfordshire Plan Vision and Objectives
- Theme 1 – Addressing Climate Change
- Theme 2 – Improving Environmental Quality
- Theme 3 – Creating Strong and Healthy Communities
- Theme 4 – Planning for sustainable travel and connectivity
- Theme 5 – Creating Jobs and providing homes
- Spatial Strategy Options

4.3 The views, expressions and statements made throughout the following sections are those submitted by stakeholders in response to the consultation. The following sections do not include any response from the Oxfordshire Plan Team to any of the representations made and the wording should not be read as such. Text has been arranged for ease of legibility, but representations have not been interpreted into actions at this stage. This document is a summary record of all representations that were made to the Regulation 18 (part 2) consultation.

Introduction and Overview

Key Points

- There was broad support for the Oxfordshire authorities working together to produce a joint strategic plan.
- There were suggestions that the scope of the Oxfordshire Plan should be refined to focus on strategic cross-boundary matters.
- The significant uncertainty in planning to 2050 was highlighted. It was suggested that flexibility and regular plan reviews will be needed.
- There were requests for the relationship between the Oxfordshire Plan and the Oxford-Cambridge Arc Spatial Framework to be clarified.
- It was highlighted that this is proposed to be the final Regulation 18 consultation, however it does not set out a preferred strategy, growth locations or the amount of development that the plan will seek to deliver. There were concerns that addressing these significant issues at Regulation 19 would not allow sufficient engagement with communities and stakeholders.

<u>The Benefits of Producing a Strategic Plan</u>

4.4 There was broad support for the Oxfordshire authorities working together to produce a joint strategic plan. It was generally agreed that this provides an opportunity to deliver more ambitious and consistent outcomes.

4.5 A number of comments highlighted that producing a joint strategic plan for the entire Oxfordshire housing market area would enable housing needs to be met in a more balanced and sustainable

way. It was also suggested that this could help to avoid protracted discussions around unmet need through local plan processes. A number of respondents suggested that a strategic plan should consider opportunities to assist with unmet need from neighbouring authorities and/or London.

The Scope of the Oxfordshire Plan

4.6 A number of comments suggested that the preferred options document was too detailed and included some policy areas that would be better addressed by local plans. It was suggested that the Oxfordshire Plan should be more concise and focused on strategic cross-boundary planning matters and matters that it can affect. It was suggested that the strategic planning matters that the Oxfordshire Plan aims to address should be clearly identified, as should the cross-boundary cooperation required to achieve this (including cross-boundary matters beyond Oxfordshire). The need for a clear spatial focus, which would set a clear framework for local plans was emphasised. It was highlighted that the duplication of national policy and guidance is unnecessary and that the Government's intention for plan-making, as explained in the August 2020 Planning White Paper, is for plans to be visual and map based, standardised, based on the latest digital technology, and generally to be significantly shorter in length.

4.7 A number of respondents were concerned that the Oxfordshire Plan is too focused on growth.

4.8 Some respondents highlighted that the Oxfordshire Plan needs to make the big planning decisions for Oxfordshire and to balance different ambitions, even when this is difficult/unpopular. It was suggested that the Regulation 18 (Part 2) document has not yet addressed the big issues.

4.9 Some respondents felt that the policy options presented were too vague. It was suggested that how policies are expected to be implemented and by whom should be clearly set out. It was also suggested that resources required to implement the Oxfordshire Plan should be identified.

4.10 It was also suggested that plan should be more clearly based on an understanding of the local context.

Relationship with Local Plans

4.11 There was some confusion around the status of the Oxfordshire Plan. It was suggested that it should be clearly stated that the Oxfordshire Plan will form part of the city and district councils' Development Plans.

4.12 It was suggested that the scope of both the Oxfordshire Plan and future local plans should be clearer.

4.13 Some local residents and parish councils expressed concerns that existing local plans and/or neighbourhood plans will be undermined/overridden.

4.14 It was suggested that the adopted local plan policies that will be superseded by the Oxfordshire Plan should be clearly stated.

Relationship with Other Plans and Strategies

4.15 Some respondents felt that there should be greater recognition of the forthcoming Arc Spatial Framework and how this will affect Oxfordshire and the Oxfordshire Plan. It was suggested that the Arc's environment principles should be referenced.

4.16 Questions were raised around whether the Arc Spatial Framework will identify additional development for Oxfordshire. There were mixed views on the potential for the Oxford-Cambridge

Arc to accommodate unmet need from London. The importance of two-way working between the Government and Oxfordshire was highlighted.

4.17 Some respondents disagreed with the Oxford-Cambridge Arc concept, suggesting that the government should instead focus on growth elsewhere in England, where there may be fewer constraints and greater opportunities to support the 'levelling-up' agenda.

4.18 There were suggestions that the Arc Spatial Framework could make the Oxfordshire Plan redundant.

4.19 There was some confusion that the timeline presented for the Arc Spatial Framework was the timeline for the Oxfordshire Plan.

4.20 It was suggested that the Oxfordshire Plan should include a section on the national context and that this should identify where Oxfordshire should be seeking to influence national agenda to be more innovative and sustainable.

4.21 It was suggested that the Oxfordshire Plan should include a section on the international context which identifies examples of best practice.

4.22 It was suggested that voluntary organisations that have a close and direct interest in Oxfordshire should be referenced as strategic influencers.

Planning to 2050

4.23 There was some concern about planning to 2050. Planning reforms, the Oxford-Cambridge Arc Spatial Framework, the impacts of development allocated in adopted local plans, the long-term impacts of a global pandemic and infrastructure funding gaps were highlighted as specific areas of uncertainty. It was suggested that regular reviews and/or a continuous strategic planning process will be needed and that governance arrangements and resources should be identified for this.

Plan-Making Process

4.24 A number of respondents expressed concern that the Oxfordshire Plan would be dominated by a top-down approach driven by the government, the Oxford-Cambridge Arc and/or the Growth Board (now the Future Oxfordshire Partnership). The need to reflect the needs and wishes of local people was emphasised.

Duty to Co-operate

4.25 The need to demonstrate effective joint working on cross-boundary strategic matters beyond Oxfordshire was emphasised. It was highlighted that the evidence base should consider cumulative cross-boundary impacts and identify appropriate mitigation.

4.26 It was stated that the duty to co-operate should extend to the newly formed Oxfordshire Local Nature Partnership.

Strategic Vision

4.27 There was some confusion around the relationship between the Oxfordshire Plan and the Strategic Vision. There were requests for this to be clarified. It was suggested that the strategic vision has no legal status and that it is misleading to suggest that the strategic vision forms part of the Oxfordshire Plan.

4.28 Some respondents felt that the strategic vision is too long. It was suggested that the strategic vision should be clearer and more concise.

4.29 Some respondents felt that the definition of good growth should include a more explicit reference to meeting development needs. It was asked whether Oxfordshire can be considered to have delivered good growth if it does not meet housing needs.

Map of Oxfordshire

4.30 It was highlighted that the settlements identified on the map of Oxfordshire do not align with the main settlements identified in existing local plans or the Oxfordshire Plan's emerging evidence base.

The Five Themes

4.31 The five themes were broadly welcomed. It was emphasised that the themes are interconnected and that therefore the Oxfordshire Plan should take a holistic approach.

4.32 It was suggested that reducing deprivation and inequality should be added as a core theme.

4.33 Questions were asked about how conflicts between the themes will be resolved.

Broad Locations for Growth

4.34 Some respondents felt that the process and timing for confirming a level of growth and identifying broad locations is unclear.

4.35 It was highlighted that the Call for Ideas requested strategic environmental projects as well as locations for large-scale housing and employment, however it was felt that the next steps seemed to ignore the former and focus on the latter.

4.36 It was suggested that if the Oxfordshire Plan will not allocate sites, it should be made clear that this decision has been reached after considering other options.

4.37 It was suggested that a framework for future engagement with developers should be set out, focusing on increased cooperation, aligning with plan outcomes and stronger governance.

4.38 It was highlighted that this is proposed to be the final Regulation 18 consultation, however it does not set out a preferred strategy, growth locations or the amount of development that the plan will seek to deliver. There were concerns that addressing these significant issues at Regulation 19 would not allow sufficient engagement with communities and stakeholders.

Other Comments

4.39 It was highlighted that the Regulation 18 (Part 2) consultation document refers to the 2019 version of the National Planning Policy Framework (NPPF). This was updated in July 2021 and any reference to the NPPF (including its new provisions) should be amended in the Regulation 19 version to reflect this update.

Oxfordshire Plan Vision and Objectives

Key Points

- The role of and relationship between the strategic vision, guiding principles, good growth definition, plan vision and plan objectives should be made clearer.
- The plan vision should be reviewed, with consideration given to the strategic vision, the climate and ecological emergencies, housing need (particularly affordable housing need), innovation and global competitiveness, and the Oxford-Cambridge Arc.
- The vision and objectives should be supported by a clear delivery and monitoring framework.

4.40 There was some confusion around the role of and relationship between the strategic vision, guiding principles, good growth definition, plan vision and plan objectives. It was suggested that multiple iterations of the same ambitions are presented. It was suggested that the vision should be refined and made more clear, focused, concise and accessible. Most respondents commented on the strategic vision rather than the plan vision. Some referred to the strategic vision and plan vision interchangeably. It was noted that the plan vision had not evolved since the Regulation 18 (Part 1) consultation.

4.41 There was a significant amount of support for the strategic vision. However, some felt that the strategic vision is too broad/should be more specific. It was also suggested that the strategic vision should have a more spatial focus. It was highlighted that the strategic vision goes beyond national planning policy and its impacts have not been properly assessed, including consideration of viability impacts.

4.42 Some respondents, particularly developers and businesses, were concerned that economic factors are not given enough weight in the vision. The importance of innovation and global competitiveness were emphasised. It was also suggested that Oxfordshire's position within the Oxford-Cambridge Arc should be recognised as this is a national economic priority. However, others suggested that economic ambitions should be removed from the Oxfordshire Plan entirely or that pursing economic growth is outdated and that a doughnut economic model, whereby we plan withing planetary and social boundaries should be followed instead.

4.43 Some respondents felt that the urgent need to deliver homes, including affordable homes, should be given more emphasis in the vision.

4.44 Other respondents, particularly environmental campaign groups and some local residents, felt that there should be greater emphasis on the environment in the vision. The urgency of the need to respond to the climate and ecological emergencies was emphasised and it was suggested by some that this should be the sole focus of the Oxfordshire Plan.

4.45 A number of respondents welcomed the intention to pursue social, environmental and economic ambitions in mutually supportive ways. It was highlighted that this aligns with the National Planning Policy Framework.

4.46 Some concerns were expressed that pursuing growth in the Oxfordshire Plan could undermine the ability to achieve the strategic vision.

4.47 Many respondents felt that more detail is needed on how the vision and objectives will be achieved and monitored. The need for the vision to be deliverable was emphasised.

4.48 Many respondents welcomed the revised plan objectives. However, there were suggestions that the objectives should be more specific/quantifiable and be supported by a clear delivery and monitoring framework. Some respondents questioned whether it was possible for all the objectives to be pursued simultaneously and there were suggestions that some may need to be prioritised over others.

4.49 Comments on specific objectives included:

- Objective 1 – There was broad support for this objective, although some respondents felt that it is not ambitious/specific enough. It was suggested that the objective should reflect net zero carbon commitments and that the plan should look at wider opportunities to achieve this, beyond planning policy. One respondent questioned the link between carbon dioxide and climate change. It was also highlighted that leadership would involve making hard decisions.
- Objective 5 – It was suggested that the importance of innovation and global competitiveness should be recognised. Need to ensure visions recognises urban/rural context
- Objective 6 – It was suggested that affordable housing for key workers should be included within this.
- Objective 7 – It was suggested that 'including affordable housing' should be changed to 'especially affordable housing'. Concerns were also raised around the interpretation of housing 'need'. Some respondents felt that building new homes did not align with the other objectives.

4.50 There was support for the five core themes proposed, although there were comments which highlighted that these themes are interrelated and should not be considered in isolation.

4.51 It was suggested that, given the long plan period, the plan needs to be flexible and open to review to enable alignment with the most up-to-date national policy and Building Regulations requirements and to remain ambitious.

4.52 It was suggested that there is an imbalance in setting numerical targets for housing but not for other policy areas.

THEME 1 – ADDRESSING CLIMATE CHANGE

Policy Option 01 - Sustainable Design and Construction

Key Messages

- Clearly define what is meant by major development in the Oxfordshire Plan context.
- Policy options should be subject to viability testing to ensure the approach is justified.
- Any policy should define approach to carbon offsetting including financial contributions and identification of mitigation sites.
- Consideration should be given to the London Plan approach to the circular economy. Policy SI 7 in the London Plan which focuses on reducing waste and supporting the circular economy was noted as an exemplar policy.
- It should be determined how the policy will be monitored, including the performance gap of buildings.
- Distinguish between regulated and unregulated energy use.
- Consider implications for building design on character of places.
- There should be consideration of supply chains and skills in the construction sector.
- Respondents highlighted the delivery plan for HBF (Home Builders Federation) and future homes task force https://www.futurehomes.org.uk/.
- The policy option should be consistent with national policy.

Policy Option 01 - Sustainable Design and Construction

How strongly do you agree or disagree with the preferred and alternative policy options?

	Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
Policy 01 - Sustainable design and construction	20	27	3	10	3
Policy 01 - Alternative option 1 - Defer standards to Local Plans	2	2	4	4	8
Policy 01 - Alternative option 2 - Defer to future homes and future buildings standards	2	17	2	3	8

4.1.1 The level of ambition of the preferred policy direction was welcomed, as it was considered that this would assist in achieving a successful net-zero carbon transition in Oxfordshire.

4.1.2 There was widespread support across the respondents for policies that seek to secure net zero carbon development, provided policies are based on robust evidence. Some respondents noted that a bigger challenge will be addressing the carbon emissions of existing buildings, and it was felt that broadening the policy to include retrofit and adaptation of existing buildings would be beneficial.

4.1.3 Stakeholders recognise that to achieve targets for net zero carbon by 2050 or sooner, there is a need to improve the environmental performance of development. The ambition of Policy 01 was well supported.

4.1.4 The importance of the circular economy in reducing the amount of construction waste was recognised by respondents. It was also suggested that policy could be strengthened by following approaches that have been established in strategic Plans, such as the London Plan.

4.1.5 Reference to existing design and construction standards was welcomed and stakeholders reflected on the merits of following one approach over another e.g. taking account of the whole life-cycle carbon of buildings.

4.1.6 Some respondents considered that the scope of the policy should be expanded so that it relates to all development rather than just major developments, while others considered that the focus on major developments was justified.

4.1.7 The viability of implementing higher level design standards was highlighted by many respondents. Viability considerations relate to both the justification for the policy and the viability of delivering development and decision making. It was highlighted how in order for higher level design standards to be justified, Oxfordshire Plan policies should be subject to viability testing, to determine what the implications would be for deliverability, in combination with other policies for affordable housing and biodiversity net gain. It was considered by many however, that viability considerations should be removed from the final policy wording, to avoid potential for standards to be watered down at decision making and implementation stages. It was expressed by respondents that any viability assessment of the Plan itself should be subject to consultation and engagement with the development sector.

4.1.8 The issue of carbon offsetting was highlighted. Some considered that the policy should include no mention of carbon offsetting, while some supported opportunities to offset carbon reductions that cannot be achieved on site. Respondents highlighted that if carbon offsetting is allowed, then policy needs to be unambiguous to avoid misinterpretation with proposed offsetting methods set out in the Plan.

4.1.9 In order to strengthen the policy, some respondents raised that a distinction should be made between the construction and building performance standards and unregulated energy use post-occupation. Stakeholders highlighted the particular challenge of meeting unregulated energy demand (the use of devices within the home) as opposed to regulated energy demand (heating, cooling and hot water). It was suggested that the policy should include monitoring framework that addresses the performance gap of buildings (the gap between energy use predicted at the design stage vs actual energy use in operation).

4.1.10 The implications for the character of buildings was highlighted. It was raised how opportunities for modern construction techniques, including the use of modular construction and incorporation of green roofs and walls could be encouraged, although comments considered it important to avoid detrimental impacts on the character of places through inconsiderate design.

4.1.11 Many respondents were concerned that the supply chains of technology and materials, and the skills in the construction sector were not currently available, presenting difficulties for implementing policy and delivering development. Many respondents considered that higher design standards could be beneficially introduced on a phased basis, to allow skills and supply chains to develop.

4.1.12 Respondents expressed support for the creation of an innovation zone focusing on skills development and training, including decision making skills and modular construction.

4.1.13 It was raised by some how measures are already being taking within the development sector to support the implementation of the Future Homes Delivery Plan. Priority is to support the development sector in meeting the future Homes Standard (Policy 01 – Alternative Option 2). This would ensure that homes are zero carbon ready for regulated energy by 2025.

4.1.14 The importance of consistency with national and regional policy was highlighted including PPS1 (now superseded), the NPPF (specifically paragraph 152) and the Arc Spatial Framework. It was raised how it is important to be mindful of consistency with other plans as the policy is developed further.

4.1.15 Respondents raised that consideration should be given to what the Oxfordshire Plan is trying to achieve and whether it is the right place for defining such standards. Many considered that building regulations are best placed to ensure a consistent approach to standards and some respondents think districts are better placed to identify and address local needs.

Policy Option 02 – Energy

Key Messages

- Policy wording should provide flexibility, to maximise use of renewable energy in developments as technology and skills improve.
- Need to clarify what major development means in the context of this policy.
- Policy requirements should be introduced on a phased basis.
- Policy requirements should be subject to viability testing to ensure that they are justified and deliverable.
- Some respondents said that viability considerations should be removed from policy wording.
- Suggestion that new development proposals should be supported by an energy strategy.
- The Oxfordshire Plan should identify locations for large scale renewable energy generation schemes

Policy option 02 - Energy

How strongly do you agree or disagree with the preferred and alternative policy options?

	Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
Policy 02 - Energy	10	16	4	4	3
Policy 02 - Alternative option 1 - Do not set county-wide renewable energy targets	1	2		7	6
Policy 02 - Alternative option 2 - Set percentage target for renewable energy		6	1	3	5

4.1.16 General support was expressed for the preferred policy approach, to minimise energy demands from new development and to maximise the amount of renewable energy provision for developments. Many stakeholders recognised and supported the ambition of the preferred policy option. They consider it important to maximise the energy efficiency of new development in the first instance.

4.1.17 Many considered it crucial that energy infrastructure requirements are given proper consideration to support the rising demand for electricity over the lifetime of the Oxfordshire Plan.

4.1.18 Some respondents felt that the policy wording at this stage is unclear in its intent and application. It was requested that clarity should be given as to whether the policy relates to an overarching county-wide target for the generation of renewable energy, or whether these would be specific requirements for new development. Many were in agreement that the policy needs to be clearer in how applicants or decision makers should respond to the policy requirements.

4.1.19 Stakeholders also expressed a preference for minimum renewable energy targets to be set for new developments (alternative option 2) and that any proposed targets set out in the Oxfordshire Plan should be evidence based, to demonstrate that they are feasible, viable and deliverable.

4.1.20 Viability considerations were highlighted throughout the consultation. Among the respondents there were numerous calls for viability evidence to be presented for consultation so that stakeholders can take a balanced and informed view on the suitability of policy requirements. It was suggested that any evidence, including that relating to viability, should be presented alongside the draft Plan, to demonstrate that policies are achievable and deliverable in accordance with the NPPF.

4.1.21 Many stakeholders considered that energy policies should provide sufficient flexibility to respond to individual site characteristics. Alternative option 1 was considered to be a more flexible approach; although other stakeholders considered that the alternative policy options could see a drift towards lower standards and a dilution of the issue. It was noted by some that the policy should also be flexible to take account of changing technology and the need for skills within the development sector to improve. Some respondents suggested that higher targets from renewable energy generation could be introduced on a phased basis, with interim targets to be achieved.

4.1.22 Some respondents felt that regard should be had to the deliverability of other Plan benefits if standards in the Oxfordshire Plan are increased. A number of stakeholders highlighted the commercial challenges of delivering 100% renewable energy on sites and the potential implications this could have on affordable housing and biodiversity net gains. It was also considered by some that renewable energy requirements should be driven by building regulations rather than Oxfordshire Plan policy.

4.1.23 Several respondents said that if the policy is going to apply to major developments, the Oxfordshire Plan needs to be clear on the definition of major development in the Oxfordshire context.

4.1.24 It was suggested that the policy could be strengthened by setting requirements for new development to be supported by an energy strategy. Another suggestion was that the Plan could benefit from the identification of acceptable offsetting schemes.

4.1.25 Stakeholders indicated that for onsite renewable generation to be most effective, it needs to be delivered at scale. Some respondents also expressed a view that the Oxfordshire Plan should identify suitable locations for the delivery of strategic scale renewable energy generation, including where large-scale solar farms could be sited.

Policy Option 03 – Water Efficiency

Key Messages

- A wide range of views were expressed and there was no clear consensus.
- All options should be subject to further consideration and testing.
- Additional evidence will be required, including evidence on the need for more ambitious standards in Oxfordshire (with consideration of environmental capacity) and the achievability of different options (with consideration of legality, technical feasibility, financial viability and potential impacts on housing delivery).

Policy option 03 - Water efficiency

How strongly do you agree or disagree with the preferred and alternative policy options?

	Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
Policy 03 - Water efficiency	9	9	6	5	1
Policy 03 - Alternative option 1 - Set requirement for water neutrality in Oxfordshire	1	3		5	3
Policy 03 - Alternative option 2 - Set less ambitious water efficiency targets	1	8		1	7

4.1.26 There was broad support for the Oxfordshire Plan establishing a strategic, countywide approach to water efficiency.

4.1.27 There were mixed views on the preferred option. A number of respondents stated their support for the ambitious water efficiency standards suggested, although many also highlighted concerns.

4.1.28 Concerns included:

- Water efficiency standards are established nationally through national policy and the Building Regulations. It was suggested that there is no scope for the Oxfordshire Plan to set requirements that go beyond the Building Regulations.
- The need for more ambitious water efficiency standards has not been demonstrated.
- There is insufficient evidence to demonstrate that more ambitious water efficiency standards are achievable (both technically feasible and financially viable). Overly ambitious or unachievable targets could impact housing delivery. Overly ambitious requirements could also impact upon developments' ability to deliver other benefits and to fund other measures required to mitigate their impact.
- More ambitious water efficiency standards may need to be phased in gradually.
- More ambitious water efficiency standards may not be achievable on all sites or for all types of development. A more flexible approach may be needed. It was suggested that non-residential development proposals can have varying water requirements and should be assessed on a case-by-case basis.

- Mechanisms for effectively monitoring and enforcing more ambitious water efficiency standards were questioned.
- How the Oxfordshire Plan might provide flexibility to adapt to new water efficiency standards that may become achievable over the plan period was questioned. There were concerns that this could create uncertainty. The mechanisms for testing and evidencing the feasibility and financially viability of these standards was questioned.

4.1.29 There was some support for aligning with the Royal Institute of British Architects 2030 Climate Challenge Targets. However, the achievability of these targets was questioned. It was suggested that the targets would require the use of greywater recycling systems within dwellings, but that there are no reliable systems currently available on the market. It was suggested that there is an opportunity for the Oxfordshire Plan to stimulate the demand for such systems through its policies.

4.1.30 Some respondents suggested that proposed water efficiency standards were not ambitious enough. Others suggested that 100 or 105 litres per person per day may be more realistic standards for residential development.

4.1.31 It was suggested that all developments, not just those at strategic development locations, should be required to include rainwater harvesting and grey water recycling.

Alternative Option 03-1 (water neutrality)

4.1.32 There were mixed views on alterative option 03-1.

4.1.33 Some respondents supported the Oxfordshire Plan seeking water neutrality and suggested that this should be pursued. It was suggested that water neutrality is necessary to achieve nature recovery and/or to ensure resilience to climate change.

4.1.34 A small number of respondents suggested that aiming for neutrality would not be sufficient and that the Oxfordshire Plan should be more ambitious.

4.1.35 The ability to effectively deliver and monitor water neutrality was questioned. It was suggested that water neutrality would require a wide range of interventions, some of which are beyond the scope of the Oxfordshire Plan. It was suggested that retrofitting may be limited to publicly owned housing stock and buildings as it is unlikely that the private sector could deliver retrofitting on a large-scale. Even if the retrofitting of private stock is attempted, the retention of the measures would not be able to be secured in perpetuity, resulting in an uncertain benefit.

4.1.36 There were concerns that pursuing water neutrality could significantly impact housing delivery.

Alternative Option 03-2 (business as usual)

4.1.37 A number of respondents stated their support for this option, particularly those respondents involved in the development industry. It was highlighted that this option aligns with recognised standards for water efficiency set out in the Building Regulations. Those in the development industry broadly agreed that strategic scale developments should be specifically encouraged to maximise water efficiency, subject to site-specific circumstances. However, other respondents felt that this option would not be sufficient given the climate emergency.

Other Options Suggested

4.1.38 The need to act within environmental limits was highlighted. It was suggested that water stress provides justification for limiting new development in Oxfordshire.

4.1.39 There was some support for a policy approach related to retrofitting water efficiency measures on existing homes and buildings. It was suggested that water efficiency standards proposed by the Oxfordshire Plan should also apply to existing homes and buildings.

Policy Option 04 – Flood Risk

Key Messages

- A wide range of views were expressed and there was no clear consensus.
- All options should be subject to further consideration and testing.
- Additional evidence will be required, including evidence on the need for more ambitious standards in Oxfordshire (with consideration of environmental capacity) and the achievability of different options (with consideration of legality, technical feasibility, financial viability and potential impacts on housing delivery).

Policy Option 04 - Flood Risk

How strongly do you agree or disagree with the preferred and alternative policy options?

	Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
Policy 04 - Flood risk	11	16	2		1
Policy 04 - Alternative 1 - Reduce scope of flood risk policy			1	2	7

4.1.40 There was broad support for the preferred option. No comments were received in support of the alternative option.

4.1.41 A number of respondents highlighted the need to address cross-boundary causes and impacts of flooding. A consistent countywide approach was broadly welcomed, as was the commitment to working with the Environment Agency and other authorities across the wider catchment area.

4.1.42 A number of respondents wanted there to be a clear commitment to stop any form of development in the floodplain. It was suggested that existing development in the floodplain should be relocated to areas with a lower risk of flooding and that natural flood plains should be restored.

4.1.43 It was suggested that flood risk mitigation should be implemented prior to the commencement of development.

4.1.44 There was a high level of support for natural flood management methods. A number of respondents highlighted that schemes should be designed to maximise benefits for nature and people. Approaches such as planting new woodlands, upstream leaky dams and the reintroduction of beavers were mentioned. It was suggested that a strategy is needed to deliver this. There was also a suggestion that natural flood management should be embedded within a wider Oxfordshire Landscape Plan, which should be used to guide the location of development.

4.1.45 It was suggested that appropriate blue infrastructure such as canals (including a restored Wiltshire and Berkshire Canal) could be incorporated into land drainage systems and help to control flooding.

4.1.46 There was a high level of support for requiring developments to utilise Sustainable Drainage Systems (SuDS). It was suggested that SuDS should be high quality, safe, open and utilise a diverse range of native species. SuDS should also be designed to deliver a range of benefits for nature and people. A number of respondents felt that local authority standards should be referenced within the policy. It was also suggested that retrofitting SuDS at a strategic scale should be supported.

4.1.47 Some respondents questioned why paragraph 3 of Policy Option 04 only applied to major development.

4.1.48 Whilst there was significant support for natural flood management and SuDS, it was also suggested that developments that cannot incorporate these measures or achieve wider benefits due to their position in the river catchment should not be adversely impacted in priority.

4.1.49 It was suggested that paragraph 1 of Policy Option 04 should recognise the need to consider flood risk across the whole catchment and to consider the cumulative impacts of development. It was suggested that where development would result in a net increase in flood risk within the catchment area, developers should make a proportionate financial contribution towards an appropriate mitigation scheme.

4.1.50 The need for the policy to be easily understood, so that requirements for planning applications are clear, was highlighted. It was stated that each policy requirement/criteria should be fully justified and should be cross-referenced to an overarching strategic flood map for Oxfordshire to avoid applicants preparing superfluous information.

4.1.51 Clarification was sought as to whether 'where possible' (Policy Option 04, Paragraph 2) applies only to the final bullet point or to all of bullet points in this section.

4.1.52 It was suggested that the Strategic Flood Risk Assessment for the Oxfordshire Plan should include:

- Identification of flood plains.
- Assessment of surface water run-off to lower elevation homes.
- Assessment of surface water run-off from new development to watercourses.
- Assessment of drainage.
- Consideration of regular, localised flooding.
- Consideration of sewer flooding.
- Consideration of flood impacts on existing development and identify relevant mitigation to ensure resilience.
- Consideration of impacts of climate change.
- Identification of opportunities to pro-actively manage flood risk.
- Identification of appropriate mitigation for new development.
- Consideration of the impacts of the Oxford-Cambridge Arc proposals.
- Consideration of the potential to use the Oxford canal to support and enhance development through surface water drainage and discharge. It was suggested that with careful design the canal could provide a sustainable option for site drainage as the managed nature of canal water levels can potentially allow the acceptance of surface water run -off and help in wider consideration of flood mitigation measures. The Canal & River Trust can provide information to feed into a SFRA.
- Investigation of the cumulative impacts arising from permitted development and householder schemes in in the flood plain.
- Clear justification for the Oxfordshire Plan's policy approach.

4.1.53 The need to address the causes of climate change, to help to reduce future flood risk, was highlighted. It was noted that Policy Option 13 was incorrectly titled 'flood risk' in the consultation document.

THEME 2 – IMPROVING ENVIRONMENTAL QUALITY

Policy Option 05 – Protection and Enhancement of Landscape Characters

Key Messages

- There have been questions raised as to whether a development management type policy for landscape is appropriate for the Oxfordshire Plan.
- A landscape sensitivity assessment should be undertaken at options stage, to identify areas of the landscape that are least sensitive to development.
- Identification of broad locations for change in the Plan should be supported by a landscape impact assessment and should include any proposed mitigation
- Where possible, policies of NPPF should be referred to rather than duplicating policy.

Policy option 05 - Protection and Enhancement of Landscape Characters

How strongly do you agree or disagree with the preferred policy option?

	Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
Policy 05 - Protection and enhancement of landscape character	11	16	2	1	

4.2.1 There was widespread support amongst stakeholders for the protection and enhancement of landscape character. The majority of respondents agree with the Plan's proposed approach, to establish a positive strategy for the conservation and enhancement of landscape and townscape features.

4.2.2 Several respondents considered it important to retain the rural character of large parts of the county, the landscape and the character of towns and villages.

4.2.3 Many highlighted however, that due consideration should be given to scale and scope of housing and employment growth in the Plan, which is yet to be established. A number of stakeholders highlighted that a necessary balance should be struck between three pillars of sustainable development, environmental, economic and social.

4.2.4 There should be detailed consideration of the landscape impacts of any proposed development locations. Identification of broad locations for change in the Plan should be supported by a landscape impact assessment and should include any proposed mitigation.

4.2.5 The Plan should consider whether exceptional circumstances exist for development in the AONB, including where such development may be in the public interest at locations such as Harwell Campus. It was considered by some that policy could be strengthened, by stating that development within the AONB would not be supported. Paragraph 176 of the revised NPPF 2021 makes it clear

that development in the setting of AONB can be acceptable if sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

4.2.6 It was questioned whether a development management type policy for landscape is appropriate for the Oxfordshire Plan. This may be sufficiently covered by national and local policy so it should be clear where any policy in the Oxfordshire Plan would add value.

4.2.7 Further details of the positive strategy for landscape need to be made available for consultation, with stakeholders noting that the identification of landscape value needs to be applied proportionately, ensuring that identification of 'valued landscape' is not overused. Stakeholders recognise the clear benefits of undertaking landscape assessment on a cross boundary basis rather than being restricted to political boundaries.

4.2.8 One respondent considered that large natural areas should be created in areas that have been subject to significant development to provide greater access to nature for communities.

4.2.9 Any policies for landscape should be grounded in evidence on landscape sensitivity and should be consistent with national policy. The Landscape Character map of Oxfordshire has been updated and due regard should be given to this in assessing landscape sensitivity.

4.2.10 It was noted that the Oxfordshire Plan should acknowledge and place significant weight on Oxford's relationship with the surrounding landscape as well as recognising the impacts of development on the character of villages. The interconnectedness of landscape features is also regarded as an important factor that the Plan should reference.

4.2.11 Oxfordshire Plan should include strategic guidance on the location of other forms of development such as solar farms.

Policy Option 06 – Protection and enhancement of Historic Environment

Key Messages

- There have been questions raised as to whether development management style policies are appropriate for the Oxfordshire Plan.
- References to the Historic Landscape Characterisation mapping are inaccurate. The potential for archaeological significance should be derived from the Historic Environment Record.
- The assessment of historic environment should be a building block for the Plan's spatial strategy.
- Where possible, policies of NPPF should be referred to rather than duplicating policy.
- Suggestion that policy as drafted is inconsistent with NPPF

Policy option 06 – Protection and Enhancement of Historic Environment

How strongly do you agree or disagree with the preferred policy option?

	Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
Policy 06 - Protection and enhancement of historic environment	11	8	1	2	

4.2.12 There was widespread support for the preferred policy to protect and enhance historic environment and to set a positive strategy for the protection and enhancement of historic character. It was noted that irreplaceable heritage assets should be preserved for future generations.

4.2.13 Many highlighted however, that due consideration should be given to scale and scope of housing and employment growth in the Plan, which is yet to be established. A number of stakeholders highlighted that a necessary balance should be struck between three pillars of sustainable development, environmental, economic and social.

4.2.14 It was highlighted that the preferred policy option is inconsistent with the NPPF 2021, which acknowledges that there may be instances where development leads to harm to heritage assets, but that a balancing exercise is then required to consider the extent of harm compared to any benefits. In contrast, Policy Option 06 does not reflect that approach and requires that development should conserve and enhance the historic environment and the setting of heritage assets

4.2.15 It was questioned whether a development management type policy for heritage is appropriate for the Oxfordshire Plan. This may be sufficiently covered by national and local policy, so it should be clear where any policy in the Oxfordshire Plan would add value to the existing policy framework.

4.2.16 Some stakeholders questioned whether a policy for the protection and enhancement of the historic character could be effective. Many felt that it is becoming increasingly difficult to see how fine words in a vision in a Development Plan translate into action on the ground.

4.2.17 In order to strengthen the policy, respondents considered that regard should be had to specific heritage features such as canals which have their own distinct character and features as well as the historic character of settlements.

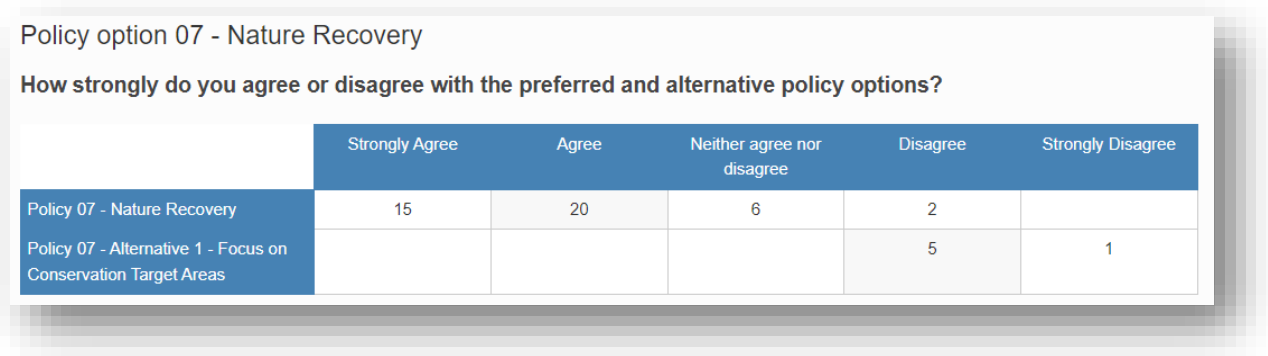
4.2.18 It was suggested that the Oxfordshire Plan spatial strategy should be framed in the context of the NPPF (chapter 16) and detailed consideration of spatial options, and in particular, reasonable alternative broad locations for growth should be supported by an equivalent level of evidence including consideration of mitigation of measures to reduce any significant impacts on heritage assets.

4.2.19 Stakeholders also highlighted that any impact assessment provided at the point of a planning application should be commensurate with the scale of the application and its location.

Policy Option 07 – Nature Recovery

Key Messages

- There is strong support for the Nature Recovery Network to be used to guide the spatial strategy for the Oxfordshire Plan.
- This policy option could be linked a to biodiversity net gain policy.
- Clearer mapping is required to understand implications for specific sites and comment on policy in more detail.
- Need to distinguish between hierarchy of sites as required by the NPPF.
- A clear monitoring framework is needed to monitor changes in nature.
- Consideration needs to be given to how developments can help meet objectives of the Nature Recovery Network (NRN).
- Policy could be strengthened by restricting development in Core and Recovery Zones.



Policy option 07 - Nature Recovery

How strongly do you agree or disagree with the preferred and alternative policy options?

	Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
Policy 07 - Nature Recovery	15	20	6	2	
Policy 07 - Alternative 1 - Focus on Conservation Target Areas				5	1

4.2.20 General support was expressed for establishing a Nature Recovery Network in Oxfordshire and for using the draft Nature Recovery Network to guide the Oxfordshire Plan spatial strategy and distribution of development.

4.2.21 It is considered by many that a Nature Recovery Network should form part of a robust strategy for Oxfordshire with collaborative working between landowners, ecologists, infrastructure providers and local government to deliver benefits within the network. Respondents highlighted that a Nature Recovery Network for Oxfordshire would assist in achieving national targets of achieving 30% of land to be well managed for nature by 2030 and could help build resilience to climate change.

4.2.22 A number of stakeholders suggested locations for strategic green infrastructure within the Nature Recovery Network to deliver multiple benefits for biodiversity and the health and well-being of communities, including the idea of a regional park to the north west of Oxford.

4.2.23 It was questioned whether policies for nature recovery could be strengthened by restricting development within part of the Nature Recovery Network, particularly the core and recovery zones.

4.2.24 It was noted however, that a balance needs to be struck between identifying land for housing and employment and establishing the Nature Recovery Network. A number of stakeholders emphasised the positive role that development can play in the delivery of green infrastructure and the contributions that can be made to nature recovery.

4.2.25 A number of stakeholders considered that policies for nature recovery could be combined into an overarching green and blue infrastructure policy within the plan, incorporating policies for natural capital and biodiversity net gain. Linking with biodiversity net gain policy is regarded as particularly important as it could help to identify biodiversity offsets where they can achieve the greatest benefits.

4.2.26 Respondents stated that any policies should be clear as to what is expected from development located within each part of the nature recovery network and how development can contribute to the policy objectives. Stakeholders considered that the Nature Recovery Network mapping must be made more accessible, to ensure that plan makers and decision takers can better understand what parts of the network proposals fall within.

4.2.27 Policy proposals as they currently stand do not properly distinguish between the hierarchy of protected sites as required by the National Planning Policy Framework. It is considered by some that parts of the Nature Recovery Network should be statutorily protected and that development should only be permitted within the core and recovery zones in exceptional circumstances in the same way as Green Belt and Areas of Outstanding Natural Beauty. It was questioned whether the extent of the three zones is fully justified. Stakeholders considered that there should be opportunities to undertake a finer grain assessment of the constraints and opportunities relating to development proposals within each part of the Nature Recovery Network.

4.2.28 Respondents suggested that where development is considered appropriate within the core and recovery zones, higher levels of biodiversity net gain should be secured. Stakeholders consider this to be a more positive approach, whereby opportunities for environmental enhancement are secured through development, rather than adding an additional policy constraint that hinders development. It was suggested that this could link to the biodiversity net gain policy, whereby differential targets for biodiversity net gain are set for different parts of the county.

4.2.29 Support for the preparation of a Nature Recovery Strategy for Oxfordshire is welcomed, as is the setting of targets for the total area of land to be managed primarily for nature in Oxfordshire by 2050. Stakeholders pointed out, that effective targets and monitoring framework are crucial to achieving policy objectives for nature recovery and it is considered that interim targets should be set within the Plan's monitoring framework.

Policy Option 08 - Biodiversity Net Gain

Key Messages

- Anything above national requirements for Biodiversity Net Gain needs to be clearly justified and viability tested.
- Greater clarity needs to be given on how the policy will be implemented, including identification of offsets and ongoing monitoring.
- There needs to be greater recognition given to the status of sites protected through legislation and national and local policy.
- A Biodiversity Net Gain policy should reference the new British Standard for Biodiversity Net Gain

Policy Option 08 - Biodiversity Gain

How strongly do you agree or disagree with the preferred and alternative policy options?

	Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
Policy 08 - Biodiversity Net Gain	16	22	5	11	2
Policy 08 - Alternative 1 - Differential target focused on environmental opportunity areas	1	7	1	1	6
Policy 08 - Alternative 2 - Do not set target in the Oxfordshire Plan	2	8		2	7

4.2.30 Consultation responses indicated significant support for the preferred policy approach of setting a minimum target for 20% biodiversity net gain across the whole of the county. Policy alternative 2 was also supported however, particularly amongst stakeholders in the development sector, who considered that the national minimum target of 10% biodiversity net gain should apply, as a higher target has not been sufficiently justified within Oxfordshire. A 20% target is considered by many stakeholders to be overly ambitious in the Oxfordshire context.

4.2.31 For a higher target to be justified within the Oxfordshire Plan, it will need to be subject to viability testing along with other Plan requirements. Stakeholders also expressed concern about the evidence presented through the consultation, particularly reference to Natural England viability testing from 2018. Regard should be had to the Government's own impact assessment for the 10% national biodiversity net gain target as set out in the Environment Act.

4.2.32 There is concern that higher level targets for biodiversity net gain could impact on the delivery of other planning gains including affordable housing and could impact on the delivery of development throughout the lifetime of the Plan. Respondents consider that any policy should be sufficiently flexible to allow individual schemes to respond to local circumstances. There may be greater challenges in Oxford for instance to achieve biodiversity net gains within the administrative boundaries of the city.

4.2.33 Some stakeholders considered that a differential biodiversity net target for parts of the county may be a more suitable approach for the county, with higher targets within parts of the nature recovery network and within areas identified for development within the Oxfordshire Plan.

4.2.34 Whatever target the Oxfordshire Plan sets, if at all, it will not prevent higher targets being achieved through individual Local Plans or through individual development schemes.

4.2.35 Stakeholders recognised the importance of the mitigation hierarchy and it was considered that this should be applied in Oxfordshire, although it was also recognised that biodiversity offsets may be more beneficial in certain circumstances and may deliver greater benefits. Stakeholders felt that It would be beneficial to draw a link between biodiversity net gain policy and the Nature Recovery Network in order to identify appropriate offsetting opportunities in the most beneficial locations.

4.2.36 A number of stakeholders also considered that policies for biodiversity net gain could be combined into an overarching policy for blue and green infrastructure, nature recovery and natural capital to ensure the delivery of multiple benefits for people and nature.

4.2.37 A number of respondents were concerned about whether policy requirements for biodiversity net gain could be circumnavigated, without the necessary local authority skills in place to assess proposals for development as well as ecological enhancements and ongoing monitoring of net gains. Respondents felt that greater clarity is needed on how the policy will be implemented and where resources would come from to implement policy.

4.2.38 Stakeholders requested that further information on the use of any biodiversity metric should be provided, to better understand how deliverable the policy would be. There was concern amongst a number of stakeholders about the robustness of the DEFRA biodiversity net gain metric 3.0 which has been called into criticism and may be subject to further change.

Policy Option 09 – Natural capital and Ecosystem Services

Key Messages

- There is general overall support for the Natural Capital baseline mapping to be used to guide the spatial strategy for the Oxfordshire Plan.
- The eco-metric tool referred to in the preferred policy option has been released for Beta testing under the new name of the Environmental Benefits from Nature (EBN) tool, and this would provide a useful way of exploring the natural capital impacts of alternative development options.
- There is insufficient clarity at this stage as to how baseline mapping will be applied to sites across the county and how natural capital considerations will be weighted against other sustainability considerations. Further clarity on how any eco metric tool will be applied should be given.
- Questions were raised as to whether natural capital baseline mapping is robust and calls for it to be subject to consultation with higher resolution, more detailed mapping made available.
- An opportunity should be taken to define green infrastructure strategy for the Oxfordshire Plan using natural capital evidence.

Policy option 09 - Natural Capital and Ecosystem Services

How strongly do you agree or disagree with the preferred and alternative policy options?

	Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
Policy 08 - Natural Capital and Ecosystem Services	8	10	7	2	
Policy 08 - Alternative 1 - Include natural capital considerations in place shaping principles				3	3

4.2.39 Widespread support was expressed through the consultation for the use of natural capital baseline mapping and evidence to guide the Oxfordshire Plan spatial strategy, distribution of development, and planning for green and blue infrastructure.

4.2.40 Stakeholders stated that, if the intention is for the natural capital baseline to guide the spatial strategy for the Plan, it is not clear why a separate policy on natural capital and ecosystem services is required. Stakeholders consider that natural capital considerations should be subsumed into the chosen strategy for the Oxfordshire Plan.

4.2.41 The links to green infrastructure are recognised and supported for the wider benefits that can be delivered for biodiversity, the health and well-being of communities and mitigating the impacts of climate change. A number of stakeholders considered that policies for natural capital could be integrated into an overarching policy for biodiversity, nature recovery and green and blue infrastructure. This could be beneficial in identifying opportunities for co-ordinated biodiversity net gain and green infrastructure delivery, potentially underpinning a fully costed green infrastructure strategy.

4.2.42 Support was also expressed for the identification of accessible natural green space and strategic green infrastructure assets, such as the idea of a regional park to the north east of Oxford.

4.2.43 In considering natural capital and ecosystem services through the Oxfordshire Plan, respondents felt that greater emphasis should be placed on the role of farming, regenerative agriculture, food production and soil health.

4.2.44 There isn't sufficient clarity at this stage however to understand how the natural capital mapping and any proposed eco-metric will be applied to sites across the county. There was concern that the natural capital baseline evidence presented through the consultation is not robust and that it could undermine the delivery of development over the lifetime of the Plan. Stakeholders consider that requiring natural capital assessment for all major development will have a disproportionate impact on small developers.

4.2.45 Stakeholders consider that baseline mapping should be based upon a robust evidence base and areas for search as part of the Oxfordshire Plan strategy should be defined at an appropriate scale. Stakeholders consider that further opportunities should be provided for landowners to submit information to inform the evidence base. Respondents highlighted that baseline maps should also provide sufficient detail to allow a fair and robust assessment process to be followed and the methodology for the selection of sites is clearly defined and consulted upon.

4.2.46 A number stakeholders stated that regard should be had to the scope of housing and employment development to ensure that the three pillars of sustainable development, environmental, social and economic are considered in tandem. Respondents considered that the Oxfordshire Plan should set out its environmental purposes with the same specificity as housing objectives, with targets set for the provision of accessible natural greenspace.

4.2.47 Many felt that the mapping at this stage is unclear and should be made available online through an interactive mapping tool, to be updated with environmental assessment information that has been submitted through the call for ideas. It was suggested that making mapping more accessible to stakeholders will assist them in making informed judgements on the policy and evidence base.

4.2.48 It is not considered clear at this stage, how mapping resources will be used in development management and how applications for major development will identify strategic environmental opportunity areas and green infrastructure. Stakeholders requested greater clarity on how the policy will be implemented and what resources will be in place to guide plan making and decision taking. Stakeholders requested that requirements relating to Natural Capital should be made clear through policy wording and should not duplicate requirements in relation to biodiversity net gain.

Policy Option 10 – Green Belt

Key Messages

- Need to ensure that policy is consistent with
- There is also no current evidence to detail how the policy may be delivered Some respondents considered that the Plan should be more active in promoting Green Belt additions. This will require evidence through an assessment of the 'contribution' of the Green Belt and land surrounding it, to the five Green Belt purposes (as set out in para 134 of the NPPF).Some respondents wanted the Plan to be more active in mitigating against previous Green Belt loss / consider losses of Green Belt land in early parts of Plan period and what further mitigations might be possible.
- Stakeholders consider that exceptional circumstances for potential release of the Green Belt have not been effectively addressed. There is a linkage to the Spatial Options testing process, Spatial Strategy development and other evidence on requirements and land availability to consider in relation to whether or not there are specific, or wider exceptional circumstances. There are other steps to take such as demonstrating that brownfield land is maximised, density is optimised, and neighbouring authorities asked to accommodate development. It follows that Policy Option 10 needs to be reviewed to ensure its current drafted scope remains effective. This could lead to the need for further Green Belt assessment that assesses the 'harm' to the Green Belt of releasing land for development.
- It was highlighted that the Oxfordshire Plan has not yet consulted on options for development specifically in the Green Belt. To proceed to Regulation 19 may be a risk depending on the outcome of the spatial options testing work.
- The narrative below highlights that some elements of Policy Option 10 may need some minor modifications prior to Regulation 19 for clarity and to ensure it is interpreted correctly.
- The absence of an up to date Green Belt assessment as part of th4e evidence base was highlighted.

Policy option 10 - Green Belt

How strongly do you agree with the preferred policy option?

	Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
Policy 10 - Green Belt	5	21	4	10	

4.2.49 Previous Plans in Oxfordshire have demonstrated exceptional circumstances for the release of land from the Green Belt and it is considered that such exceptional circumstances may exist going forward. There is concern amongst some stakeholders that the Plan's growth strategy will again lead to exceptional circumstances being demonstrated to release Green Belt land. Current Plans have enabled loss of Oxford Green Belt to accommodate development and many consultees do not want to see this continued.

4.2.50 Many consider that urban regeneration and City focussed development should be put ahead of building on Green Belt and greenfield sites. National policy on Green Belts will require the

Oxfordshire Plan to consider the reasonable alternatives, and only propose release Green Belt options if there are exceptional circumstances to justify that.

4.2.51 It was considered by some respondents that exceptional circumstances may exist in relation to specific sectors such as logistics, with growing demand for logistics and warehouse space in accessible locations.

4.2.52 Some stakeholders considered that the term "exceptional circumstances" in relation to the Green Belt must be reinterpreted in the light of the climate emergency, to be construed exceptionally narrowly and restrictively.

4.2.53 It was highlighted by some that there are opportunities for allocations in sustainable locations beyond the Green Belt, in locations outside of areas of sensitive landscape, including AONB. It appears to some that landscape and Green Belt policies are dealt with independently of one another, but in principle this should be explored in spatial options testing.

4.2.54 Some respondents considered that a review of the Green Belt should commence as part of the Oxfordshire Plan evidence base. Some respondents were of the view that options for development in the Green Belt should be considered, including community led Green Belt release. It was noted that the assessment of growth needs for Oxfordshire has acknowledged that given certain development choices, there is the potential for the length of commuting trips to decrease, for modal share to shift towards greener, more sustainable forms of transport, and for millions of private vehicle miles to be taken off Oxfordshire's roads by 2050. It was highlighted that locations close to the city and centres of employment could fulfil these objectives and the vision, and therefore there may be a need to review the Green Belt.

4.2.55 A respondent highlighted that the high number of commuters into Oxford doesn't align with the plans aims on decarbonation. They considered that there is no distinction between journey types of those commuting, which is trending towards decarbonisation.

4.2.56 Many consultees are however strongly opposed to any future Green Belt reviews. They highlighted that the purpose of Green Belt is to prevent urban sprawl and coalescence. They therefore considered that no development should be supported on Green Belt sites without an in-depth review of the Oxford Green Belt with full public consultation.

Policy Specific Comments

4.2.57 Some respondents considered that there should be a policy to protect Oxford Green Belt from further Green Belt releases and to protect its extent. They referenced two sections of national policy that firstly states that one of the two essential characteristics of Green Belts are their permanence (NPPF para 137) and secondly that Green Belt boundaries are intended to endure beyond a plan's time period (NPPF para 140). They therefore held the opinion that there should be no further release of Green Belt in the Oxfordshire Plan or other forthcoming plans.

4.2.58 Support was expressed for the preferred policy approach for Green Belt enhancement, recognising that significant parts of the existing Oxford Green Belt are low quality, damaged or derelict land. However, any enhancements to the Green Belt would need to be constrained to those that are appropriate to such a location.

4.2.59 It was suggested that policy should specify what Green Belt enhancement actions are and how they will be achieved. Some stakeholders felt that more detail is required in the policy and this should be supported by evidence, in order for the aim of the policy to be effective and justified.

4.2.60 Some respondents considered that Oxfordshire exceptional circumstances need to be defined in policy. As currently drafted, the policy option does not refer to Oxfordshire Plan having regard to the Green Belt in the spatial strategy for Oxfordshire. If exceptional circumstances exist following testing of Spatial Options, the policy can define what those are, or it may be that background evidence explains this.

4.2.61 Questions were raised about the implementation of the policy as there is no indication of how landowners would be influenced to get involved. Some respondents highlighted that not all Green Belt land could support such enhancement and nor will many landowners be willing to do so. Stakeholders felt that options could be explored to provide more detail on this.

4.2.62 It was suggested that links could be drawn between Green Belt policy and the nature recovery network, to focus on restoring habitats and providing a high quality connected green network across the county. Local plans will need to 'adopt, support, and work to' the assessment of recovery of nature. Opportunities to align beneficial use of the Green Belt with environmental enhancements based on the NRN should be explored.

4.2.63 A number of respondents felt that care needs to be taken in the drafting of the policy, particularly when referring to Oxford. National guidance on Green Belt applies to the Green Belt as a whole and would therefore apply to any settlements within the Green Belt.

4.2.64 It was emphasised by some respondents that the Green Belt is a policy designation as opposed to an environmental designation. They considered that policy wording should be revised and explanatory text should be added to clarify this.

4.2.65 It was considered that all spatial options presented in the consultation could lead to loss of Green Belt – It is too early and the evidence doesn't currently exist to determine whether there are exceptional circumstances to release land from the Green Belt, based upon the availability of land within elsewhere in the county and the amount of development needed to 2050. It is not currently known what capacity there is within reasonable alternatives that don't fall within the Green Belt.

Policy Option 11 – Water Quality

Key Messages

- There are interrelationships between water quality and other policy areas (such as nature recovery, green infrastructure, water efficiency, flood risk, healthy communities and leisure and recreation). A holistic approach is needed.
- The policy should be more precise, measurable and Oxfordshire specific. Additional wording suggested by the Environment Agency should be incorporated.
- Opportunities to be more ambitious should be explored, whilst also considering impacts on the deliverability of development (including testing through an appropriate viability assessment).
- Ensuring sufficient wastewater infrastructure capacity and the timely delivery of infrastructure upgrades is vital. This should be evidenced through the Water Cycle Study.
- Cross-boundary and partnership working will be needed to effectively address water quality.

Policy option 11 - Water Quality

How strongly do you agree or disagree with the preferred and alternative policy options?

	Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
Policy 11 - Water Quality	8	11	4	1	
Policy 11 - Alternative 1 - Defer water quality standards to Local Plans		1		1	5

4.2.66 Many respondents raised their concern about water quality in Oxfordshire. Sewage discharges to rivers were highlighted as a particular cause for concern. There should be greater recognition of current environmental conditions.

4.2.67 There was broad support for the Oxfordshire Plan establishing a strategic, countywide policy framework in relation to water quality.

Preferred Option

4.2.68 The preferred option was broadly supported.

4.2.69 Some respondents suggested that the policy should be more precise, measurable, Oxfordshire-specific and clearly linked to evidence, including the Water Cycle Study. There should be specific references to Oxfordshire's canals and chalk streams, and these should also be shown on the related maps. It was suggested that greater detail should be provided on how the design, layout, construction and maintenance of development would be expected to protect and improve water quality over its lifetime. Repetition of national policy requirements should be avoided.

4.2.70 Some respondents felt that the protection of water quality would not support nature recovery given current water quality issues in the county. It was suggested that the Oxfordshire Plan should be more ambitious and require the enhancement/improvement of water quality. It was suggested that

the proposed policy wording should be strengthened. (For example, the phrase “where possible” should be removed and policy paragraph 4(ii) should be amended to “eliminate” rather than “reduce” risk.) There were also suggestions that water quality improvements should be quantified and that development should be required to demonstrate net gains in water quality.

4.2.71 It was suggested that sustainable drainage systems should be mandatory for developments over a certain size. Sustainable drainage systems should be high quality and deliver benefits for water quality, flood risk, biodiversity and amenity. Retrofitting of sustainable drainage systems in existing settlements should be encouraged/supported.

4.2.72 It was raised that the Oxfordshire Plan’s aspirations for environmental improvement should be strengthened by identifying land to function as riparian buffers and/or to deliver nutrient reduction.

4.2.73 The need for continued engagement with Thames Water in relation to water quality issues was highlighted. It was suggested that there should be a clear roadmap for the improvement and maintenance of Oxfordshire’s waterbodies. It was also suggested that there needs to be a clear plan for wastewater treatment infrastructure upgrades, including timescales for delivery.

4.2.74 It was suggested that development proposals should be supported by proportionate hydrogeological risk assessments where there is potential for impacts on groundwater resources or Water Framework Directive Assessments where development could have direct impacts on designated waterbodies.

4.2.75 A respondent also recommended that pollution from agricultural sources is addressed in the Oxfordshire Plan.

4.2.76 A concern was raised that a requirement for major development to be phased to align with any necessary wastewater treatment work and associated infrastructure upgrades could potentially undermine a significant amount of development in Oxfordshire. It was suggested that the policy should instead proactively seek to support infrastructure provision so as to not inhibit development.

4.2.77 It was also suggested that it is not reasonable to expect developments to deliver the achievement of bathing water status, particularly where there are existing water quality problems.

Policy Option 12 – Air Quality

Key Messages

- General support for the overall policy approach.
- The detailed policy language and requirements should be reviewed taking account of the comments received, to ensure that it is robust, can be clearly interpreted and applied, will help to achieve the plan objectives, and that it fully realises the benefits of a consistent countywide approach.
- Strategic opportunities to improve air quality to be considered in more detail.
- An Air Quality Impact Assessment (AQIA) will be commissioned to inform the production of the Oxfordshire Plan.

Policy option 12 - Air Quality

How strongly do you agree or disagree with the preferred and alternative policy options?

	Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
Policy 12 - Air Quality	5	12	1	2	
Policy 12 - Alternative 1 - Reduce scope of strategic air quality policy					6

4.2.78 A number of respondents stated that improving air quality was important to them.

4.2.79 There was a high level of support for establishing a consistent, countywide policy on air quality through the Oxfordshire Plan.

Preferred Option

4.2.80 A number of respondents suggested that the policy should be stronger, with clearer, more specific language. There were specific requests remove the words “where possible” and to replace “consider” with “implement” (preferred policy option paragraph 6 - mitigation hierarchy - avoid). It was also suggested that the Oxfordshire Plan should reference national planning policy, but not repeat it.

4.2.81 There were suggestions that there should be greater recognition of current environmental conditions in Oxfordshire.

4.2.82 Some respondents considered that the policy should include quantifiable targets for air quality improvement in Oxfordshire, supported by appropriate mechanisms for delivery and monitoring. There were also suggestions that:

- New development should not result in any air quality emissions/no net gain in emissions.
- Air quality enhancement should be mandatory/net gains in air quality should be required.
- New development in areas that are failing or may fail to meet air quality standards should demonstrate how they will contribute to reaching safe levels/should not be permitted.
- There should be penalties and incentives for developers linked to air quality outcomes.

4.2.83 It was suggested that more specific detail should be provided on how the criteria for improving air quality set out in paragraph six of the preferred policy option is expected to be implemented.

4.2.84 Rather than avoiding the creation of street canyons, it was advised that they might be desirable as they can help to reduce the impacts of rising temperatures, by providing shade and cooling. However, it was also suggested that avoiding the street canyon effect by ensuring buildings have sufficient frontages could have wider benefits (such as front gardens for new homes). Additionally, it was raised that shared surfaces, which bring vehicles closer to pedestrians, should be avoided as they put people within closer proximity of car emissions.

4.2.85 A number of queries were raised in relation to the proposed mitigation hierarchy:

- It could provide 'get out clauses' for unacceptable development.
- What criteria will be used to consistently apply this approach? (For example, how would it be determined that it is not possible to avoid negative impacts?)
- Several respondents questioned whether offsetting air quality impacts was possible and/or appropriate.

4.2.86 There were mixed views on the threshold that should be used for requiring development proposals to be supported by an Air Quality Impact Assessment (AQIA). It was suggested that this should be a requirement for all new development, not just major development. It was also suggested that the need for an AQIA should be determined on a case by case basis, when appropriate and proportionate. It is noted that many respondents from the development industry accepted the proposed requirement or did not raise concerns about the proposed requirement for major development proposals to be supported by an AQIA.

4.2.87 It was recommended that the Oxfordshire Plan should have reference to National Institute for Health Care Excellence Guidance [NG70] Air Pollution: outdoor air quality and health. Published 30 June 2017.

4.2.88 There was some support for identifying strategic opportunities to improve air quality in Oxfordshire. It was advised that the Oxfordshire Plan should identify land for the purpose of improving air quality (for example new woodlands). It was also advised that nature-based solutions should be prioritised.

4.2.89 The strong relationship between transport and air quality was highlighted. As well as supporting movement by active travel and public transport, it was suggested that initiatives such as monitored average speed reduction should be considered along all of Oxfordshire's high-speed roads including A34, A40, and M40.

4.2.90 It was also highlighted that the AQIA undertaken to inform the production of the Oxfordshire Plan must consider the most up-to-date air quality data for settlements where Air Quality Management Areas (AQMAs) have been designated. It was noted that generally data indicates that air quality is improving, which could lead to a review of AQMA designations in the short to medium term**.**

THEME THREE – CREATING STRONG AND HEALTHY COMMUNITIES

Policy Option 13 – Healthy Place shaping and Health Impact Assessments

Key Messages

- A standalone healthy place shaping policy was generally supported by respondents and considered to be compliant with Chapter 8 of the NPPF.
- The implementation of Health Impact Assessments across Oxfordshire was generally supported.
- There were several suggestions relating to the list of health principles, so these will need to be reviewed moving forward.
- The scope and criteria of any Health Impact Assessment should be clearly defined, proportionate to the scale and complexity of the proposed development, and viability tested.

Policy Option 13 - Healthy Place Shaping and Health Impact Assessments

How strongly do you agree or disagree with the preferred policy option?

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
Policy Option 13 - Healthy Place Shaping and Health Impact Assessments	7	12	2		

4.3.1 The proposed policy was positively received by the majority of respondents, who generally supported the idea of a standalone healthy place shaping policy, as well as the inclusion of a Health Impact Assessment requirement. Several respondents explicitly stated that they considered the policy to be compliant with the NPPF, particularly Chapter 8 of the NPPF.

4.3.2 A few respondents considered that the policy could potentially be made simpler by combining elements of Policy Option 01 and Policy Option 15 to create a general place-making and/or design policy.

4.3.3 A respondent highlighted the fact that in order to create strong and healthy communities, air quality and water quality improvements must be made, recognising the link Policy Options 11 (Water Quality) and 12 (Air Quality) have to health, as well as this theme and policy.

4.3.4 The Future Oxfordshire Partnership suggested that the health principles list could potentially be split into three areas – statistical goals (such as life expectancy and physical inactivity), particular types of harm or benefit (such as obesity, healthier food choices, and crime), and particular desired activities or qualities (such as social interaction and active travel). They considered that in doing so, it might help the reader to understand the specific benefits of the policy if each of these three different types of thing were separated out and treated separately. They additionally stated that the policy option includes references to good mental health, but that these are not systematic through the text. They recommended that consideration should be given as to whether to treat this important issue separately and with a more systematic approach.

4.3.5 Some respondents considered that the list of health principles could be reviewed and potentially amended with new principles added. For example, it could include references to new concepts such as 15/20 minute neighbourhoods and Healthy Streets, as well as a bullet point specifically relating to mental health.

4.3.6 Some respondents stated that the health principles should be less aspirational and more clearly defined to result in a policy with measurable targets.

4.3.7 A few respondents raised a concern that there had not been enough consideration about the challenges on implementing the health principles in rural populations, where it can be harder to achieve some of the aims set out in the policy option.

4.3.8 Regarding the proposal to require Health Impact Assessment's in Oxfordshire, respondents stated that the length and detail of any Health Impact Assessment should be proportionate to the scale and complexity of the proposed development. Additionally, they considered that the scope and criteria of any Health Impact Assessment needs to be clearly defined and viability tested before it is included in any future policy.

4.3.9 The Environment Agency stated regarding the Health Impact Assessment requirement proposal, that the desktop assessment could include the use of Natural England's National Green Infrastructure Standards, and that a reference to these standards in the policy would be welcomed.

Policy Option 14 – Health Infrastructure

Key Messages

- Generally, the proposed policy option was supported. However, some respondents did raise concerns over the inclusion of the policy within the plan, questioning the necessity and whether it was supported by evidence.
- The health infrastructure needs of Oxfordshire should be considered strategically, with evidence.
- Evidence is needed to justify the inclusion of a bespoke strategic policy.
- Appropriate consultation and liaison should take place with relevant bodies, e.g., the Clinical Commissioning Group (CCG).

Policy Option 14 - Health Infrastructure

How strongly do you agree or disagree with the preferred policy option?

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
Policy Option 14 - Health Infrastructure	3	3	3	4	

4.3.10 Generally, the proposed policy option was supported.

4.3.11 Some respondent supported the policy option but thought that there should be a requirement that new health facilities are exemplars for zero carbon construction and running.

4.3.12 Others felt that the policy option needs strengthening so that medical provisions are provided before new development. Specific examples of when the John Radcliffe Hospital and Wallingford Surgery were unable to accept patients were provided by some respondents.

4.3.13 Some respondents did not think that the policy option went far enough. They said that the health infrastructure needs of Oxfordshire should be considered strategically, not just as part of a question relating to health reorganisations. They said that whilst much planning might be done by the NHS, and may be included within Local Development Plans, the local authorities should take a view of what would constitute appropriate health provision now, and in the future, and seek to ensure that it is suitable.

4.3.14 One respondent thought that this section should be supported by evidence and that it should be considering difficult questions about the current state of the population health, and in particular co-morbidities and the impact of Covid19/Long Covid, together with projections relating to ageing and long-term care.

4.3.15 Respondents raised the importance of health facilities nearby to where people live. With a couple of respondents focusing specifically on rural communities. They commented that rural communities' needs should be taken into account, and that health services in rural locations should be coordinated and accessible.

4.3.16 Some thought that the policy option lacked detail, with no distinction between healthcare provision and social care provision. It was also noted how there is no reference to private healthcare provision. There were some suggestions that the policy should identify specific goals.

4.3.17 One suggestion from a respondent was for regular future consultations with the relevant NHS bodies and private health and social care bodies to understand their plans.

4.3.18 Some respondents felt that evidence is needed to justify the inclusion of a bespoke strategic policy. They noted how there is currently little evidence supporting how health infrastructure would be delivered. Some also questioned what the intentions of the policy are, with it appearing as if health organisation will be subject to less stringent development management considerations compared to other forms of development, which was noted as not being appropriate.

4.3.19 Some questions were raised over how the policy would work, with the relationship between the relevant NHS and local authority bodies unclear. Whilst some respondents recognised that 'joined-up thinking' is needed, there were concerns over whether the Oxfordshire Plan should map out the future of the NHS structures in Oxfordshire. The respondents expressed views that any development should be led and planned by the NHS with the surrounding CCGs and Integrated Care Systems and the public and patients, with facilitation from relevant district and/or county councils.

4.3.20 One comment focused specifically on the shortage of GPs and how essential their role is. They said that developments in more remote areas should be discouraged due to the lack of GPs, and specifically noted a lack in rural GPs.

4.3.21 Some respondents flagged that health impacts should be an essential part of planning and that health infrastructure should include dentists, mental health providers, as well as clinicians. The

issues for communities on the borders of the county were also raised by some, where provision is made by a neighbouring CCG for example.

4.3.22 It was expressed by some that health provisions should be recognised as an essential part of the planning process, and that developers should be made to meet their obligations to their new residents. They said that health provision should be treated the same as other essential infrastructure in S106 agreements.

4.3.23 The John Radcliffe Hospital was given as an example by a respondent who felt that the site has been constrained by not being able to expand the parking facilities.

4.3.24 Some comments were made on accessibility. Respondents were pleased to see that active travel and access for those with disabilities was already included in the policy. One respondent also said that adequate provision must be made for patients and the public to access medical care by all modes of transport.

4.3.25 One comment noted how there is a need for improved references to the importance of inclusivity and the needs of disable people in policy option 14, and others.

4.3.26 Oxford City Council strongly welcomed Policy Option 14 on Health Infrastructure and commented that everyone involved should develop, as a matter of considerable urgency, the comprehensive masterplan referred to in order to shape and plan for the needs of the primary and acute medical facilities required to 2050.

4.3.27 Some specific questions were raised by respondents:

- What is the role of Integrated Care Systems (or their future equivalents) in the policy making process?
- Where are the considerations of prospective future resident profiles?
- How will primary care and other point of access services such as community pharmacy and dentistry develop as the gateway into the system?

4.3.28 A number of respondents raised the title error on page 90 of the consultation document.

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

Key Messages

- There needs to be greater clarity surrounding design code requirements, including who is responsible for preparing them, and at what stage of the planning process they are required.
- The rationale behind the 700 units threshold needs to be explained and justified moving forward, as many respondents suggested this should be lowered.
- There were a number of suggestions relating to the criteria that could be included in the policy. These suggestions will require further review when the final criteria is drafted.
- Several respondents expressed that new development should be built to higher densities, so it may be appropriate to add a requirement relating to density.
- Oxford City Council raised that this policy should have improved references to inclusivity and the needs of disabled people, and therefore requirements regarding accessible and inclusive design should be considered.
- The Future Oxfordshire Partnership stated the policy option does not take the opportunity to reference specific design standards other than the Garden Town and Garden Village standards and does not contain any mechanism for reviewing, validating and updating those standards as times change and with them local needs, locally available technologies and building materials and building practices. They suggested that in place of the current approach a more generalised and structured approach could be considered and provided guidance on how this could potentially be achieved.

Policy Option 15 - High-Quality Design for New Development

How strongly do you agree or disagree with the preferred Policy Option?

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
High-Quality Design for New Development and Garden Town Standards for New Settlements	8	11	2	5	

Garden Town/Village Standards

4.3.29 The adoption of Garden Town and Village standards across Oxfordshire was generally supported. A respondent expressed that it should be noted that there may be situations in rural communities and existing urban areas in the county where these standards may not be appropriate. Additionally, one respondent referenced the paper 'Transport for New Homes, Garden Villages and Garden Towns: Visions & Reality' and recommended the findings of this paper are reviewed moving forward, to ensure these high standards are met in Oxfordshire. The Environment Agency also voiced their support for the requirement for all new proposed settlements to be planned to Garden Town and Village Standards.

Relationship to Local/Neighbourhood Plans

4.3.30 Several respondents emphasised the importance of leaving local and neighbourhood plans to define and implement requirements at a local level in recognition of local distinctiveness and circumstances.

Masterplans and Design Codes

4.3.31 Respondents were generally supportive of the requirement for certain new developments to be supported by a masterplan and a design code, and expressed that these requirements are necessary to seek high quality design that responds to local distinctiveness and characteristics.

4.3.32 However, several respondents stated that the requirements surrounding design codes will require clarity moving forward. For example, the policy needs to be clear as to whether design codes should be prepared by the developer, or the Council, and how these processes would sit alongside the National Model Design Codes.

4.3.33 It was also expressed that the policy should clarify the triggers and process for when the masterplan and design code are required, for example, if the masterplan forms part of a planning application submission, or will it require separate approval by the Council prior to progressing with an application.

4.3.34 It was emphasised that the approach will have important implications on the housing trajectory for the delivery of such sites. Views surrounding when design codes should be required varied, with one respondent recommending that design codes are only required on larger multi-phase developments, whilst another suggested that these should be required for all major development.

4.3.35 The Environment Agency stated that a strict, high standard design code should be incorporated, with an example given of 'Building with Nature'. They agreed that the adoption of such design principles in policy will create healthier communities and minimise impacts of climate change to people and wildlife, on and off the development site.

Unit Threshold

4.3.36 A number of respondents including the Environment Agency requested that the rationale behind the 700-unit threshold set out in the policy is explained.

4.3.37 Many respondents also expressed that the threshold itself should be lowered, with some recommending specific figures such as 500 or 300 homes, and others suggesting that it should simply be applied to all major development. The Environment Agency additionally stated that if 700 units is the cut off for master planning, then other points should have numbers associated with them, including what size development requires employment to be co-located.

Green and Blue Infrastructure

4.3.38 A number of representations were made regarding the policy criteria relating to green and blue infrastructure. The Environment Agency stated that as parks and green space are green infrastructure they should not be listed separately in policy, as this could cause confusion, and provided wording for a future criterion to support their statement. Currently there are no requirements regarding the levels of green infrastructure proposed for new developments in Oxfordshire, however the Environment Agency requested that this policy includes a requirement for 50% of the development area to be dedicated to green infrastructure. Another respondent suggested that the plan should implement specific accessible green space standards. The Canal and

River Trust stated that they fully support the policy and are pleased that blue infrastructure is specifically mentioned. They additionally provided generic guiding principles for waterside development.

20 Minute Neighbourhoods

4.3.39 There was wide support for the proposal to create 20-minute neighbourhoods. Notably, Oxfordshire County Council expressed their support for the 20-minute neighbourhoods criterion, however emphasised that this requires careful planning, especially if new urban extensions are planned, as these would likely require new centres in order for this to be achieved.

General comments regarding the policy criteria

4.3.40 The approach of seeking high quality design which responds to local distinctiveness and characteristics was supported by the majority of respondents. Buckinghamshire Council expressed their support for the policy, particularly in ensuring green (or blue where relevant) infrastructure will be incorporated as an integral part of new development and public access to high quality green space. South Oxfordshire District Council also expressed that they welcome polices that ensure high quality design into the master planning process at an early stage.

4.3.41 A number of specific recommendations were made concerning the criteria that will be set out in the final policy. For example, several respondents expressed views that key areas for the policy to cover are walking and cycling, street layout, community infrastructure and building quality – all aspects which affect people's health. Others expressed that new development will need to be designed with public transport and active travel in mind.

4.3.42 Oxford City Council raised that this policy should have improved references to inclusivity and the needs of disabled people. Another respondent also highlighted the importance of accessible and inclusive design.

4.3.43 Regarding the requirement surrounding neighbourhood centres and community facilities, one respondent stated that the policy should also allow improvements to existing neighbourhood centres and community facilities, as this may be the most appropriate response and fully justified for viability reasons and/or to support and provide the maximum benefit to existing communities.

4.3.44 Regarding biodiversity, a respondent stated that the Oxfordshire Plan should set minimum standards for the design of high-quality biodiversity in build development and provided examples of potential criteria.

4.3.45 Several respondents expressed that new development in Oxfordshire should be built to higher densities, and therefore requirements that encourage higher densities could be implemented.

4.3.46 More general comments on the policy proposal were also submitted. For example, one respondent stated that the wording of the policy option should be stronger, in order to make it easier for planning authorities to enforce the design ideas. They recommended that the wording should be amended to ensure the design requirements are adhered to. One respondent also recommended that there should be separate policies for place-making and design for new settlements.

4.3.47 Some respondents stated that there was scope for elements of this policy option to be combined with Policy Option 01 and 13 to create a general placemaking and/or design policy.

4.3.48 One respondent emphasised that there will need to be consistency between design requirements for the Oxfordshire Plan and the OxCam Arc.

4.3.49 Although the policy was generally supported, one respondent stated that setting design principles would be futile, as ensuring Oxfordshire remains beautiful cannot be distilled into a set of principles. Additionally, government guidance, including the National Model Design Code already has relevant principles, again making these principles unnecessary.

4.3.50 Additionally, the Future Oxfordshire Partnership stated that the policy does not take the opportunity to reference specific design standards other than the Garden Town and Garden Village standards and does not contain any mechanism for reviewing, validating and updating the standards as times change and with them local needs, locally available technologies and building materials and practices. They suggested that the policy should allow for review at regular intervals. They also recommended that in place of the current approach a more generalised and structured approach could be considered and provided guidance on how this could potentially be achieved and provided recommendations on how this could be achieved.

4.3.51 One respondent expressed that they would also be supportive of additional design policies for the broad locations for growth.

Policy Option 16 – Leisure, Recreation, community and Open Space Facilities

Key Messages

- Sport England emphasised that any proposal needs to be backed up by up to date and robust evidence, as reinforced by paragraph 98 of the NPPF.
- Sport England also highlighted that not all Oxfordshire Authorities have up to date assessments and strategies, so these are likely to need updating in order to support the policy.
- Oxfordshire County Council importantly emphasised that as an increasing number of schools are independent of the County County's control (i.e. academies, of which are all new schools in the county), it cannot be required to make their facilities available to the community, only encouraged. Raising viability and deliverability considerations.
- Oxford City Council highlighted that there could be potential for conflict between the aims of policy options 10 (Green Belt) and 16, in the use of Green Belt land for leisure and recreation use. They expressed that this should be carefully considered to ensure consistency across the plan.
- The Canal and River Trust expressed their support for the policy option but stated that further clarification on what might constitute a strategic asset is needed. Similarly, the Future Oxfordshire Partnership also recommended that 'community facilities' is more clearly defined.
- Respondents were generally supportive of the strategic nature of the policy, but some respondents considered this should only be at the Local Plan or Neighbourhood Plan level, or that it should cover local level facilities.

Policy Option 16 - Leisure, Recreation, Community and Open Space Facilities

How strongly do you agree or disagree with the preferred policy option?

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
Policy 16 - Leisure, Recreation, Community and Open Space Facilities	3	8	2	2	
Policy 16 - Alternative 01 - Protection of existing indoor and outdoor sports facilities and open spaces	2	5			

<u>General policy approach</u>

4.3.52 A number of respondents agreed with the approach for the policy to cover strategic matters only. Several respondents stated that the purpose of this policy in the Oxfordshire Plan should be to set a framework or decision-making criteria for the allocation/delivery of such facilities in Local Plans and/or Neighbourhood Plans. Alternatively, one respondent expressed that the requirements set out in this policy should instead only be a matter for neighbourhood or Local Plans, however this view was not widely shared.

4.3.53 There were several suggested amendments/additions to the policy that will require further review in the next drafting stage. For example, the Environment Agency suggested an amendment to the last bullet point criterion of the policy, relating to sports lighting. They considered that it should be

reworded as it puts the onus of proof on the wrong party, as it is for the developer to demonstrate that there would not be an impact on biodiversity, not the council or regulative body to demonstrate that it would give rise to harm. They provided suggested rewording. The Environment Agency also enquired about the potential inclusion of impacts to amenity, dark skies, views from the AONB and road users, as sports lighting can also have significant impacts on these.

4.3.54 Additionally, the Future Oxfordshire Partnership stated that the policy does not consider the difference between public and private facilities, or distinguish between free and local facilities and paid facilities for sports for which people will travel. They suggested an amendment in reflection of this, which is to expand paragraphs 325 and 327 to cover these different levels and types of provision, with policy requirements for each.

4.3.55 The Future Oxfordshire Partnership also stated that consideration should be given to having a set of high-level planning policies in the Oxfordshire Plan for local facilities as well, and stated that 'community facilities' should be defined.

4.3.56 Sport England emphasised that any policy proposal needs to be backed by up to date and robust evidence, as reinforced by paragraph 98 of the NPPF. They also highlighted that not all Oxfordshire Authorities have up to date assessments and strategies, so these are likely to need updating in order to support the policy. They expressed that they were keen be involved with the development of the policy if required.

4.3.57 On a similar note, another respondent emphasised that any imposed standard within the policy should be evidenced, proportionate and tested for viability.

4.3.58 One respondent considered the requirement for the facilities set out in the policy option to be delivered within the built-up area to be very limiting and many proposals may not be achievable in these locations. This could be due to a lack of available and viable space within the built-up area, or that it is not compatible with the Plan's objectives to make efficient use of urban land to meet other needs. Similarly, another respondent considered the policy option to be very focused on built-up areas whilst potentially overlooking opportunities for strategic facilities outside these areas that can be linked to built up areas.

4.3.59 The Canal and River Trust expressed their support for the policy option, but stated that further clarification on what might constitute a strategic asset is needed. They also considered that the canal and canal towpath could be considered strategic assets.

4.3.60 One respondent stated that although they support the policy in principle, they believed that not enough consideration is given to provide easy access for rural communities to indoor sports and recreational facilities.

4.3.61 Oxford City Council highlighted that there could be potential for conflict between the aims of policy options 10 (Green Belt) and 16, in the use of Green Belt land for leisure and recreation use. They expressed that this should be carefully considered to ensure consistency across the plan.

4.3.62 One respondent stated that the policy should include specific goals (in line with 20 minute or 15 minute settlements) for access to natural green spaces and other 'healthy areas'.

4.3.63 Oxfordshire County Council also recommended that recreational facilities aimed at the elderly are included, i.e. bowls, boules, grouped external chess – in order to encourage connections between the elderly and reduce social isolation.

Alternative policy option

4.3.64 Some respondents voiced their support for the alternative policy option, to protect existing indoor and outdoor sports facilities and open spaces within the county. They emphasised the importance of protecting facilities that we already have, as creating new facilities could potentially lead to less demand or even loss of existing facilities.

4.3.65 Regarding the alternative policy option, one respondent also stated that sports facilities and open space should be treated separately. They consider that open space has an amenity value wider than its particular use and should be protected as such. On the other hand, sports facilities are subject to trends and should be considered separately on economically derived merits. As a result, if this alternative option is taken forward then it should be split to reflect this.

4.3.66 One respondent stated that the alternative policy option of protecting existing sports and community facilities should be incorporated into the preferred option, as it is possible for both to be implemented.

4.3.67 Additionally, Sport England considered the alternative policy option to be very basic compared to the preferred policy option.

4.3.68 Oxfordshire County Council importantly emphasised that as an increasing number of schools are independent of the County County's control (i.e. academies, which are all new schools in the county), it cannot be required to make their facilities available to the community, only encouraged. They also highlighted the other practical implications on making school facilities open to the public, including safeguarding, health and safety, maintenance, and potential expansion needs of schools.

4.3.69 This was also raised by other respondents, one of which similarly questioned as to whether it was reasonable to require schools to open up their facilities to the public, especially regarding supervision, health and safety, and damage to facilities.

4.3.70 Another respondent stated that they supported the principle of this approach, however also noted that it is generally down to the school operator to decide whether the school facilities would be made available to the local community. They emphasised that this requirement is outside the control of developers and not a requirement they can be held to securing.

THEME FOUR – PLANNING FOR SUSTAINABLE TRAVEL AND CONNECTIVITY

Policy Option 17 – Towards a Net Zero carbon transport Network

Key Messages

- Issues of sustainability and traffic impacts should be considered including for the rural areas.
- The chosen Plan strategy will determine the effectiveness of the sustainable travel aims and should take account of the effects of Covid 19 on travel patterns.
- The design and location of development should be considered to encourage active travel, bus use and to reduce travel by car, including by exploring the potential of 15-minute neighbourhoods.
- Neighbouring authority characteristics and policies on transport should be considered.
- New technologies and different approaches to transport provision should be taken account of and explored, including securing appropriate investment.
- View that OXIS needs revision and infrastructure provision should be related to the Plan strategy.
- Local strategies and policies relating to transport will need to be taken into account moving forward.
- The viability implications of what the policy is asking for should be considered.

Policy Option 17 - Towards a net zero transport network

How strongly do you agree or disagree with the preferred policy option?

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
Policy Option 17 - Towards a net zero transport network	8	20	2		

4.3.71 There was widespread support expressed through the consultation for this policy approach, particularly for ensuring alignment between the Oxfordshire Plan and the Oxfordshire Local Transport and Connectivity Plan (LTCP).

4.3.72 Stakeholders support the principle that development proposals should be planned to both take account of and take opportunities to support the delivery of an Oxfordshire net zero carbon emissions transport network, including the delivery of walking and cycling and public transport routes. The overarching aims of the policy are supported, to reduce overall transport movements, particularly by private car and to secure a shift towards public transport and improve opportunities for walking and cycling.

4.3.73 The decarbonisation of the public transport network is progressing and many respondents emphasised that this should be prioritised.

4.4.1 There was also support for the policy aims to deliver improvements to transport interchange facilities including enhanced transport hubs such as at rail stations that facilitate take up of sustainable travel opportunities.

4.4.2 The preferred policy of developing a countywide transport policy is widely supported, because transport isn't confined by council administrative boundaries.

4.4.3 There were concerns expressed however, that the inclusion of improvements to the road network within policy would be inconsistent with net zero carbon aims and that the delivery of increased road capacity would lead to them filling with traffic.

4.4.4 Concern was also expressed as to whether the Oxfordshire Plan would take account of comparatively poor transport connections in the rural parts of the county and whether measures would be put in place to enhance or maintain them.

4.4.5 It was highlighted that public transport alone is likely to support the varied needs of rural communities, although it is considered that lessons could be learned from the recent pandemic experience in terms of reduced need for office work, reduced need for commuting, and more flexible working patterns and the implications this has had for travel patterns and congestion.

4.4.6 Specific examples that some communities experience were cited, such as difficulty of travel between some settlements by rail or bus, for example from Faringdon to other settlements.

4.4.7 It is considered that the bus network, including a greatly strengthened inter-urban network, would likely deliver across a much wider range of settlements and travel needs. Bus infrastructure is widely regarded as more flexible and cost effective to upgrade than rail, making the delivery of electrification simpler and easier to deliver. It is also recognised however that buses in many cases have to utilise the same corridors as other road-based traffic and are therefore subject to the same constraints, congestion and delays experienced by other traffic.

4.4.8 It is considered that major investment is needed in bus infrastructure including bus lanes, bus gates, and dedicated bus links and they should be better funded and cheaper to use.

4.4.9 Improvements to the railway network have delivered relatively little to the majority of Oxfordshire localities and as no new railway stations are proposed for Oxfordshire on East West Rail, it is not considered that this can provide the basis for deciding development distribution or a spatial strategy approach.

4.4.10 In terms of infrastructure schemes that have been identified, including reference to schemes listed in the Oxfordshire Infrastructure Strategy (OxIS) stage 1, stakeholders emphasised that sustainable growth should not be limited to the scope of this infrastructure and further exploration of infrastructure needs should be considered through a further stage of OxIS. There were also concerns highlighted about the accuracy of stage 1 OxIS and whether the plotting of existing infrastructure was accurate.

4.4.11 The Oxfordshire Plan should facilitate the delivery of key elements of new infrastructure that will need to be provided, such as new forms of inter-modal interchanges which could act as charging points for electric vehicles and delivery hubs for e-commerce.

4.4.12 It was raised by some respondents that consideration should also be given to new fuels as part of the future transport infrastructure, including the delivery of sufficient electric vehicle charging

infrastructure and the potential for hydrogen as part of the future fuel mix. It was also raised that the provision of electric vehicle charging points is a challenge for residents in certain locations and needs to be addressed.

4.4.13 Stakeholders indicted that there is insufficient evidence provided at this stage to demonstrate who will be responsible for the delivery of infrastructure improvements.

4.4.14 It was considered by some respondents that the Oxfordshire Plan could be strengthened by identifying where enhanced walking and cycling routes could be delivered, including those identified through Local Cycling and Walking Infrastructure Plans (LCWIPS) and those associated with the natural environment and canals. There is a possible link in this regard with policies for natural capital and ecosystem services.

4.4.15 As a spatial plan, it was highlighted that the Oxfordshire Plan has a role to play in supporting towards a net zero carbon transport network, with the location and design of new development having a significant impact on the propensity for people to travel, and the number, type and length of travel movements. As a result, it was raised that these should be key considerations in developing the Oxfordshire Plan spatial strategy, focusing development where the best opportunities for enhancing sustainable transport infrastructure exist. It was also emphasised by some that these shouldn't be Oxford centric and should extend beyond the city, and that the role of transport in determining the spatial strategy should be clear and this should include consideration of the wider, cross boundary implications of development patterns.

4.4.16 It was also suggested that consideration should be given to how different land uses can be co-located, such as housing and employment, to reduce the need to travel long distances to work and encourage sustainable travel. This included the suggestion that the delivery of 15-minute neighbourhoods should be clearly referenced in policy, in an attempt to reduce demand for car travel and encourage walking and cycling.

4.4.17 It was raised by some stakeholders that the selection of a spatial strategy should provide a balance of public transport options and ensure that networks are joined up.

4.4.18 Some respondents considered that a better connected and more permeable cycle network could improve existing and create new cycle routes enabling people to choose cycling as a safer, more convenient transport option. It was also recommended that active travel links between settlements, transport hubs and key employment locations should be identified.

4.4.19 In terms of infrastructure delivery, many stakeholders considered that obligations sought from developers should be proportionate to both the scale of development proposals, as well as the likely impact on the transport network. Some stakeholders did not consider it proportionate to place all of the requirements for infrastructure delivery on developers. Viability and deliverability were again highlighted as key concerns.

4.4.20 Other respondents consider that the policy as currently worded is too passive, and that there should be more specific requirements for the delivery of infrastructure in order to achieve net zero emissions target by 2050. It was also raised that development proposals that are unable to deliver safe access for pedestrians and cyclist should not be supported.

Policy Option 18 – Sustainable transport in new Development

Key Messages

- The location and design of development should be considered to encourage sustainable transport options, including bus use and walking and cycling, to reduce car travel and emissions.
- Proposed developments should be measured against the sustainable travel hierarchy and 15/20-minute neighbourhoods should form part of the strategy.
- Issues of sustainability and accessibility in the rural areas should be considered.
- More strategic planning and resourcing is needed for rail and bus services, to achieve active travel and to reduce existing congestion.
- Electric charging infrastructure and other technologies should be utilised and provided but the policy approach should be flexible to accommodate future technology and viability considerations.
- Neighbouring authority commitments and polices on transport and cross boundary issues should be taken into account.

Policy Option 18 - Sustainable Transport in New Development

How strongly do you agree or disagree with the preferred policy option?

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
Policy Option 18 - Sustainable Transport in New Development	8	15	2	1	

4.4.21 There was a significant amount of support expressed for this policy through the consultation, particularly the principle of policy that encourages the provision of sustainable transport in association with new development.

4.4.22 The aspirations of the policy are widely supported, including those aimed at reducing the need to travel, planning for sustainable transport modes, planning for active travel and providing infrastructure for zero emissions vehicles. There was also general support for the travel hierarchy as presented in the consultation and it was considered by many that adherence with the hierarchy should be a condition of planning approval. A one size fits all approach may not be appropriate however and stakeholders felt that there should be flexibility for some types of development, such as tourism development which may be situated in more remote locations

4.4.23 It was widely considered by respondents that the Oxfordshire Plan has a role to play in planning for sustainable transport and that it shouldn't be left to individual local authorities and Local Plans alone.

4.4.24 Respondents recognised however that reducing the need to travel is not always possible, particularly for rural communities that are likely to be more car dependant. It was recommended that new development should be designed to ensure that the community provides the facilities that satisfy

day to day needs, means of working from home, with other human interactions such as mobility hubs.

4.4.25 It was raised by some respondents that a policy that includes measurable targets such as the delivery of 15-minute communities and neighbourhoods would be supported. They also suggested that the Oxfordshire Plan should consider the density of development necessary to enable a walkable neighbourhood to be successful in the long term. They recommended that the principles of 15-minute neighbourhoods and the hierarchical approach to planning should be implemented in all new and existing developments so that residents do not have to travel to essential amenities. They also stated that other quantitative standards such as public transport access within a 10 minute walk of all homes in new developments would also be supported.

4.4.26 Stakeholders welcomed recognition that there is a need to move away from a planning approach based on forecast transport movements to a plan that is vision and outcomes led.

4.4.27 It was raised by some respondents that necessary infrastructure should be put in place to support sustainable transport movements, but this should be complemented by other infrastructure such as that to support future technological advancements, such as electric vehicle charging points, full fibre broadband, 5G mobile networks and other sustainable energy provisions. They acknowledged that although the policy considers the scale of provision for EV charging infrastructure, it doesn't cover the volume of car parking provision required more generally and considered that this should be addressed. They also stated that consideration should be given to the additional burdens that EV infrastructure will place on the electricity network and the electrical loads of each new dwelling, particularly if compounded by more stringent policies for the design and construction of development and the energy network. They also considered that the Plan should require homes to be 'ECV Ready' rather than pre-empting the infrastructure that householders may subsequently require. The length of the Plan period mean that it will be important for policies to be flexible to accommodate changes in future technology.

4.4.28 A number of stakeholders highlighted that streets should be designed for people and that routes for cyclists and pedestrians should be properly segregated from car movements. Heavy usage of safe cycleways in and around Oxford clearly demonstrate that there is demand for such infrastructure.

4.4.29 Several respondents considered that the spatial strategy should be guided by the availability and opportunities for the delivery of sustainable transport infrastructure. It was considered by some respondents that large developments should only be located where they can be connected by sustainable transport infrastructure and where cycling and walking are safe and realistic travel choices. They also considered that public transport routes to rural areas could be delivered or improved as an additional benefit of new development in such locations. It was additionally suggested that development in rural areas could create multi modal active travel corridors, linking rural settlements with one another, in order to become collectively more sustainable. A focus of growth at the main settlements and along sustainable transport corridors was also considered to be an effective method of linking the benefits of development and sustainable transport. Rail for instance, could provide rapid transit into Oxford City from outlying towns in the County and beyond, or from a park and ride at Parkway Station.

4.4.30 Others pointed out however, that development should not take place where sustainable travel corridors pass through environmentally sensitive or other protected areas such as AONBs and Green Belt.

4.4.31 It was suggested that this policy option could be split as parts relate to locational sustainability and others relate to design aspects such as provision of EV charging spaces and parking spaces.

4.4.32 Concerns were expressed as to whether the objectives of this policy could be achieved and whether they would ultimately be successful. Some respondents felt years of national and local policy that has allegedly aimed to put sustainable modes at the centre of transport and land use planning have failed to have much impact. Some respondents also considered that the levels of growth already committed to 2031 will place burdens on transport systems, and on roads in particular which cannot practically be accommodated.

4.4.33 It was felt that more resourcing is needed to plan strategically for more cycling lanes, walking routes and public transport. Developments that are based upon active travel and public transport networks will require lower levels of car ownership.

Policy Option 19 – Supporting Sustainable freight Management

Key Messages

- Local transport hubs should be created for rest stops, transfer and last mile deliveries which could cater for electric vehicles, and new technology to avoid large vehicles impacting on communities.
- A strategy is needed for sustainable freight within Oxfordshire including for rail transport.
- Technology is fast changing in the distribution/EV sector and policies will need to be flexible to reflect this.
- The logistics sector is not adequately catered for in the Plan and economic growth should be encouraged including at motorway junctions.

Policy Option 19 - Supporting Sustainable Freight Management

How strongly do you agree or disagree with the preferred policy option?

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
Policy Option 19 - Supporting Sustainable Freight Management	5	7	2	3	

4.4.34 There was majority support expressed for this policy which would support a move to more sustainable a freight delivery, particularly encouragement for use of electric vehicles, rail and transfer husband efforts to avoid congestion and reduce carbon emissions.

4.4.35 Some respondents considered that as much freight as possible should be transported by rail, although it was stated that rail connectivity to Birmingham and Bicester from the south of the county is considered to be poor and some considered that the proposed policy does not adequately address this issue. It was suggested by respondents that there should be greater consideration of rail freight provision and recommended long haul road freight routes which avoid villages on A roads.

4.4.36 It was highlighted that freight movements cannot be sustainable while the A34 remains the only viable option for north / south bound freight movements. A major concern about the lack of

appropriate freight vehicle parking and rest stops in Oxfordshire was expressed, as this causes disruption to freight movements and delivery.

4.4.37 The policy option was considered by some respondents to not adequately address the critical role of the logistics sector to the national and regional economy, and fails to provide spatial direction for the identification of suitable locations to meet this spatial need. It was suggested that this should be addressed through the spatial strategy. It was recommended that national logistics are not located adjacent to existing residential areas and instead in areas immediately off of the strategic road network to avoid freight vehicles needing to use smaller, more localised routes. It was also raised that the Plan must take into consideration development taking place beyond the Oxfordshire border, and that the Plan should identify the strategic need, and if necessary, recommend locations / policy-based criteria for locations.

4.4.38 It was also emphasised by some respondents that care must be taken regarding the approach to identifying need and quantifying land/floorspace terms for the logistics sector as examining past rates will underestimate future needs. It was noted that the nature of modern logistics operations has fundamentally changed with demand trends further increased with Covid 19 and the response to the pandemic.

4.4.39 Concern was expressed by some respondents about the rise in large delivery vehicles using residential streets, due to a rise in home deliveries, particularly during the pandemic. However, it was recognised that technology and innovation will in future allow new ways of transporting goods , such as autonomous vehicles, drones and delivery bots and these will need to be planned for. It was suggested that there should be proactive support for the creation of infrastructure needed for zero carbon freight transport, covering both long-distance transport infrastructure and the repurposing of existing car-based infrastructure (e.g. park and ride facilities) as distribution hubs for the coordinated transfer of goods to smaller electric vehicles and e-cargo bikes for local delivery.

4.4.40 It was considered by some respondents that new developments should include micro-consolidation centres, to keep larger freight vehicles away from cyclists, pedestrians and other low-speed transport. It was suggested that a network of cargo bikes and zero emission vehicles for local/last mile deliveries, along the lines of Pedal and Post in Oxford, could be provided with transfer hubs provided at railway stations, on the outskirts of urban centres and at employment sites. It was emphasised that with a growing trend for last mile/hour logistics, it is increasingly important that logistics and distribution is close to where people live and work.

4.4.41 Some respondents argued that insufficient evidence has been provided at this stage to justify a bespoke policy for freight management.

Policy Option 20 – Digital Infrastructure

Key Messages

The proposed policy option was well supported, with many comments agreeing on the need for reliable digital infrastructure. The associated benefits for people and the environment of providing reliable digital infrastructure were highlighted by several respondents. Respondents noted how there is a transformation in life and work taking place in society, which has accelerated during the Covid-19 pandemic. Those changes which have taken place include how we work, shop, use public services and socialise.

- There was a large focus on rural communities across Oxfordshire and the need to ensure that they are able to access digital infrastructure.
- Questions raised over whether the proposed policy option was ambitious enough.

Policy Option 20 - Digital Infrastructure

How strongly do you agree or disagree with the preferred policy option?

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
Policy Option 20 - Digital Infrastructure	3	7	1		

4.4.42 The proposed policy option was well supported, with it acknowledged that reliable digital infrastructure is essential in the modern day. The emphasis on full fibre broadband connectivity and the development of 5G mobile technology was strongly supported. A lot of comments made reference to the fact that digital infrastructure is needed as more people work from home and for local businesses, in all areas of the county. The cross-boundary approach, co-ordinated with other parties was also seen as a positive element of the policy.

4.4.43 There were several comments which focused on the rural areas of the county and stated that the specialist needs of rural communities must be taken into account. Comments highlighted how in some areas mobile reception is not possible and therefore an emphasis on these areas would be welcomed. One respondent provided examples from other places where rural connectivity is successful, including Northern Ireland and Romania, summarising that local investment from both the private and public sector is needed.

4.4.44 Some respondents agreed that this policy should be reserved for new developments, with due consideration for viability (including converting existing buildings). It was noted how delivery of the highest level of internet capacity is a priority for most housebuilders and their customers. However, it was raised how they are limited in the scope for delivering full fibre broadband and 5G by the relevant infrastructure providers. Therefore, whilst the rollout of such facilities is taking place, the comment suggested that development has the potential to connect these networks once they are provided.

4.4.45 However, there were some comments which questioned the benefit of this policy for existing settlements. Questions were raised about the possibility for new development to enable broadband

installation in surrounding communities where they do not exist already, to improve areas where there is poor provision. One respondent suggested that developers should be mandated to seek solutions that also enhance the digital infrastructure of existing developments. One respondent felt that companies putting in this service must be held to account to ensure good services and supply.

4.4.46 The associated benefits for people and the environment of providing reliable digital infrastructure were highlighted by several respondents. Respondents noted how there is a transformation in life and work taking place in society, which has accelerated during the Covid-19 pandemic. Those changes which have taken place include how we work, shop, use public services and socialise. The reduction in travel as people can work from home was frequently raised by respondents, both in terms of the social impact of this, and the positive impact on the environment. Some of the broad changes identified by respondents also include:

- Allowing residents to work from home or local offices reducing the need for commuting.
- Reducing the need for road repairs.
- The need to rethink the need for new roads.
- Increased business start-up relying on good internet connections.
- Distribution of foods by bicycle and electric vehicles.
- Online co-ordination of social and business services to better meet needs.
- Reduced social isolation among the vulnerable elderly, as shown in the Digital Donnington project, supported by Oxford City Council.
- Allowing delivery of 'smart homes' that help residents in their day-to-day lives, for example by better controlling heating to reduce energy consumption.
- Ensuring that all new residents have full access to high quality digital provision from when moving in, making sure that they are not digitally excluded.
- Giving new residents live provision of real-time integrated public transport information where journeys are necessary.
- Allowing for the provision of sensors in homes of vulnerable people to enable access to services and permitted monitoring of live health data.
- Facilitation of a Living Labs environment to trial new technology.

4.4.47 It was noted that the Plan references The Oxfordshire Digital Infrastructure and the national Future Telecoms Infrastructure Review, which in turn outlines that in order to provide for a future digital world there is a need to focus on roll out of both full fibre broadband and the infrastructure needed to support deployment of 5G mobile technology. The rollout of enhanced digital infrastructure is vital for rural and urban Oxfordshire, and some feel that to ensure the benefits reach everyone, more needs to be done than proposed in the Future Telecoms Infrastructure Review. Some feel that there is a need for more ambition with regards to digital connectivity because as a region, we are far from where we should be. This was particularly noted for rural areas, which can still suffer from extremely poor digital connectivity and therefore rapid progression across the county is needed.

4.4.48 Another point raised was how people need support to change the ways they work and live, with it needing to go further than just provide the technical connectivity.

4.4.49 It was specifically noted how Harwell campus offers a unique opportunity for a ‘Living-Lab’ to deliver the objectives identified through utilising digital infrastructure and the colocation of supporting uses.

4.4.50 Another comment felt that the policy should be future-proofed, as conventional broadband will be outdated by 2030.

4.4.51 One comment questioned whether enough research been done to ensure safety of 5G.

Policy Option 21 – Strategic Infrastructure Priorities

Key Messages

- The Oxfordshire Infrastructure Strategy (OxIS) needs updating to align with the Oxfordshire Plan to 2050.
- Infrastructure provision should be considered alongside the proposed plan strategy and policies and provide before development occurs.
- Infrastructure provision should be focused on delivering zero carbon outcomes and sustainable and active travel**.**

Policy Option 21 - Strategic Infrastructure Priorities

How strongly do you agree or disagree with the preferred and alternative policy options?

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
Policy 21 - Strategic Infrastructure Priorities	2	11	1	1	
Policy 21 - Alternative Option 01 - Safeguard land for strategic infrastructure priorities		3	1		1

4.4.52 Respondents expressed support for the preferred policy approach with some support for the safeguarding of land for strategic infrastructure priorities. There is support for the Oxfordshire Plan being linked to infrastructure provision identified in OXIS and embedding sustainability into spatial planning.

4.4.53 It is considered by some respondents that there are insufficient measures currently identified in the Plan to address the existing infrastructure deficit. Stakeholders highlight that there is inadequate infrastructure in parts of the county to cope with the existing population, and some respondents consider that the Plan currently offers little to cope with thousands of additional residents and the resulting traffic. There was also concern raised about the infrastructure strategy, in that infrastructure will be prioritised that facilitates further growth. It was advised that the Plan should identify, cost and define the infrastructure required to support planned development to 2050. It was also the view of some respondents that infrastructure should be planned and secured before development is allowed to proceed in order to avoid defaulting on infrastructure commitments due to viability considerations.

4.4.54 It was raised that there is currently no mention within the Oxfordshire Plan 2050 of any values attributable to the infrastructure, or where and how it will be developed and delivered. It was suggested that consideration should be given to how individual allocations can contribute to infrastructure such as through CIL or Section 106 obligations.

4.4.55 It was highlighted by respondents that there is a need for investment in a range of infrastructure throughout the period of the Plan, including in road and rail and digital infrastructure to support the economic assets of the County and the linkages between them. As a result, it was suggested that the policy should take a holistic approach towards strategic infrastructure needs across the county and identify the full package of infrastructure measures that will be required to support the delivery of future development sites.

4.4.56 It was also noted by some respondents that infrastructure priorities must also be factored into a Spatial Strategy at both a County-wide and local level and provided before development occurs to ensure sustainable development and environmental protection is achieved. It was also noted that regard should also be had to how communities can play a role in achieving high levels of containment of movement, for purposes of accessing services, work, and amenities.

4.4.57 A further consultation on strategic spatial options would be appropriate once further detail of the strategic infrastructure framework is available.

4.4.58 Some respondents considered that the Oxfordshire Infrastructure Strategy (OXIS) and Oxfordshire Plan should be aligned with targets and programmes set for the delivery of infrastructure. They also highlighted that Local Plans, and any supporting documents such as Infrastructure Delivery Plans, and Infrastructure Funding Statements should also take into account the OXIS when being developed and updated.

4.4.59 Stakeholders made reference to specific infrastructure schemes that should be supported through the Oxfordshire Plan and OxIS including;

- The upgrade of junction 7 of the M40 motorway would allow for greater accessibility and improve the market attractiveness along this part of the strategic route network.
- As a driver of economic success, connectivity to London Heathrow must be a central part of the Plan and the western Rail Link to London Heathrow should be delivered now, not by 2050.
- The Oxfordshire Plan should include a policy that supports the Cowley Branch Line as a priority project.
- A new railway line from Carterton to Oxford is needed as the current plans for the A40 bus lane between Witney and Oxford with a travel hub at Eynsham are not sufficient

THEME FIVE – CREATING JOBS AND PROVIDING HOMES

Policy Option 22 – Supporting the Creation of Jobs

Key Messages

A range of quite polarised views were expressed in relation to this policy. Many respondents felt that growth should not be determined by economic aspirations, while others considered that economic growth should be one of the main driving factors for planning in Oxfordshire to 2050.

- Some respondents, predominantly developers and site promoters, supported the preferred option. These respondents tended to support higher levels of economic growth in line with the aspirations of the Local Industrial Strategy.
- Other respondents questioned the need to create more jobs in Oxfordshire. There were concerns about negative environmental impacts. It was suggested that economic growth should be focused in other parts of England where there is greater need for new jobs and investment.
- A number of respondents considered the Oxfordshire Growth Needs Assessment (OGNA) methodology to be flawed and not a sound basis to inform policy making. It was suggested that the OGNA should be subject to peer review.
- There was support for encouraging growth in the low carbon and innovation sectors.
- The need to provide a wide range of jobs to address inequalities was highlighted.
- The needs of the logistics sector were highlighted.

Policy Option 22 - Supporting the creation of jobs

How strongly do you agree or disagree with the preferred policy option?

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
Policy Option 22 - Supporting the creation of jobs	2	14	4	3	4

4.5.1 Some support was expressed for the preferred policy option, predominantly from developers and site promoters, who often stated support for pursuing the Oxfordshire Growth Needs Assessment (OGNA) transformational scenario, which aligns with the aspirations of the Local Industrial Strategy.

4.5.2 Significant support was expressed for the strengthening of the economy and creation of jobs across a range of sectors, particularly to achieve a shift to 'good growth'. It was noted that significant growth is expected in the Oxfordshire economy, including in low carbon and innovation sectors, as highlighted in the Local Industrial Strategy. It was also highlighted that Oxfordshire is identified as being a focus for 'transformative technologies' in the fields of quantum computers, autonomous vehicles, digital health, and space and satellites within the Government's Industrial Strategy. It was suggested that the Oxfordshire Plan has a clear brief to identify land to support economic growth and productivity in this nationally significant region of innovation. Many stakeholders felt that the Oxfordshire Plan should prioritise the creation of green, zero carbon jobs and restoring natural capital.

4.5.3 It was suggested that the Oxfordshire Plan should recognise that high skilled jobs may not help to address inequalities in Oxfordshire and that all types of jobs should be encouraged. It was suggested that policies should support high quality jobs, improved training and inclusive approaches to recruiting local people.

4.5.4 Differing views were expressed in relation to logistics and warehousing. Some respondents considered that warehousing does not support a high skilled workforce. However, others considered logistics and warehousing to be a key part of a highly effective and efficient freight network. It was suggested that logistics and warehousing represents critical infrastructure in supporting economic growth. Some respondents noted that the warehouse and logistics market has seen unprecedented levels of demand in recent years and suggested that this needs to be better reflected in the forward growth projections. It was also suggested that to be consistent with the NPPF a buffer should be included in the amount of logistics and warehouse space being planned for in Oxfordshire, so that it can respond to the fast-evolving nature of the market.

4.5.5 Some respondents suggested that to ensure future prosperity in Oxfordshire and to deliver a sustainable balance of homes and jobs it is essential to deliver significant employment growth. It was highlighted that the NPPF is clear that significant weight should be placed on the need to support economic growth and productivity. These respondents therefore suggested that the transformational scenario identified in the OGNA should be planned for, to deliver the new homes and jobs that are needed.

4.5.6 Some respondents highlighted that the OGNA has identified the under delivery of housing compared to jobs in recent years, significantly compounding affordability issues and in commuting levels in Oxfordshire. It was therefore suggested that following the 'standard method' trajectory would be inappropriate.

4.5.7

4.5.8 It was suggested that housing affordability is a key barrier to attracting and retaining workers in Oxfordshire and that this needs to be addressed in the Oxfordshire Plan.

4.5.9 There was significant objection to the preferred policy approach, predominantly from local groups and residents, due to environmental damage that would be caused by significant development. Many of these respondents considered that economic growth is not appropriate at a time of climate crisis. It was also suggested that economic growth conflicts with other preferred policy options.

4.5.10 Some respondents considered the information in this section of the consultation document to be inadequate and suggested that it should be updated to reflect changes brought about by BREXIT and COVID-19 in Oxfordshire.

4.5.11

As the consultation document did not conclude on a favoured option from the OGNA scenarios, some stakeholders found it difficult to form a view on the consultation proposals.

4.5.12 Some respondents questioned the robustness of the OGNA methodology, considering it flawed and inaccurate. There were suggestions that the OGNA should be subject to further justification and peer review. There were also views that the OGNA is based on an assumption that economic growth is required, many respondents did not agree with this underlying assumption. It was felt by some that the projections in the OGNA are not realistic, rely on private sector funding as set out in the LEP Investment Plan and are being used to justify unnecessarily high housing requirements.

4.5.13 Many respondents expressed concern that growth figures are largely an externally imposed top-down political decision and are based on an arbitrary growth goal from non-elected bodies, rather

than based on local needs. There is a view that the proposed policy option is already framed by the outputs of the OGNA and that therefore the choices appear pre-determined. Concerns were also raised about the risks of circular approach where the number of jobs is used to justify housing which then justifies jobs.

4.5.14 Some respondents considered the number of new jobs already planned to be delivered in Oxfordshire to be too high and that this then fuels a shortage of housing in the county. Concerns were expressed that excess growth will stretch infrastructure, damage the Green Belt and have a negative impact on the environment including wildlife, eroding well-being and sustainability.

4.5.15 There were some concerns that the current spatial distribution of jobs and homes encourages unsustainable travel patterns and has negative effects for economic productivity, work/life balance and the environment. It was suggested that the Oxfordshire Plan should seek to achieve a more sustainable balance in the distribution of homes and jobs, helping to make Oxfordshire's towns and rural areas more sustainable. It was highlighted that locating employment uses next to transport nodes is highly sustainable and is also attractive to the market.

4.5.16 It was suggested that a mix of sites (in terms of size, location and tenure) is supported through the Oxfordshire Plan and delivered through the city and district councils' local plan reviews.

4.5.17 Many respondents felt that economic growth should be located in other parts of the country, instead of Oxfordshire, in accordance with the levelling up agenda. It was suggested that geographic flexibility due to broadband provides greater scope to redirect investment and growth to areas of the country which have both lower land values and higher latent capacity for development.

4.5.18 It was suggested that this section of the consultation document should be more tangible and contain more information, with clear choices for the quantum, type, location, phasing and economic feasibility of employment growth. Some respondents felt that supporting employment growth should include the development of new employment centres to create new jobs as well as supporting existing employment centres. Some respondents suggested a greater emphasis on the West End of Oxford as a centre for innovation and growth within the Oxfordshire Plan. Banbury was also identified as a key centre in the north of the county, and given its location adjacent to M40, was considered to have potential to play a key role in enhancing the employment offering along this strategic corridor.

Policy Option 23 – Protection of Economic Assets

Key Messages

- There was some support for protecting key economic assets but the need for flexibility was emphasised by many respondents.
- There was support for using land at new and existing employment sites more efficiently.
- It was suggested that the Oxfordshire Plan should also consider potential investment/economic growth at other locations such as town centres.

Policy Option 23 - Protection of Economic Assets

How strongly do you agree or disagree with the preferred policy option?

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
Policy Option 23 - Protection of Economic Assets	2	11	3	6	

4.5.19 There were mixed views expressed in relation to the preferred policy option, with support for the Oxfordshire Plan recognising Oxfordshire's valuable economic assets, but some concern that economic uses might be protected when sites may be better suited to other uses.

4.5.20 Some respondents considered it vital to the continued success of Oxfordshire that key and strategic employment locations are protected, and that their growth is supported. It was highlighted that Oxfordshire's existing employment sites are instrumental in ensuring Oxfordshire remains a driver of economic growth, wealth creation and productivity. It was suggested that employment sites, particularly sites used for research and development, high tech jobs and education, should be protected as Oxfordshire is a global leader in these sectors. It was suggested that further consideration should be given to how these assets are connected and linked together, to provide a coherent and collaborative innovation and industrial ecosystem.

4.5.21 Some respondents were concerned that maintaining focus on sustaining investment at business and science parks could risk missing opportunities at other locations, such as town centres.

4.5.22 It was suggested that the Oxfordshire Plan should recognise the importance of enabling the universities to build on their success by enabling expanded research and education facilities, staff and student accommodation, spin out space and the other supporting activities. The need to increase skills aligned with new trends and technologies was emphasised.

4.5.23 It was suggested that a flexible intensification of economic activity at key sites, with re-purposed buildings and site layouts, new building and extensions, may be required at some key locations. Some respondents suggested that the growth of key economic assets has been curtailed through the absence of supportive policy frameworks that would facilitate development beyond their existing site boundaries. It was noted that the OGNA forecasts additional net employment growth in Oxfordshire and therefore it was suggested that to accommodate this growth, existing employment areas will need to be supplemented by new employment sites.

4.5.24 Some respondents felt that if Oxfordshire's economic ambitions include high quality job creation, through attracting inward investment from global companies, then a range of premises, such as agile labs and scientific co-working spaces will be needed.

4.5.25 It was highlighted that a wide range of economic sectors, including agriculture, should be supported to sustain a balanced economy. Some respondents felt that there should be greater recognition of the importance of farming in the Oxfordshire Plan. It was suggested that food miles and food security should be major considerations. Some respondents cautioned that whilst the preferred policy option is focused on the strategic scale, it must not lose site of the contribution made by smaller scale employment locations, particularly in rural communities. There was also concern that the preferred policy option overlooks the economic activity associated with the arts, music, tourism, entertainment and leisure industries.

4.5.26 It was suggested that new city and district local plans should be supported by up to date employment land reviews. It was also suggested that a policy should provide sufficient flexibility for some lower quality employment land to be released for other uses, including housing, which may be more appropriate in that location. The need for a flexible approach was emphasised to ensure that the Oxfordshire Plan can respond effectively to evolving business needs over the next 30 years.

4.5.27 Some respondents felt that any policy approach that restricted the loss of economic assets to housing would suggest an inflexible approach towards delivering development on brownfield sites. It was suggested that employment site protections could put more pressure on greenfield sites for housing. A respondent stated that the phrase ‘we will not support the loss of economic assets to housing’ is concerning, but that the inclusion of the word ‘active’ could clarify the intention. There was concern that the preferred policy approach entrenches existing approaches of protecting sites for jobs, even when the sites have been vacant for extended periods of time and the need for housing is more pressing than the need for employment.

4.5.28 There was support for all development to be required to use land efficiently, for example by having fewer car parks, less wasted space, and higher densities.

4.5.29 It was suggested that the Oxfordshire Plan should establish an appropriate hierarchy of alternative uses for sites where current economic assets become redundant. Some respondents felt that, given changing working patterns and the imbalance of employment and housing, there should not be a policy which contains an overall presumption against the loss of economic assets in Oxfordshire.

Policy Option 24 – Town Centre Renewal

Key Messages

- Significant support was expressed for town centre renewal.
- Town centres are viewed as sustainable locations for development and as providing significant brownfield opportunities.
- It was suggested that there should be flexibility within the policy to allow for a range of uses in town centres, including housing and employment.
- There were cautions that some matters may be better addressed through local and neighbourhood plans.
- There was support for increasing densities in town centres.

Policy Option 24 - Town Centre Renewal

How strongly do you agree or disagree with the preferred policy option?

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
Policy Option 24 - Town Centre Renewal	6	8	5	3	

4.5.30 Significant support was expressed for town centre renewal. There was also broad support for the development of town centre strategies, and it was suggested that town councils could have role in their production.

4.5.31 There was support for a flexible policy approach for town centres due to the need to respond to changing consumer demands. The need to consider the long-term impacts of the Covid-19 pandemic and other market trends was highlighted. There was general support for a policy approach that would allow for a greater range of uses in town centres and that would enable a quick response to new/diversified economic opportunities.

4.5.32 It was suggested that the Oxfordshire Plan should provide more detail about where renewal is needed and how it will be delivered. It was suggested that an assessment of needs and opportunities should support the policy approach.

4.5.33 Some respondents felt that the preferred policy approach is not transformational and that the Oxfordshire Plan should be more ambitious.

4.5.34 It was suggested that the policy approach should allow for housing, including affordable housing, in town centres, which would be accessible to services and facilities, thereby reducing the need to travel. Oxfordshire's significant housing needs were highlighted. It was identified that town centres tend to be highly sustainable locations and provide brownfield opportunities. It was suggested that town centres provide opportunities for higher density residential development and 'Build to Rent' development. Some respondents felt that providing housing in town centres could play an important role in ensuring the long-term sustainability and vitality of Oxfordshire's centres. It was suggested housing in town centres could help to support anticipated innovation-led economic growth across Oxfordshire. There was wide support for prioritising development on previously developed land.

4.5.35 Some respondents cautioned that care should be taken not to let residential development permeate into town centres where night- time entertainment is being envisaged to avoid conflicting land uses.

4.5.36 Many respondents considered references to density in the consultation document to be vague/weak. There were suggestions that providing higher density housing in centres is a key way of ensuring affordable, sustainable, climate-friendly development which increases the viability of public transport and other services and infrastructure and avoids the use of greenfield land.

4.5.37 There was support for ensuring the provision of green infrastructure, such as parks and green spaces, in town centres. It was highlighted that this could enable biodiversity to be enhanced.

4.5.38 Some respondents felt that town centres should not be dependent on the private car and that 'people priority areas' should be designated, with speeds limited, public transport provided and an appropriate parking strategy. However, some respondents felt that town centres should be accessible by all means of transport and that it should be recognised that public transport is not always an option for all, including those travelling from rural areas.

4.5.39 It was highlighted that changes to the Use Classes Order will have a significant effect on town centres and planning policy. It was suggested that the economic role of centres should be realised, such as the role of offices, research and development facilities, innovation centres and warehouse development. It was highlighted that offices with appropriately designed ground floor frontages can bring animation and activity to streets. Some respondents considered that greater protection for pubs experiencing short-term decline is needed.

4.5.40 It was suggested that the Oxfordshire Plan should recognise the role that new settlements can play in boosting existing town centre catchments and local spending power thereby supporting town centre renewal.

4.5.41 There were cautions that the policy approach should avoid being too prescriptive and that some matters may be better addressed through local and neighbourhood plans.

Policy Option 25 – Visitor Economy

Key Messages

- Most of the respondents generally supported Policy Option 25.
- A number of comments expressed that the proposed policy should also set a positive approach for the enhancement of existing tourism locations.
- Some respondents questioned whether new development of this kind should be supported, considering the plan objectives regarding climate change, what the recent covid-19 pandemic has shown us, and the types of jobs created.
- It was suggested that a definition 'sustainable tourism' should be provdied.

Policy Option 25 - Visitor Economy

How strongly do you agree or disagree with the preferred policy option?

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
Policy Option 25 - Visitor Economy	4	5	4	1	2

4.5.42 Most of the respondents generally supported Policy Option 25. However, some did urge caution as they flagged that the visitor economy is often driven by the market.

4.5.43 Whilst supporting the policy generally, a number of respondents made suggestions as to how the policy could be improved. One of these suggestions was that the policy should set a positive approach for the enhancement of existing tourism locations.

4.5.44 Several comments noted how the focus of the proposed policy was on new facilities, but that enhancement and better use of existing facilities is equally important and therefore the proposed policy should also set a positive approach for existing tourist locations. Specifically, paragraph 81 of the NPPF was flagged - *planning policies and decisions should help create the conditions in which businesses can invest, expand and adap*t.

4.5.45 There was a specific comment on freshwater areas, which stated that almost all the lakes in Oxfordshire are already used for fishing or water sports, rather than for public access and biodiversity. The respondent felt that this is out of step with the approach and the focus on nature recovery and sustainability in the rest of the consultation document. The respondent would prefer to see a focus on generating new eco-tourism and educational opportunities based on rewilding, nature recovery, and pioneering sustainable and regenerative agriculture that restores the natural beauty of the Oxfordshire countryside.

4.5.46 A number of comments pointed out how central Oxford is likely to be the biggest benefactor of the visitor economy, with Blenheim Palace and Bicester Village also noted in the comments. One comment expressed how it would be good if visitors could be encouraged to visit historic market towns. Some comments also noted that heritage is a key aspect of Oxfordshire's tourism industry.

4.5.47 Several respondents said how maintaining the attractiveness of the county, specifically the beauty of its countryside and historic environment, is necessary to maintain the visitor economy. They commented that some of the best ways to attract tourists is to value the landscape for all to enjoy

and to ensure that existing and future settlements are made more beautiful and accessible through good design.

4.5.48 A number of comments were specifically made about accommodation. One of these related to AirB&B and that properties being brought for this purpose were being taken off the market for Oxfordshire residents. Another comment recommended an aspiration to encourage overnight and multi-day stay.

4.5.49 Some comments were focused on facilities, flagging that visitor attractions often require investment (e.g. offices, parking, etc). A comment was also made about local communities wanting these facilities, and where possible local initiatives should be used, such as the Story Museum in Oxford.

4.5.50 A number of respondents made clear that reliance on private cars should be discouraged. Some felt that encouraging sustainable travel is not enough and that it should be required, with new facilities being zero or negative carbon. Comments were made that the policy option is not compatible with reducing travel, specifically referring to Bicester Shopping Village as an example. There were also a number of comments on coach parking, and the need for this to be prevented in central Oxford due to the harm excessive heavy traffic is having on the city. Respondents requested a rethink of travel by tourists and recommend that a policy on how tourists move around is added, favouring sustainable modes and actively providing alternatives to driving into historic urban centres, especially for coach operators. Comments were also made on buses and the need for consideration of a county wide network of bus routes, using electric buses.

4.5.51 There were some respondents who did not agree with the proposed policy approach and felt that new development to advance the visitor economy should not be encouraged. Questions were raised over the true economic value of visitors to Oxfordshire and the fact that jobs created for tourism are often low skilled and seasonal, with many commuting into Oxford to work in these jobs. Caution was also given when discussing increasing hotel provision and the potential to for it to undermine high quality employment opportunities was flagged, especially for Oxford.

4.5.52 Concerns were also raised around the sustainability of the policy given that covid-19 has illustrated that relying on the visitor economy leaves settlements and communities vulnerable. Comments raised how it will be important to think carefully about the longer-term impact of covid-19 and what this means for the pattern of activity. An example of potential long-term reductions in international tourism and increases in intra-national tourism was noted, with potential impacts being unknown. Some respondents expressed views that efforts should be put into making our existing settlements safe and resilient and that new development should be minimised.

4.5.53 Some of those not in support of the policy also raised how the proposed policy would sit with the Strategic Vision objective to revert the impact of climate change, or the UK's Carbon Budget. Bicester Shopping Village was noted as an example where development may have economic appeal, but its operations may need reconsidering going forward, considering the climate emergency. The term 'international draw' was picked up on in comments and concerns were raised over this and the objectives in other policies to reduce the need to travel, and the transport emissions arising from this travel.

4.5.54 There were some comments which supported the alternative option, saying that the proposed policy option it is too prescriptive and that these matters that are best addressed through local and neighbourhood plans where local conditions are understood and can be accommodated. One comment noted how strategic place-based sustainability criteria will help to guide development to the correct places, without the need for bespoke policies controlling it.

4.5.55 Some respondents noted that they were not sure what is meant by 'sustainable tourism'. With some comments expressing that 'sustainable tourism' will be difficult to achieve with reducing travel.

4.5.56 The Wilts and Berks Canal Trust generally supports policy option 25. They set out how a positive planning approach that encourages development that will advance the visitor economy, particularly including active tourism in rural Oxfordshire that supports the rural economy and diversification, is consistent with restoration of the Wilts & Berks Canal. Restoration of the canal and its subsequent functioning as an operational waterway will attract visitors and generate business opportunities relating to the visitor economy (in addition to the existing local economy); and restoration and subsequent operation of the canal will themselves be supported by visitors and the visitor economy.

Policy Option 26 – Culture and Arts

Key Messages

The principle of this policy was largely positively received and generally supported. When respondents provided caveats to their response, they often raised similar issues.

Key issues raised include:

- Retaining and repurposing existing facilities should be prioritised rather than building new facilities.
- It should be noted that a large part of cultural and educational experience is social, collegiate, and educational, and therefore although cultural industries are becoming more digital, it should be noted that the act of physically coming together is central for these industries.
- Several respondents stated that culture and arts would be better addressed in local plans.
- One respondent highlighted that it will be important to think carefully about the longer-term impact of Covid-19 on culture and the arts and what this means for the pattern of activity.

Policy Option 26 - Culture and Arts

How strongly do you agree or disagree with the preferred policy option?

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
Policy Option 26 - Culture and Arts	5	5	3	2	1

4.5.57 A number of respondents stated that the policy appears to be focused mainly on new facilities. One respondent considered that this approach will consequently put more pressure on land use in Oxfordshire due to the limited supply of town centre land, which could consequently displace housing to greenfield sites. Several others stated that in a situation where we cannot afford maintenance of existing cultural centres, we should prioritise ways to repurpose, reuse and restore existing buildings for cultural and community use, rather than build carbon-intensive new buildings.

4.5.58 One respondent stated that restricting the change of use of cultural and arts facilities may restrict uses from moving to new premises, which the policy is supporting the development of.

4.5.59 The Future Oxford Partnership strongly support this policy. However, they highlighted that the list of facilities does not include libraries, and although it is taken that they are included, they should be explicitly specified.

4.5.60 Regarding the element of the policy which states that the cultural industries 'will likely turn increasingly more digital', the Future Oxfordshire Partnership emphasised that care should be taken when stating this, as a large part of cultural and educational experience is social, collegiate, and educational. They noted that while the creative industries will continue to exploit the opportunities of digital engagement, the act of physically coming together will remain central.

4.5.61 Some respondents stated that although they support the ambition of the Oxfordshire Plan to encourage new cultural and arts facilities of regional, national and international draw, they emphasised that this is most often driven by the market. As a result, they stated that strategic, placed-based sustainability criteria will help to guide development to the correct places, without the need for bespoke policies controlling it.

4.5.62 It was also raised that that although this policy is reasonable with regard to large scale cultural industries, these are largely likely to be 'parachuted in', and the policy does not appear to fully consider home-grown arts and culture development. They stated that a solution to this issue could be simple, by requiring local plans to give consideration and weight to locally originating culture and arts provision within the county.

4.5.63 One respondent highlighted that local facilities are as important as city centre facilities, to encourage local talent and local entertainment, and limiting travel, and therefore this locational aspect should be reconsidered.

4.5.64 A point was raised that it will be important to think carefully about the longer-term impact of Covid-19 on culture and the arts and what this means for the pattern of activity.

4.5.65 One respondent expressed caution around this policy as currently worded as they considered the 'and' policy requirements to be onerous and noted that the requirement to improve the operation and management of businesses is outside the control of landowners and developers.

4.5.66 The same respondent raised that this policy would also potentially conflict with the need for flexibility which is acknowledged as being important to support the re-imaging and repurposing of town and city centres moving forwards.

4.5.67 A respondent raised that policies on creating more easily accessible funding and investment in culture and the arts would be welcomed.

4.5.68 A number of specific wording amendments to improve the policy approach were put forward by respondents.

Policy Option 27 – Meeting skills and Education Needs

Key Messages

- Generally, the proposed policy option was well supported.
- Comments supported the principle of the policy and felt that the integrated and coordinated approach was positive.
- Some comments were focused specifically on educational facilities, highlighting that they should be located where there is an identified need.
- Several respondents, including the Oxfordshire Skills Board put forward a strong case for the inclusion of Community Employment Plan (CEPs) aligned to major developments.

Policy Option 27 - Meeting Skills and Education Needs

How Strongly do you agree or disagree with the preferred policy option?

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
Policy Option 27 - Meeting Skills and Education Needs	1	11	3	2	

4.5.69 Generally proposed policy option 27 was well supported by respondents. Comments supported the principle of the policy - planning for education and training facilities based on need, with a joined up and consistent approach across Oxfordshire. Particular support across the comments was noted for the integrated, coordinated and comprehensive approach, with local planning authorities working with partners, including authorities neighbouring Oxfordshire. Some respondents expressed views that the most valuable parts of this policy option are the idea of co-location and that the County Council will "co-ordinate" with others to identify where new provision is required.

4.5.70 Some comments, whilst supporting the principle of the policy option, did questions its necessity in the Oxfordshire Plan. They put forward the case that there is a statutory requirement to provide educational spaces, especially as a consequence of new development. The development management type elements around durability and sustainability are repetitive of other parts of the consultation document, and therefore could easily cross-referenced rather than repeated.

4.5.71 Some comments focused more generally on the topic, commenting that a strong flow of skills and talent into Oxfordshire is essential for the growth and success of the innovation sectors. Respondents clearly supported the provision of modern and up to date facilities, supporting existing and future education and training needs.

4.5.72 Comments were made about the need to recognise regional sector specialisms and capabilities and to reflect this in education, training and skills provision. Some respondents felt that specific acknowledgement of where this applies is necessary, for example Harwell Campus.

4.5.73 One respondent commented that the preferred policy option fails to recognise the synergies between higher education and the research and development sector in enabling a highly skilled workforce in line with objectives of the Oxfordshire Local Industrial Strategy. They said that the preferred policy option should include support for educational and learning facilities at strategic

research and development campuses. They also commented that reference should be made to the provision of infrastructure to enable effective collaborative working between higher education facilities and research and development enterprises at strategic employment sites across Oxfordshire.

4.5.74 Some respondents thought that the proposed policy should include a greater focus on lifelong learning (and reskilling), addressing climate change and environmental emergencies, and providing support for communities. Community and education hubs were also identified as important, recognising that there are many options other than university. Comments raised how people should be retrained for the new zero carbon economy, covering things such as retrofitting homes, regenerative agriculture, and nature restoration. Another suggestion was for the policy to require financial contributions from developers towards a green constructions skills programme. One respondent also felt that community employment plans and onsite training should also be required on all major sites.

4.5.75 Some respondents said that policies in the Oxfordshire Plan should support good quality jobs that attract good salaries so that people can afford to live in Oxfordshire. It was also noted how policies should support improved learning, training and inclusive approaches to develop and recruit local people (e.g. apprenticeships).

4.5.76 Comments expressed how the first part of the preferred option should form part of the spatial strategy and that the second part should be much more positive, and the County Council should seek to identify, and potentially allocate locations for new provision through the Oxfordshire Plan. Comments said that waiting for local plans to allocate sites could be too late.

4.5.77 There were also comments about the potential of the Oxfordshire Plan to anticipate likely trends, for example covid-19 resulting in a move to distance learning in higher education. One respondent said they would like to see independent analysis of the education needs of new communities created by development, which should include nursery, primary, secondary and tertiary education to identify needs and to make sure they are met.

4.5.78 Some respondents felt that the policy option does not go far enough in meeting a net zero caron target. Comments were made on the need for new education, training and development facilities to be exemplars of good design, being built at net zero or negative emissions and being run and maintained at net zero emissions in order to provide positive role models for all who use and interact with the facilities. In the comments, it was also noted that active travel routes are needed to reach the facilities and that use of sustainable travel should be required, not promoted. A respondent did acknowledge that there may be exceptions to meet specific needs, such as for the ageing population.

4.5.79 The provision for facilities for schools and colleges was supported by a number of respondents. It was felt that secondary school provision is not keeping up with development in Oxfordshire. Some respondents also questioned the provision of pre-schools, since they are not a statutory requirement and often struggle for funding and premises. A comment supported the availability of school facilities for evening education, however they did note the logistical difficulties of this. One comment felt that education facilities need to be available to local people, with it suggested that the large draw of international students' places pressure on resources in Oxfordshire. There were a number of comments specifically aimed at the Further Education and Higher Education. One respondent felt that too much emphasis is placed on Higher Education, with Further Education neglected as a result. The comment made reference to Government policy in the area and the need for this policy to be taken seriously.

4.5.80 One comment noted how the role of libraries should not be forgotten in this policy option.

4.5.81 It was suggested that opportunities to fully embrace Community Employment Plans (CEPs) linked to major developments should be sought. Successful pilots instigated by the Skills Board and the OxLEP Skills Team were highlighted through consultation responses. It was suggested that CEPs are fundamental to the successful delivery of strategic objectives identified in Oxfordshire's Local Skills Plan and Report, the Economic Recovery Plan, and by the emerging Oxfordshire Inclusive Economy Partnership. It was highlighted that for those living in areas of deprivation, CEPs could be greatly beneficial in providing opportunities for people of all ages to gain necessary skills, apprenticeships and work, to address the identified skills shortages and lack of training opportunities locally and providing enhanced social mobility and economic growth as a result. It was stated that if skills, training and employment levels are not significantly improved in Oxfordshire's deprived areas, this will consequently inhibit local economic growth and prosperity. It was proposed that preparation and implementation of CEPs could significantly benefit businesses, the economy and provide opportunities for local people to improve their skills and training in support of the strategic plans identified in the previous paragraph.

4.5.82 It was noted that the National Planning Policy Framework (NPPF) states '*planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future*' (para 81). '*Planning policy should; set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration*' (para 82).

4.5.83 It was suggested that CEPs could be part of a local approach, delivered in partnership with willing investors, many of whom cite 'improved training, skills and employment opportunities' as a key mitigation of their proposals. CEPs could provide the framework to help developers deliver on these ambitions. CEPs are employer-led initiatives which could form part of planning obligations for significant developments. The measures contained within CEPs would seek to maximise the wider community benefits of development through ensuring that local people can better access job opportunities arising from development. The outcomes in CEPs could apply at the construction phase and at end-use phase of employment generating development, and are likely to include:

- Apprenticeships;
- Employment/training initiatives for all ages;
- Best endeavours to maximise local labour; and
- School, college and university engagement initiatives.

4.5.84 It was requested that the Oxfordshire Plan seek to encourage the implementation of CEPs through strategic development proposals. Strategic hooks could be provided in the Oxfordshire Plan.

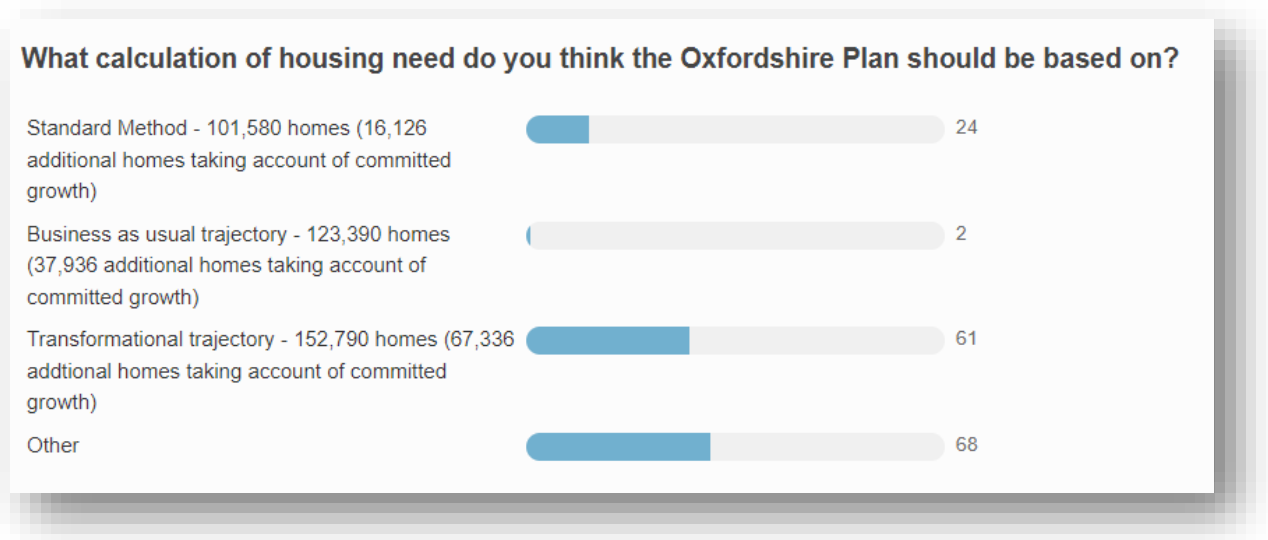
Policy Option 28 – Homes: How Many? Commitments and Locations

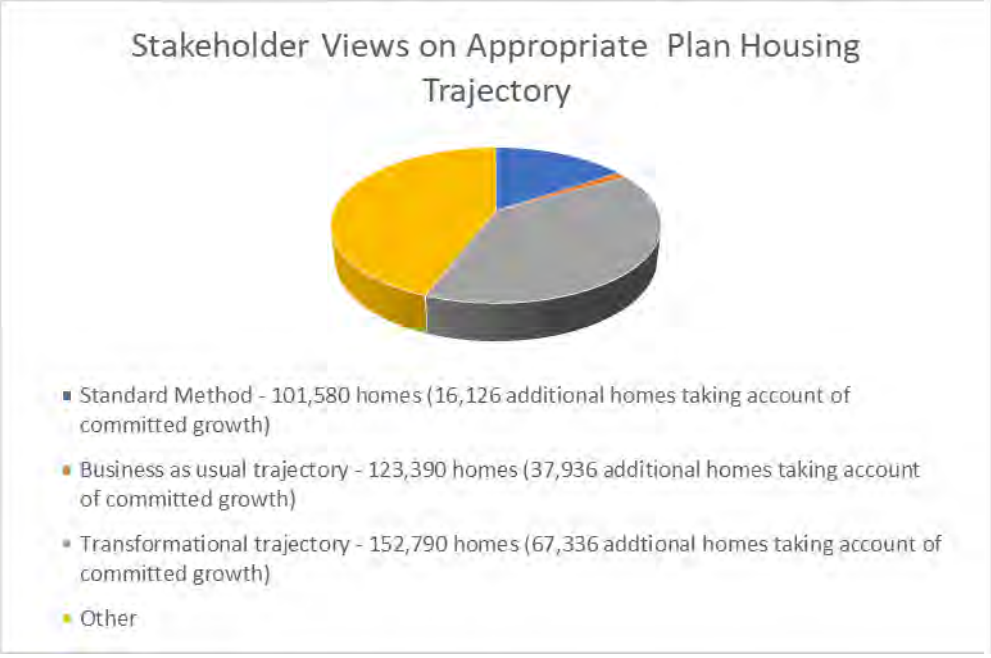
Key Messages

There were a wide range of views expressed in relation to the number of new homes that should be delivered in Oxfordshire to 2050.

Regarding the three housing need scenarios, opinion largely varied. Some respondents considered that the transformational figure should be selected, as they believe it is required to provide new homes, encourage economic growth and reduce commuting. However, several others considered that the standard method figure should be selected, stating that it best matches with climate change objectives, and that higher housing growth could cause significant environmental damage. Other scenarios were also suggested, including an option proposed that would let Oxfordshire grow organically, based on up to date natural population growth figures produced by the Office for National Statistics, with the focus on making housing in the area more affordable.

There were also many comments received that related to the Oxfordshire Growth Needs Assessment (OGNA). A number of comments received questioned a number of the assumptions used in the OGNA, with some respondents considering that its findings require review.





4.5.85 A variety of views were expressed through the consultation. Several respondents considered that the Oxfordshire Plan provides a real opportunity to secure the policy framework required to support a step change in housing delivery in Oxfordshire and to align homes, jobs and infrastructure to deliver sustainable outcomes.

4.5.86 Some support was expressed for the Oxfordshire Plan's recognition of commitments made to housing supply in current Local Plans. Several respondents considered that any decision on the number and location of new homes must take into account the significant amount of development that has been built out in Oxfordshire in recent years, as well as the development that is already planned to be delivered in Oxfordshire to 2031/35/36. However, it was widely cautioned by respondents that taking account of existing commitments assumes that the residual dwellings from local plan allocations are all deliverable and developable.

4.5.87 Regarding the housing need scenarios, it was found that predominately developers and site promoters supported the transformational scenario, often stating that this scenario is needed to support economic growth and to provide the homes Oxfordshire needs. On the other hand, there were a significant number of objections to the transformational scenario, particularly amongst local groups/stakeholders. The objections widely related to the use of the OGNA and the view that significant levels of housing growth would cause damage to both local communities and the environment. Many respondents also felt that high levels of growth would make it impossible for Oxfordshire to meet climate emergency net zero carbon targets.

4.5.88 Those stakeholders that supported the transformational scenario provided a variety of justifications for this figure. Some reasons provided by respondents include that it will support the Oxfordshire Local Industrial Strategy (LIS), address the major issue of affordability of homes in the county and help tackle climate change through reduced commuting. Stakeholders also highlighted that the transformational growth option would match the figure identified in the Growth Deal in terms of providing homes. It was also noted by respondents that this scenario would support the Government's aspirations for the OxCam Arc.

4.5.89 A number of respondents felt that the Oxfordshire Plan should use the standard method figure. Some considered that the standard method figure should be adopted whilst also encouraging local

planning authorities to make additional provision for affordable housing specifically for local residents. However, there were also concerns raised about using the standard method as a minimum. It was highlighted that it is not a mandatory requirement, provided that an alternative approach can be justified with consideration given to planning constraints such as Green Belt and AONB, as cited in NPPF paragraph 11, and that this should be acknowledged.

4.5.90 Additionally, it was also felt by many that there is no justification for going beyond the minimum level of housing growth set out by the "standard method" and that there should be an option for Oxfordshire to grow organically, based on up to date natural population growth figures produced by the Office for National Statistics, with the focus on making housing in the area more affordable. It was expressed by some respondents that Brexit, Covid-19, 2050 carbon neutrality, the falling birth rate, slower economic growth, and automation will significantly affect the natural trajectory of growth. These respondents stated that they considered it possible to have a dynamic and transformational plan with lower levels of growth that supports Oxfordshire's economic specialisms especially in learning, research and innovation without excessive housing growth. They also considered that 'accelerated growth' and 'robust growth' as described in the OGNA following recession should not be defined as Business as Usual.

4.5.91 There were also a large number of respondents who considered all levels of growth proposed through the consultation to be too high and unjustified. They expressed their view that all growth levels will ultimately lead to further traffic congestion and pressure on local services. These respondents often expressed that the housing figures proposed are far too high and far in excess of Office for National Statistics figures, which identify that Oxfordshire needs only 53,000 more houses between now and 2050. They referenced the predicted population growth in the OGNA and considered it to have been calculated not on the basis of ONS trend-based data, but using GP registrations, which they consider unreliable, and thus concluded that this was inflating Oxfordshire's predicted 2050 population.

4.5.92 Additionally, respondents who considered all growth options too high often stated that as over 78,000 houses are already included in current local plans in Oxfordshire, they considered that further development is not needed. They proposed a further growth scenario, which is an option to allow natural 'organic' growth, with a focus on providing more genuinely affordable housing.

4.5.93 Several respondents stated that previous reports like the Strategic Housing Market Assessment (SHMA 2014) have overpredicted need and deliverability. They considered that numbers expressed through the consultation appeared to be based on a notional growth figure rather than based on an assessment of need. As a result, some respondents stated that the housing need scenarios are based on an outdated model of economic growth.

4.5.94 It is considered by some respondents that higher levels of growth in Oxfordshire may be unachievable, placing local authorities under pressure to maintain a 5-year housing land supply, exposing them to appeal challenges and opening communities to damaging planning proposals. Doubts were expressed that even the Standard Method level of growth can be achieved in the Plan period, considering the lower level of housing completions previously achieved in the County.

4.5.95 There was also a degree of scepticism about the intention to develop new sites at pace. It was suggested by one respondent that house builders may restrict the release of new dwellings in order to maintain demand, price and profit. One respondent also raised the view that the capacity of the construction industry to build at speed is likely to decline because of the loss of skilled workers, poor training, old fashioned construction materials and methods and the age structure of existing workers.

4.5.96 A number of assumptions used in the OGNA have been questioned by stakeholders, comments included:

- It was stated that in recent years net commuting in Oxfordshire has doubled from 2011 levels, but this has not been reflected in the OGNA, which simply projects forward the 2011 census commuting data.
- It was expressed that the OGNA assumes that migration will continue at past levels but consideration should be given to whether there is scope to test high and low migration scenarios
- They considered the OGNA data to be incomplete and out-of-date and stated that it needs to be informed by the 2021 Census.
- A respondent considered that the OGNA fails to recognise the importance of communal establishments, particularly student accommodation, in Oxfordshire.
- Some considered the 'adjusted' standard methodology to have not been calculated accurately as they consider the 2014-based household projections used to be out of date.
- Some considered it misleading to describe the first trajectory as "Standard Method (adjusted)" as they expressed that it had been derived using different baseline data and the adjustments applied are contrary to the method adopted in official projections from ONS.

4.5.97 Questions were raised regarding what will happen if demand for housing is significantly less than the trajectories modelled in the OGNA, and if there has been a risk assessment associated with this. They highlighted that existing demand for buy to let, second homes and holiday lets and the implications for the housing market and on communities also need to be considered.

4.5.98 Several respondents expressed that the Plan should ensure that a mix of sites in terms of size, location, tenure and are provided for. They stated that this should include policies to enable housing association and council houses to be developed on brownfield sites which could help delivery.

4.5.99 A respondent highlighted that 'Need' and 'requirement' are noted as specific terms but not defined. They stated that clarity is also required in policy as to whether different housing targets relate to dwellings or households.

4.5.100 One respondent expressed that care needs to be taken as to how 'committed growth' is taken account of in the Oxfordshire Plan. They state that the consultation document appears to be incorrectly based on two different concepts, on the housing requirement for some districts, and on the level of supply for others. They expressed that commitments only use planning permissions in the Regulation 18 document, where as Local Plans have spatial allocations for housing and other non-site specific trend commitments which should be taken into account. They stated that the calculation of residual requirements should be based on the requirement in each authority, not the level of supply the authority anticipates.

4.5.101 One respondent recommended that the Oxfordshire Plan should include an assessment of the deliverability of existing sites allocated in Local Plans to take account of potential non-delivery. They stated that the Plan should re-phase the outstanding commitments 2020-2031 over the period 2020-2050 as necessary.

4.5.102 One respondent noted that in order to determine the housing requirement for the Plan, further partnership work should take place to ensure an accurate process. It was also expressed that the evidence to support this policy should have been subject to consultation previously.

Policy Option 29 – Urban Renewal

Key Messages

Generally, the proposed policy option was well supported, with multiple comments expressing support for brownfield land development and increasing densities in urban areas. Some respondents, whilst supporting the principle of encouraging the reuse and/or intensification of brownfield sites, do not consider a bespoke policy is required.

Some concerns were raised about the deliverability of urban renewal schemes, which can often be costly and lengthy. Comments raised a need for realistic assumptions about the availability, capacity, feasibility and viability of development on brownfield land.

Key messages included:

- A need for realistic assumptions about availability, capacity, feasibility and viability of brownfield development.
- The important role hinger densities and brownfield land development has in climate change resilience.
- That high density development should not compromise good design.
- That community led urban renewal projects should be encouraged and supported.

Policy Option 29 - Urban Renewal

How strongly do you agree or disagree with the preferred policy option?

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
Policy Option 29 - Urban Renewal	8	8	6	6	1

4.5.103 Generally, the proposed policy option was well supported. There was strong support for the principle of encouraging the reuse and/or intensification of brownfield sites, with a number of respondents expressing strong support for increasing densities in urban areas and the prioritisation of brownfield sites.

4.5.104 A number of respondents expressed views that brownfield sites should be used instead of greenfield sites. They highlighted that concentrating development in urban areas and on brownfield sites, maximising densities, and making better use of existing building stock through redesign and repurpose, would help to protect the countryside. There were some comments on food production within Oxfordshire, and the need to prioritise farming land for this purpose. Some respondents stated that it is a better use of land to focus on compact and high-density design.

4.5.105 Some were disappointed that this policy option is the only place in the Oxfordshire Plan where housing density in mentioned. It was also raised that the reference to density is only vague, with language such as ‘where appropriate’ used.

4.5.106 Some respondents support the principle of encouraging the reuse and/or intensification of brownfield sites, but do not consider that a bespoke policy is required to encourage urban renewal,

as this can be left to local planning authorities, directed by an inclusion of brownfield first principles in a spatial strategy.

4.5.107 Several comments focused on the need to increase resilience to climate change. They commented that greenfield land should not be developed as it could be restored for wildlife or regenerative agriculture. It was highlighted that high-density urban housing can reduce carbon emissions and produce well rounded and vibrant communities. Several respondents noted the Goldsmith Street housing project in Norwich as an example development that the Oxfordshire Plan should aspire to.

4.5.108 One comment noted how urban renewal is needed in the context of Covid-19.

4.5.109 Housing density was commented on by several of the respondents. They stated that density is important because it has a significant impact on land-take; with two or three storey compact housing more likely to produce climate friendly 20-minute neighbourhoods. Respondents also highlighted that higher housing density can increase the viability of public transport and other services and infrastructure. It was noted by some that it can facilitate the building of smaller, more affordable properties, and that the focus of the Oxfordshire Plan should be on high density, low cost, low land take, units.

4.5.110 Some respondents did raise concerns and objections. Some respondents objected to the policy option, stating that it is not transformational, and simply restates Oxford city's statement about ring-fencing employment land. They considered that there should be a complete re-appraisal of how land is used in Oxfordshire, for example through changing urban centres and increasing densities. Others objected to the proposed policy because of a lack of emphasis on providing high density housing. Another respondent objected as they felt that the proposed policy imposes demands on brownfield land and that there is no need to redevelop the town centres.

4.5.111 Some respondents felt that further consideration should be given to the possibility of adding additional homes to existing business/employment buildings in towns and villages. The Botley Road was noted as an example where flats could be added above business premises.

4.5.112 A number of respondents provided the same observation that urban renewal can often be costly (such as costs of remediation) and lengthy (including land ownership). These respondents stated that it is important to have realistic assumptions about the availability, capacity, feasibility, and viability of residential development on brownfield land, to quantify the contribution that such land can make to meeting Oxfordshire's housing needs. One respondent flagged the potential concerns regarding when brownfield land is within multiple land ownerships without formal agreements, or is subject to legal restrictions, and the implications on the feasibility of development, and timeframe of delivery.

4.5.113 It was highlighted that brownfield development can often be more complex and costly, and may not be able to deliver the same levels of development, including community and infrastructure benefits, that an equivalent greenfield development could provide. Whilst it was acknowledged by some respondents that brownfield land offers the opportunity to seek environmental improvements, it was raised that there are often constraints imposed by the feasibility, time and cost of remediating despoiled, degraded, derelict, unstable or contaminated land. Specific comments were also made on the cost of development and the importance of grant funding and other financial support.

4.5.114 Comments were also provided on specific policy wording concerning environmental gains and the function of brownfield land. Some respondents cautioned that brownfield sites may not be able to

deliver environmental benefits when the land is contaminated, considering wildlife, carbon storage, and flood risk mitigation.

4.5.115 Several respondents felt that the Oxfordshire Plan should seek to incorporate a balance of urban and rural growth. They commented that the approach to growth should recognise the benefits greenfield development can bring, such as infrastructure investment and affordable homes. Several respondents felt that the Oxfordshire Plan should recognise that brownfield development alone will not deliver the level of housing Oxfordshire requires, and that there is a risk of setting unrealistic assumptions about brownfield capacity, which could lead to insufficient housing land being identified. Another respondent raised how rural areas often have a much more limited stock of brownfield sites, and therefore the development of greenfield sites is often unavoidable. It was noted that brownfield registers should currently be available to provide an insight into the availability of such land.

4.5.116 It was raised by some respondents that an aspirational housing target might mean that urban renewal may not be the preferred option, as it would concentrate on areas of Oxford and potentially overlook other opportunities. Some respondents also stated that the strong focus on business and science parks might ignore innovation taking place elsewhere, such as in rural communities and town centres.

4.5.117 The policy option states that brownfield MOD land will be brought forward, however one respondent raised that it is important to recognise that a number of current and former MOD sites which might be considered brownfield, are not located in sustainable locations. They were of the opinion that just because a site is brownfield must not mean that it scores more highly than a greenfield site that is in a more sustainable location.

4.5.118 Another respondent questioned if development on previously developed sites in the Green Belt had been overlooked in this policy, and whether this should be recognised as the Oxfordshire Plan progresses.

4.5.119 It was raised by some respondents that projected delivery from regeneration initiatives on brownfield sites should include some level of certainty if this is to be included within the trajectory for housing. They stated that it should take into account an assumed level of non-delivery based on past trends to reflect the reality of the challenges of brownfield sites, also taking into account the impact of new policy requirements, such as those relating to energy efficiency and biodiversity net gain.

4.5.120 Some felt that caution is needed over the priority placed on compact, high-density new development. They felt that limiting sprawl should not be achieved at the expense of people's quality of life. Whilst it was recognised by many that 'compact' does not equate to high-rise housing, design should not be compromised.

4.5.121 Some comments raised concerns over the potential consequences for the character of settlements if significant urban renewal schemes take place. Therefore, when seeking higher density development, the respondents raised that it is important to ensure the policy is supported by suitable character and placemaking analysis, to ensure assumptions made regarding density and capacity are realistic and that high-quality housing will be delivered.

4.5.122 Several respondents stated that there are design solutions to high density, low cost, and low land-take development, which the Oxfordshire Plan should take account of.

4.5.123 The Environment Agency recommended that 'supported' is replaced with 'prioritised' in the policy option. They commented that projects can only be supported if they comply with the NPPF and do not cause harm to the environment. They stated that some schemes may not be supported if they impact the environment. They highlighted that the word 'prioritised' makes it more accessible to developers but does not guarantee it will be supported.

4.5.124 One respondent felt that community led urban renewal projects should be encouraged and supported in the policy.

4.5.125 A respondent also suggested that the policy should have targets for high density housing in urban and peri-urban areas.

4.5.126 One suggestion was that the policy should provide a more flexible and ambitious approach to urban renewal.

4.5.127 It was raised that the strategy for urban renewal should set out in more detail the appropriate mix of housing, affordable homes, and emphasis attractive place-making for communities.

4.5.128 One representation highlighted that stating 'more energy efficient' is not enough, and that the proposed policy should be aiming for maximum energy efficiency and zero carbon.

4.5.129 Other respondents said that support should be extended to innovative models of construction and ownership; and that the policy should include an ambition to re-balance urban areas by locating businesses on appropriate transport links outside towns and cities. They also stated that the policy should safeguard employment sites in urban centres for mixed used development.

4.5.130 Representations on behalf of Harwell Campus stated that the policy wording should be amended to apply itself to the different contexts within Oxfordshire, including locations such as Harwell Campus, as currently only Oxford, the market towns, and former MoD sites are identified in the proposed policy.

Policy Option 30 – Affordable Homes

Key Messages

It was generally agreed that more affordable homes are greatly needed across Oxfordshire. People would like to see a policy which provides good quality, locally affordable homes and provides a sustainable solution to the ongoing affordability crisis. The affordability issues of housing were raised by many of the respondents, with comments made relating to the whole of Oxfordshire, as well as Oxford city specifically, and also in relation to rural areas. Key messages included:

- Several respondents raised concerns regarding viability and deliverability, and the need for evidence on this.
- The potential implications on other Oxfordshire Plan and Local Plan policies and the need to consider this was raised.
- There was a notable split between those agreeing with the proposed policy option, and those who think the Oxfordshire Plan 2050 should go further.
- Positive suggestions were provided from Community First Oxfordshire concerning community led-housing/rural affordable housing.

Policy Option 30 - Affordable Homes

How strongly do you agree or disagree with the preferred and alternative policy options?

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
Policy Option 30 - Affordable Housing	7	23	3	4	
Policy Option 30 - Alternative 01 - Set tenure mix targets in Oxfordshire Plan		4	1	3	1

4.5.131 On the whole, the comments were in agreement that affordable homes are greatly needed across Oxfordshire. People would like to see a policy which provides good quality, locally affordable homes that provides a sustainable solution to the ongoing affordability crisis. Housing affordability issues have been raised by many of the respondents, with comments made relating to the whole of Oxfordshire, as well as those relating to Oxford city specifically, and also in relation to rural areas.

4.5.132 Some respondents said that housing unaffordability in Oxford should be a key focus for the Oxfordshire Plan. Comments raised concerns around the overall effect affordability is having across Oxfordshire, including the overall attractiveness of Oxfordshire as a place to live/work, the difficulties in retaining younger demographics and families within Oxfordshire, and the increased pressures on transport infrastructure as commuting distances increase.

4.5.133 Most of the comments were either in support of the proposed policy option, or not. The majority of comments were in support of the proposed policy option; however, a substantial number of respondents did raise concerns and felt that the policy could go further.

4.5.134 A lot of the respondents supported the proposed policy option. They agreed that local planning authorities should be the ones setting affordable housing targets and tenure mix. The reasons for this include:

- It ensures local context is taken into consideration.
- It allows varying circumstances across Oxfordshire to be considered.
- Affordable housing targets should be based on up to date, robust local evidence.
- Targets must be assessed against local circumstances and market signals.
- It should be considered by each Local Plan's viability assessment to ensure requirements do not render development unviable.
- The final quantum and mix of affordable housing should be determined through local assessment of needs and viability.
- The type of homes being build should be led by local need.

4.5.135 Some comments raised concerns with the potential implications of a countywide affordable housing requirement, raising that it could result in housing which does not truly meet the needs arising in the area. The same concern was also raised regarding tenure mix requirements. A number of respondents stated that the proposed policy option will need to ensure local needs are taken into account. Several comments also highlighted that across the county, affordable housing requirements currently vary between 30%-50%, supported by viability assessments on a case-by-case basis. Some comments even challenged how affordable housing targets could be applied at a city/district level. One respondent raised questions about how this policy would be applied to a planning application or allocation, which covered multiple local planning authority areas.

4.5.136 In contrast to those comments supporting the proposed policy option, there were a number of comments which raised concerns. They felt that as drafted, the affordable housing policy currently lacks clarity and does not go far enough in addressing the need for more affordable homes. Comments were made about the need for further clarity on the amount and types of affordable homes that are needed, and how they will be delivered. Support was expressed by some for the alternative policy option, which includes a housing mix requirement, helping to ensure a consistent and diverse affordable housing mix across Oxfordshire, whilst seeking to retain flexibility to respond to local circumstances. Some felt that the most effective way to make housing affordable in Oxfordshire is to increase the supply of affordable housing, setting ambitious requirements, rather than relying on an overall housing number to deliver affordable homes as a 'by-product'.

4.5.137 Some respondents raised that the policy should include specific requirements for local plans, including a breakdown of the percentage requirements for affordable housing, as per the alternative option presented. The policy option's current lack of guidance on the level of affordable housing which would be sought on sites, other than for it be maximised, was seen as a weakness by some. An alternative point raised was that if not expressed as a target, there should be an agreed mechanism to support appropriate apportionment and ensure that affordability is not exacerbated through an inconsistent or skewed approach across the city/districts. In acknowledging the risks of the alternative approach, respondents noted that these risks could be mitigated through the five-year plan review mechanisms.

4.5.138 Viability and the importance of viability assessments was a key issue raised by many of the respondents. It was one of main reasons why the preferred policy option was supported, with it expressed multiple times that establishing affordable housing requirements in local plans is the most appropriate way to consider the viability of sites. Some comments noted that there are questions around how the plan's viability assessment will factor in development cost; including how any viability assessment may need to consider a range of affordable housing scenarios.

4.5.139 Respondents raised that viability could have implications on local planning authorities affordable housing requirements, taking into account potential increased costs resulting from other policies in the Oxfordshire Plan. One comment noted that the policy option does not enable any assessment to be undertaken as to whether the Plan would support viable policies, because the effect of the preferred policy option is unclear. The importance of viability assessments was raised in relation to plan-making and decision-making, with respondents noting their experience dealing with planning applications and viability assessments, and the importance of knowledge in this area.

4.5.140 There were also a number of comments stating that any policy concerned with the delivery of affordable housing must have the flexibility to ensure that the viability of schemes is not compromised. This was flagged as being an important issue both at the countywide level and local level. The need for flexibility was also highlighted in relation to reviewing any potential policy, so that changing circumstances can be considered, especially given the long-term nature of the Oxfordshire Plan.

4.5.141 Respondents also highlighted how the provision of affordable housing forms part of a wider range of considerations, such as education contributions, transport contributions, and open space contributions. Seeking to maximise affordable housing could have implications for other policy areas. Respondents noted how this is especially relevant for the Oxfordshire Plan, with the shift towards net zero carbon construction, which will increase build costs and have an impact on financial viability. Comments raised how the cumulative impact of the Oxfordshire Plan should be considered to ensure sites are deliverable. It was also specifically raised how the delivery of more affordable housing must not result in the relaxation of requirements to be carbon neutral.

4.5.142 Many respondents expressed how they would like the policy to go further, and to be transformational in its approach in addressing the need for genuinely affordable housing across Oxfordshire. Several comments have focused on the types of affordable housing that need to be delivered, emphasising the need for 'genuinely' and 'truly' affordable homes. This links with comments asking how affordable is defined, and whether anything can be done to make the definition Oxfordshire specific. Some respondents do not think that the Government definition of affordable housing (at 80% of market rates provides affordable homes in Oxfordshire) is genuinely affordable, and that the Oxfordshire Plan should be used to set an Oxfordshire definition with Oxfordshire targets.

4.5.143 Other comments feel that alternative innovative solutions are now needed in order to meet the unmet need and address affordability issues. These include:

- Giving local authorities powers to acquire land at a value determined by its existing planning status.
- Local authorities must be the beneficiaries of the uplift in land value resulting from consent to development.
- Property taxation should be applied to the value of the site, not the buildings on it and even if the land is undeveloped.
- Local authorities must be empowered to build genuinely affordable homes.
- The minimum term for Assured Shorthold Tenancies should be extended to 3 years.
- Community trusts and councils could be using their existing stock of homes – buying them, retrofitting them for energy efficiency, and supplying them at secure, social rents.
- Densities on new developments should be increased.
- Affordable homes should be monitored.
- Local authority housebuilding should take place.

4.5.144 A number of respondents felt that those doing vital jobs within the Oxford city cannot compete in the housing market. It was highlighted that affordability issues have a negative impact on recruitment and economic performance in Oxfordshire.

4.5.145 Concerning affordability, a number of Oxford specific comments were made, stating that housing policies have led to over half of Oxford's population being tenants rather than owner-occupiers. It was expressed by some that Oxford city is already intensively developed and therefore the Government solution of building more homes does not address the issues.

4.5.146 Some comments expressed how some of the affordability issues in the county are due to the national position on affordable housing. They considered that going beyond current NPPF definitions on affordable housing is necessary in Oxfordshire, and that the allowances due to viability given in planning applications results in a lower amount of affordable housing being delivered, which is not acceptable. Others felt that the high value of land in Oxfordshire is causing problems in the delivery of affordable housing.

4.5.147 Some respondents also commented that they would like the Oxfordshire Plan to recognise the particularly negative impact unaffordability has on rural communities. The pricing out of people has a significant impact on local businesses and services.

4.5.148 A significant number of the respondents agreed that affordable housing should be tenure blind.

4.5.149 It was also raised that consideration should be given to appropriate cluster sizes, both in terms of the management of the homes, but also the sense of community that larger clusters of similar tenure housing can provide. Comments note how this was highlighted during COVID-19 lockdown.

4.5.150 Concerns were also raised regarding permitted development rights and extensions, with some respondents stating that these are removing 2 and 3 bedroom market units. They stated that this stock is not being rebalanced, with more 4+ bedrooms being built. It was raised that this is creating an excess supply of larger 'executive' properties, which are not as accessible to younger demographics.

4.5.151 A number of respondents expressed views about the mix of affordable housing on developments. A number of these also overlap with comments made about affordability across the county. These views included:

- That commercial developments cannot deliver affordable housing according to the current concept of 80% of market rent/price.
- Schemes such as first-time buyer initiatives simply inflate the cost of properties.
- That there is insufficient social housing available or being built, and this means that local residents are unable to find homes to rent, and employees on average salaries cannot buy but must commute long distances, creating issues of traffic congestion and pollution.
- Harwell Campus specifically raised that there is an opportunity to provide homes that directly meet the needs of the science community, as currently there is little housing that is fit for this purpose and an identified need for it.
- That there is a need to provide social housing for rent, recognising that not everyone is in a position to purchase their own home.
- That affordable housing in the context of Build to Rent should be considered to meet the needs of those renting their homes. Any future policy should consider the NPPG on Build to Rent.
- That homes for sale should only be available to those living/working in Oxfordshire.
- That homes should only be sold to people in need of them.

- That affordable homes should remain in perpetuity.
- Suggesting percentages of rented, shared ownership etc is over-detailed and legally challengeable, with it being too fixed at a moment in time.

4.5.152 Respondents generally supported the First Homes references within the Oxfordshire Plan, but asked that there is clear guidance on how it applies in relation to the future mix of tenure on site. Some respondents did raised concerns regarding First Homes, with it being a relatively new mechanism to deliver affordable homes.

4.5.153 There was also support for community led-housing schemes, with suggestions that this element of the policy should be strengthened. Detailed comments on community led-housing were made by organisations with knowledge in this area, knowing what it is capable of achieving in Oxfordshire.

4.5.154 Some would like to see the vital role that community led-housing can take reflected more strongly in the Oxfordshire Plan. It was highlighted how although community led-housing is an emerging sector, with the right support it can play a significant role in housing delivery numbers. It was raised that in Oxfordshire, based on current interest, it is believed a pipeline of 28 projects over the next 5 years providing in the region of 500 new homes could be provided, but delivery of these projects relies on access to land and finance opportunities. Some respondents highlighted that community-led housing needs active support in terms of planning policy to ensure that groups (who can be seen as small developers) have access to land opportunities. It was noted that without proactive support groups are unlikely to be able to compete for sites against large developers, and that groups also need funding and technical support to take advantage of opportunities. They would like to see the reference to the role of community led-housing strengthened, realising that the Oxfordshire Plan is too high a level for detailed policy, but stronger wording would be significant in encouraging city and district local plans to develop their own detailed policies, particularly through Supplementary Planning Documents (SPDs).

4.5.155 Comments noted how the policy could be strengthened by making particular reference to affordable housing needs for rural communities. Comments were made on how a small number of new affordable homes to meet identified local needs in rural communities would be transformative. They stated that for these reasons, the Oxfordshire Plan 2050 could play a significant role in setting the policy trajectory.

4.5.156 Some respondents took the opportunity to provide suggestions as to how the plan and policy option 30 could be expanded or improved to increase the provision of affordable homes. Some of the suggestions were:

- To avoid the further loss of affordable housing it is necessary to restrict “right to buy” and “right to acquire” within locations, such as AONBs, where there is no realistic possibility of replacing the sold stock. It was suggested that this issue is recognised in Oxfordshire Plan policy with a minimum requirement to demonstrate how stock lost to Right to Buy or Right to Acquire will be replaced.
- That there should be pressure on local planning authorities to co-operate to achieve a reasonable county-wide provision, which should be in this policy.
- That there should be a greater emphasis on the full involvement of the community in the provision of their own housing.
- That the Plan should support the threshold for affordable housing provision in the AONB being set as low as necessary to deliver the affordable housing needs of the local community.

- That the Plan should give support to local policies that maintain existing affordable and lower cost housing, rather than focussing solely on house building.
- That the Plan should encourage maintaining and renewing the existing social housing stock.
- That the proportion of affordable and key worker housing in future developments should be increased.
- That a higher quantum of housing would contribute to more affordable housing.

4.5.157 It was also raised that consideration should be given to the fact that the provision of affordable homes is often greater on greenfield sites, with comparatively lower remediation costs than brownfield counterparts.

Policy Option 31 – Specialist Housing Needs

Key Messages

The proposed policy option was well supported, and generally respondents were positive about the way the Oxfordshire Plan could address the topic of specialist housing needs. Some common themes to occur in the comments related to housing for older people, student accommodation and key worker housing.

Key messages included:

- Questions regarding viability considerations.
- That additional requirements in the policy should be included, i.e., lifetime homes.
- That local needs are often best understood at local level.

Policy Option 32 - Specialist Housing Needs

How strongly do you agree or disagree with the preferred and alternative policy options?

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
Policy Option 31 - Specialist housing needs	1	10		1	
Policy Option 31 - Alternative 01 - Support delivery of specialist housing to meet identified needs	2	2		2	1
Policy Option 31 - Alternative 02 - Leave to Local Plans to determine how specialist needs are met	2	2		3	

4.5.158 Generally, the proposed policy option was well supported, with many comments offering their support for the approach outlined. Respondents noted that including detailed housing needs or requirements about the need for specialist housing is more appropriate via Local Plans and Neighbourhood Plans, given the differences in provision and requirements. Comments noted that local communities are best placed to understand their specialist housing needs, and that flexibility is needed in policies to ensure final provisions are informed by evidence and site and settlement-

specific considerations, as well as viability considerations. There was support for the Oxfordshire Plan providing a framework, or criteria-based approach, within which local plans operate.

4.5.159 A number of comments raised potential additions and things to consider with regards to the proposed policy. This included comments that related to the reference to lifetime adaptability and lifetime homes, with some respondents stating that all homes should be appropriate for people with disabilities. Comments were made on the need for specialist housing near to Oxford, to help reduce the need to travel for those who work in Oxford. There were several comments on the need for easy travel connections. Some respondents noted how the policy could help ensure mental and physical health benefits are incorporated into design proposals. Comments were also made regarding the potential for including forms of housing such as Build to Rent, Co-Living, as well as innovative forms of tenure, such as community-led housing and community land trusts. One comment highlighted the potential opportunity for retrofitting existing homes and the positive impact this will have on revitalise town centres.

4.5.160 However, whilst in the minority, some respondents did feel that the policy options did not go far enough. Some respondents stated that specific requirements for local plans should be included, whilst others suggested that the policy should provide a breakdown of the requirements for specialist housing by type. A couple of comments suggested that the policy should also include requirements for lifetime homes.

4.5.161 Many respondents commented on the need for housing for the elderly, and that this need is likely to increase and grow over the plan period. It was raised that accommodation for the elderly needs to be in good proximity to health services and local shops. Some comments were also made about the suitability of purpose-built accommodation for the elderly, and the need for this to be appropriate. It was also suggested that communities should be multi-generational, with accommodation for older people well integrated.

4.5.162 Detailed comments around meeting the needs of older people also focused on the need for allocations, whether in isolation or as part of mixed-use development. One comment set out how this policy should indicate that the in the first instance, the Oxfordshire authorities should look to allocate sites for older people's accommodation that are in the most sustainable locations close to key services. However, they noted that it is also important that the delivery of specialist accommodation needs can be monitored, and that there are mechanisms in place to support their delivery.

4.5.163 The importance of policies in local plans supporting the delivery of accommodation for older people was raised. It was suggested by a respondent that annual targets for the delivery of homes for older people are implemented, with consequences such as operating a presumption in favour of proposals for older people, if the targets are not met.

4.5.164 There were a number of comments also focused on the student accommodation element of the policy option. Comments were made about the issues surrounding student accommodation displacing local residents, and whether the Oxfordshire Plan could address this, suggesting a percentage cap on student accommodation. It was also raised that education establishments should be supported alongside student accommodation.

4.5.165 Some respondents commented on the alternative policy options presented in the consultation document. This included the Environment Agency, who provided some suggested wording, such as the inclusion of healthcare and shops, the provision of green infrastructure and access to nature, and encouraging a move away from cars for student accommodation. Some felt alternative policy

option 30-02 which suggested not having a strategic policy and leaving it to local plans to set policies was the best option.

Policy Option 32 – Gypsies, Travellers and Travelling Showpeople

Key Messages

Generally, the preferred option was supported, with it noted that considering gypsies, travellers and travelling showpeople accommodation at a countywide level was appropriate. Suitably located sites are favoured if it reduces incidents of travelling communities setting up on non-designated sites and pitches. Some respondents raised the following observations on the proposed policy:

- Often travelling communities set up on non-designated sites and pitches, which is likely outside the scope of the Plan to make provision for.
- It can be difficult to plan for the needs of travellers within small geographical regions, because they travel.
- The policy lacks clarity as it is not clear if it is suggesting additional site provision or not.
- Green Belt, the AONBs and areas at a high risk of flooding should be excluded as possible locations for future provision of gypsies, travellers and travelling showpeople accommodation.
- A question was raised regarding how nimbyism will be addressed.
- It was noted that it is best considered county-wide, with negotiation between authorities and communities.

Policy Option 32 - Gypsies, Travellers and Travelling Showpeople

How strongly do you agree or disagree with the preferred policy option?

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
Policy Option 32 - Gypsies, Travellers and Travelling Showpeople	2	7	2		

4.5.166 Most of the comments received in relation to this policy option were supportive. They acknowledged that considering gypsies, travellers and travelling showpeople accommodation at a countywide level was appropriate. Comments suggested that the locational criteria was also supported.

4.5.167 Some respondents commented on non-designated sites and pitches and the ability, or not, of the Oxfordshire Plan to be able to address this. Some comments did note that the provision of suitably located sites may reduce incidents of travelling communities setting up on non-designated sites and pitches.

4.5.168 Some respondents felt that Green Belt and the AONBs should be excluded as possible locations for future provision of gypsies, travellers and travelling showpeople accommodation. Some comments also said that the policy needed to clarify as to whether additional sites need to be provided.

4.5.169 The Environment Agency have requested that it is clearly stated that gypsies, travellers and travelling showpeople sites are not to be located in areas at risk of flooding, and that all such development is considered as 'highly vulnerable' in line with the NPPF Annex 3. The Environment Agency have requested the quoting of the NPPF Annex 3 vulnerability for traveller sites and the Planning Policy for Traveller Sites 2015. They state that traveller sites are not appropriate in areas at high risk of flooding (flood zone 3) and that the exceptions test must be passed for sites in areas of medium flood risk (flood zone 2).

4.5.170 Reading Borough Council has commented that they have unmet needs for permanent accommodation for gypsies and travellers, which due to the constrained urban nature of the Borough, the Reading Local Plan could not identify any sites to accommodate this need. This need has not been met elsewhere, and therefore Reading Borough Council have requested that any consideration of needs in Oxfordshire should therefore take account of whether there is any scope to accommodate any of Reading's unmet needs.

SPATIAL STRATEGY OPTIONS

Spatial Option 1 – Focus on opportunities at larger settlements and planned growth locations

Key Messages

Key issues raised in support of Option 1:

- Focuses growth at locations with the highest concentration of jobs, services and facilities, affordable housing need, sustainable transport connectivity and infrastructure.
- Growth would be well related to Oxfordshire's key economic assets.
- Provides scope to optimise land use at larger settlements and at strategic allocations.
- Strategy previously found sound through local plan examinations.
- Less confusion caused by a radical strategy change mid-way through local plan periods.

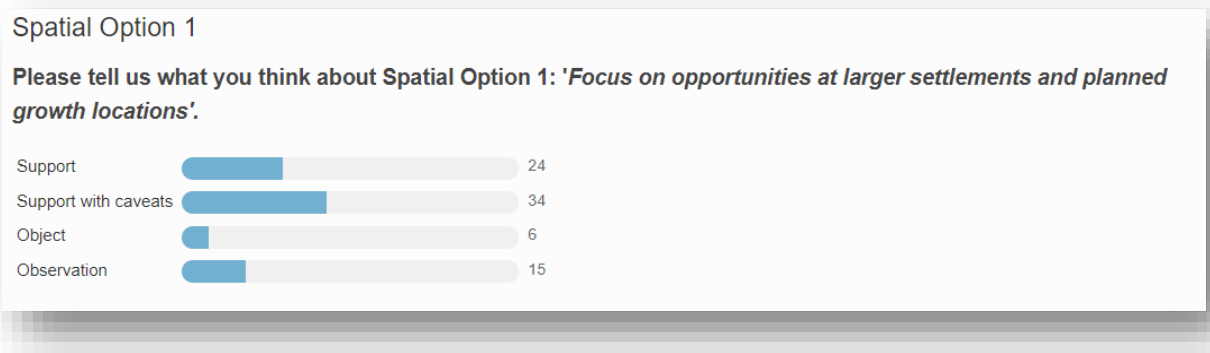
Key concerns raised about Option 1:

- Questioned raised about the capacity of larger settlements to accommodate further large-scale development, both in terms of infrastructure capacity and environmental constraints.
- Growth at the edge of settlements is becoming increasingly distant from town centres and sustainable transport hubs, reducing sustainability benefits.
- Risk of harm to the character of existing settlements and a risk of urbanising rural or semi-rural environments.
- Risk of missing opportunities to deliver transformational change.

The need for an assessment of the capacity of larger settlements and planned growth locations to absorb further development was highlighted.

There were suggestions that the Oxfordshire Plan provides an opportunity to review the settlement hierarchy at a countywide scale and that this review should take account of the changing role of some settlements as a result of planned growth.

Option 1 may not be sufficient on its own to meet Oxfordshire's growth needs.



4.6.1 There was some support for Option 1. Some respondents felt that this was the 'least bad' option.

4.6.2 It was suggested that the locations identified within Option 1 are growing communities and it is reasonable to continue to view them as such. It was also highlighted that this approach aligns with established settlement hierarchies and has previously been found sound at local plan examinations. Some respondents felt that this was the most achievable/deliverable option.

4.6.3 However, whilst some respondents saw benefits in continuing current local plan strategies, others felt that this would limit the potential to deliver transformational change. It was suggested that opportunities to deliver sustainable growth in other locations could be missed. It was also suggested that it i not a sound approach to distribute growth to a location simply because it has accommodated growth previously. There were suggestions that the Oxfordshire Plan provides an opportunity to review the settlement hierarchy at a countywide scale and that this review should take account of the changing role of some settlements as a result of planned growth.

4.6.4 Some respondents cautioned that whilst some locations may have capacity for further growth, others may be limited by constraints. In particular, concerns about the capacity of transport infrastructure and the further erosion of the Oxford Green Belt were raised. Some residents questioned whether any of the identified locations had capacity for further strategic scale development. The need for an assessment of the capacity of larger settlements and planned growth locations to absorb further development was highlighted.

4.6.5 Questions were asked as to whether development would be distributed across a large number of locations or whether the option would be refined to focus on a smaller number of locations. There was some support for a more dispersed pattern of growth as this was seen as having less of an impact on established communities. It was also highlighted that large strategic sites can have long delivery periods and there is a higher risk of delays, which can have negative impacts on housing land supply. It was suggested that a more dispersed pattern of growth would increase opportunities for small and medium sized developers.

4.6.6 It was suggested that Option 1 could be considered 'good growth', for a number of reasons:

- It would capitalise on existing/planned infrastructure investment and encourage further investment.
- It would focus growth at Oxfordshire's most sustainable locations, close to jobs and existing services and facilities. This could help to reduce the need to travel and/or travel distances.
- It would support the viability of existing services and facilities in larger settlements.
- It would strengthen the role of existing and planned growth locations.
- It would support the delivery of ultra-fast broadband at identified locations.
- It would focus growth around established sustainable transport nodes and would help to deliver improved/expanded sustainable travel options.
- It would have the lowest environmental impact.
- It would result in the lowest loss of greenfield land of all the options.
- It would respond to the need for housing, support the delivery of existing commitments and continue high levels of delivery.

4.6.7 However, it was caveated that good growth would need to ensure that environmental impacts are properly considered and there is sufficient additional infrastructure investment. The need to consider impacts on the character of existing settlements and of urbanisation on rural or semi-rural environments was highlighted, as was the need to ensure that communities within larger settlements have sufficient access to green spaces and the countryside.

4.6.8 It was suggested that there may be opportunities to review existing allocations, particularly as many sites will continue to be built out beyond adopted local plan periods. A number of people suggested that densities should be increased to ensure an efficient use of land and that this could reduce the need to identify further greenfield sites for development. It was suggested that opportunities within, and adjacent to, allocated sites should be explored. However, there was some concern that it may be premature to locate further development where new communities and associated services, facilities and infrastructure are not yet established.

4.6.9 It was also suggested that intensification within larger settlements should be explored, including increasing densities. There was some concern about further growth at the edge of settlements as this would become increasingly distant from settlement centres, reducing opportunities for walking and cycling. It was suggested that edge of settlement growth, with its own services and facilities, could detract from existing centres and risk new sub-settlements forming on the edge of existing towns. The risk of urban sprawl was also highlighted.

4.6.10 Some respondents suggested that Option 1 should be pursued alongside other options. It was suggested that new settlements could complement this approach and provide for the scale, quality, and longevity of growth needed, maximising opportunities for comprehensively planned sustainable development that meets growth aspirations alongside environmental aspirations. It was suggested that pursuing Options 1 and 3 together has the most potential to achieve carbon reduction targets.

Spatial Option 2 – Focus on Oxford-led growth

Key Messages

A key issue raised frequently by respondents is the how this spatial option will be able to deliver against the Plans Vision and Objectives.

Many of the comments were concerned about various Green Belt impacts should this option be promoted.

There were contradictory views expressed either suggesting Oxford is the economic hub of the county where growth should be focussed, or recognising that Oxford is not the predominant economic hub.

A number of respondents raised concerns that this Option is promoting commercial development over housing.

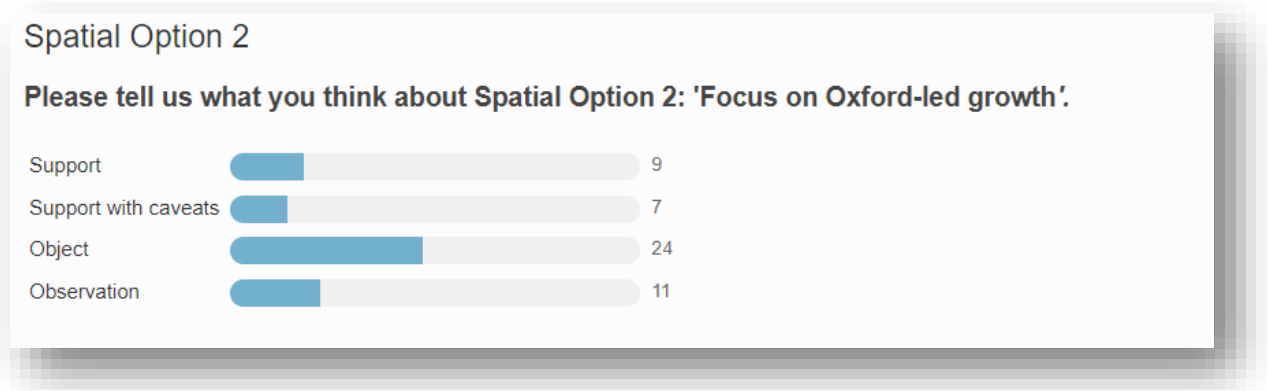
Key issued raised in support of Option 2:

- Strong support for enabling brownfield development, reuse of underused commercial land and effective use of land.
- Support in principle but mainly in relation to city development.
- Support from promoters where land is included in the City fringe area, or linked well to the City fringe area.
- Wider benefits include making best use of existing sustainable transport modes and delivery of affordable housing.

Key concerns raised about Option 2:

- Significant concerns about the capacity of the city and the Option to accommodate growth. Some indications that this may be the most constrained of the five options.
- Majority concerned about the impact on the Green Belt, highlighting that no exceptional circumstances have been demonstrated to date.
- Respondents advocating that the focus on the city should not be at the expense of the Green Belt;
- Transport challenges were raised.

Environmental challenges were raised, for example flood risk is frequently highlighted.



4.6.11 Stakeholders expressed a range of mixed views in relation to Spatial Option 2, often recognising that it has limitations in respect of further growth in the city of Oxford.

4.6.12 Respondents said that to meet the full range of housing and economic needs across Oxfordshire, the priority should be ensuring that there is a wide range of sites, both in terms of size and location, that will support a vibrant and diverse housing market. However, some respondents considered that the housing needs of the City need to be met as close as is feasible to where that need arises.

4.6.13 Some respondents made it clear that developing the city is regarded as a sustainable option provided development on greenfield sites and within the Green Belt is limited.

4.6.14 Many respondents focused on the availability of brownfield land and opportunities for intensification of development within the city. Respondents highlighted that any spatial option or combination of options should include a strong emphasis on the effective use of previously developed land including under-utilised land and buildings. Increasing the density of development was suggested by some as way in which this could be achieved on the limited brownfield land available. It was considered by some however, that although urban intensification and the recycling of urban land should be a component of the strategy, it should be a supportive element rather than a principal component of the spatial strategy.

4.6.15 It was highlighted that urban intensification has long been regarded as a component part of growth strategies. However, respondents raised that because this objective has been pursued for some time already, its potential has largely already been realised and there is now limited capacity to supply further housing from this strategy. Comments raised how this is evidenced by the fact that surrounding authorities have had to plan to meet Oxford City's unmet housing need due to the City's issues of capacity.

4.6.16 Stakeholders expressed concern about recent evidence demonstrating that Oxford has little capacity to accommodate extra development within its boundaries. Some communities are concerned about the displacement of development from the city to rural parts of the county, and many question whether commercial and employment land within the city could be re-purposed for other uses, including housing as part of the Oxfordshire Plan strategy.

4.6.17 Others dispute that the physical capacity exists to accommodate the majority of the County’s development needs in immediate proximity to the City. Respodents highlighted how environmental, ecological and landscape constraints are very substantial, even before the land-use protection of the Green Belt, intended to prevent urban sprawl and maintain the distinct setting of the City is considered. The capacity of transport networks around the City is highly challenged and was noted by respondents. Respondents highlighted that this includes the local highways network, and the nationally managed rail and road infrastructure.

4.6.18 Some respondents expressed views that as Option 2 covers urban intensification and new or extended urban edges to the city, there will be a limit to the level of sustainable housing that this option can deliver. Respondents said that high existing property values within the city have already resulted in urban intensification, further resulting in limited availability of deliverable development sites.

4.6.19 It was raised how the city is constrained in terms of transport infrastructure and faces challenges in accommodating significant levels of commuter traffic accessing the city each day. Respondents said that within the boundary of Oxford city there exists no further land to be developed for transit routes and, the radial and arterial bypass roads are already heavily congested. Some respondents

considered this to be a direct result of not building high density housing within the city, which drives high levels of in-commuting from across the small towns and villages of Oxfordshire.

4.6.20 It was suggested that spatial Option 2 is potentially the most environmentally damaging and least practical of the spatial options presented. Respondents raised that Oxford's transport problems and the commuter flows are too significant to accommodate a growth in residents, and were of the opinion that the option would restrict sharing the benefits of the high skill knowledge economy with the rest of the county.

4.6.21 It was highlighted by some stakeholders that Green Belt release will likely be needed to support a city focused growth strategy, but while Green Belt release may be part of the answer to meeting needs, it may not deliver the amount of growth required across Oxfordshire as a whole.

4.6.22 Many stakeholders said that they would not support further incursion into the Green Belt as part of the Oxfordshire Plan spatial strategy. Respondents that commented on this said that t release of further Green Belt sites around the city would have to be carefully considered and justified, in light of alternatives, particularly potential development locations with access to rail and/or park and ride into the city.

4.6.23 Respondents said that due regard should be given to the purpose of the Green Belt in defining the spatial strategy. It was highlighted how the Oxford Green Belt was established for reasons which remain valid. Reference was made to adopted Local Plans which already include Green Belt release as part of the strategy and how these will be carried forward. Some comments said that any further incursion should be limited in its extent and certainly not of a strategic nature. Some respondents said that any opportunities to accommodate additional development within the Green Belt should be focussed on existing locations, where allocations are made on land released from the Green Belt.

4.6.24 It was noted by some stakeholders how the area around Oxford has experienced considerable loss of Green Belt land in recent plan making. Some expressed the view that no more such land should be taken for, or threatened with development. They consider that to do so damages not only the lost land itself but also the health of the remaining Green Belt which it borders. They think that the plan for 2050 should restate and reinforce protection for the Green Belt around Oxford.

4.6.25 Respondents commented on how Oxford is a highly sustainable city. They went on to say that care should be taken to avoid unsustainable urban sprawl on the edge of the city which would compromise how the city functions overall in terms of transport connectivity and access to services and green infrastructure.

4.6.26 Some respondents felt that because Oxford is the main urban centre within Oxfordshire, there will need to be some growth sensibly allocated to the city and its surrounding area. Having said that, some respondents did recognise that Oxford is immediately surrounded by Green Belt and therefore, significant growth to this area would require Green Belt intervention at a considerable scale. Some stakeholders consider that limited Green Belt release on Oxford's periphery, combined with the redevelopment of brownfield land will be an appropriate spatial strategy, but that the bulk of development will need to be allocated elsewhere in the county at sustainable locations such as at major settlements.

4.6.27 Some respondents said that any future development located on the city's periphery and would be required to demonstrate 'Exceptional Circumstances' to justify the release of land from the Green Belt. Some respondents expressed their opinion that given the availability of land in Oxfordshire

outside of the Green Belt, exceptional circumstances cannot be demonstrated to have this scenario as a realistic option for delivering the level of development required.

4.6.28 Comments were made that said growth should be located where it is well-served by sustainable transport and close to where people will work and in locations where renewable energy can be provided. Some respondents said that a dispersed pattern of development, distributing new homes to rural areas where people will be reliant on their cars and far from their workplaces, schools and amenities would not be considered sustainable.

4.6.29 Respondents said that there is an urgent need to provide more affordable housing within or in close proximity to the city. They highlighted that this is particularly important if Oxford is to maintain its economic role, to enable residents to access affordable housing and travel sustainably rather than commuting over extensive distances to their place of employment.

4.6.30 Some respondents said that all options should focus on the role of the City of Oxford as a vital economic node, with city focussed growth required in all options. They highlighted that this would support Oxford as a global centre of knowledge and innovation and a key anchor in the Oxford to Cambridge Arc. Respondents noted that the potential for transformation arising as part of the West End Area of Change should be acknowledged in particular and supported in the Oxfordshire Plan.

4.6.31 Some respondents felt that there has been little development in Oxford over the last ten years compared with other areas. For this reason, they felt that the need for more housing in Oxford is self-evident and should be met within the city and that this will help to facilitate the achievement of environmental, climate change and transport objectives.

4.6.32 Some said that as Oxford is the highest order settlement in the county jobs and homes should be concentrated as close as possible to it as it is highly sustainable. Respondents also said how concentrating development like this will also minimise the need to travel and maximise economic growth. Respondents recognised the benefits of focussing development on sustainable transport hubs such as that at Oxford Parkway Station.

4.6.33 A number of stakeholders were opposed to a strategy based on Oxford focused growth and city centric development. They considered it unrealistic for diverse geographical housing needs to be met in one location. Respondents highlighted that other locations beyond Oxford offer similar opportunities for sustainable development, including economic drivers outside of the city and sustainable locations for co-locating jobs and homes.

4.6.34 Respondents flagged how Oxford is not the only local centre that provides employment, retail and leisure facilities. Respondents commented on the other equally important employment locations within the county, such as within with Science Vale, which should also be supported through housing development. They highlighted the range of local needs and benefits that can be addressed and delivered through development beyond the immediate influence of Oxford city.

4.6.35 Some respondents commented on how the spatial strategy should also be mindful of cross boundary relationships with other higher order settlements, including Reading and Swindon. It was highlighted how the Oxfordshire Plan is a cross-boundary document that is to serve the needs of all districts within the county and ensure its future growth needs are adequately met. Some respondents raised how economically dynamic growth areas outside of Oxford are recognised nationally as being as important as Oxford city on its own, and equally Oxford is part of a wider growth area that goes beyond the city in its isolation.

4.6.36 Some respondents said that Oxford-led growth suggests an unwillingness to consider an enlarged role for other districts to have more employment in an expanding green economy and revived public sector in the future.

4.6.37 It was suggested that rather than seeking to accommodate growth on the edge of Oxford, a more appropriate approach may be to focus development on those nearby towns where there are opportunities to link into the city sustainably.

4.6.38 Respondents said that the Oxford-led spatial option ignores the opportunity to make a region of growth that works as a unit. They commented that opportunities to capitalise on the advantages connected to the university and current businesses to the whole of Oxfordshire would be missed.

4.6.39 Some felt that an Oxford focused strategy could truncate the ability of other parts of the County to evolve sustainably by directing infrastructure investment away from other parts of the county. Some respondents said that the proposed strategy option could exacerbate existing problems of over-centralisation of activity within and around the City. They were of the opinion that over-burdening the City with more growth could jeopardise the steps necessary for other parts of the County to evolve sustainably and risks the City becoming overwhelmed by mobility challenges.

4.6.40 Some respondents felt that a significant limitation of this growth option is that does not promote growth at any other locations in the Knowledge Spine. Respondents highlighted how the growth locations of Didcot, Abingdon, Oxford, Kidlington and Bicester are all located in the Knowledge Spine, which is expected to remain a significant driver of economic activity, accounting for a potential two-thirds of net additional jobs in the Functional Economic Market Area (FEMA) to 2050. Respondents said that it is important that the Knowledge Spine, acknowledged in the Local Industrial Strategy as an area of strategic importance for the county, being "home to several science, innovation, technology and business parks that form a spine of knowledge intensive economic activity", is supported comprehensively by the chosen spatial strategy for the Oxfordshire Plan 2050. They said that this will help to ensure that homes and workforce are matched to jobs, thus reducing in-commuting and tackling climate change.

4.6.41 Stakeholders pointed out that the role of the City within the county is changing and is becoming less dominant as other major foci for activity emerge. They highlighted the emergence of Science Vale, and functional inter-relationships with the Thames Valley and the distinct role of Banbury in its wider hinterland, which are not acknowledged by Option 2. Respondents said that the Oxford-centric strategy reflects a view of development needs and spatial relationships that is becoming out-dated. Stakeholders highlighted that a focus on economic growth within the city at the expense of housing provision would further exacerbate issues of housing need. This discrepancy between housing and jobs growth within the city was noted as an example of the mismatch between economic ambitions aspirations and commitments to meet housing needs.

4.6.42 Didcot was cited as an example of development that is more sustainable and supports the decentralisation of economic growth away from Oxford City by respondents.

4.6.43 It was noted by respondents how the supporting text in the consultation document references consideration of growth proposals that are well connected to the city. Respondents said this is essential in ensuring any significant delivery of development, particularly pointing towards the A41 as a sustainable transport corridor that connects Oxford to Bicester.

Spatial Option 3 – Focus on opportunities in sustainable transport corridors and at strategic transport hubs

Key Messages

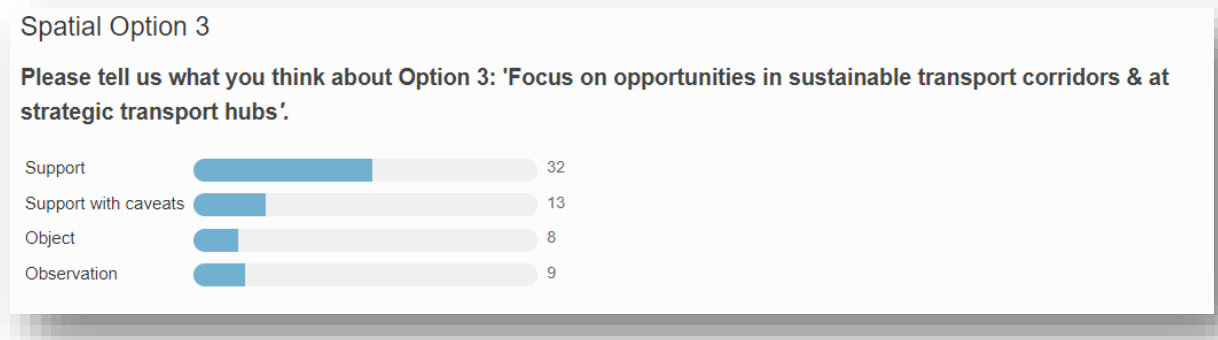
- Stakeholders recognise the benefits of Spatial Option 3 in achieving decarbonisation of transport and other objectives of the Plan.
- Some point out that Option 3 would align with other Spatial Options, particularly Spatial Option 2 (Oxford Focus).

Key supporting comments about Option 3:

- Option complements opportunities to capitalise on bus as well as rail infrastructure investment.
- Stakeholders recognise that this option would complement the Local Transport and Connectivity Plan (LTCP) vision.
- It is considered that Spatial Option 3 fits with the net zero carbon ambitions of the Oxfordshire Plan.
- It has potential to link to wider infrastructure aims and objectives e.g. east west rail, Oxford-Bicester train line, HIF funded projects, OXIS schemes.
- Spatial Option could provide a balance of sites across a wider geographical distribution.

Key objections about Option 3:

- Some stakeholders consider that Spatial Option 3 does not align with Option 1 and may result in an imbalance between planned infrastructure investment and future development.
- Many Stakeholders consider that Spatial Option 3 should be a component of an overarching strategy and shouldn't be considered in isolation of the other proposed options.
- Stakeholders indicated that locations identified for future development may not align with market needs.
- Concern was expressed by stakeholders for the potential environmental impacts of this option



4.6.44 Stakeholders expressed significant support for Spatial Option 3, particularly in terms of aligning the Oxfordshire Plan with national transport strategies and achieving the Oxfordshire Plan vision and objectives. Qualified support was expressed for this option as it has attractions in terms of guiding sustainable development, such as helping to locate development where people will be able to access jobs and everyday services using non-car modes.

4.6.45 Many stakeholders supported elements of Option 3 but consider that it should be a be complementary component of the overall strategy. Respondents consider that Spatial Option 3 offers a strong opportunity to support the zero carbon ambitions of the Oxfordshire Plan.

4.6.46 Stakeholders highlighted that focussing development opportunities within sustainable transport corridors and at strategic transport hubs would represent a sustainable spatial strategy and would be a significant contributor to meeting the overarching vision and objectives of the Plan.

4.6.47 Spatial Option 3 would ensure alignment with the Local Transport and Connectivity Plan (LTCP) vision, including objectives for active and healthy travel, encouraging healthy choices, promoting the use of public transport and improved regional and local connectivity.

4.6.48 One Stakeholder made reference to the government's National Decarbonisation Plan for Transport (NDST), noting that it requires substantial and immediate modal shift, recognising that reducing the energy intensity of mobility and transport is crucial to also meeting decarbonisation goals. They highlighted that decarbonising transport is not something that can be treated in isolation, without consideration of the spatial distribution of development. Stakeholders pointed to the legacy of past and current planning strategies that have driven longer, car dependant patterns of movement. Decarbonisation of transport requires patterns of development to facilitate the highest possible mode share for active travel and public transport. As a result, the NDST contains a commitment from national government to ensure that local plan strategies secure this objective, and closely and fully align with the zero-carbon transport strategy.

4.6.49 The option is considered by respondents to be consistent with the aims of East West Rail. One of the main principles and purposes of EWR is to support and facilitate economic growth across the Oxford – Cambridge corridor, through providing infrastructure and service enhancements across the sub-region. Stakeholders highlighted significant rail enhancements are proposed within Oxfordshire, with station enhancements at Oxford, Oxford Parkway and Bicester Village, alongside service enhancements across the sub-region that would help improve connections between people's homes and their jobs.

4.6.50 Some stakeholders expressed qualified support for Spatial option 3. They considered that the option would best enable sustainable transport links and improved and new sustainable transport hubs and facilitate improvements to wider sustainable connections. It was also considered that the option recognises the importance of the M40 corridor in enhancing links to London and beyond.

4.6.51 One stakeholder highlighted that both the new national bus strategy and bus services implementation plan and national rail strategy will soon be issued. They consider that these should be used to influence future iterations of the Plan and the spatial strategy.

4.6.52 Stakeholders highlighted that any ambition to facilitate a modal shift and transition towards active transport modes, can only be achieved if they are viewed as primary objectives, rather than 'nice-to-have' add-ons. Respondents feel that this means considering cyclists, in particular, in the early stages of transport development.

4.6.53 Respondents highlighted that Option 3 would ensure that developments aligned with existing transport corridors and transport hubs and would likely to lead to additional investment in these areas, thus increasing accessibility in those areas.

4.6.54 Caution was advised however, against an approach that suggests all identified transport corridors to are equal in terms of the potential benefits that could be realised. Some transport corridors benefit from more frequent services than others, varying in frequency from half hourly to-hourly services.

4.6.55 There was support expressed through the consultation for focussing on locations on high frequency bus routes, such as premium bus routes which are relatively close to existing or proposed railway stations. Stakeholders emphasised that the strategy should take account of planned or proposed infrastructure that will improve the sustainability of locations.

4.6.56 Stakeholders highlighted that some transport corridors are more significant in supporting key functional relationships with main settlements outside Oxfordshire than others. For example, the Oxford – Thame – Haddenham & Thame Parkway– Aylesbury corridor where Thame has an important role and functional relationship with Aylesbury and Oxford; Oxford – Eynsham- Witney (A40) and Oxford – Faringdon – Swindon (A420).

4.6.57 Attention was drawn to transport corridors that are set to benefit from significant improvements, enhancing their role with improved public transport services. The A40 and A420 corridors are subject to route strategies that will form the basis of more detailed proposals and may provide opportunities for further growth.

4.6.58 Concerns were expressed by some for a strategy that was too heavily focused on rail. It was stated that explicit and implicit rail bias hasn't necessarily led to positive outcomes for land use planning. It was highlighted that obvious development opportunities in close proximity to existing and proposed rail stations are already committed and any new or future proposals are likely to be more distant from rail transport hubs.

4.6.59 Those concerned by a rail focused strategy questioned what additionality could be achieved to meet longer-term development needs. Walking or cycling distances to key stations from uncommitted sites are likely to be extended. It was suggested that rail cannot supply a solution for most journeys, as existing local rail infrastructure is geared towards provision for longer-distance trips. It was suggested that there is limited scope to provide a comprehensive local "commuter" railway network in Oxfordshire. It is felt bey some stakeholders that the strategic approach should recognise that only the bus offer is likely to supply relevant mobility solutions, across much more of the County.

4.6.60 Stakeholders highlighted that the potential to deliver growth around new rail stations other than those proposed in the Oxfordshire Rail Corridor Study (Grove, Oxford Science Park and Oxford Business Park) will rely on focusing growth at a significant scale in limited locales to support the delivery of new stations. Respondents consider that opportunities will be limited by capacity constraints that exist on rail services across all lines through Oxfordshire and operational efficiencies – including service frequencies, operator preferences and the impact of additional stops on journey times - which will be a critical consideration in the viability of any new rail station.

4.6.61 Stakeholders welcomed the potential to address cross boundary connectivity issues through a strategy based on transport connectivity. Stakeholders feel that the Plan must ensure that cross boundary transport and travel requirements are fully considered, and appropriately influence the spatial strategy. Stakeholders highlighted significant gaps in cross-boundary connectivity by public transport, including weak links with Gloucestershire, the absence of connections to Northampton,

Newbury and the western M4 corridor. Stakeholders feel that the Plan should be supported by strategic measures to protect and accelerate bus journey times long corridors.

4.6.62 Respondents felt that a strategy based on transport corridors and hubs will ensure there is not an over-reliance on the largest settlements, where significant development is already taking place, and would allow some of the smaller accessible settlements to grow in a sustainable manner. It was suggested that a wider distribution of development will help to strengthen community services within accessible locations.

4.6.63 Stakeholders considered that Spatial Option 3 could unlock the most sustainable development opportunities that are not reliant on a particular development scale, typology, location or context. It is considered by a number of respondents to be a flexible and effective spatial Option. It was highlighted that for any identified development opportunities, sustainable access and mobility could be at the centre of planning and decision making rather than an ineffective and expensive bolt on.

4.6.64 Stakeholders highlighted that Option 3 could take account of the relative transport options of urban and rural areas delivering relative growth to smaller settlements where access to services via active travel (i.e., walking or cycling) or proportionate public transport links are provided. Stakeholders welcome acknowledgement that development may be generated from transport investment that improves the sustainability of particular locations. Respondents highlighted that investment that results in improved accessibility and sustainability of locations could be particularly important in meeting growth needs.

4.6.65 Respondents highlighted that this option could support areas where urban renewal, urban intensification, or opportunities for brownfield redevelopment could be triggered by transport improvements, such as new railway stations and extending rail services on the Great Western Line, or following the upgrade to Oxford Station, including the North Cotswold Line, East-West Rail and the line to Didcot.

4.6.66 Stakeholders cautioned that impacts on transport corridors should be independently assessed, to ensure that they are able to accommodate increased development, without additional road building or lane widening. It was highlighted that there are so many possible development options within transport corridors that is difficult to know what the cumulative impacts on the transport network might be, or which of them will pick up most of the growth. This option could add to transport problems. Respondents highlighted that access to Oxford along the transport corridors already leads to almost unmanageable congestion.

4.6.67 It was highlighted that travel by road should not be ignored and opportunities to relieve existing highway congestion issues and enhance the highway network generally should also be taken.

4.6.68 Stakeholders recognise that as towns centres continue to rapidly evolve, and higher levels of residential use are focused within centres, this could give rise to different patterns of movement within and on the edge of settlements and potentially less inter-urban traffic. This option has particular merits is securing socio-economic inclusion.

4.6.69 Stakeholders recognise that this option would focus growth at locations within or connected to the highest concentrations of jobs, affordable housing need and sustainable transport connectivity to ensure that development is well placed to meet the needs of existing and future communities in a sustainable manner.

4.6.70 Respondents considered that this growth option alone would not fully consider the holistic needs of cities, towns and other locations. It is considered important that development is located in the right locations in order to limit need to travel. This could also help to tackle affordability issues and support inward investment.

4.6.71 The sensitivity of landscapes and the environment was highlighted by respondents. A number of the transport corridors run through Green Belt or Areas of Outstanding Natural Beauty where opening up land for development would not be suitable. It is felt large swathes of countryside around the county could change, altering the whole character of Oxfordshire.

4.6.72 Some stakeholders do not support Option 3, as many communication routes flow through open countryside where the introduction of new development would cause significant damage. The map illustrated in the consultation document indicated how this option would extend development widely across the County which could result in ribbon development.

4.6.73 Stakeholders consider that the spatial strategy should not focus solely on connectivity to Oxford. The functional economic area analysis undertaken through the Oxfordshire Growth Needs Assessment highlights that other destinations within and beyond the County are important in terms of commuting flows.

4.6.74 Respondents felt that the key word is 'sustainable' and there should be more emphasis on local employment to reduce the need to travel particularly, distributing growth away from locations that have experienced significant growth in first phase of plan and are allocated through adopted local plans.

4.6.75 Some stakeholders objected to the focus on opportunities in sustainable transport corridors and at strategic transport hubs for the following reasons:

- Development of Symmetry Park within one mile of the western Oxfordshire boundary will result in a substantial increase in traffic on the A420.
- Further development along this road, such as has taken place at Faringdon, Kinston Bagpuize and Shrivenham may make matters worse, so the aim of good public transport connectivity to Oxford will not succeed.
- Any attempt to create connectivity between Swindon and Oxford along the A420 is bound to fail given the already overcrowded state of this road.
- Spatial Option 3 should be given low weighting in the final mix of spatial options and specifically that the section of A418 between the M40 and Thame no longer be regarded as a sustainable transport corridor.

4.6.76 Some stakeholders considered it doubtful that the necessary scale of behaviour change could be achieved without public transport offering a better experience than using the car. It is considered difficult to persuade people to give up their car and travel longer distances by public transport. Even encouraging people to convert to using park and ride requires onward bus journeys that are frequent and comfortable.

Spatial Option 4 – Focus on strengthening business locations

Key Messages

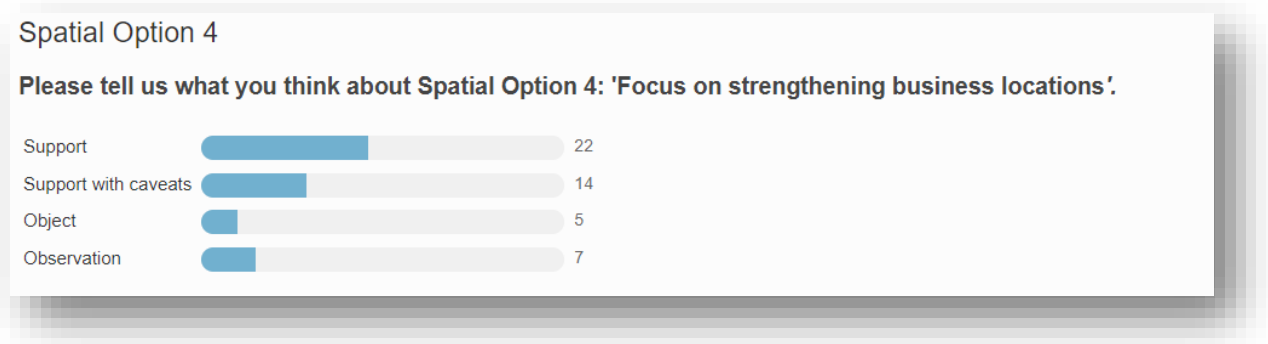
Some concern from all statutory consultees regarding the delivery and scope of this Option.

Key supportive comments about Option 4

- Option supports emerging themes from the Ox-Cam ARC.
- Complementary to Option 1
- Complementary to Option 3
- Takes advantage of existing sustainable transport hubs
- Helps to retain and strengthen the important employment identified in the LIS

Key objections about Option 4

- Focus on key employment rather than existing communities where a full range of services and facilities are located.
- Employment sites mentioned are by their nature isolated and not sustainable for growth nor well served by public transport on a key corridor
- Question as to whether co-location of uses would lead to self-containment.
- Option unlikely to support the level of growth necessary
- The option should consider future planned employment provision not just existing provision.



4.6.77 Many respondents expressed views that were supportive of Spatial Option 4.

4.6.78 It was recognised that this option would locate new homes close to jobs and could limit the need for people to travel. It would support objectives for reducing the need to travel and demonstrating leadership in addressing the climate emergency by significantly reducing greenhouse gas emissions.

4.6.79 It was felt that Spatial Option 4 could help to tackle affordability issues and support inward investment.

4.6.80 Focusing new homes in proximity to key employment locations could help achieve wider aspirations of the Oxfordshire Plan 2050, including supporting economic growth and minimising the need for travel by locating new homes close to jobs.

4.6.81 The merits of locating housing close to employment should be assessed on a case by case basis however and should exclude locations within protected landscapes, or those where existing planned development threatens to overwhelm local communities and existing infrastructure.

4.6.82 The synergies with Spatial Option 1 are recognised and it is considered that a focus on strengthening business locations would be complementary to an approach that focused on existing growth locations. If future development is concentrated around business locations, then it could reduce the need for communities to travel for employment. This could deliver benefits to the health and well-being of communities by improving work-life balance, as well as delivering environmental benefits by reducing carbon emissions associated with transport. The co-location of economic and residential uses could help to deliver sustainable economic growth in Oxfordshire.

4.6.83 It is recognised that an approach to development distribution set out in Spatial Option 4 could deliver development that balances social, economic and environmental objectives. There was qualified support for this option, due to attractions in terms of sustainability and the co-location of jobs and housing. It was highlighted that the existing distribution of science and other business parks would benefit from a coherent strategy linked to transport improvements. Many current sites are not in locations that could support expansion however, by virtue of their Green Belt and AONB locations.

4.6.84 It is considered that elements of Option 3 could form part of an overarching spatial strategy that draws elements from all Spatial Options being considered. A number of key employment locations are situated within top tier settlements and are therefore tried and tested in terms of their sustainability credentials. Those locations that are not situated within main settlements could be incorporated into the strategy to ensure that it takes account of the aims of Local Industrial Strategy (LIS). Focusing new homes in areas already identified as being suitable for growth, that have or will have access to sustainable transport modes and that benefit from new and improved employment provision is considered to be an optimum approach.

4.6.85 The importance of science and business parks in and around Oxford for attracting world-class businesses is such, that they must be a focal point of the Oxfordshire 2050 Plan. Regard should also be had to planned employment growth set out in existing Local Plans. Building on current economic strengths in key sectors would support the current world-class facilities at established locations such as Harwell Campus and help to secure investment in the future, building on current economic strengths in key sectors such as life sciences and advanced engineering.

4.6.86 The strength of Oxfordshire's economy has been and will be driven to a large extent by innovation sectors, business clusters and transformational technologies developed through the universities and the network of business and science parks in Oxfordshire. Supporting the growth and sustainability of Oxfordshire's innovation ecosystem will also help support a balanced economy so that prosperity is shared across the county.

4.6.87 The challenges in retaining growth in these key sectors and enabling business to establish themselves and grow in Oxfordshire are well recognised and include the availability of space for business to grow, the availability of affordable housing and capacity in the transport and infrastructure network.

4.6.88 Option 4 is considered imperative to the continued economic success of Oxfordshire, and will be important to the delivery of supporting services and residential development to areas in which economic assets are situated. Taking the option forward into the Plan will help to ensure that Oxfordshire can be a global leader within the innovation and knowledge industries, by supporting

economic and residential growth to 2050 and beyond. As current and new economic sectors grow, the demand for employment space will grow further highlighting the need for a strategy to support this.

4.6.89 Option 4 is considered important for the Oxfordshire Plan to secure long-term, sustainable, innovation-led economic growth in the county. The concept of Innovation Villages provides the greatest potential for securing economic, social and environmental benefits and delivering a 'more resilient, more efficient and more sustainable county'.

4.6.90 There was also concern and a degree of opposition expressed in relation to Spatial Option 4.

4.6.91 It is considered that it would be neither sustainable nor effective and the consultation failed to explain how a focus on strengthening business locations could deliver the quantum of development required in sustainable locations or in a sustainable manner. It is far from clear that such a strategy would be considered sound having regard to environmental landscape or other physical constraints.

4.6.92 Many of the areas that are identified as business or science clusters have a long planning history. Many are former military establishments, the location of which had no regard whatever to the site characteristics that would support sustainable development today. Many locations are remote and distant from major public transport corridors. A large number of sites are widely dispersed and it is disputed whether some of the locations identified are major existing centres of employment and business clustering (Heyford Park and Chalgrove).

4.6.93 Stakeholders do not see how co-location of homes with employment clusters will demonstrably achieve high levels of local self-containment. Some locations are simply just an employment park, although Bicester as a successful and complete town (with major social, transport and green infrastructure) stands out. In many households often two adults are employed, but in most cases at different businesses in different locations. While developing housing near business locations e.g. science parks will reduce commuting for one household member, the other is most likely to need to commute, but it is an improvement on both having significant commutes.

4.6.94 This spatial option on its own does not represent a holistic strategy, taking into account the development needs of all locations and all sustainable opportunities for growth to settlements. A strategy that is too heavily focused on growth at business park locations is regarded as less sustainable than one focused on existing communities which offer a full range of services for everyday needs.

4.6.95 It is considered that this option does not fully take account of constraints to development such the Oxford Green Belt. It is highlighted that exceptional circumstances would have to be demonstrated to justify strategic land releases. Availability of land limits the ability of the Oxford City Green Belt to significantly contribute. Outside the Green Belt more flexible opportunities exist for employment growth that may be closely related to housing growth. Another potential constraint is that the opportunity for introducing residential growth at scale in the identified locations may be limited, due to the need to balance intensification of businesses with the required residential growth. Many of these locations identified in option 4 have significant environmental constraints such as flooding and AONB designations, whilst others are already tightly constrained in existing urban areas. It is felt that this option could damage large swathes of countryside around the county changing the whole character of Oxfordshire.

4.6.96 Whilst these areas are significant economic assets, the scale of housing that could be accommodated is more limited than other spatial options. For this reason, option 4 is regarded as ineffective at accommodating the scale of growth anticipated through the Oxfordshire Plan 2050.

4.6.97 It was also emphasised that designating land close to or adjacent to these locations for housing, especially in constrained locations, could prejudice further employment expansion. Any allocations would need to have the flexibility to respond to changing requirements and demands of businesses.

4.6.98 Research and development activity around Oxford is of international value and must be supported, but some consider that the site strategies of many science parks are very last century in their land usage and travel plans. All new or re-development of sites must consider land use more efficiently with fewer car parks and better linkages to more sustainable transport, less wasted space and higher density building design. No further land should be taken from either the Green Belt or AONB until the use of already allocated sites has been maximised.

4.6.99 Where employment sites are underused or disused they should be considered as a policy priority for other uses, particularly housing, given the scale of housing needs in the County.

4.6.100 It should not be forgotten that a major business of Oxfordshire is agriculture, which gives it its distinctive nature and attraction. There also needs to be more development of high value employment in market towns to reduce the need for commuting.

Spatial Option 5 – Focus on supporting rural communities

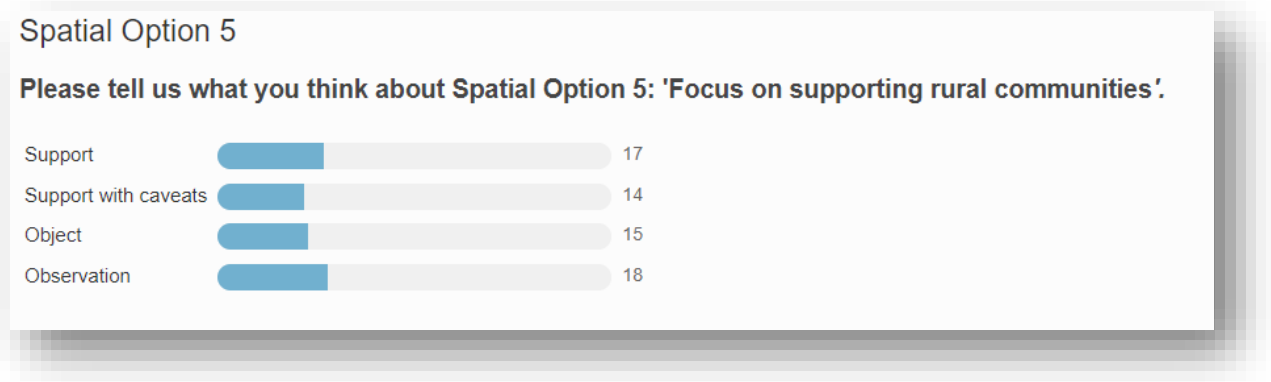
Key Messages

Key Supportive comments about Spatial Option 5

- Compliant with specific parts of the NPPF
- Could support stagnant/economically inactive villages
- Would secure investment into rural communities
- Could improve affordable housing delivery close to demand and where high cost of housing is preventing choice
- May align with future demand after the Covid-19 pandemic

Key objections about Spatial Option 5:

- Concern that focusing growth at such locations will damage the settlements, not support them
- Unable to meet key objectives of the Plan e.g. net zero carbon
- Isolated and unsustainable locations
- Will require more investment than other strategies
- May not deliver significant choices
- Not enough options for development of the right scale
- More appropriate for local plans and neighbourhood plans to deliver
- SA and HIA have differing outcomes for this option.



4.6.101 There were a range of mixed views expressed in relation to Spatial Option 5 which is focused on supporting rural communities.

4.6.102 Challenges faced by rural communities are well recognised, such as limited access to public transport, poor broadband connectivity, access to affordable housing and access to community infrastructure. It is considered that a strategy which focuses on rural communities could help to address these challenges

4.6.103 An approach steered primarily by public transport offers significant scope to address opportunities and challenges in rural parts of the County. Stakeholders support some limited growth in rural areas, but only where there is suitable public transport and that the countryside, especially Green Belt and AONB are suitably protected.

4.6.104 Stakeholders also recognise that stifling growth in rural areas could exacerbate imbalances in economic, social and environmental sustainability.

4.6.105 Development in rural areas would seek to address existing issues of isolation and rural deprivation by redirecting growth away from main settlements to where it could best address such inequalities and meet the needs of ageing populations. Smaller settlements subject to strict development restraint have declined in terms of populations and services. The most widespread deprivation factor in Oxfordshire relates to barriers to housing and services, and that such inequalities have become most prevalent in the rural areas which in many cases have become increasingly isolated with the removal of public transport services and restricted growth.

4.6.106 A case for more rural development could be made if better broadband was widely available and more flexible home working patterns continued, reducing the dependence on the need for transport to work locations. Greater focus is needed on how rural communities can be connected – physically or virtually, and the role new communities can play in connecting and improving access to sustainable services for separate smaller, existing rural communities.

4.6.107 Transport is a key issue for rural locations, so the spatial strategy needs to consider the network of rural travel into transport hubs, towns and employment areas and how best to enhance connectivity for existing residents.

4.6.108 A major dispersal of new growth would be inconsistent with the Plan strategy and make it harder to deliver strategic scale infrastructure and the major change required to meet net zero carbon ambitions. While some villages and small towns are on existing public transport routes, in many cases the ongoing viability of these routes is uncertain and as such the scale of development would need to be of sufficient scale to ensure that bus services could be made commercially viable long-term.

4.6.109 New models of infrastructure provision should be explored, to enable smaller communities, and even larger villages, to become sustainable in health provision, education and recreation. It is considered that the characteristics of Spatial Option 5 would make it difficult to secure S106 contributions towards strategic infrastructure putting a bigger ask on the public investment which may not be forthcoming.

4.6.110 Oxfordshire has a diverse range of rural communities offering opportunities for sustainable growth but in many cases already facing challenges. Support was expressed for Spatial Option 5 if it could deliver benefits such as community led and social housing, affordable and specialist housing, carbon emission reductions and biodiversity net gain. The Oxfordshire Plan spatial strategy needs to deliver investment in rural communities to ensure the objectives of the strategic vision are met. Many rural communities have limited opportunities for growth due to constraints such as AONB, Conservation Areas and flood risk. It is recognised however, that such communities have the same need for investment in affordable housing, public transportation, active travel routes and fibre broadband to the home. Investment in such infrastructure is limited by the availability of CIL and S106 funding which is limited by constraints on development.

4.6.111 Improved access to services, facilities, homes and jobs in rural areas, reducing pressure on main settlements, securing '20 minutes neighbourhoods' and delivering net zero carbon growth could be highly beneficial in addressing existing rural deprivation and inequalities. The Plan can provide better investment in the rural economy and improve rural infrastructure through sustainable development.

4.6.112 The Taylor Review of Rural Economy and Affordable Housing ('Living Working Countryside') was published by the Department for Communities and Local Government in 2008. It set out a vision for 'flourishing, vibrant communities that will be genuinely sustainable'. The Report highlighted the problem of the 'sustainability trap, whereby planning policy dictates that development can only occur in places already considered to be in narrow terms 'sustainable', thus writing off development prospects. It warns of the planning system determining the future development of rural communities against a narrow tick-box approach to sustainable development, assessing communities as they are now and not what they could be.

4.6.113 The Plan should not overlook growth to rural areas with the aim of improving sustainability, plugging local affordable housing need and improving the "completeness" of rural settlements, especially where there is an opportunity to collocate housing and jobs.

4.6.114 Some stakeholders emphasised that lower order settlements, such as the larger villages, can contribute to sustainable development. From a social perspective, sites in rural locations could bring forward new homes of the type required at the right time and location to meet market and affordable housing need. Development can mitigate any environmental impact and contribute to biodiversity whilst with a high-quality design to address climate change and improve environmental quality

4.6.115 Respondents also pointed out the likely challenge of identifying sufficient, appropriate and unconstrained growth opportunities within or adjacent to higher order settlements. While dispersal is regarded as unsustainable, increasing density of development within sustainable transport corridors, can create greater density of population. New and expanded villages could offer a sustainable development strategy that facilitates sustainable travel patterns from existing rural populations, through improved public transport choices.

4.6.116 Rural communities within Oxfordshire are plentiful, and they can play an important role in the growth of the county. Any development should be proportionate to the communities affected however, so that it can be viewed as sustainable. Many communities are concerned with the scale of growth that has taken place in recent years and the effects of overdevelopment. Consideration must be given to development that has already taken place over the last ten years when shaping the spatial strategy

4.6.117 Securing 20 minute neighbourhoods and small linked settlements can be an ideal model for development in rural areas. Many Oxfordshire villages naturally form walkable communities due the way they have historically grown before the advent of the car, but some require growth to restore lost facilities within the 20 minute zone. Its challenging to create walkable communities through repeated expansion of larger settlements, often encircled by infrastructure or inward looking. Rural communities often retain their historic street patterns which modern urban designers seek to recreate in new settlements. This means that these long-established rural towns and villages are well suited to encourage walkable neighbourhoods and supporting a larger population can help support new and existing amenities within the settlement as a whole.

4.6.118 There's also strong existing relationship between the urban areas and rural communities across Oxfordshire, which could be further strengthened through better connectivity. There needs to be a detailed review of settlements rather than broad-brush assumptions across Oxfordshire to ensure that rural settlements that are capable of taking some growth are identified.

4.6.119 Many stakeholders were opposed to a spatial strategy that was too heavily focused on rural communities.

4.6.120 It is considered that major dispersal of growth across a wide range of villages would not be consistent with the Plan strategy, as it is would be much harder to deliver strategic scale infrastructure and the major changes necessary to meet net zero carbon ambitions. A key concern is the ability for a dispersed pattern of growth to deliver sustainable outcomes, particularly when many development opportunities could be located at a distance from services centres and well beyond the catchment of sustainable transport corridors that offer frequent and reliable services.

4.6.121 Spatial Option 4, contrary to the title, would appear to promote developments that are more likely to result in the erosion of the natural environment and heritage of rural communities, rather than supporting them.

4.6.122 There was a view that option 5 would direct development to precisely the countryside and rural settlements that people are seeking to protect. There may be occasions when allowing some housing growth is necessary and desirable and, in particular, could provide affordable housing so that villages are more sustainable and better able to meet the demands of climate change by being more self-contained.

4.6.123 Concern was expressed that further erosion of rural communities will continue the destruction of traditional village life as fields are built over, and farmland and recreational spaces are lost. Within all the options considered, there are numerous locations which would struggle to accommodate any further growth without serious detrimental impact to the countryside, including further erosion of the Green Belt.

4.6.124 It is recognised that some development must be directed to rural areas, to arrest decline caused by an ageing population and address issues of isolation and rural deprivation, but this should not be the focus. Rural settlements are inherently less sustainable locations for significant growth, with limited public transport connections, lacking in sustainable access to jobs and services, and it's not realistic to expect that their sustainability credentials can be enhanced to such a degree as to support a focus for growth.

4.6.125 The principles of option 5 should be considered alongside the other spatial options, but it is not supported as a realistic and sustainable spatial option in its own right. Whilst supporting rural communities is important, the Oxfordshire Plan strategy cannot be to focus growth in this way, as it will not achieve the ambition and growth potential.

4.6.126 Whilst there is merit in supporting the vitality of rural communities through development, the majority of smaller settlements don't have the capacity to support or accommodate the scale of growth that needed. Contrary to the other options, to push development to the rural areas instead of focusing on the key centres would lead to an increase in unsustainable movement patterns against the objectives of the plan.

4.6.127 Whilst there will be some suitable opportunities for development in rural areas, this should not be focus of the spatial strategy. The Oxfordshire Plan should recognise the presence of such opportunities and the limited contribution smaller, rural sites can make to housing delivery and put in place a framework that allows allocations to be made through Local Plans to be prepared by the Districts or Neighbourhood Plans. This would provide the basis for development in each rural settlement to be analysed by each local authority, with the proper buy-in from the communities affected, allowing the partnership to focus on the overall, higher level, spatial strategy, which will deliver the majority of growth to 2050. Rural development on the scale that could be justified in the pursuit of sustainable development should more appropriately be addressed through policies in local

plans given that the significance of any contribution from this source of growth is unlikely to be of a strategic nature.

4.6.128 There may be circumstances that limited rural growth could support the overall spatial strategy, possibly through the reuse of a brownfield site or to facilitate homes near a key employment centre, and there will be suitable greenfield opportunities in certain settlements, but this should not be focus of the spatial strategy. Supporting rural communities can be achieved through smaller scale allocations, rural exception sites and a policy framework that seeks to sustain and enhance local community services

4.6.129 Stakeholders highlighted the scoring of Spatial Option 5 in the Sustainability Appraisal. Option 5 scores the least favourably overall against the other Spatial Options, with no 'green' scores and a high number of 'red'. It scores particularly poorly against connectivity to towns and cities, areas of employment, sustainable transport infrastructure and car driver mode share and only achieves an 'amber' score within the Transport Stage 1 Review of Spatial Options.

4.6.130 The conclusions of the SA also took into account the introduction of Garden Villages, as well as smaller scale rural growth. Whilst not condemning the sustainability of these new settlements, the conclusions of the SA should not be read in the context that any development in rural areas would be unsustainable.

4.6.131 In contrast to the SA the 'Health Impact Assessment' considers Option 5 to be a sustainable option. This is because option 5 "aims to address rural deprivation and inequalities by improving access to services, facilities, homes and jobs in rural areas". It is therefore paramount that the emerging plan allows rural areas to grow, making them sustainable in their own terms, removing some of the concerns stated in the SA.

MONITORING FRAMEWORK

Key Messages

- More work is needed to develop the monitoring framework as draft policies emerge.
- Procedures for undertaking monitoring and producing annual monitoring reports should be established, clearly identifying where monitoring responsibilities sit.
- The conditions that would trigger a plan review should be identified.
- The local plan policies that will be superseded by policies in the Oxfordshire Plan should be identified.

4.7.1 Most comments on the monitoring framework expressed that more detail and clarity is needed around monitoring arrangements. There were questions about where the responsibility for monitoring will sit and the terms of reference for producing and publishing monitoring reports. It was suggested that monitoring should be undertaken centrally by the core team and not delegated to each district to ensure consistency. It was also suggested that it may be appropriate to undertake monitoring on the basis of geographical areas around the main settlements, to assist in assessing the effectiveness of cross-boundary initiatives, such as those in place around Oxford City and Didcot.

4.7.2 It was suggested that the monitoring framework should form part of a larger implementation plan which would enable consistent delivery and enforcement processes.

4.7.3 More detail on monitoring metrics was requested. It was suggested that monitoring metrics should be ambitious. It was also suggested that plan progress should be judged against the 17 United Nations Sustainable Development Goals.

4.7.4 A number of comments stated that the conditions that would trigger a plan review should be set out in the Oxfordshire Plan.

4.7.5 It was also suggested that local plan policies that will be superseded by policies in the Oxfordshire Plan should be clearly set out.

CALL FOR IDEAS

4.8.1 The Regulation 18 part 2 consultation was supplemented by a Call for Ideas, in order to identify parts of Oxfordshire that would be suitable for housing and employment development, environmental enhancement and infrastructure investment.

4.8.2 Stakeholders were asked to submit sites and broad locations to the Oxfordshire Plan team for consideration through the Plan making process.

4.8.3 A total of 77 new submission were made in 2021, to add to the 173 submissions made in 2019. The submissions are listed in the table below, with the extent and distribution of sites illustrated on Map 2.

Site Reference	Site Location	Submission Type	District Location
688651	Stanton St John, Forest Hill, Beckley and Elsfield	Environmental	South Oxfordshire
689809	Harwell Science Education Centre	Community Infrastructure	Vale of White Horse
689874	Land at Barton	Community Infrastructure	South Oxfordshire
690235	Nth of A420 Shrivenham	Housing	Vale of White Horse
690235	Land at Hanney Road, Steventon	Housing	Vale of White Horse
690399	Land at Thornhill Park and Ride	Mixed use	South Oxfordshire
690496	London Road, Chipping Norton	Housing	West Oxfordshire
690545	South Oxfordshire broad location	Housing	South Oxfordshire
691982	land behind Larkdown Road, Wantage	Housing	Vale of White Horse
691986	The Pump Station, Harwell campus	Housing	Vale of White Horse
708742	Gavray Local Wildlife Site	Environmental	Cherwell
709174	Land west of Chalgrove Airfield	Housing	South Oxfordshire
709789	Cornmarket Regeneration	Housing	Oxford
709852	Carterton Football Club	Community Infrastructure	West Oxfordshire
709857	Witney-Yarnton-combe Triangle	Mixed Use	West Oxfordshire / Cherwell
713527	Pages Farm, Wootton	Housing	Vale of White Horse
714058	Land at Colliers Farm, Baulking	Housing	Vale of White Horse
715040	3km Chiltern AONB Buffer	Environmental	South Oxfordshire
715504	Cotswold AONB National Park	Environmental	West Oxfordshire

Site Reference	Site Location	Submission Type	District Location
715943	Strategic Countryside Park	Environmental	Oxford / Cherwell / South Oxfordshire
716006	Cowley Branch Line	Transport	Oxford
716453	AONB Extension	Environmental	South Oxfordshire
716732	Land west of Harwell	Housing	Vale of White Horse
716734	Land at Milton Heights	Housing	Vale of White Horse
716758	Land west of Thame	Housing	South Oxfordshire
716759	A40 Bus Lanes	Transport	West Oxfordshire
716765	Land at Dalton Barracks	Housing	Vale of White Horse
716768	South Fleet, Didcot	Housing	South Oxfordshire
716772	Frieze Farm, North Oxford	Housing	Cherwell
716773	Wick Hall Estate, Abingdon	Housing	Vale of White Horse
716782	Grove Station	Transport	Vale of White Horse
716784	The Triangle, Wheatley	Employment	South Oxfordshire
716788	Boars Hill Farm	Housing	Vale of White Horse
717317	Kelham Hall Drive, Wheatley	Housing	South Oxfordshire
717322	Land south of Kennington	Housing	Vale of White Horse
717325	Oxfordshire Cotswolds Garden Village	Mixed use	West Oxfordshire
717996	Shipton Quarry	Mixed use	Cherwell
717997	Land west of Burford Road, Chipping Norton	Housing	West Oxfordshire
717999	Land north west of Ambrosden	Housing	Cherwell
718243	Land at Thame Show Ground	Mixed use	South Oxfordshire
718248	Land south east of Didcot	Housing	South Oxfordshire / Vale of White Horse
718258	Land north of Grove	Mixed use	Vale of White Horse
718264	Land at J11 M40	Employment	Cherwell
718264	Land at J10 M40	Employment	Cherwell
718264	Land at Graven Hill	Housing	Cherwell
718342	Barnard Gate Garden Village	Mixed use	West Oxfordshire
718346	Land east of Caversham Park Road, Playhatch	Housing	South Oxfordshire
718350	Land north of Burford Road, Witney	Housing	West Oxfordshire
718352	Land north of A422 Banbury	Employment	Cherwell
718356	Land off Peppard Road, Emmer Green	Housing	South Oxfordshire
718357	Land north and south of A418, Thame	Mixed use	South Oxfordshire
718360	North Reading Broad Area	Housing	South Oxfordshire
718364	Land at Monument Road, Chalgrove	Housing	South Oxfordshire

Site Reference	Site Location	Submission Type	District Location
718365	Troy farm Nr Somerton	Housing	Cherwell
718368	Land at Old Marston	Housing	Oxford
718373	Chawley Farm, Cumnor	Housing	Vale of White Horse
718442	North Oxford Strategic Wildlife Area	Environmental	Oxford / South Oxfordshire / Cherwell
719603	Land north of Berinsfield	Mixed use	South Oxfordshire
719613	Land west of Wantage	Mixed use	Vale of White Horse
719618	Land adj Abingdon Rd, Kingston	Housing	Vale of White Horse
719624	Bicester Phase 2	Employment	Cherwell
719639	Land at J9 M40	Employment	Cherwell
719642	Land north east of J10 M40	Employment	Cherwell
719647	Land east of Wendlebury	Housing	Cherwell
719659	Land north of Launton	Housing	Cherwell
719740	Thame Road, Thame	Mixed use	South Oxfordshire
719746	Campion Hall Gardens, Didcot	Housing	South Oxfordshire
719750	Lincoln Gardens, Didcot	Housing	South Oxfordshire
719784	Land at Exlade Street, Checkendon	Housing	South Oxfordshire
719795	Land south of Heyford Park	Housing	Cherwell
719817	Land at Crowmarsh Gifford	Housing	South Oxfordshire
719845	Land at Lashford Lane, Wooton	Housing	Vale of White Horse
719860	Bicester Gateway	Housing	Cherwell
719882	Kidlington Moors	Housing	Cherwell
719886	Land at Kilkenny Farm	Housing	West Oxfordshire
719888	Charlbury Enterprise Village	Mixed use	West Oxfordshire
719892	Land east of Brize Norton	Mixed use	West Oxfordshire
720052	Land at Manor Farm Bungalow, Chalgrove	Housing	South Oxfordshire
720065	Banbury Nature Park	Environmental	Cherwell
720067	River Cherwell	Environmental	Cherwell
720072	Land at Milton Park	Employment	South Oxfordshire / Vale of White Horse
720084	Land east of Hendred	Housing	Vale of White Horse
720278	Rectory Farm, Kidlington	Housing	Cherwell
721038	Land west of Lower Road, Long Hanborough	Housing	West Oxfordshire
721041	Land north of Witney Road, Long Hanborough	Housing	West Oxfordshire
721047	Land at Milton Heights	Mixed use	Vale of White Horse
721065	Challow Fields	Mixed use	Vale of White Horse

Site Reference	Site Location	Submission Type	District Location
721073	Land east of Oxford Parkway Station	Housing	Cherwell / South Oxfordshire
721087	Land at Challow Park	Housing	Vale of White Horse
721101	Land south of Sprinhill, Southmoor	Housing	Vale of White Horse
721111	Land at Milton Common	Housing	South Oxfordshire
721113	Land off London Road, Chipping Norton	Housing	West Oxfordshire
721696	Land north of East Hanney	Housing	Vale of White Horse
721709	Land at Cholsey Fields, Cholsey	Housing	South Oxfordshire
721724	Land at Egrove Park	Housing	Vale of White Horse
722005	Berinsfield	Housing	South Oxfordshire
722005	Kemps Farm, east of Twyford	Housing	Cherwell
722014	Land at High Fields, Thame	Housing	South Oxfordshire
722039	Land at Chilworth Farm	Housing	South Oxfordshire
722045	Land adjacent to Thornhill Park and Ride	Housing	South Oxfordshire
722052	Land south of Culham	Housing	Vale of White Horse
722055	Land west of Yarnton	Housing	Cherwell / West Oxfordshire
722073	Land north of Abingdon	Housing	Vale of White Horse
722092	Land off Wantage Road, Wallingford	Housing	South Oxfordshire
722124	Land north and west of Little Chesterton	Housing	Cherwell
722182	Land east of Weston on the Green	Mixed use	Cherwell
722188	East of Warwick Road, Banbury	Housing	Cherwell
722191	Land south of Harwell Campus	Mixed use	Vale of White Horse
722207	Land east of Kingston Bagpuize	Mixed use	Vale of White Horse
722229	Land at Reading Golf club	Housing	South Oxfordshire
722241	Cotswold AONB National Park	Environmental	West Oxfordshire
722252	Land north of Springhill, Kingston and Southmoor	Housing	Vale of White Horse
722254	Land at Islip	Mixed use	Cherwell
722268	Land north of Emmer Green	Housing	South Oxfordshire
722275	Land East of A34, Drayton	Housing	Vale of White Horse
722279	North West Bicester	Housing	Cherwell
722281	Land west of A34, Drayton	Mixed use	Vale of White Horse
722293	Proposed Thames crossing	Transport	South Oxfordshire
722295	Park and Ride Locations	Transport	South Oxfordshire
722296	Land north of Reading	Mixed USe	South Oxfordshire

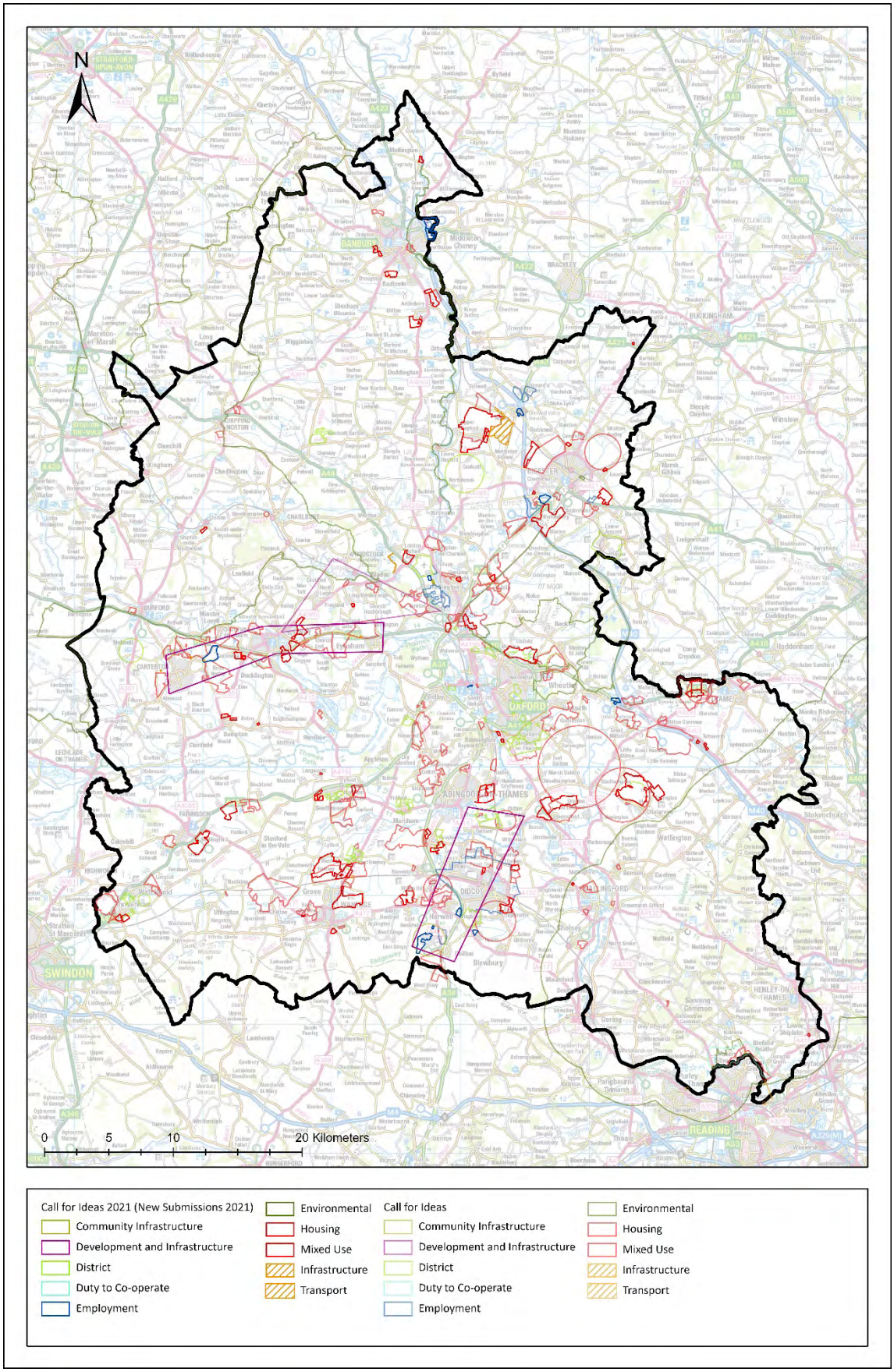
Site Reference	Site Location	Submission Type	District Location
722298	Land at Nineveh Farm	Housing	South Oxfordshire
722302	Land adjacent to Hanborough Station	Housing	West Oxfordshire
722310	Berry Hill Road, Adderbury	Housing	Cherwell
722316	Radley South	Housing	Vale of White Horse
722381	Land west of Minster Lovell	Housing	West Oxfordshire
722393	Banbury Canalside	Housing	Cherwell
722433	Land north of Oxford	Mixed use	Cherwell
722440	Land west of Carterton	Housing	West Oxfordshire
722452	Land north of Majors Road, Watchfield	Mixed use	Vale of White Horse
722456	North Carterton Garden Village	Mixed use	West Oxfordshire
722504	Land south of Majors Road, Watchfield	Housing	Vale of White Horse
722508	Radcot Green	Housing	Vale of White Horse
722519	Land at Dymock's Farm, Bicester	Housing	Cherwell
722526	Land north of Wykham Lane, Banbury	Housing	Cherwell
722530	Land at Shores Green, Witney	Housing	West Oxfordshire
722533	Land south of Grenoble Road, Oxford	Mixed use	South Oxfordshire
722536	Caulcott Farm, Lower Heyford	Housing	Cherwell
722629	Land at Nielson, Risinghurst	Mixed use	Oxford
722640	Land west of Race Farm, Kingston Bagpuize		Vale of White Horse
722644	Waterstock New Village	Mixed use	South Oxfordshire
722807	Land south of Bushwell Business Park, Wallingford	Housing	South Oxfordshire
723137	Land north of Headington	Housing	South Oxfordshire
723144	Land at South Witney	Housing	West Oxfordshire
723158	Land south of Shrivenham	Housing	Vale of White Horse
723163	Land north of Wallingford	Housing	South Oxfordshire
723179	Land north of Didcot	Housing	South Oxfordshire
723204	Dalton Barracks	Housing	Vale of White Horse
723229	Tulwick Park, Grove	Housing	Vale of White Horse
723239	Land east of Sandringham Road, Didcot	Housing	South Oxfordshire
723243	Harwell Innovation Village Expansion	Employment	Vale of White Horse
723256	North Weston Garden Village	Mixed use	South Oxfordshire

Site Reference	Site Location	Submission Type	District Location
723275	Land at Northfield	Housing	South Oxfordshire
723286	Rowstock Innovation Village	Mixed use	Vale of White Horse
723289	Land at Waterstock	Mixed use	South Oxfordshire
723297	Land east of Forest Hill	Housing	South Oxfordshire
723300	Land north of Carterton	Mixed use	West Oxfordshire
723302	Land south east of J11 M40	Employment	Cherwell
723306	Land south of B4099, Benson	Housing	South Oxfordshire
723310	Land adjacent to Culham Science Centre	Housing	South Oxfordshire
723346	Land south west of Downs Road, Standlake	Housing	West Oxfordshire
723349	Land south of Sheep Street, Burford	Housing	West Oxfordshire
723366	Culham Science Village	Mixed use	South Oxfordshire
723376	Land east of J11 M40	Employment	Cherwell
723382	Begbroke Science Park	Employment	Cherwell
723386	Land south east of Bicester	Housing	Cherwell
723419	Land at Begbroke	Employment	Cherwell
723967	Land north of Langford Lane, Kidlington	Employment	Cherwell
732818	Land at Abingdon Road, Didcot	Housing	South Oxfordshire
733117	Harrington New Village	Mixed use	South Oxfordshire
735996	land south of Kingston Bagpuize	Mixed use	Vale of White Horse
735998	Land north of Coxwell Rd	Mixed use	Vale of White Horse
736000	Home Farm, Buckland	Housing	Vale of White Horse
736232	West Witney	Mixed use	West Oxfordshire
1043112	Blenheim cycle path	Infrastructure	
1043115	Woodstock Swimming Pool	Community Infrastruture	West Oxfordshire
1044530	Barcote Garden Village	Landowner	Vale of White Horse
1044663	Land South of Shrivenham	Housing	
1046038	Brize Norton Park	Employment	West Oxfordshire
1046074	Land west of Junction 8a M40	Employment	South Oxfordshire
1046212	Oxfordshire Railfreight Terminal	Transport	Cherwell
1046272	Land east of Adderbury	Housing	Cherwell
1046275	Crowmarsh Farm, Bicester	Mixed Use	Cherwell

Site Reference	Site Location	Submission Type	District Location
1046278	Land north of Broughton Road, Banbury	Housing	Cherwell
1046280	Wicklesham Lodge Farm, Faringdon	Mixed Use	Vale of White Horse
1046288	Land at Curbridge	Housing	West Oxfordshire
1046364	Chalgrove Airfield	Mixed Use	South Oxfordshire
1046444	Richmead Park	Housing	South Oxfordshire
1046637	Land south east of Grove	Housing	Vale of White Horse
1046639	Land east of Harwell	Employment	Vale of White Horse
1046650	Land east of Upton	Employment	Vale of White Horse
1047805	Land at Milton Road, Adderbury	Mixed Use	Cherwell
1047941	Harwell Campus	Nuclear Decommissioning	Vale of White Horse
1047944	Land at Ardley	Employment	Cherwell
1048025	Land at Banbury - J11 of M40	Employment	Cherwell
1048029	Land at Blackthorne Hill, Bicester	Housing	Cherwell
1048032	Land at Chainhill Road, Wantage	Housing	Vale of White Horse
1048036	Land at Cote Road, Aston	Housing	West Oxfordshire
1048038	Land north of A417, East Hendred	Housing	Vale of White Horse
1048044	Land at Grange Farm, Launton	Housing	Cherwell
1048046	Heyford Park	Mixed Use	Cherwell
1048051	Land at High Street, Tetsworth	Housing	South Oxfordshire
1048287	Land at Loop Farm	Mixed Use	Cherwell
1048293	Land at North Weston	Mixed Use	South Oxfordshire
1048298	Land at School Close, Longworth	Housing	Vale of White Horse
1048302	Land at Drayton East Way	Housing	Vale of White Horse
1048306	Land north of Abingdon Road, Drayton	Housing	Vale of White Horse
1048310	Land at Webbs Way, Kidlington	Housing	Cherwell
1048311	Withycombe Farm, Banbury	Housing	Cherwell
1048314	Land at Woodhouse Fruit Farm Kinston Bagpuize	Housing	Vale of White Horse
1048315	Land at Wykham Park Farm, Banbury	Housing	Cherwell
1048318	Land south of Bicester	Housing	Cherwell
1048319	Land south of White Owl farm, bampton	Housing	West Oxfordshire

Site Reference	Site Location	Submission Type	District Location
1048324	Land east of Claydon Road, Cropredy	Housing	Cherwell
1048326	Land east of Oxford Road, PR6a	Housing	Cherwell
1048335	Land south of Bicester	Employment	Cherwell
1048337	land at Wises Farm, East Challow	Housing	Vale of White Horse
1048338	Land north of Banbury Road, Finmere	Housing	Cherwell
1048341	Land at Bayswater Brook	Mixed Use	South Oxfordshire
1048342	Land north of Berinsfield	Mixed USe	South Oxfordshire
1048343	Land north of Camp Road, Upper Heyford	Housing	Cherwell
1048460	Land north of Grove	Mixed Use	Vale of White Horse
1048473	Land at Sires Hill, Didcot	Housing	South Oxfordshire
1048477	Land south east of Woodstock	Housing	Cherwell
1048479	Land south of A4130, Brightwell Cum Sotwell	Housing	South Oxfordshire
1048481	Land west of Southmoor	Housing	Vale of White Horse
1048484	Land at Fringford Lane, Caversfield	Housing	Cherwell
1048486	Land west of Mount Owen Road, Bampton	Housing	West Oxfordshire
1048487	land west of Shrivenham	Housing	Vale of White Horse
1048500	Site A: Land west of A4074, Sandford-on-Thames	Housing	South Oxfordshire
1048723	Former Oil Storage Depot, Bletchingdon Road, Isli	Housing	Cherwell
1048890	Land at Radley Station	Mixed Use	Vale of White Horse
1048967	Site B: Land west of Sandford Road, Sandford-on-T	Housing	South Oxfordshire
1048983	Land at Wroslyn Road	Housing	West Oxfordshire
1049000	Land at Mount Hill Farm, Tetsworth	Housing	South Oxfordshire
1049023	Land at J11 M40	Employment	Cherwell
1049050	Land East of New Road (B4016), East Hagbourne, Did	Housing	South Oxfordshire
1049158	Land East of Witney	Mixed Use	West Oxfordshire
1049172	Land north of Green Lane and east of The Hale, Che	Housing	Cherwell
1049176	Land off A4130, Didcot	Mixed Use	Vale of White Horse
1049179	Land off B480, Chalgrove, Oxford	Housing	South Oxfordshire

Site Reference	Site Location	Submission Type	District Location
1049182	Land off New Road, Lower Shiplake	Housing	South Oxfordshire
1049487	Oxford West End Sites	Employment	Oxford
1049503	Land north of Grove	Mixed Use	Vale of White Horse
1051272	Land at Oxford Technology Park	Employment	Cherwell
1051275	The Piggeries	Community Infrastructure	Cherwell
1051302	A40 corridor - Witney Carterton Eynsham	Development and Infrastructure	West Oxfordshire
1051324	West Oxon Rail Infrastructure	Infrastructure	West Oxfordshire
1051327	Science City (Harwell, Dicot, Culham Corridor)	Mixed Use	South Oxfordshire / Vale of White Horse
1052150	Land south of Camp Road, Upper Heyford	Housing	Cherwell
1058303	Land at London Lane, Ascott under Wychwood	Housing	West Oxfordshire



Map 2 – Distribution and extent of Call for Ideas submissions for Oxfordshire

APPENDIX 1 – Summary of Responses to Environment Focused Webinar

XFORDSHIRE PLAN 2050

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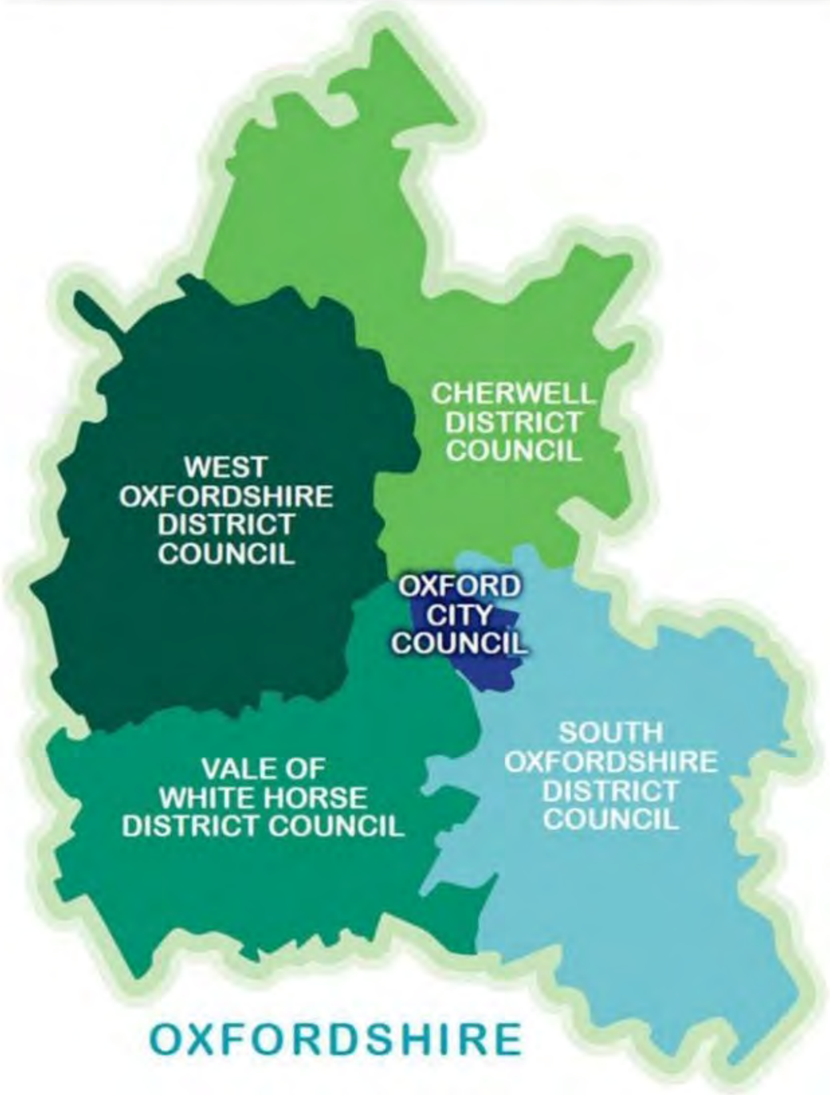
Purpose of today's webinar and workshop.

- To draw on your knowledge and experience as professionals in your field
- To understand what additional evidence may be required to support the Oxfordshire Plan
- To understand barriers to implementation of polices and strategy
- To supplement ongoing consultation and provide focus for next phase of Plan making

What is the Oxfordshire Plan?



- Oxfordshire's councils working together
- Thinking long-term
- Addressing key issues

Work completed so far…

Early consultation

Developed a shared vision

Call for Ideas

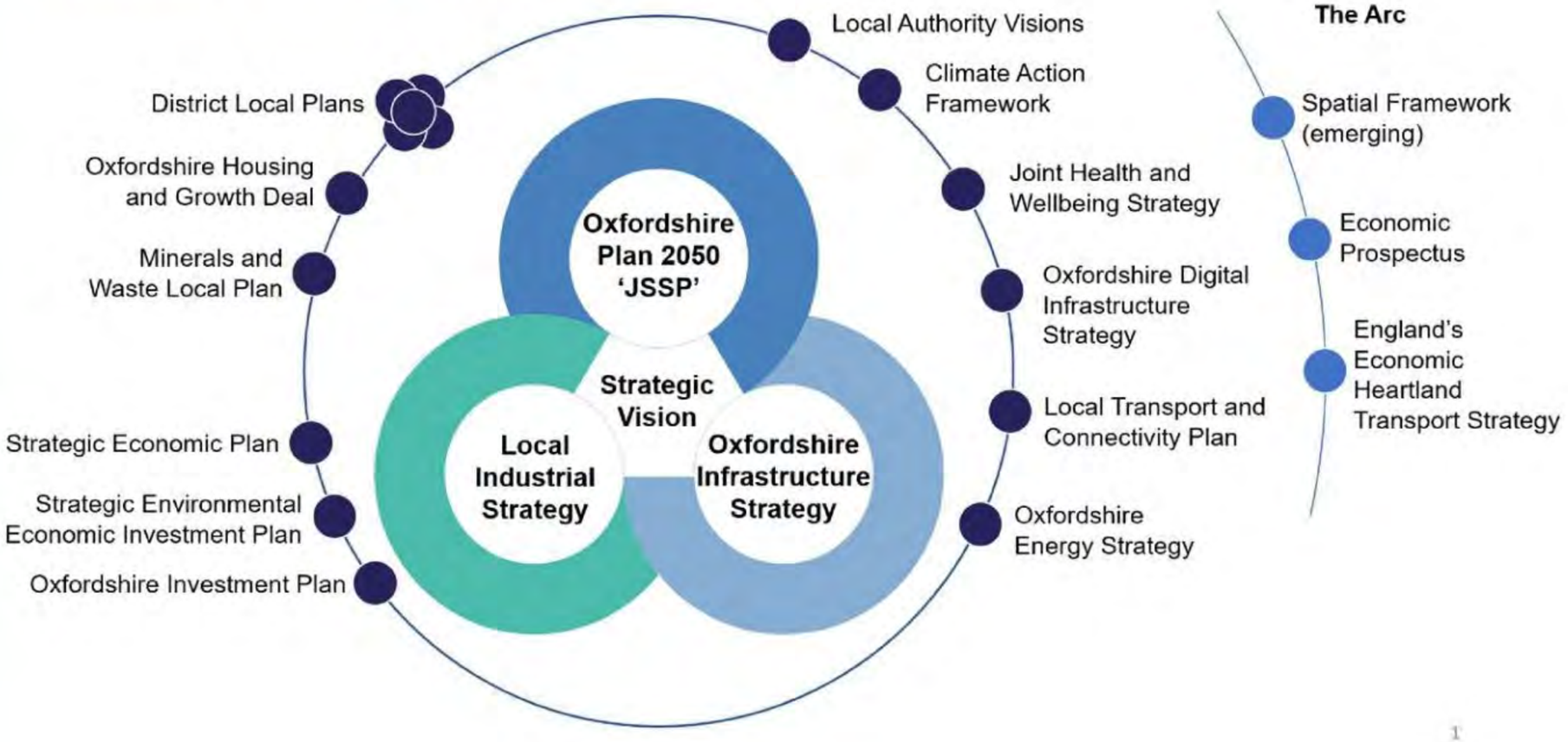
Engagement

Evidence

Where we are now...

Relationship with other Plans and Strategies

Oxfordshire's Strategic Map



Key themes

Addressing climate change
Creating strong and healthy communities
Creating jobs and providing homes
Improving environmental quality
Planning for sustainable travel and connectivity

Theme 1 – Addressing Climate Change

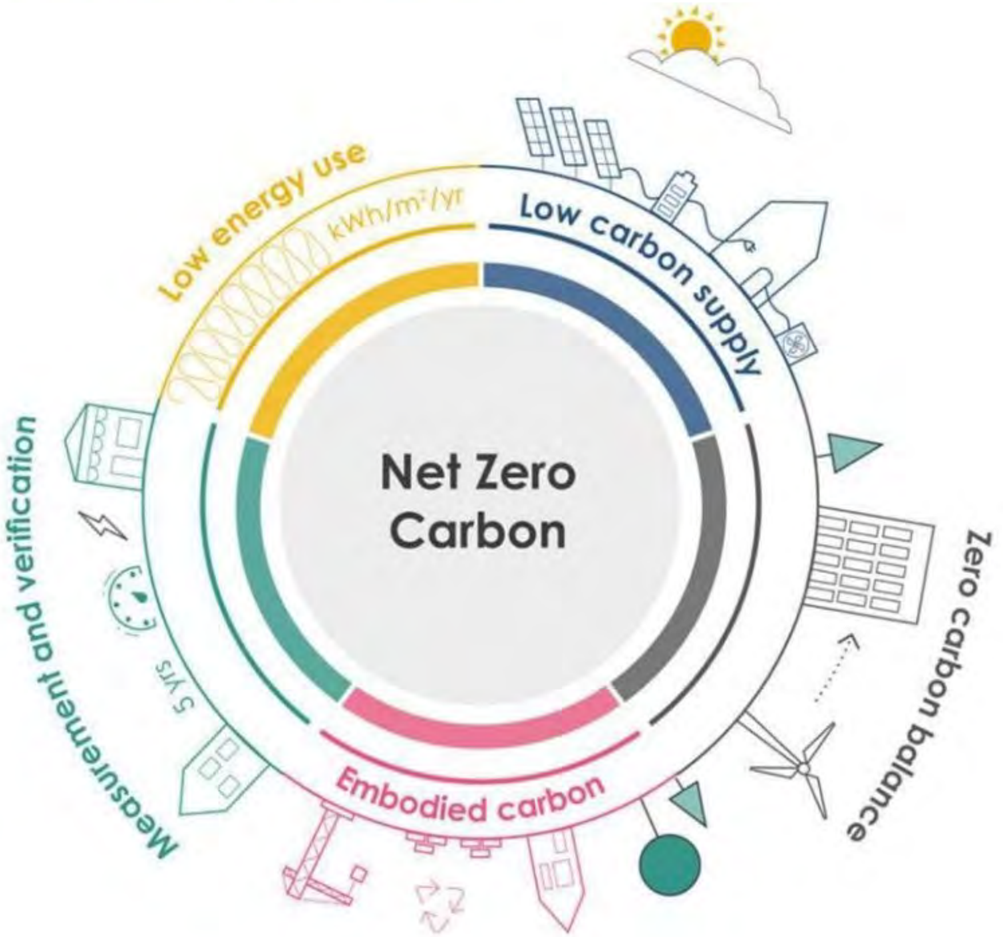
Sustainable design & construction

Energy

Water efficiency

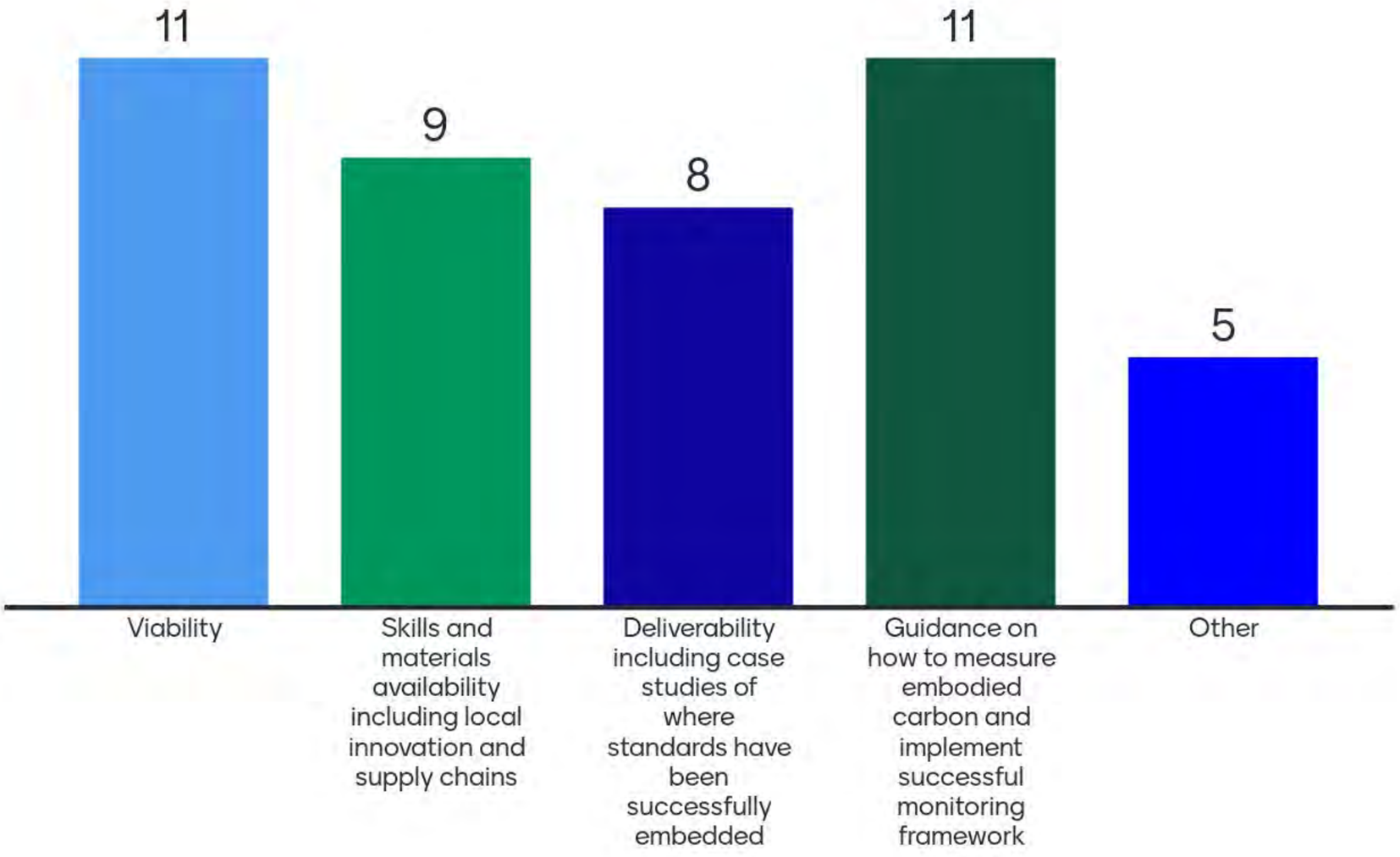
Flood risk

Policy Option 01: Sustainable Design and Construction



- Proposed higher level design standards for new development
- Minimising energy demand of new development
- Taking account of embodied carbon
- Use of circular economy principals to reduce resource consumption and waste
- Preferred approach of LETI / UKGBC type standards
- Carbon offsetting potentially linked to environmental projects such as natural flood risk mitigation

What additional evidence is required to support this approach?



If other – please provide further information or examples, or feel free to provide more detail of your response

How the design standard will ensure govt net zero target met

Sustainable design needs to include water collection and grey water use, and design of plots and roads to deter car ownership and use- car dominate streets deter walking and cycling

Establish clear link with natural capital and ecosystem services, including biodiversity, as the climate emergency and ecological emergency are intrinsically linked, especially with regard to carbon offsetting and biodiversity net gain

Details of monitoring and enforcement will be vital

Keen to share best practice in natural solutions, eg tree planting for shading & cooling, as well as engineered solutions.

Measures of viability should adopt a triple bottom line approach to calculation including environmental and social measures as well as economic

Some case studies would be useful.

It's not clear that this will meet climate change objectives. For example flooding will worsen till 2050 and so offsetting only is not enough

Need to justify why Oxfordshire should have different building standards to the national building regulations etc. What happens if national standards go on to exceed those set in the plan?

If other – please provide further information or examples, or feel free to provide more detail of your response

Building regs restricting certain materials eg timber may be at odds with sustainability objectives.

CAn there be targets and target areas for nature based solutions (woodland wetland etx) as there are for housing?

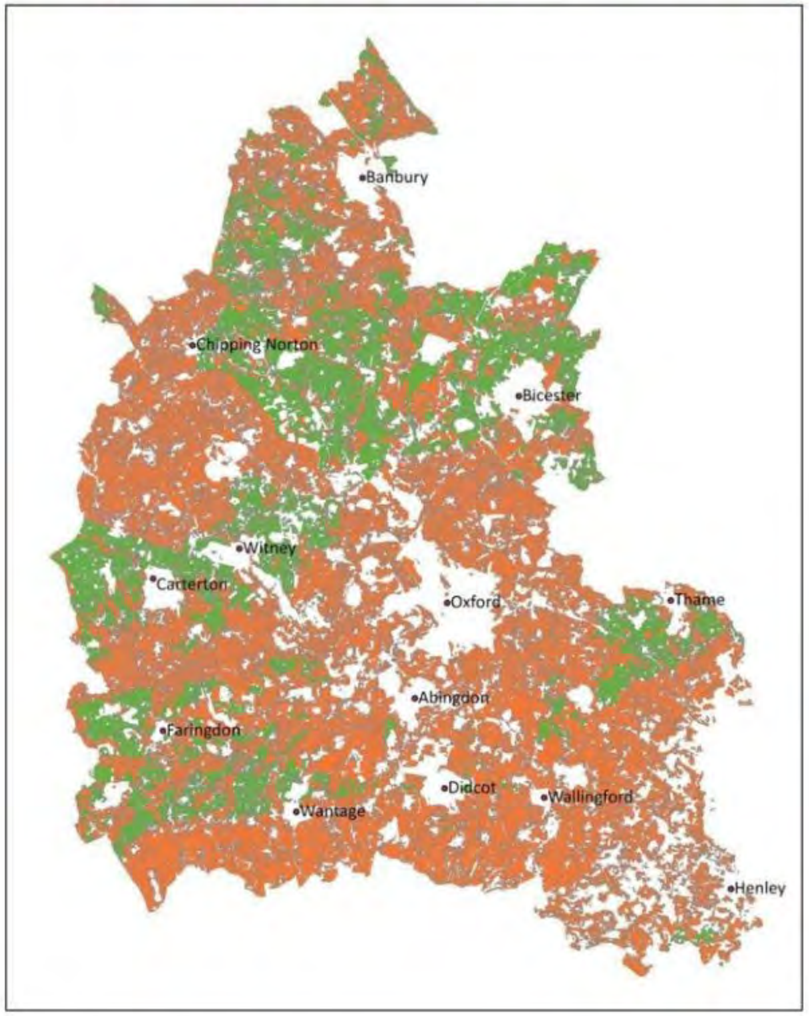
Policy will need to be clear that meeting or exceeding performance standards do not justify overriding other environmental or strategic policies.

Climate change is ultimate threat to viability! Short term financial issues should not block vital action.

Trouble is that different places setting different standards is problematic for the development industry and adds disproportionately to the cost of development by reducing opportunities in economies of scale.

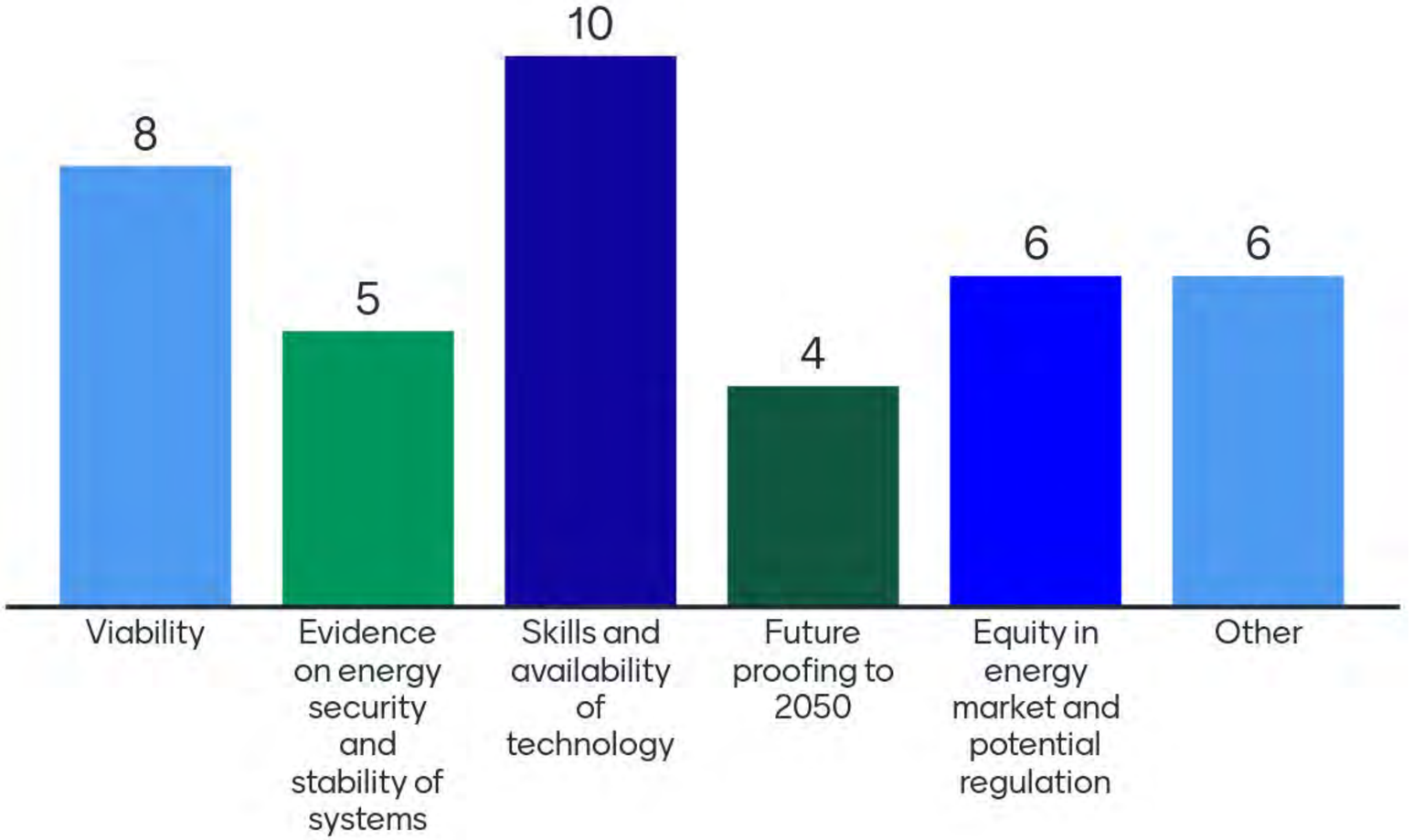
knowledge and skill sharing systems would be good

Policy Option 02: Energy



- Aim to minimise energy demand from new development
- 100% of energy need to be met be renewables
- Support for renewable energy generation schemes
- Spatial strategy to be guided by opportunities for renewable energy generation and local energy networks

What evidence is required to support this potential shift to Local Energy Networks for future development in Oxfordshire?



If other, please provide further information or take opportunity to provide additional information on your views.

There are a lot of competing land uses in Oxfordshire alongside PV (food, housing, nature based solutions). There needs to be an overall land use management plan of some sorts joining these up and balancing them correctly

Case study examples of local energy networks eg pilot scheme from Westmill Solar

Local communities impacted by development should have first option to own and manage local renewable energy schemes

Need to balance land used for solar power generation with need to produce our own food

Location of renewable energy generation and potential to tick natural capital investment box, eg biodiversity net gain.

I agree with the land use competition point. Also need to focus on multiple uses - e.g. all the massive warehouses being built up the M40 *must* have solar panels, surely?

Important to win hearts and minds for solar and other onshore renewables for planning consents.

Individual DNO guidance on acceptable approaches and solutions to this

There is a need to take decisions about prefered energy generation methods, eg solar farms - probably yes, wind turbines - probably not.

If other, please provide further information or take opportunity to provide additional information on your views.

This requires countrywide consideration

Solar can be combined with livestock grazing, free range poultry, hedgerow restoration and other positive land uses.

shouldn't compromise the nature recovery strategy e.g. reduce or remove potential to create key habitat links

Need to ensure that other environmental considerations aren't trumped by renewable energy eg landscape, land for food production.

Reduction in car use (electric cars putting stain on any Local Energy networks) is vital so need to put houses where they can plug into rapid transit network. this is vital in determining viability of a Local Network.

Do we want pv to be locally or community owned?

Industrial estates and employment sites incorporating wind and solar generation

We need to recognise land as a truly scarce resource that we are going to need for multiple solutions to our nature/climate/health emergencies.

Some local authorities eg West Berks are raising local green finance to develop solar.

If other, please provide further information or take opportunity to provide additional information on your views.

Relationship between generation infrastructure and transmission infrastructure - avoiding the need to increase overhead lines, esp. in protected landscapes.

Policy should give clear priority to encompassing renewable energy as part of other development/brownfield, rather than additional landtake.

Restricting the number of homes in OP 2050 would reduce energy requirement.

For private landowners, having the right financial support is key.

Solar panel shelters at surface car parks, e.g. especially Oxofrd's P&R sites

What are barriers to establishing Local Energy Networks in Oxfordshire?

National legislation currently preventing local microgrids

Selfish approach

Clear narrative on benefits and opportunities. Can be combined with other land uses.

Local opposition , NIMBY. Financial frameworks.

Impacts on protected landscapes (although local networks can help reduce impacts by reducing need for transmission infrastructure).

Risk approach by developers

Too high demand from electric cars where no realistic alternative transport exists!

Public perception?

Landscape designations- need to look to the future and change inevitable

What are barriers to establishing Local Energy Networks in Oxfordshire?

Land owners opposition and/or financial agreements for passage over land

LENs could focus more on generation and distribution of *heat* than of electricity.

Skills development amongst community leaders in local energy networks

Join up with Elms for mix of solar and restoration

Policy Option 03: Water Efficiency

Residential Development
Average water use 141 litres per person per day
Building Regulations 125 litres per person per day
Building Regulations (optional) 110 litres per person per day
Can we do more ? litres per person per day

- Explore the potential to go further than 110 litres per person per day for residential development.
- Explore the potential to set minimum water efficiency standards for some non-residential uses.
- Community-scale rainwater harvesting and greywater recycling at strategic growth locations.
- Be flexible to respond to future change.

Is there anything else the Oxfordshire Plan could do to support the efficient use of water?

Make Suds and low water use systems mainstream / mandatory in all existing and future developments

Golf courses are a major offender

No info to add, but thoroughly support policy in this area being as ambitious as possible.

Design houses, particularly smaller units without baths

Support use of composting toilets in new homes

Support retrofitting of existing dwellings

Hold water companies to account for investing in infrastructure and fixing leaks

Don't forget agricultural water use- it is linked to soil condition that as it is improved would improve carbon capture. Change of crops, and rainwater retention would be impo9rtant- often through natural vegetation areas

user pays to reflect environmental cost of water demand/use

Is there anything else the Oxfordshire Plan could do to support the efficient use of water?

Riparian trees to reduce water loss in heated climate

Stop decking and concrete over gardens

Water resource / scarcity should be influential in regards to finalising growth targets / constraining growth.

Co-benefits and strategic recognition of this opportunity, linking biodiversuty net gain, historic heritage, etc.

We have a problem locally with domestic water efficiency resulting in not enough waste water to wash out blockages in sewage system, leading to sometimes catastrophic blockages. How can this be resolved?

Policy Option 04: Flood Risk

What are the barriers to delivering natural flood risk management schemes and linking with biodiversity and natural capital objectives?

These schemes, unlike renewable e

Funding

staff resource in being able to take action on where we need it.

These schemes, unlike renewable energy, are generally popular. It's about spreading info and offering practical support.

Poor land management and insensitive development leading to loss of woodlands and hedgerows.

The Sussex Flow Initiative is a good example.

Lack of ready to go projects in order to apply for the short term funding windows

Catchment Partnerships have good examples e.g. https://www.wildoxfordshire.org.uk/biodiversity/river-catchments/evenlode-catchment/

Introduce policy that development should lead to a net reduction in flood risk in a catchment through investment in natural capital in other parts of the catchment

What are the barriers to delivering natural flood risk management schemes and linking with biodiversity and natural capital objectives?

needs payment for these schemes in targetted areas where can deliver best gains, funding via agri environment schemes.

https://westcumbriariverstrust.org/projects/natural-flood-management

needs more innovation and support to farmers to do this

Better ways to engage with farmers/land managers need to be evolved. Principally they are food producers and they need to feel supported if they are to give up land for interventions which deliver natural solutions

If developers have to do it, they will!

Focus on development in flood plains is misplaced - key problems are with development *outside* flood plains resulting in increased run-off. This is a big complex issue that requires a more nuanced approach than stopping development in floodplains.

Flood retention schemes are too often been used as the open space for an area and therefore cannot have high wildlife sites. The soil water regime resulting from flood retention schemes also mitigate against them having high wildlife value

Biodiversity projects need to be countywide not arising from flood risk management

Funding - local businesses need to mitigate for their environmental footprint - systems need to be set up to direct that money to Oxfordshire rather than elsewhere

Improving environmental quality

Landscape

Historic environment

Nature recovery

Biodiversity gain

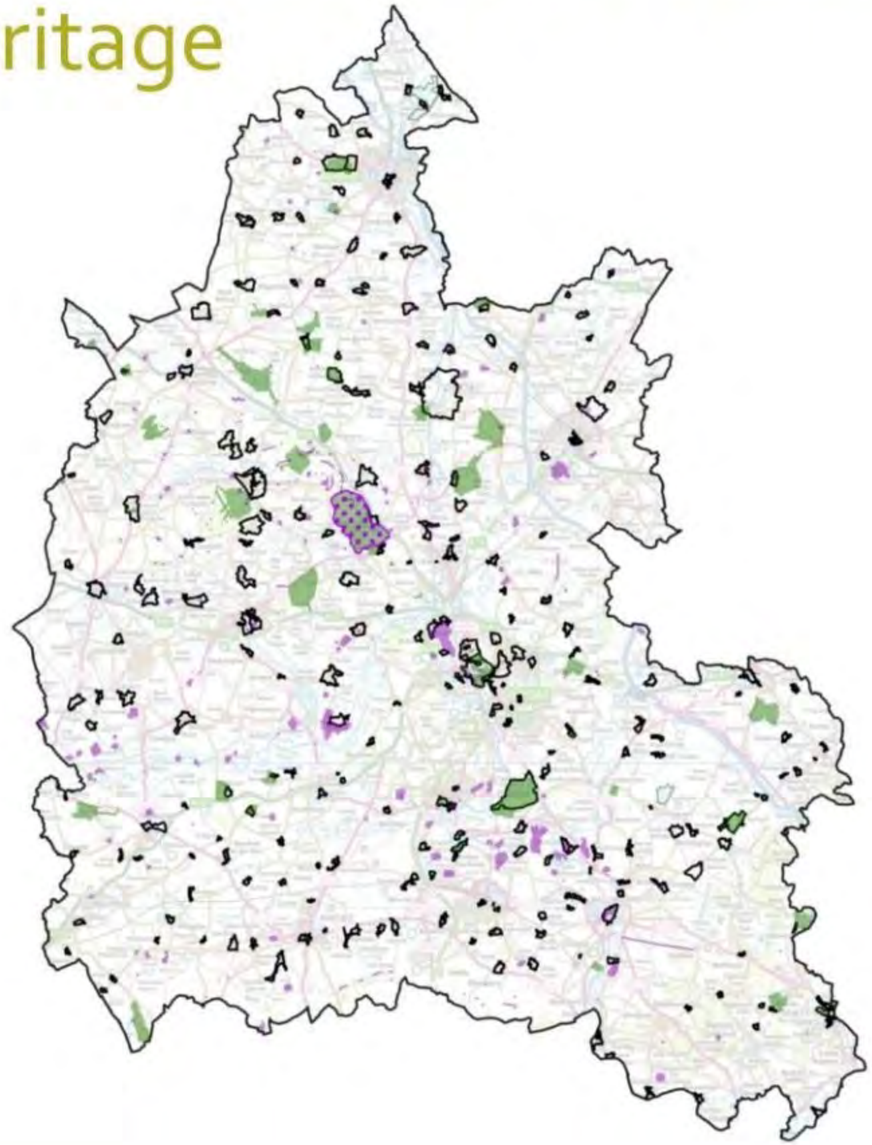
Natural capital

Green Belt

Water quality

Air quality

Policy Options 05 & 06: Landscape and Heritage



- Establish a positive strategy for the conservation and enhancement of landscape features at a landscape scale.
- Establish positive strategy for the conservation and enjoyment of Oxfordshire at the strategic scale.

What more can the Oxfordshire Plan do to add value to national and local policy requirements that are currently in place?

Be stronger about protecting the areas deserving of the "highest status of protection" in the NPPF than the NPPF is. If you can do it for building standards, you can - and should - do it for the AONBs.

setting out needs and standards for residents - i.e. access to green spaces of certain sizes similar to South's local plan

Setting a target for tree canopy cover, and delivering it, is important for climate resilience and nature recovery.

Emphasise the importance of connectivity between landscape sssets

It could start by following National Policy on the Green Belt rather than trying to override it

We need to remember conservation areas does not mean no change or no development. It needs to be proprtionate and appropriate.

Develop plan for long-tern conservation of key heritage assets and preventing encroachment of development that impacts the setting of key assets, e.g. has happened recently with Bicester Roman Town.

Seek to add ecological value into management of Green Belt (although not required by NPPF), and insist on accessible green space around all major settlements.

Build green space into all developments

What more can the Oxfordshire Plan do to add value to national and local policy requirements that are currently in place?

Priority habitats identified in nature recovery networks need to be safeguarded from development.

Cross boundary areas could be important to identify characteristic areas- particular the Otmoor, Bernwood and Stowood area.

Build in a very stong commitment to environmental goals which make rural and urban landscapes more resilient to climate change. This is about adaptation and being able to evolve as the climate changes.

🙄 Don't propose major greenfield allocations in the AONBs, then! There are plenty of alternatives.

Recognise economic value of our landscape/heritage assets

Put greater value on what local communities consider valuable as landscape assets

Remember conservation and archaelogy/SAMs are not the same.

Acknowledge challenge that arises between protecting heritage assets and increasing urban densities

Develop nature recovery focus for green belt, including accessible natural green space

What more can the Oxfordshire Plan do to add value to national and local policy requirements that are currently in place?

Need to have a greater emphasis on local heritage assets across the county

The national historic landscape survey is important resource- particularly to protect and enhance the more intact historic enclosure , open landscape and ancient wood doninated landscape- all particulary degraded in Oxon

Protect ancient woodland with 50m buffers.

CAVAT assessment for existing trees and set greater than 1:1 replacement standards where trees are lost.

Set standards for access to natural green spaces and woodland.

Increase housing density to make best use of scarce land resource

Land that is meant to be protected in the long-term from development in AONBs or Green Belt is the best place in which to invest in environmental enhancement.

Get NRN in place

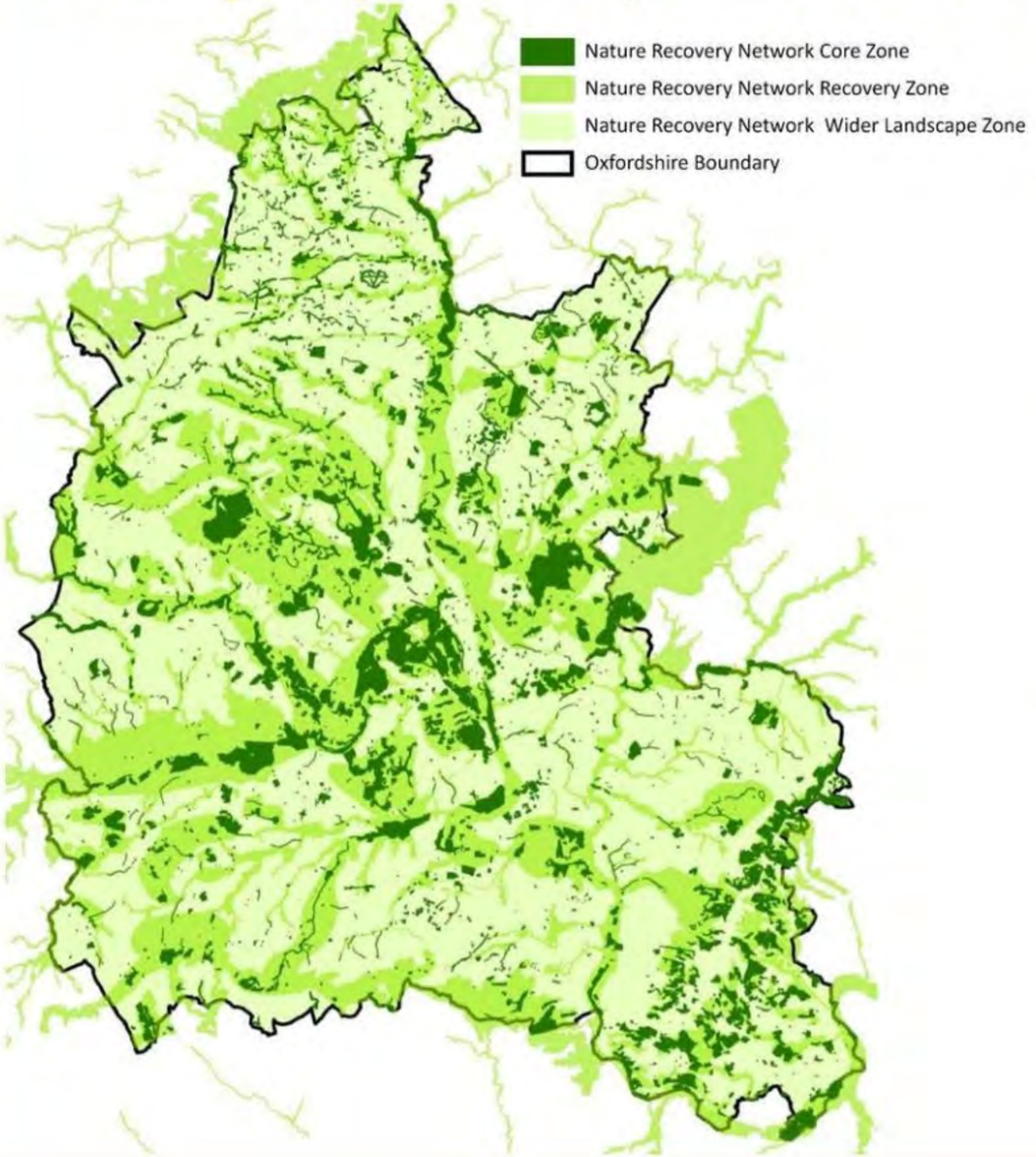
Remember that AONB protections apply to *all* aspects of development, including minerals, waste and other infrastructure as well as housing.

What more can the Oxfordshire Plan do to add value to national and local policy requirements that are currently in place?

Too much emphasis on AONBs- they have lots of totally degraded landscape. Nation Landscape review showed that there are important unprotected landscapes

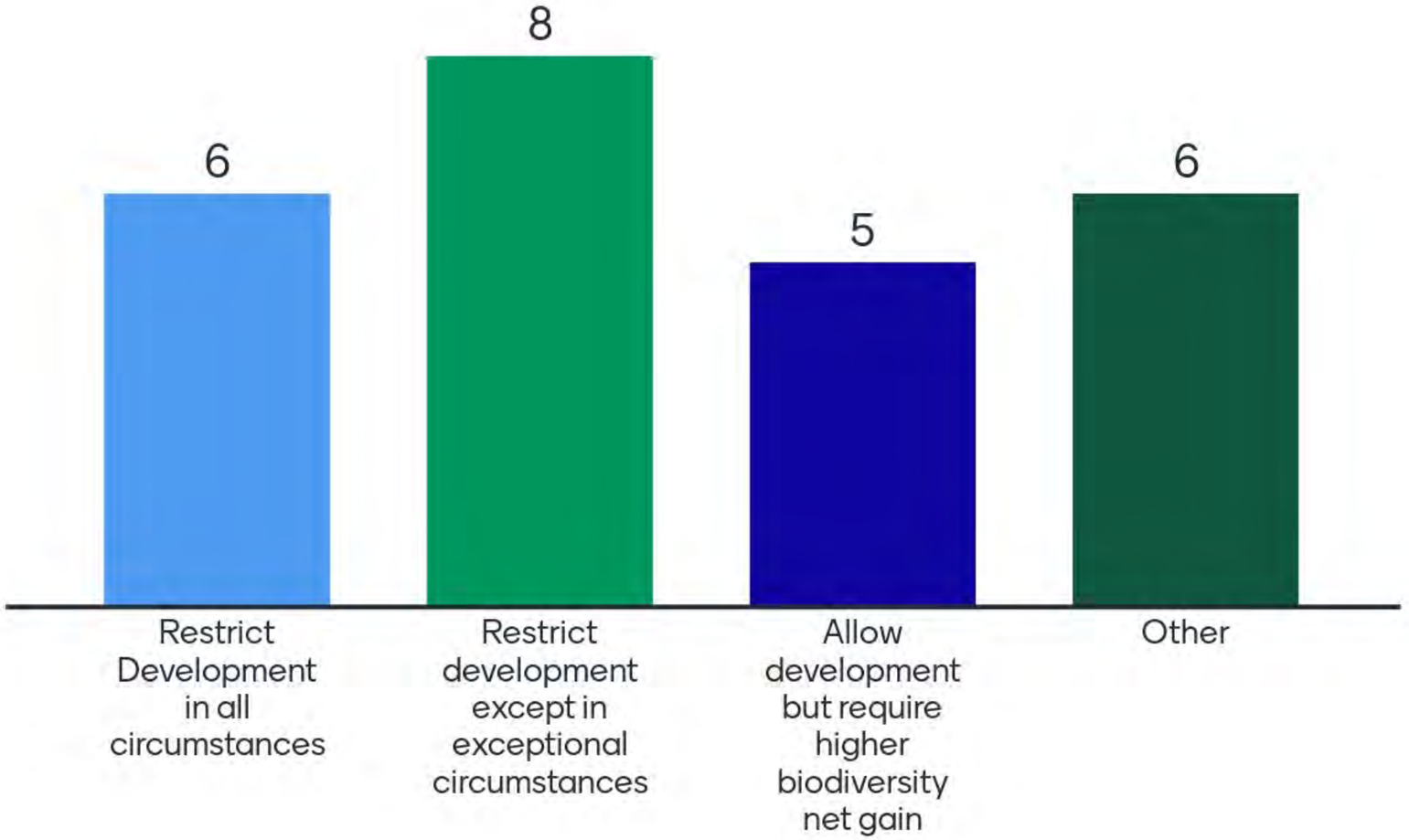
adopt wild belt concept around towns, currently the focus is on warehouse belts around towns!

Policy Option 07: Nature Recovery



- Oxfordshire Plan to support delivery of Nature Recovery Strategy for Oxfordshire
- Clear intention to use draft Nature Recovery Network to guide spatial strategy
- 3 distinct zones with different opportunities for environmental protection and enhancement

What potential policies are required, to manage development within the Recovery Zone in particular?



What are the barriers to setting development management policies in the NRN? Should zones be better defined to set policies relating to development?

What about the "other" free text from the previous question?

Zones will need 'hard boundaries'

Zones need to be rigidly defined and absolutely protected. Recent experience with AONB redefines "exceptional circumstances" as "Oxford needs more houses", which is no bar at all.

Clear guidance is essential.

There is a need to engage landowners in this.

Connectivity is key for nature recovery networks, so while sensitive development might be acceptable within some sites, it must respect corridors and buffers.

Nature recovery needs to be THE priority

Linking private landowners

Zones need to be real lines on the ground

What are the barriers to setting development management policies in the NRN? Should zones be better defined to set policies relating to development?

What we conclude needs to be justified and based on evidence, or it will not get through the Examination.

NRN is not yet in place - is urgent

Better definition only relevant to recovery zone and whats needed in wider landscape

Building in gaps in the Recovery zone should not happen- proximity of development to nature sites is a major problem.

Vital that both Core and Recovery Zones have strong protection within policy - exceptional circumstances only. (But if devt allowed, net gain requirement should be higher than elsewhere)

Nature Recovery Network needs funding separate from developer contributions

Rivers/riparian areas are vital for biodiversity but also a lot of development pressure on them so need special protection.

Need buffer areas around zones too

Exceptional circumstances can mean anything and should not be a criteria

What are the barriers to setting development management policies in the NRN? Should zones be better defined to set policies relating to development?

Most precious habitats eg ancient woodland must have absolute protection including from NSIP schemes.

Lack of resource for effective oversight and regulation of net gain associated with development.

Need to minimise new roads in the NRN as these segregate habitats.

Recovery zones may need to have set objectives and targets in LNRA

NRN needs to protect even more the areas with the rarest species with low populations

Zones needed to be completely mapped

LNRS not LNRA!

Housing need = exceptional circumstances so overrides everything else

60% of the land in the recovery zone is agricultural land and that makes up 30% of the total agricultural land in Oxfordshire. So food productio has to be part of what is considered too - importing more food is mostly worse for the environment

What are the barriers to setting development management policies in the NRN? Should zones be better defined to set policies relating to development?

Buffer zones are vital for high wildlife sites- recent research shows the need

Need to also recognise connecting features between zones in the landscape

NRN needs to be independent of FUTURE OXF P/SHIP

NRN is part of and informs the LNRS

Full detailed assessment of sites before allocation is really important, including fresh survey as well as historic data.

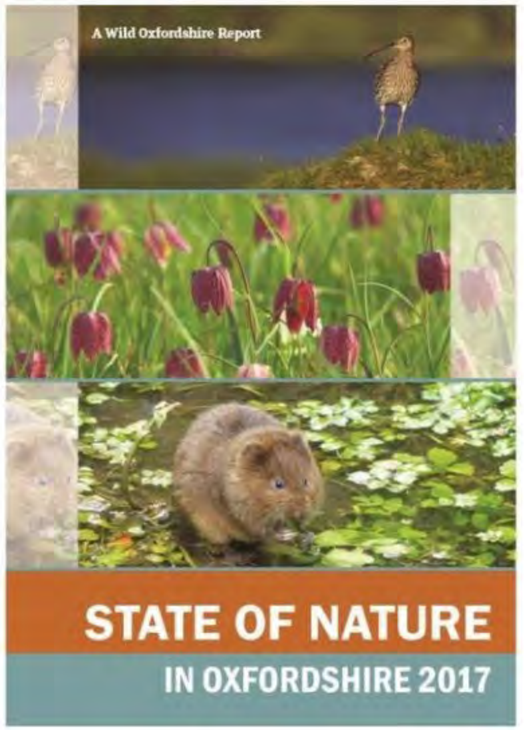
Net gain currently mostly delivered after development, needs policy to do the net gain ahead of development and checked before development progresses

Lack of understanding of different stakeholders.

Policy Option 08: Biodiversity Net Gain

The mitigation hierarchy

Avoid harm,
Minimise impacts,
Rehabilitation / restoration,
Compensation (on-site),
Offset (off-site).



- Proposed preferred policy approach of 20% biodiversity net gain to apply to all developments in Oxfordshire
- Alternative could be differential targets to be applied to developments in different parts of the county.
- Higher level targets proposed to account for past losses in biodiversity as identified in State of Nature Report

What evidence might be required to support the proposed approach? Is viability evidence and State of Nature Report sufficient?

State of Nature Report needs to be updated

Draw on other more recent evidence bases eg State of UK Woods and Trees report

Need BNG assessments of sites before allocation to set the baseline

evidence of suitable costed opportunities

Site specific material

Need to account for impact on wildlife of expected future climate change

Still big questions to be answered on net gain - is methodology robust, especially in long-term?

The DEFRA biodiversity measurement doesn't take account of the rarity of species

Developers shouldn't be left in control of measuring bio/d net gain

What evidence might be required to support the proposed approach? Is viability evidence and State of Nature Report sufficient?

Need to understand how local authorities will resource robust assessment and monitoring (otherwise developers will run rings round process)

The approach needs to show that it will not result in loss of rarer species and any natural habitat, including through proximity.

Monitoring costs need to fall on the developers- has it actual worked and what changes needed.

Consider urban green metric for urban areas where biodiversity base and therefor potential fir net gain is low.

Developers are manipulating net gain ALREADY

Monitoring should be independent and properly funded

Need to adopt BNG principles

Need strategic approach to delivery of off-site BNG

Wycombe canopy cover SPD has excellent metric for measuring tree cover for net gain.

What evidence might be required to support the proposed approach? Is viability evidence and State of Nature Report sufficient?

Need to add in consideration of intrinsic value of nature as set out in DasGupta review

Need to better take into account past losses if wildlife- Oxfordshire is so nature depleted suggest 25% net gain

Needs to be specific and measurable, not vague and general.

Need to accept that off-site BNG is fundamental to nature recovery and restoration of priority habitats (and species such as brown hares)

Developers want profit from homes and biodiversity doesn't make money

Needs proper funding

Need to ensure Ancient Woodland Inventory is updated with smaller sites

insufficient funding of the Local Nature Strategy

Developers using 'viability' to escape net gain requirements

What evidence might be required to support the proposed approach? Is viability evidence and State of Nature Report sufficient?

Profit comes first for developers

Quality standard needed for developers biodiversity assessment- need to meet agreed business standard published by CIEEM

Sadly there are major gaps in the TVERC database- including bats and invertebrates- been better base data

What are the barriers to implementation of such policies?

costed opportunities

Viability is a key issue

staff resource

Lack of local authority resource - expertise / funding - to provide any rigorous assessment of developer claims

Baseline data, common understanding of what good looks like, resource for ongoing monitoring

Coherence within developer teams - planners/promoters may not also handle the build out and aftercare

Huge potential for green infra in built environment

The fact that the entire net gain methodology doesn't really stack up as yet

Public and political perception of off site delivery as negative when would be most benefit for habitats and species especially priority habitats and species recovery incl brown hares etc

What are the barriers to implementation of such policies?

Support local communities to ID net gain opportunities in their neighbourhoods

Need to include natural regeneration in net gain assessment

https://www.theguardian.com/environment/2021/jul/21/biodiversity-metric-algorithm-natural-england-developers-blight-valuable-habitats-aoe

Developers want profit not biodiversity

lack of capacity monitoring and regulation is key barrier, developers can get away with too much at the moment! Strong net gain plans for sites need to be in place before planning permission given, and started before built development starts.

Generic net gain levy on developers to support the NRN

Needs proper funding

thorough database of 'shovel ready' projects of all scales ready to receive funds would help

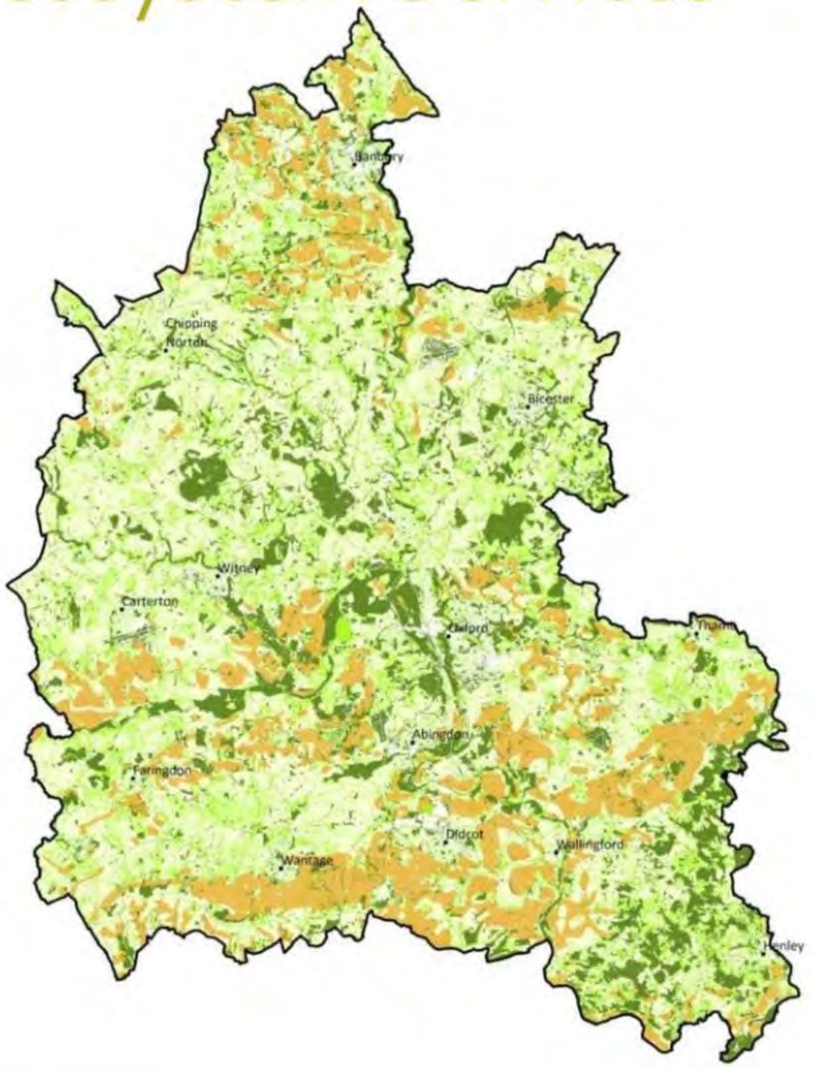
Bit harsh on developers - they need guidance and right funding environment like any landowners

What are the barriers to implementation of such policies?

Mitigation hierarchy relates to avoiding imlact and compensating, net gain enhancements off site are enhancements rather than "offsetting"

Responses are not harsh on developers ,

Policy Option 09: Natural Capital and Ecosystem Services



Types of ecosystems services		
Provisioning Services	**Cultural Services**	**Regulating Services**
Food crops Livestock Wood Fish Fresh water supply	Recreation Aesthetic value Education and knowledge Interaction with nature Sense of place	Flood control Erosion control Water quality Carbon storage Air quality Cooling and shading Noise regulation Pollination Pest control

- Spatial strategy to be guided by understanding of Natural capital in Oxfordshire
- Identify environmental enhancement opportunities as well as potential development areas
- Must involve assessment of demand for services as well as supply

How can this evidence be made more accessible? Does it need to be supported by guidance or a metric similar to the biodiversity metric?

Both guidance and a metric

Yes, allow for developments to meet a natural capital net gain requirement

Enabling a natural capital approach on GOV.UK website

Guidance doesn't work nor does the biodiversity metric. Needs something better,

Example NC assessment of an area of growth - show how the maps relate to assessment of options and how this might be used to make decisions

At parish, neighbourhood plan level can have NCI strategy for each area.

Need to involve landowners. Cant just impose.

Integrate to CIL approach with schedule of natural capital investment opportunities

Sussex LNP has a good NCIS.

How can this evidence be made more accessible? Does it need to be supported by guidance or a metric similar to the biodiversity metric?

New tool sits alongside biodiversity metric 3.0 released by Natural England - EBN (environmental benefits from nature)

Show Parish councils what natural capital they have in their parishes

Encourage community ownership of natural capital

Important to note the caveats in the Oxfordshire Natural capital report.This includes that it does not show which areas can and do deliver a variety of natural capital services, and it does not include the location of demand, f access to nature

Link to funding eg ELMs to steer landowners action

Spatial location of BNG delivery for multiple benefits

Natural capital investment plan

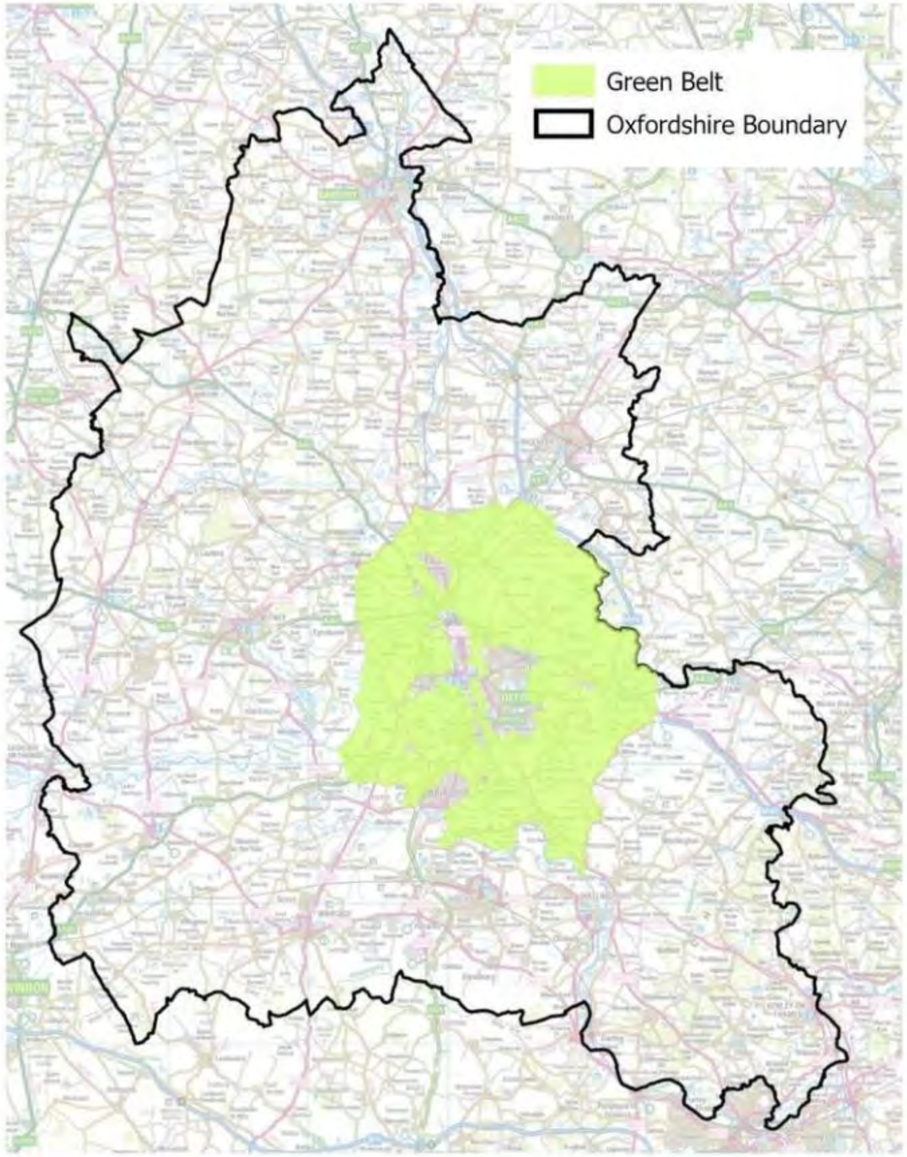
Recognising multiple benefits from biodiversity enhancements, habitat creation

Stacking and bundling

How can this evidence be made more accessible? Does it need to be supported by guidance or a metric similar to the biodiversity metric?

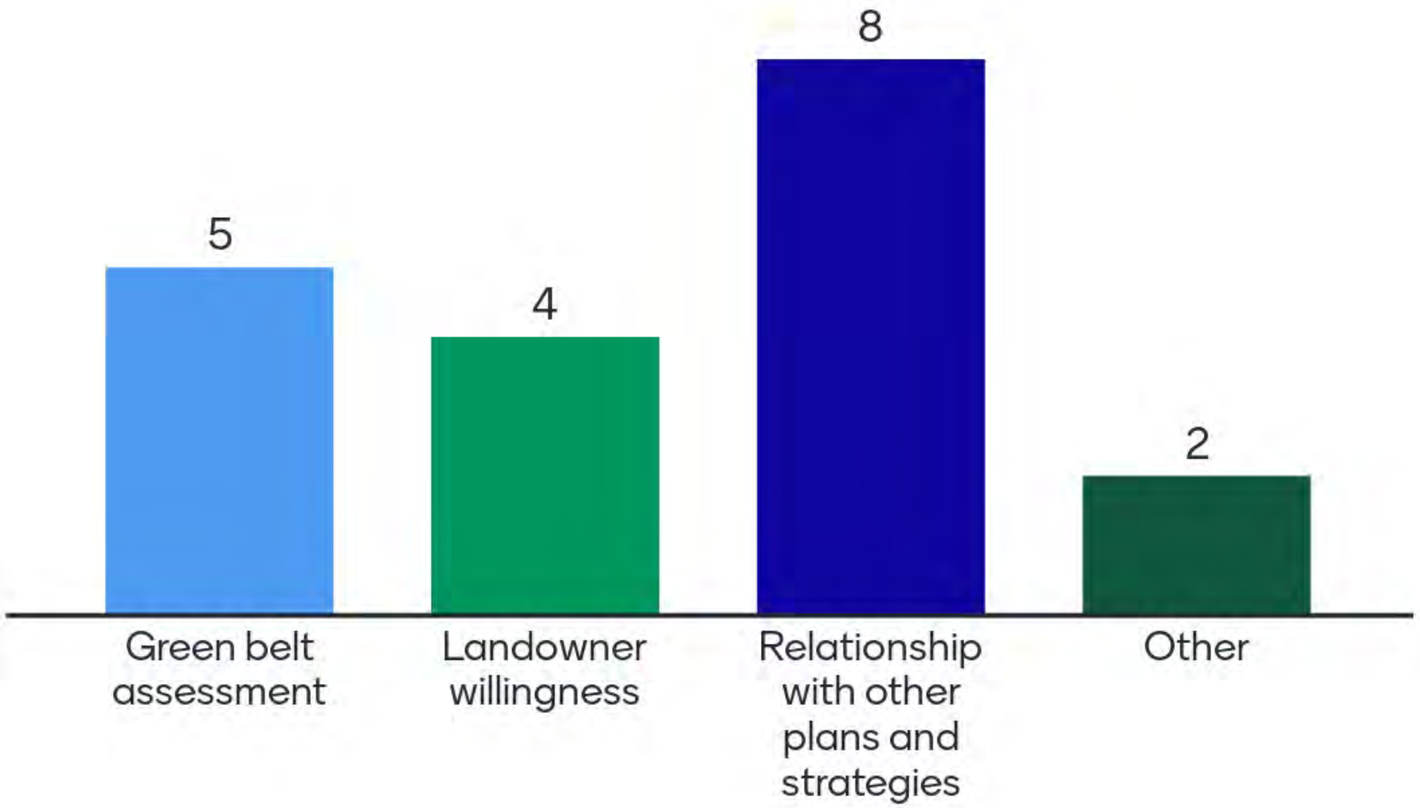
Natural Capital report gives extra weight to AONBs when they don't necessarily have best areas

Policy Option 10: Green Belt



- Proposed Oxfordshire Plan approach is to focus on enhancement of Green Belt for beneficial uses
- Could include better public access, opportunities for outdoor sport and recreation, enhanced landscapes or improved biodiversity.
- Identification of such uses wouldn't need to demonstrate exceptional circumstances in the same way as new Green Belt or removal of land from the Green Belt would

What additional evidence is required to support the proposed approach?



If other or you wish to provide further information in relation to your response then please provide details on this slide.

Good policy but will only be effective if policy commits to continued Green Beltstatus to all current Oxford Green Belt land, at least for the duration of the Plan,

Avoid too much development just outside the green belt to avoid a doughnut effect around oxford

Green Belt provides access to green spaces, need to start by protecting what is left of the Green Belt

Green belt cannot be set in aspic, it needs to earn its status by delivering active environmental benefits.

Without undertaking a review of the Green Belt it will not be possible to pursue the Country Park idea north of A40 and sout of M40.

Public access and improved biodiversity dont always go hand in hand - depends on habitat and species present. Restoration of good quality priority habitat means limited public access or managed access (restricted at certain times of year perhaps)

Big support of your strategy to keep the Green belt as is, and impove its value to the other Natural Capital issues

forums for knowledge sharing and collaboration would be helpful

Need to prevent landowners from deliberately degrading greenbelt land in the hope of getting it allocated for future development

If other or you wish to provide further information in relation to your response then please provide details on this slide.

High quality landscape has innate value but other areas could have change of (green) use eg rewinding, renewable energy, tree planting

The risk of the policy, looked at another way, is that landowners will be incentivised to degrade land in order to ease its release for development

Consider linkages of green belt to other landscape and natural capital features

Lets remember the Green Belt is not a comment on its landscape value.

Protection of Green belt needs to be linked to rapid transit network

Green belt is not always good for biodiversity, major opportunity for delivery of Nature recovery , BNG and natural capital investment

Need to address the conflict between carbon capture by tree planting, historic landscape and linking natural habitats. So far only seen separate assessments

Green Belt is not as important as the AONB. It is merely a policy designation.

Don't use exceptional circumstances ie housing requirement to relentlessly release green belt

If other or you wish to provide further information in relation to your response then please provide details on this slide.

Green belt sites should be judged on merit not all sacred

Policy Option 11: Water Quality

Green Infrastructure & Sustainable drainage systems

Sewage treatment capacity

Natural flood management over hard defences

Restore 'natural' river system

Water efficiency measures

Restore contaminated land

River Basin Management Plans

Partnership working

Is there anything else that the Oxfordshire Plan could do to help improve water quality?

Is there anything else that the Oxfordshire Plan could do to help improve water quality?

look at examples such as Earth Trust Rivers of Life project

Designated swim sites

Require independent examination of sewage capacity for new development rather than just water companies

Support for comprehensive approach- and changing farming methods vital!

Don't rely on just Thames Water / Environment Agency. Are you talking to other groups such as WASP ?

Natural flood management, riparian trees, other natural solutions

Identify specific GI features that benefit water quality - guidance for developers? Ref to Building with Nature?

Centre for Ecology & Hydrology do a lot of monitoring

Review storm drains for capacity

Is there anything else that the Oxfordshire Plan could do to help improve water quality?

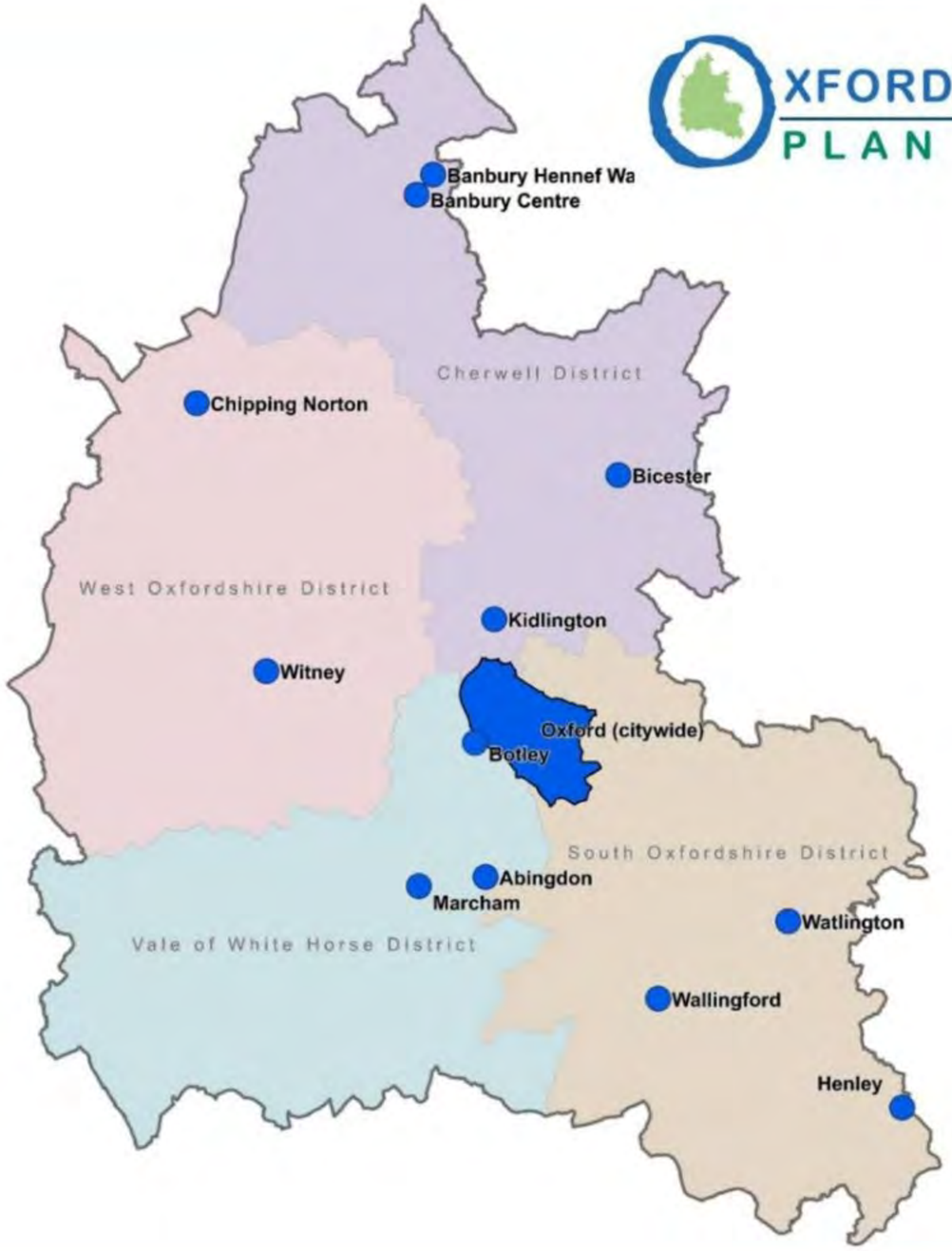
Get a better understanding of issues at parish council level. A reasonable number of Oxon parishes are seeing regular sewage collection by tankers with associated noise/traffic issues.

Policy Option 12: Air Quality

The preferred option seeks to:

- Require air quality assessments for major development proposals
- Improve air quality wherever possible
- Mitigate negative impacts on air quality

Air Quality Impact Assessment to be commissioned.



What opportunities are there for improving air quality in Oxfordshire?

Constraining excessive development

Street tree planting

Air quality net gain rather than just mitigation

Tree planting and GI can mitigate- eg GLA London studies

Map out the implications of the shift to electric vehicles.

Strategic active travel network to take cars off the road

setting framework and examples if the county council were to introduce clean air zones in urban areas

High density development = 20 minute neighbourhoods

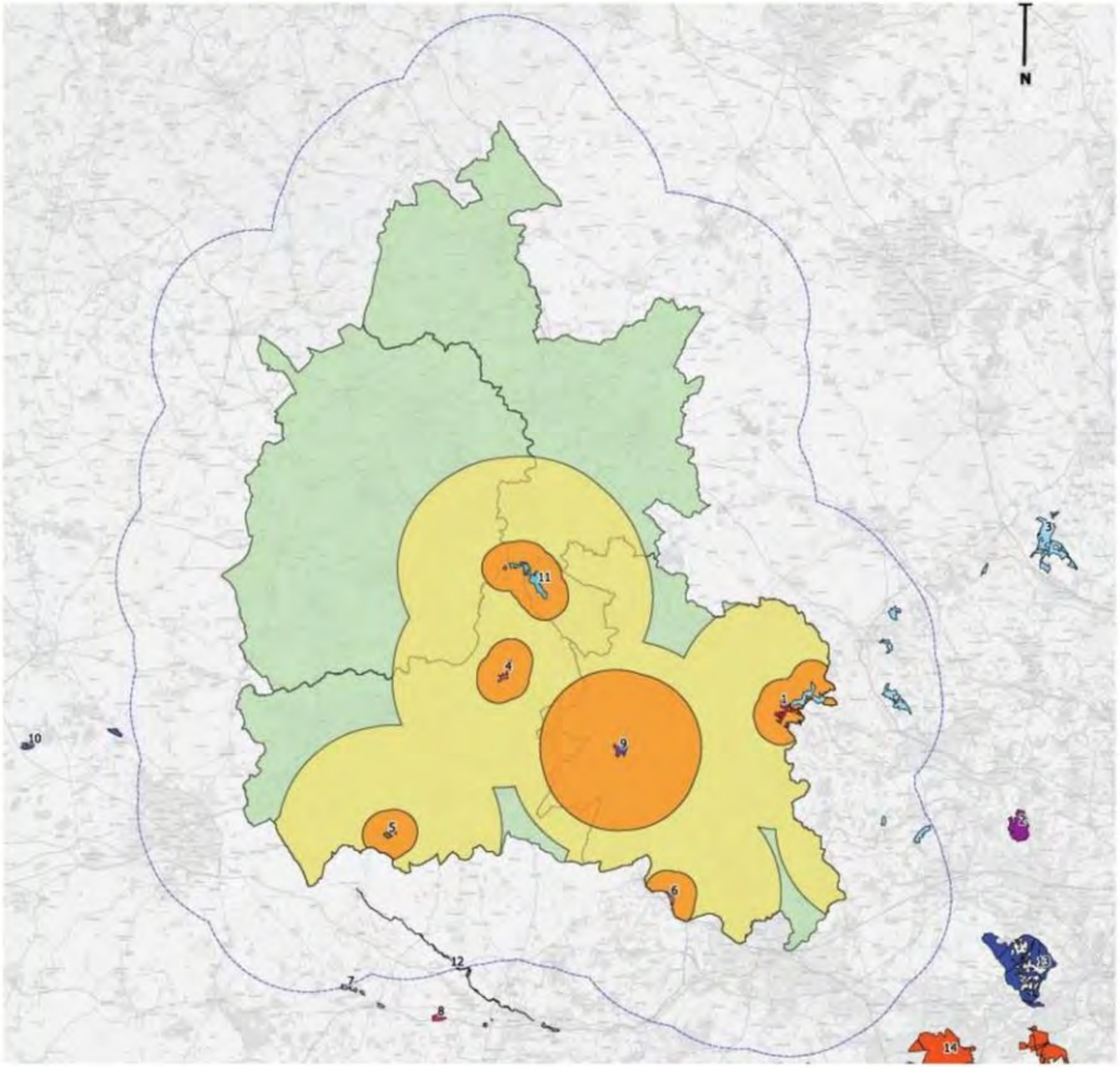
Require ammonia impact assessments from intensive farming

What opportunities are there for improving air quality in Oxfordshire?

Street trees now supportee by NPPF

Use of shared space roads and rural lanes

Habitats Regulations Assessment



- Early pre-screening work undertaken
- Report 1 – Establishes distance-based risk zones
- Report 2 – Considers the spatial options against the distance-based risk zones

Thank you

Website	www.oxfordshireopenthought.org
Email	info@oxfordshireplan.org
Post	Speedwell House, Speedwell Street, Oxford, OX1 1NE

APPENDIX 2 – Summary of Responses to Developer Focused Webinar

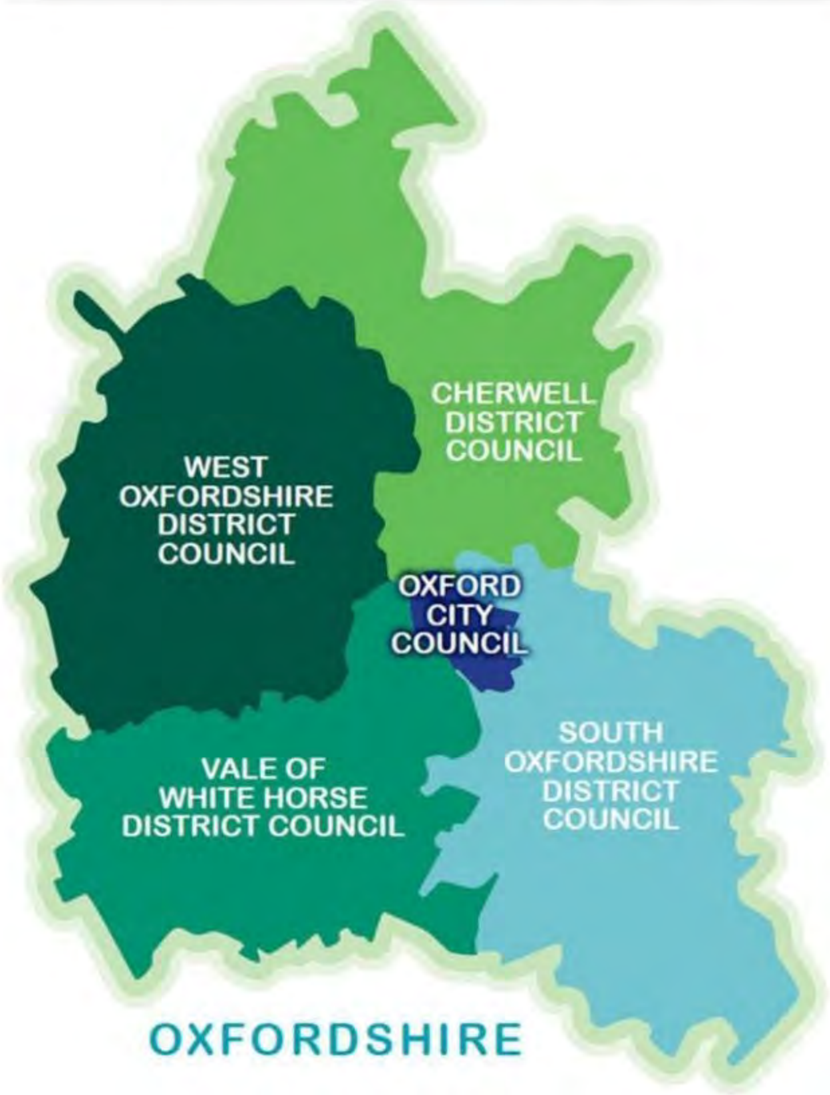
XFORDSHIRE PLAN 2050

www.menti.com

Purpose of today's webinar and workshop.

- To draw on your knowledge and experience as professionals in your field
- To understand what additional evidence may be required to support the Oxfordshire Plan
- To understand barriers to implementation of polices and strategy
- To supplement ongoing consultation and provide focus for next phase of Plan making

What is the Oxfordshire Plan?



- Oxfordshire's councils working together
- Thinking long-term
- Addressing key issues

Work completed so far…

Early consultation

Developed a shared vision

Call for Ideas

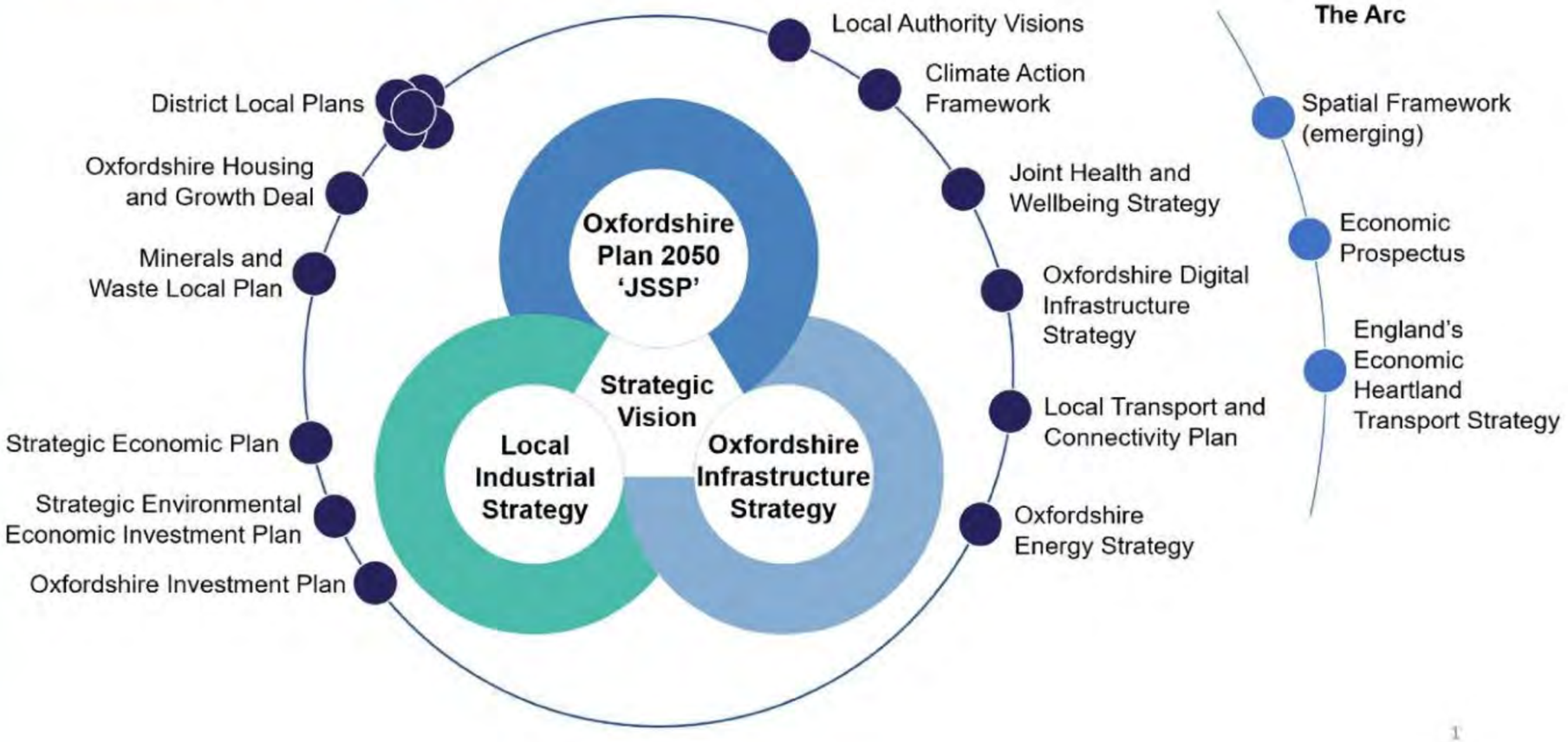
Engagement

Evidence

Where we are now...

Relationship with other Plans and Strategies

Oxfordshire's Strategic Map



Key themes

Addressing climate change
Creating strong and healthy communities
Creating jobs and providing homes
Improving environmental quality
Planning for sustainable travel and connectivity

Theme 1 – Addressing Climate Change

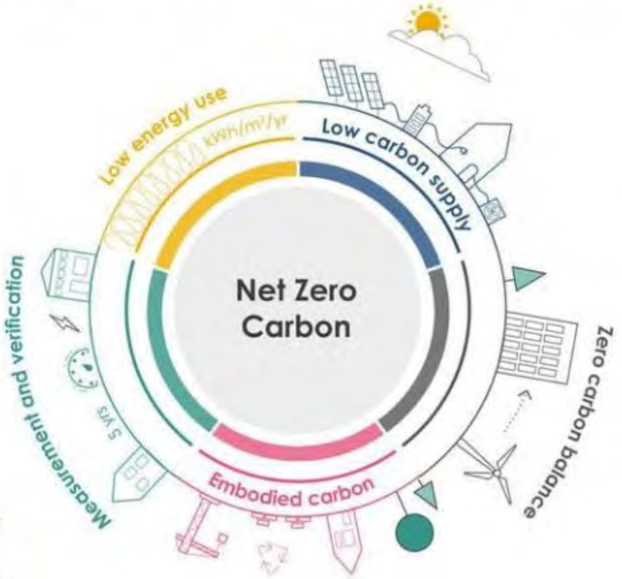
Sustainable design & construction

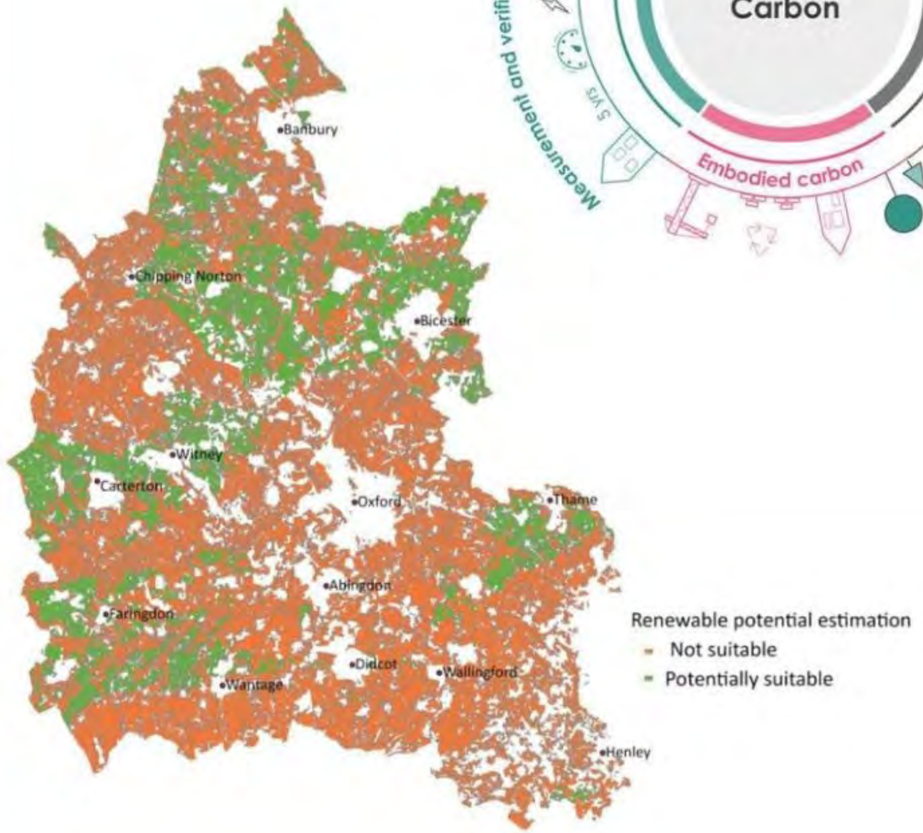
Energy

Water efficiency

Flood risk

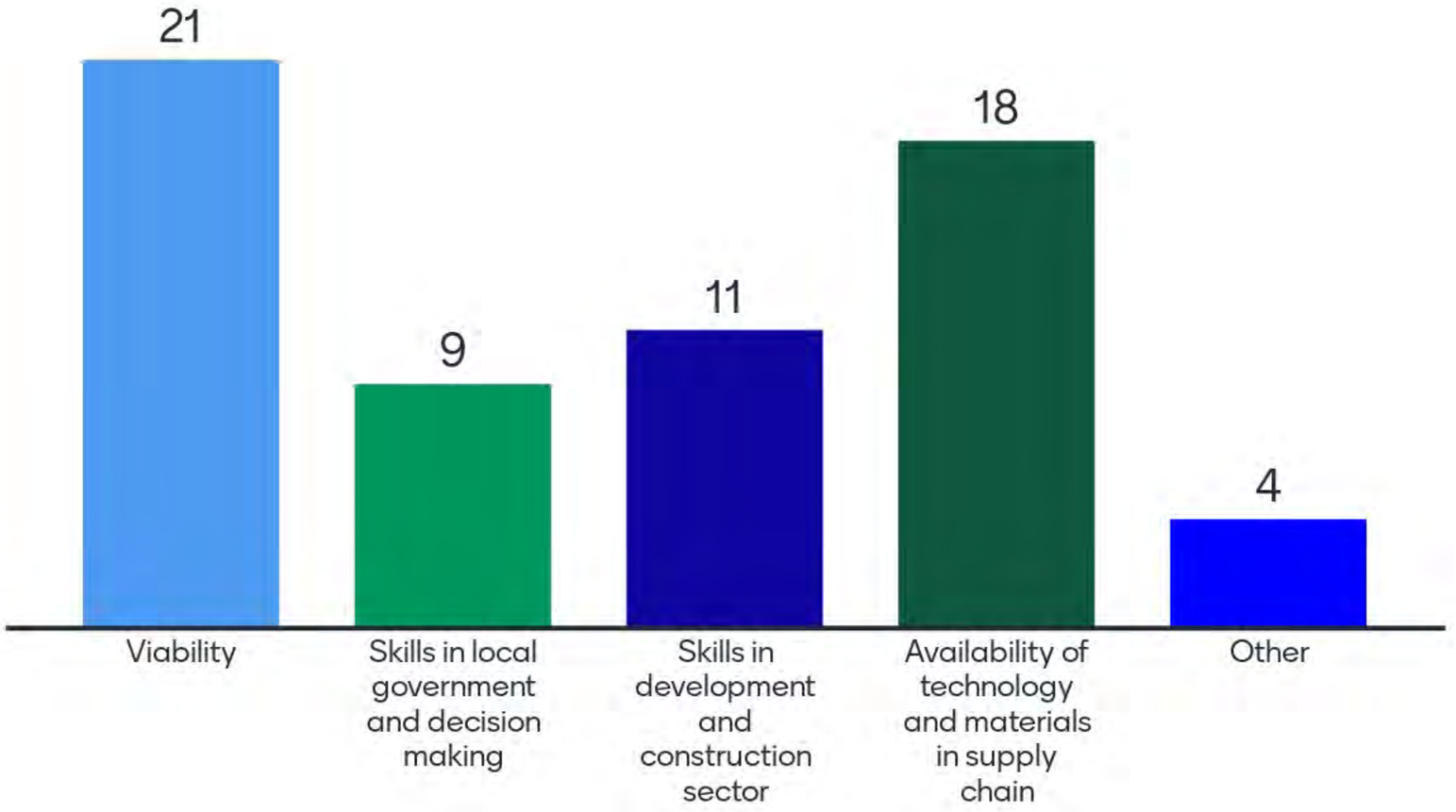
Sustainable Design and Energy Infrastructure





- Proposed design and construction standards go further than Future Homes Standard
- Focus on energy use of buildings and embodied carbon of building materials
- Maximising renewable energy in new developments
- Spatial strategy to be guided by opportunities for renewable energy generation and local energy networks

What do the Oxfordshire Authorities need to consider, to ensure that higher standards are deliverable?



If other please state, or take the opportunity to illustrate your response. What are your views on the Plan's inclusion of higher design standards?

It will need to accord with national planning policy and the Arc Spatial Framework.....

There needs to be coordination between the planning system and building regulation requirements.

Protecting consumers from local energy schemes that limit consumer choice and presents risks of putting households in fuel poverty

Need to be consistent with NPPF / NPPG / National Design Code

Needs to take account of Building regulation requirements and their evolution in the coming years.

It's the right way forward for sure but it must always be balanced with other needs and requirements. Development must not be seen as the solution to pre-existing problems as it often is now.

Consideration of consistency/ alignment with Future Homes Standard

If higher standards are set across the board then there's a greater chance they will be met.

it is important to recognise that tech evolves quickly e.g electric car plugs aren't usually generalised sockets so owners of properties should be able to install what they want

If other please state, or take the opportunity to illustrate your response. What are your views on the Plan's inclusion of higher design standards?

This (higher design standards) is to be welcomed but it needs strong policies that are consistently applied by well resourced and skilled planning departments

Subject to viability

As an RP setting aspirational Organisational standards and scheme assessment tools future proofing stock.

The Council's need to consider any higher standards against the detail and timescales for the more onerous requirements being brought in via changes to building regs to avoid uncertainty and conflict.

Upward Extensions!

If the improved standards apply to ALL new development does this not at least provide a level playing field from a viability point of view?

Upward Extensions!

What steps are being taken to future proof developments in line with changing national standards?

space standards more commonly asked for

Biodiversity net gain

Size and configuration of new homes is being looked at yet we are often required to conform with housing mix policies (SHMA) which are often based on outdated evidence.

Areas for BNG now addressed from the outset

Requiring drainage calculations to consider climate change more.

Particularly noting the current increases in energy prices are any developers reconsidering "automatic" installation of gas mains? If we want to do away with fossil fuels, why are gas mains to new areas being installed?

Future Homes Standard - Industry working group around implementation

We have engaged specialist consultants in order to be able to include solutions and more information on climate change and net zero and how these can be met, as part of the promotion of sites as Local Plans progress

The costs of Future Homes Standard are being allowed for within our viabilities but there is an acknowledgement that further standards will follow on the road to Net Zero

What steps are being taken to future proof developments in line with changing national standards?

Buyers are not currently prepared to pay for new tech, so the additional cost squeezes viability

Water Efficiency

Residential Development
Average water use 141 litres per person per day
Building Regulations 125 litres per person per day
Building Regulations (optional) 110 litres per person per day
Can we do more ? litres per person per day

- Explore the potential to go further than 110 litres per person per day for residential development.
- Explore the potential to set minimum water efficiency standards for some non-residential uses.
- Community-scale rainwater harvesting and greywater recycling at strategic growth locations.
- Be flexible to respond to future change.

Is there anything else that the Oxfordshire Plan could do to support the efficient use of water in Oxfordshire?

Information packs for new residents.

Should be led through Building Regs, at a national level

The planning system should not get involved in this....

Are all of those options supported by the necessary technical evidence to demonstrate how they could be achieved on the ground and across site boundaries?

Grey Water harvesting technology has potential to assist but regulated water use should be set and enforced via Building Regulations.

I rather hope that efficient sewerage systems can be considered too

Requirements to supply Waterbutts for homes

These need to be discussed with the water authorities because they will also need to play their part

Work with immediate neighbouring authorities to improve water efficiency.

Is there anything else that the Oxfordshire Plan could do to support the efficient use of water in Oxfordshire?

Identify specific areas for biodiversity to offset development

Improving environmental quality

Landscape

Historic environment

Nature recovery

Biodiversity gain

Natural capital

Green Belt

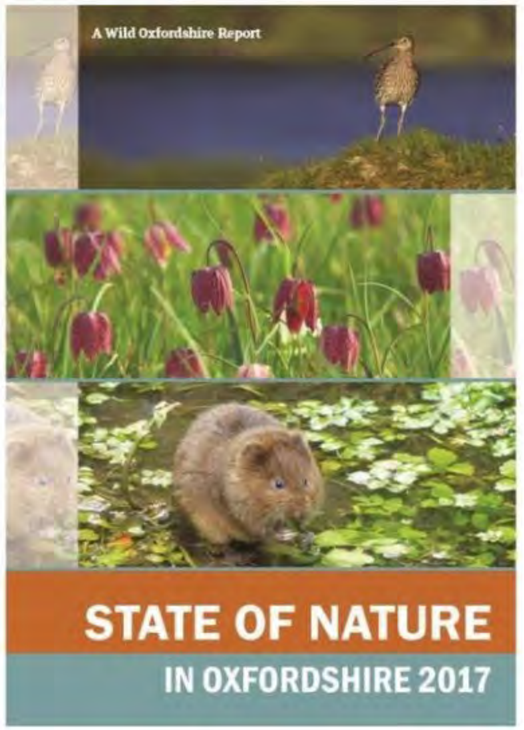
Water quality

Air quality

Biodiversity Net Gain

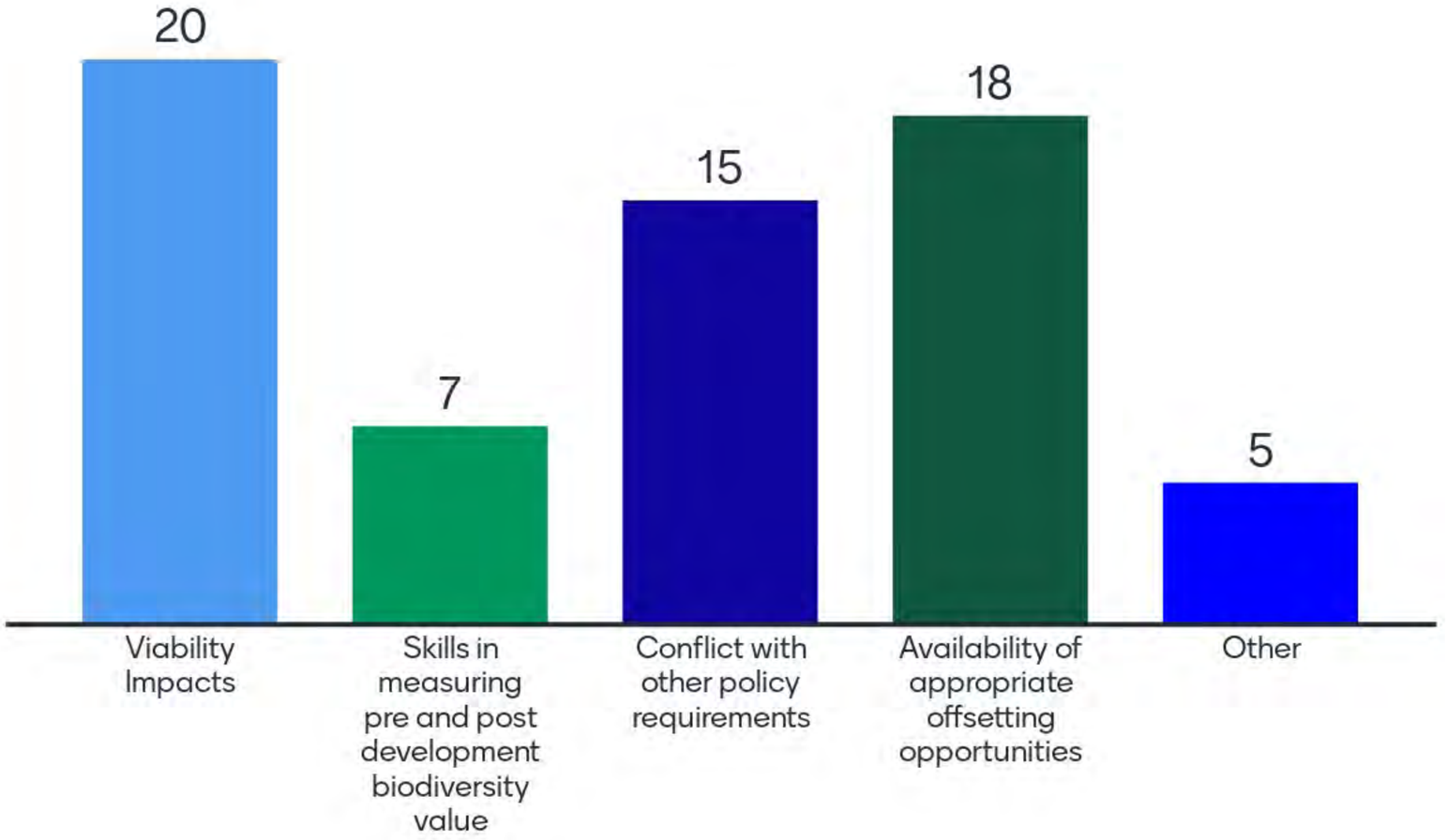
The mitigation hierarchy

Avoid harm,
Minimise impacts,
Rehabilitation / restoration,
Compensation (on-site),
Offset (off-site).



- Proposed preferred policy approach of 20% biodiversity net gain to apply to all developments in Oxfordshire
- Alternative could be differential targets to be applied to developments in different parts of the county.
- Higher level targets proposed to account for past losses in biodiversity as identified in State of Nature Report

What do the Oxfordshire Authorities need to consider, to ensure that higher biodiversity targets are deliverable?



If other please state, or take the opportunity to illustrate your response. Can any barriers be overcome by the time the Plan is adopted?

You will need to allocate larger development sites to meet these aspirations and meet development needs.

Aspirational policies across sustainability and biodiversity will impact on viability. If blanket 20% this will require additional development land.

Impact on amount of housing land required- >10% on site is potentially very challenging depending on site baseline

Higher BNG requirements need to consider affects on land take and how this may affect the number of sites needed to deliver housing and other plan priorities.

Net gain is difficult to achieve on medium and smaller sites without impacting viability. Offset schemes are essential.

Through dialogue with developers and looking at sites to see how/whether the competing demands can be met on site or not with increased BNG in addition

Harder to achieve on smaller greenfield sites - off-site opportunities essential to support delivery of these sites

How to measure biodiversity is still evolving!

Very difficult for small/medium scale sites to achieve more than the 10% requirement due to land take. There needs to be other sites to offset this.

If other please state, or take the opportunity to illustrate your response. Can any barriers be overcome by the time the Plan is adopted?

A high baseline can often make it more difficult to achieve the 10% gain

There is an opportunity for the Oxfordshire Authorities to 'get ahead' and lead the process - scope to identify and acquire suitable sites and then provide and implement a mitigation regime which could help release smaller sites

Focus habitats rather than exceedance on all sites would have a better ecological outcome vs impact on developmeny

20% exceedingly difficult on some sites.

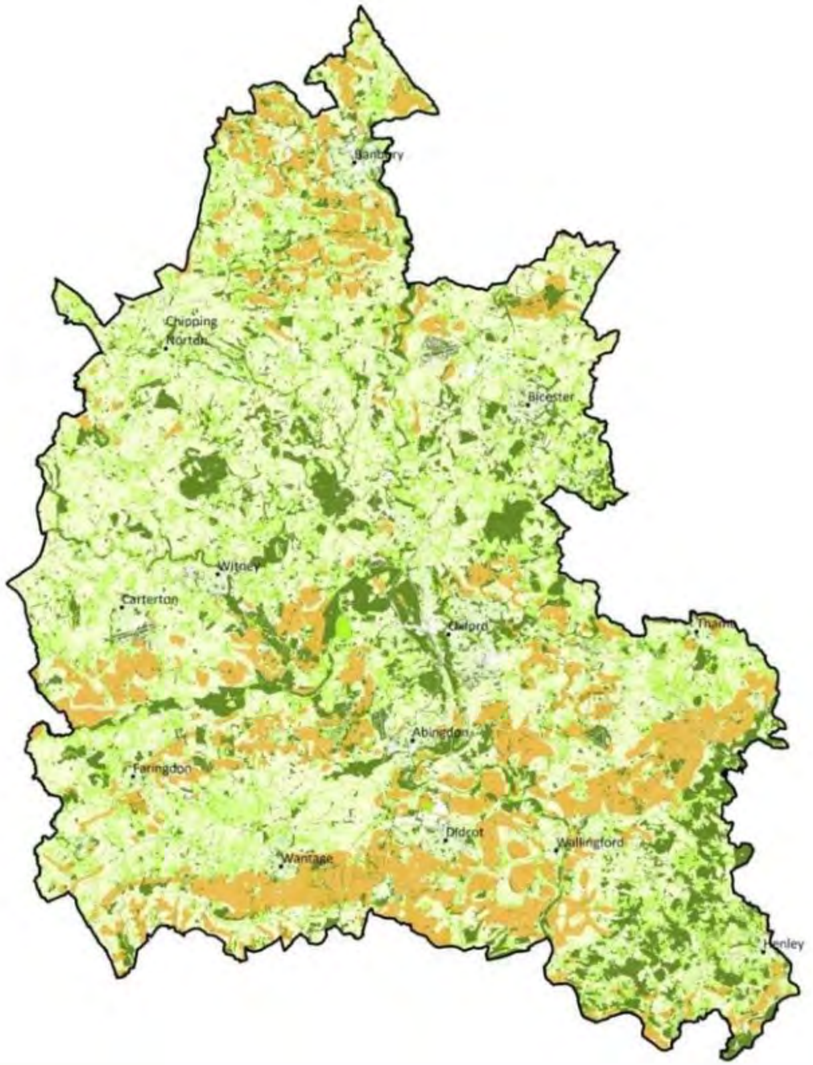
Makes small sites and all affordable schemes difficult to deliver technically and viably.

There will have to be significant reliance on greenfield sites to meet housing needs and so it will be important to have a deliverable policy that doesn't hold back those sites coming forward

20% all mean that the developable area of small to medium sites will be at or less than 50%. If these sites are to come forward (which is required by the NPPF) an efficient and fair value off-setting scheme is needed.

Why does it have to be 20% where is the evidence behind this figure?

Natural Capital and Ecosystem Services



Types of ecosystems services		
Provisioning Services	**Cultural Services**	**Regulating Services**
Food crops Livestock Wood Fish Fresh water supply	Recreation Aesthetic value Education and knowledge Interaction with nature Sense of place	Flood control Erosion control Water quality Carbon storage Air quality Cooling and shading Noise regulation Pollination Pest control

- Spatial strategy to be guided by understanding of Natural capital in Oxfordshire
- Identify environmental enhancement opportunities as well as potential development areas
- Must involve assessment of demand for services as well as supply

Are you aware of the emerging natural capital evidence? Do you consider that this could be used to positively shape development in Oxfordshire?

was not aware

Not aware

Not heard of this previously

Not aware of the potential implications

Aware of this, unsure how it will be used/controlled.

Not aware

Yes aware - but not sure how you are proposing to use this "to positively shape development"? Sounds like an approach to get developers to pay for it - how would it accord with CIL 122 tests?

Not really. As ever, there needs to be balance struck so that sites can come forward in a timely fashion.

I am not particularly aware of this evidence but it is worth noting that planning on the basis of lower quality agricultural land, for example, might not mean development is in the most sustainable location in connectivity terms.

Are you aware of the emerging natural capital evidence? Do you consider that this could be used to positively shape development in Oxfordshire?

Not aware. How would it be prepared positively for ecology rather than development barrier.

Not at the espense of appropriate and sustainable locations being overlooked

Water Quality

Green Infrastructure & Sustainable drainage systems

Sewage treatment capacity

Natural flood management over hard defences

Restore 'natural' river system

Water efficiency measures

Restore contaminated land

River Basin Management Plans

Partnership working

Is there anything else that the Oxfordshire Plan could do to help improve water quality?

Is there anything else that the Oxfordshire Plan could do to help improve water quality?

Consider wider benefits of canal network- and biodiversity benefits that they could bring if management regimes were amended

Their needs to be early engagement with the sewerage undertakers to ensure that they identify the associated infrastructure and improvements to sewerage treatment come forward in a timely fashion. More flood resilient solutions

Very much agree with need for early engagement with sewerage undertakers on improving their infrastructure. Do hope this improves in future

appreciate what you are trying to do but the water company discharging raw sewage into the rivers and farming nitrate run-off are the problem. Not new development

Diffusive nitrates associated with farming is the key issue for water quality.

off-setting opportunities

Tree planting to reduce run off

Learn from the experience elsewhere in the country (e.g. Solent) and work more closely with the utility companies to improve their infrastructure. Many of the existing problems are as a result of their management regime and discharge into rivers

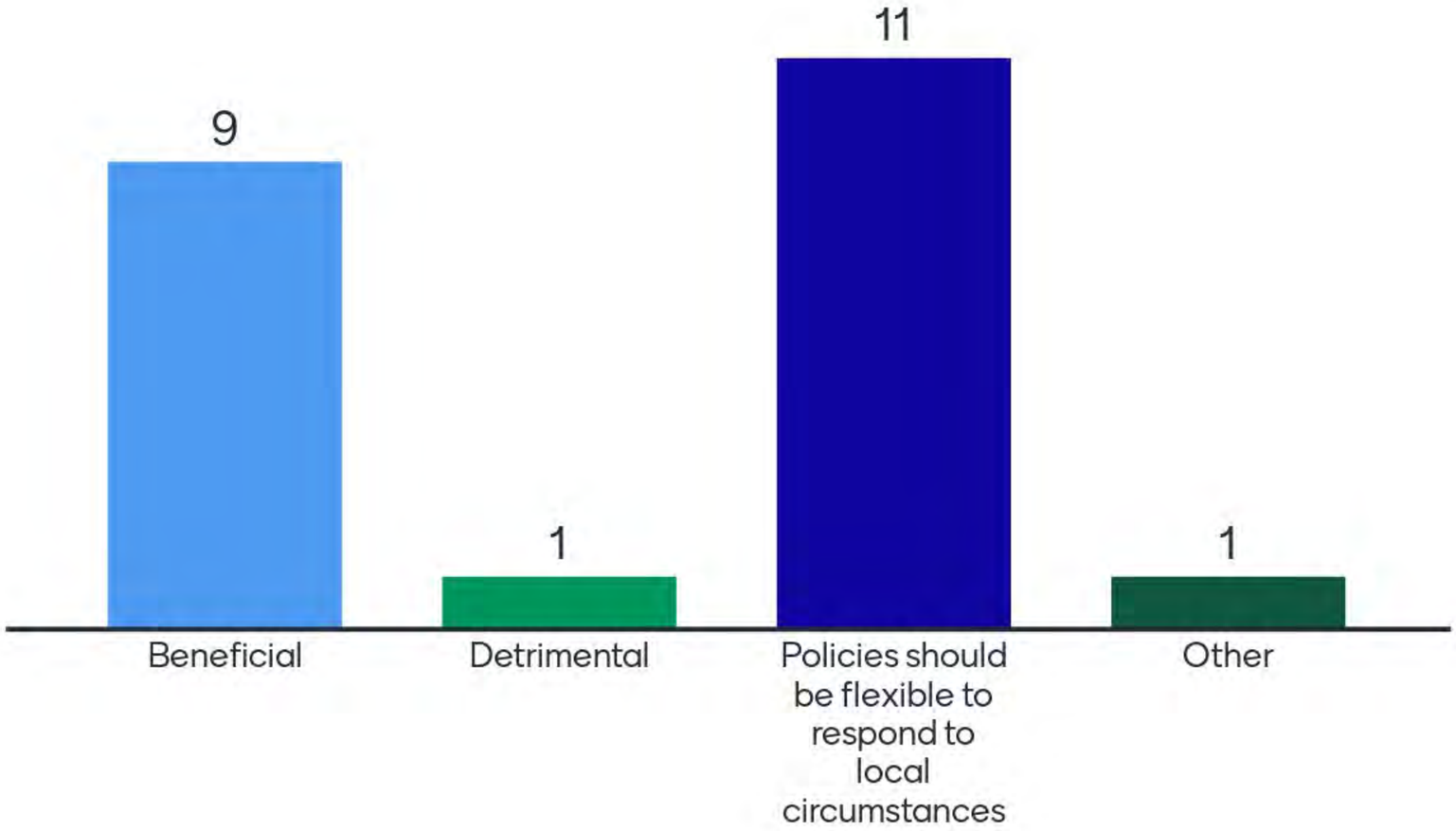
Creating strong and healthy communities

Healthy place shaping

Health infrastructure

High quality design

What are your views on potential county wide requirements for health impact assessments and consistent design standards for major developments?



Are there changes to current local design policy and guidance that would help achieve high quality design and healthy place shaping in Oxfordshire?

Better integration of new housing developments with the place in which they are situated - better linkages

some good policies (e.g. West Oxon) but need constant application of policies by skilled LPA staff. Are County Highway engineers bought into healthy place shaping?

Strategic consideration towards greater town centre living but with appropriate design standards and a mix of types

Flexibility to respond to as wide needs as possible based on quality of design and spaces rather than just more space should be the driver.

No. Use your current design guides and update them and resource LPA teams appropriately. There is enough national guidance on this in the latest NPPF

As developers this is largely embedded within our design process already. Where help is needed is ensuring early work with CCGs so that we can understand what their requirements are so this can be incorporated, they are too detached from process

Putting the development in the most sustainable location in the first place would be a huge step towards achieving all of the previous objectives.

Each site will be different and there will be different views about what is acceptable. Design panels could be used to good effect.

at officer level e.g with urban designers, them providing alternative options or visuals will assist in establishing what quality they expect at a local level instead of just saying no its poor design etc

Are there changes to current local design policy and guidance that would help achieve high quality design and healthy place shaping in Oxfordshire?

Not a matter for the Oxon Plan

High quality design and healthy places is surely one of the key building blocks of the Oxfordshire Plan. As a result this is fundamental and yes changes needed to strengthen

Planning for sustainable travel & connectivity

Towards a net zero carbon transport network

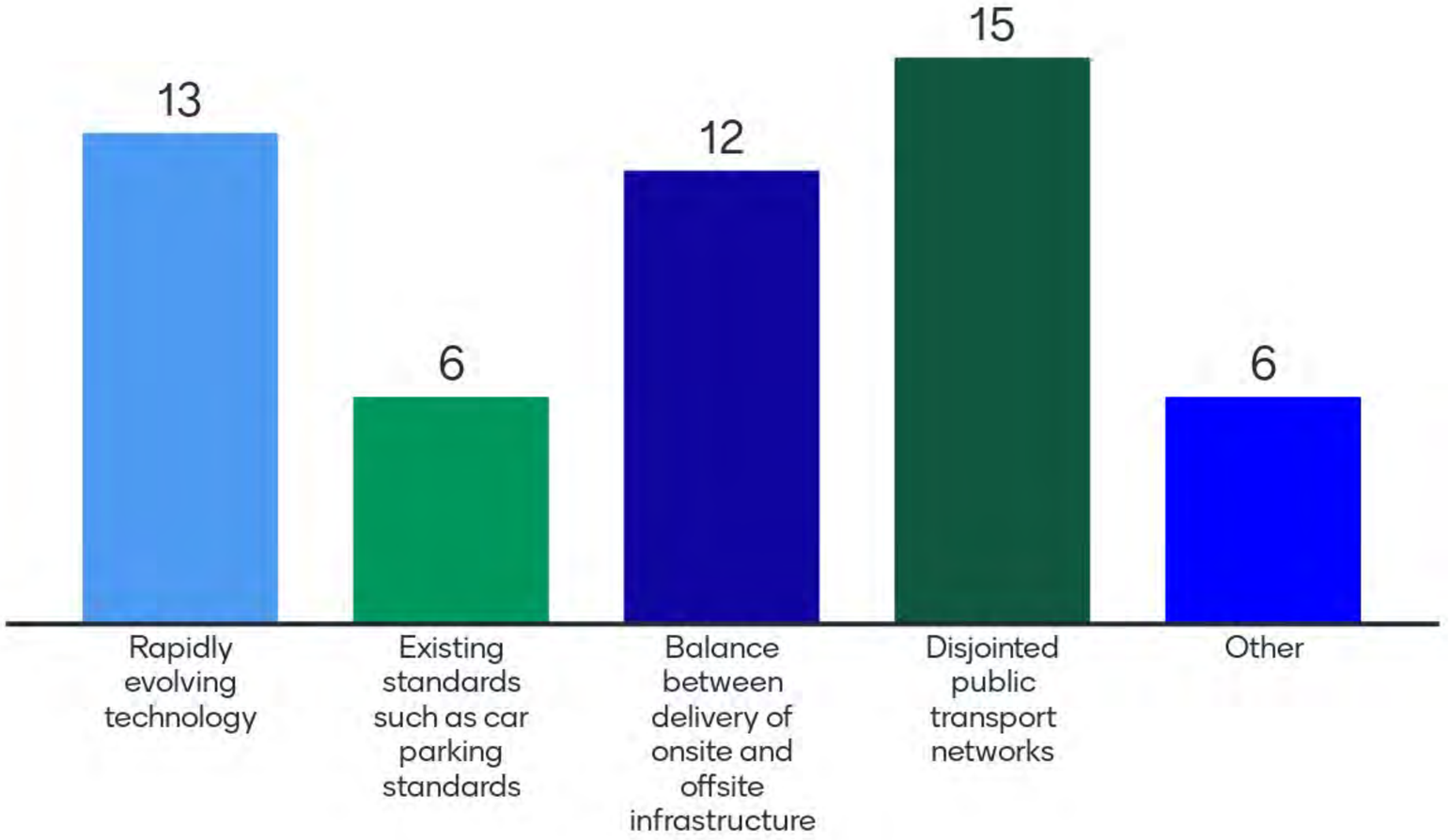
Sustainable transport in new development

Supporting sustainable freight management

Digital infrastructure

Strategic infrastructure priorities

What do the Oxfordshire Authorities need to consider, to facilitate a shift towards a zero carbon transport network in Oxfordshire?



What steps are being taken to future proof developments and prepare for the shift to a zero carbon transport network?

Provision of electric car charging points.

Opportunities for freight consolidation.

Seeking to enhance rail infrastructure.

Very little is being done and the Plan needs to address this.

Car club supporting a shift away from household reliance.

electric car infrastructure increase in demand for set up at completion of plots and also communal parking spot increases

Provision of E-Bikes on strategic sites part funded by County Council

Development being located in sustainable locations in the first place....

Need for more joined up cycle routes

What steps are being taken to future proof developments and prepare for the shift to a zero carbon transport network?

EVC - Early consideration of additional electrical loads per dwelling - impact on infrastructure and network

Delivering sustainable, mixed use developments to ensure communities become socially inclusive and there is less reliance to commute/travel.

Eco Business Centre at Bicester is good example

there are (ev charging points) but as with some other issues the problem isn't new development but existing roads being cycling unfriendly and poor public transport, for example.

Forward thinking developments need to embrace current modes including EV and electric scooters but policy needs to be flexible as tech moves on. Standards need to move with those changes

Provision of 15-20minute neighbourhoods which encourage walking to all facilities

Identifying potential bus routes. Electric car charging points. Car sharing schemes. Flexible workspace to allow people to work locally rather than commuting into a central office.

Housing developments have very little connectivity with the wider place in which they are situated with poor footpath and cycle links created.

Need to take account of infrastructure constraints, such as the additional electrical loads placed on the network by fast charge EV.

What steps are being taken to future proof developments and prepare for the shift to a zero carbon transport network?

Policy needs to be responsive to emerging solutions and improvements to tech that will evolve and become more viable both direct cost and network demand (ie electric network reinforcement).

More needs to be done nationally with communications on how we all need to do more leave our cars at home and try other forms of transport. Good health benefits for us and the planet!

Creating jobs and providing homes

Supporting the creation of jobs

Protection of economic assets

Town centre renewal

How many homes?

Urban renewal

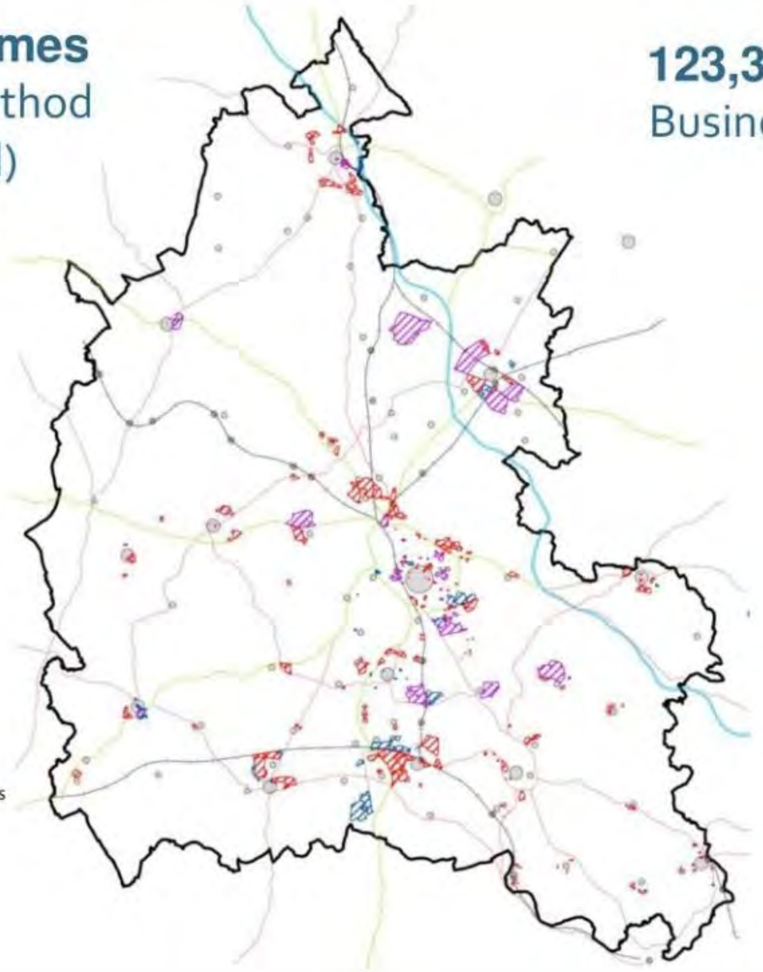
Affordable homes

How Many Homes?

101,580 homes
Standard method (adjusted)

123,390 homes
Business as usual

152,790 homes
Transformational



OGNA Homes 2020-2050		Illustrative Residual (OGNA minus Committed Growth) Approx.
Standard Method	101,580	16,126
Business as usual trajectory	123,390	37,936
Transformational trajectory	152,790	67,336

What are your views on the scale of development that should be planned for and why?

Clear evidence that the LHNSM is not the OAN and should therefore be disregarded as an option.

The housing target should be aspirational given the acute affordability issues in Oxfordshire (5th least affordable county). The housing targets from 2030-2050 should match the aspirations of the Growth Deal.

The scale should be as high as possible to ensure enough housing is delivered over the plan period across the County.

Transformational - exceptional opportunity to drive growth as part of Arc

Should be aspirational. Need to ensure that proposals are of sufficient scale to deliver new infrastructure rather than adding to burden of existing infrastructure.

Transformational - Oxfordshire is still one of most least affordable area outside of London.

At the higher end - because the county is well connected with infrastructure and has great employment prospects. As a result it should it's higher proportion than other areas

As with environmental standards, the target should be set high to meet the clear needs and support economic growth - and only worked back if it leads to a clear conflict with other policies and objectives.

Affordability is a significant barrier across the county. Growth should seek to improve the affordability constraints which needs aspirational growth around housing and employment.

What are your views on the scale of development that should be planned for and why?

Public support is never going to be secured for an option called 'transformational' - why use this badge?

Should be aspirational to deliver affordable housing

Current LP targets in Oxfordshire are well above the current Standard Method targets - as a minimum these levels of growth need to be sustained, ideally this should transformational growth given the County's connectivity and location within the Arc

given the house prices to average earning ratio in the county it would be absolutely crackers to go for anything less than business are usual.

Affordability and lack of sufficient affordable housing drives a larger not smaller requirement. Not all commitments might be deliverable and so reserve sites should provide additional flexibility to meet needs.

the county is a net contributor to the Exchequer - the economic aspirations that are important to UK PLC must align with housing provision for workers

There is little point in asking this question without you undertaking your own assessment up to 2050 and beyond. It will also need to meet needs within the Arc....

Oxfordshire is not meeting the numbers agreed as part of the OGD so it is not 'business as usual'

Transformational is a continuation of currently proposed rates in adopted plans. Selecting a lower level would damage the good work done by the Growth Deal to start to address affordability

What are your views on the scale of development that should be planned for and why?

Need more housing to continue economy growth

Delivery affected by poor site selection choices by the Councils - Chalgrove is a clear example!

Maintain flexibility in tenure products. First Homes will constrain more affordable products so greater flexibility in delivering other tenures would assist alongside more aspiration housing targets. The more aspirational policies will put a strain o

Concern that local politics in Oxfordshire will seek to suppress housing growth and reduce the housing target down to Standard Method (or lower!)

Propose a higher housing target and allocate more land! Perhaps its time for the Oxfordshire Councils to build again rather than rely on RPs?

Maintain flexibility in tenure products. First Homes will constrain more affordable products so greater flexibility in delivering other tenures would assist alongside more aspiration housing targets.

Needs to support bringing standard of old affordable housing stock up to the aspirations of net zero. This will require regeneration alongside new growth to make this viable and feasible.

Making sure development can continue to be viable (taking account of other costs that other policy aspirations may impose).

Reduce CIL charges!

What steps could be taken to make housing more affordable and increase the delivery of affordable housing in Oxfordshire?

build more houses!

Ensuring that the majority of the supply is on large sites that are better likely to deliver policy compliant levels of affordable housing.

Allocate more sites - all of which are subject to viability testing at the Local Plan stage.

Higher overall housing target and therefore higher delivery of affordable

last few years delivered over 5000 dpa and this coincided with reduction in affordability ratio reduction indicating this is the correct level to meet the market

Demanding higher proportions of affordable housing actually increases the cost of the market housing on the same site

Wider range of tenures/products - Build to Rent, PRS etcEnsure that there is a product suitable for the whole market

There are lots of complaints that affordable housing is not affordable.80% of market rent is not affordable by 90% of those on housing register!

Making sure new policy requirements still enable sites to viably delivery affordable housing.

What steps could be taken to make housing more affordable and increase the delivery of affordable housing in Oxfordshire?

delivery of affordable needs to be by Local authorities as well as the private sector. The trick will be making sure there is enough land available for both to do this. Also need 'affordable' products to buy as many aspire to own a home.

It's about selecting the right range of sites, particularly larger ones, which are viable to deliver a policy requirement level of affordable housing. If there are viability issues then it shouldn't be that AH is lost. Reduce other unnecessary cost

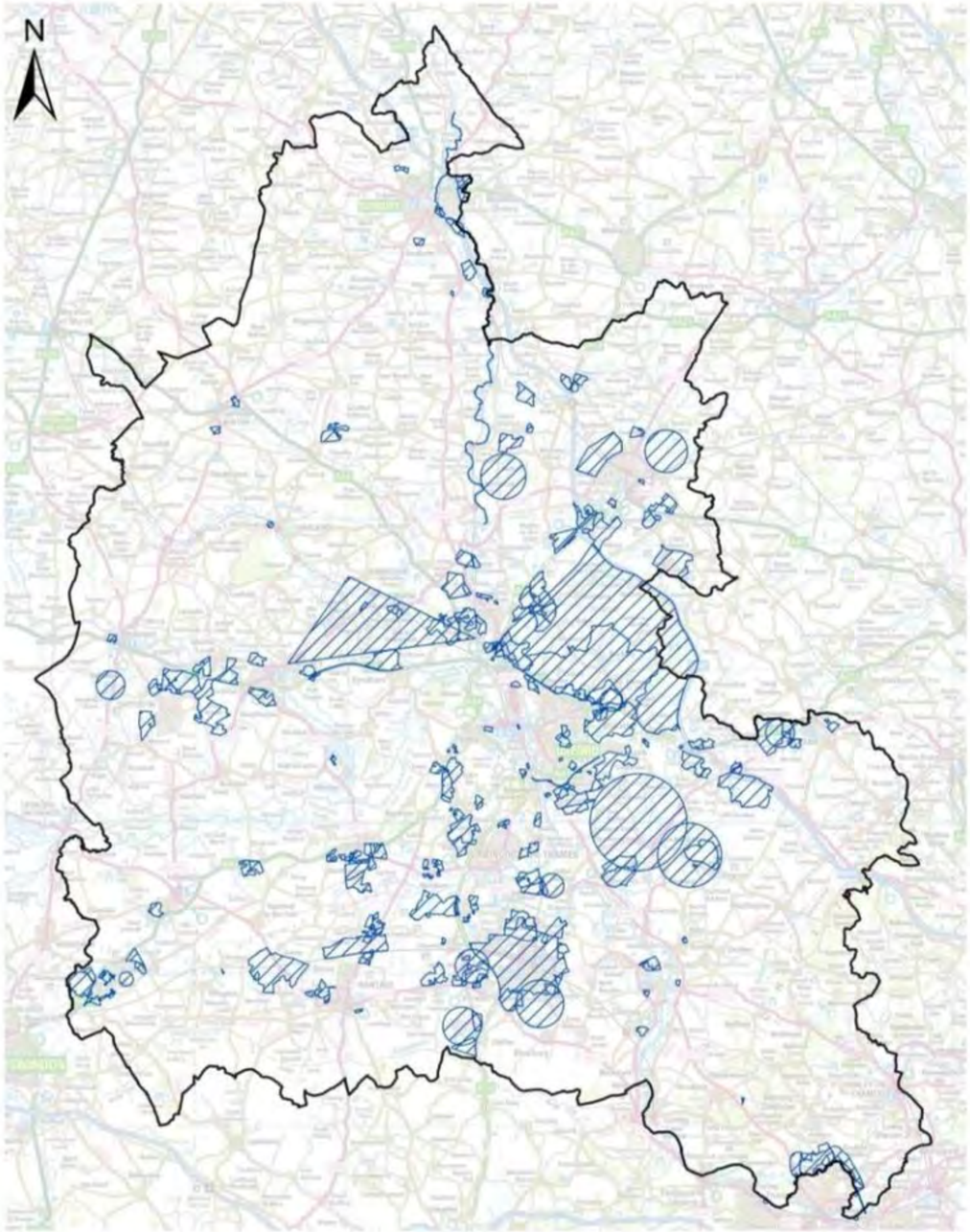
Local authorities need be build more houses

discount market homes are more affordable than shared ownership

Maintain flexibility in tenure products. First Homes will constrain more affordable products so greater flexibility in delivering other tenures would assist alongside more aspiration housing targets.

Spatial options

- Focus on opportunities at larger settlements and planned growth locations
- Focus on Oxford-led growth
- Focus on opportunities in sustainable transport corridors and at strategic transport hubs
- Focus on strengthening business locations
- Focus on supporting rural communities



Site Options and Call for Ideas

- Sites submitted for consideration for range of land uses
- Site assessment process to be undertaken in tandem with assessment and refinement of Spatial Options
- Site selection and identification of broad locations for growth to be strategy led

Thank you

Website	www.oxfordshireopenthought.org
Email	info@oxfordshireplan.org
Post	Speedwell House, Speedwell Street, Oxford, OX1 1NE