

BIOABUNDANCE RESPONSE TO JOINT LOCAL PLAN ISSUES-PLAN 2041 CONSULTATION

June 2022

1/ Executive summary

We are extremely pleased to see this excellent document, planning for a prosperous South Oxfordshire in a safe climate with abundant and resilient nature, in keeping with the Corporate Plan.

We have held focus groups at Bioabundance to discuss this.

Our chief concern is that this plan, rather than having as its chief objective, the improving of nature, climate and prosperity, has the objective of development and house-building. The house-building purpose is clear in the infographics in the Consultation document, and in the Sustainability Assessment Scoping where housing allocation is used to forecast growth.

We believe that the Local Plan can and should be achieving wellbeing for the district even when that involves no new built development. To do so we need to focus the Local Plan around meeting our carbon budget and halting and reversing the nature catastrophe. These need to be the limits to growth and the context for all the other policies. For example any development will need to be outside the landscape-scale nature regeneration network needed to successful halt and reverse the nature decline.

We believe that political change, both in the Districts and in recent Government Policy by Mr Gove, makes it possible to change the housing forecasts that the Local Plan is based on, and that there needs to be a new consultation on what growth should go into the Local Plan, including a low-growth option.

We also believe that any realistic assessment of the Carbon budget for the Districts will show that new housing could only occur if there is a very successful retrofit campaign for buildings in the District and significant shift soon from car to sustainable transport. These figures need to be worked out now before the Local Plan is considered further.

Bioabundance has much expertise in the Local Plan issues and we have set out page by page comments and suggestions, and at more length at the end in-depth ideas.

Bioabundance is recommending a 'Regional Park' a district and regional green infrastructure to enable co-ordination of a multi-benefit area with landscape-scale action on nature, landscape, access to nature, flood control and carbon capture (through natural habitats, deep soils and tree planting) made accessible by a sustainable transport plan. The proposed Park is in the Stowood and Otmoor part of SODC, continuing into Cherwell and Buckinghamshire. This would deliver key objectives to tackle the Climate and nature emergencies.

2 Structure of this response

Firstly we set out why we think the housing numbers for the Plan both need and can be lower, and must be consulted on before the Local Plan is taken any further.

Then we give our comments on the contents of the consultation document linked to its page numbers and subjects, with positive actions the Local Plan can undertake.

Finally we set out under 'Anything else you want to say' section detailed ideas from our membership on

- What wellbeing before growth would look like
- Why we can reset expectations for growth
- How we can apply new thinking to:
 - Green belt land
 - Affordable housing
 - Sewage and water issues
- What a comprehensive response to Climate Change in the Local Plan would look like
- The impact of traffic on communities and why we need to get cars out of residential areas

3 Forced Growth in the Built Environment and why we can now go for low-growth

It is important that the plan is explicit about housing numbers at the start. LP2041 has not presented any target housing numbers. This is vital, because housing growth directly conflicts with meeting climate targets and with environmental improvement, which are, quite rightly, key elements of this plan. Additionally the current cost of living crisis emphasises the need to protect our land for food production.

Political change at local and national level suggests reduced housing numbers and greater local autonomy; for example whilst Oxford City may politically be wedded to unbridled growth, South Oxfordshire is not. Better local democracy would mean that districts would not be beholden to the growth aspirations of the city. Of course, it is sensible to plan Oxfordshire-wide, but our duty is to plan for our own people to live well.

Bioabundance thinks that there is scope for the Joint Plan 2041 to set a low growth housing target. Need not Greed Oxfordshire and other civic groups have been told repeatedly that the housing numbers from Oxfordshire Plan 2050 *will not* be imposed upon Districts. So P81 should not be saying "the Oxfordshire Plan will set the future number of new homes to be built by 2050. The Joint Local Plan will only need to decide how and where our districts will deliver the homes". Councillors may decide to reject the high growth options in the Oxfordshire Plan 2050, resulting either in low housing targets cascading down to the Joint Plan or the Joint Plan replacing a defunct Oxfordshire 2050 Plan. Either way consultation at District level should address the housing issue.

The Duty to Cooperate, and being forced to take the growth aspirations of a neighbour is under fire from Mr Gove, Secretary of State, who at the second reading of the Levelling Up and Regeneration Bill criticised his own inspectorate for imposing "on local communities an obligation to meet figures on housing need that cannot be met, given the environmental and other constraints in particular communities".

Mr Gove also stated that the Inspectorate has "been operating in a way that runs counter to what Ministers....have said over and over again". An example might be that we are told that building on the Green Belt is not to occur. Forced building on the Green Belt should end.

Bioabundance also thinks that the high-growth targets are not realistic and not based on sound thinking. Bioabundance and other actors have long-criticised the Objectively Assessed Growth Need in Oxfordshire Plan 2050, as it is based on spurious population estimates, and bigged-up housing requirements, in just such a way as the 2014 Strategic Housing Market Assessment, which has led to political turmoil in our County.

Realistically, it is unlikely that the high housing growth in LP2035 will be met. We are entering an economic downturn with high levels of poverty; there is a shortage of workers and materials; for a comprehensive rollout of retrofit (insulation and materials) there will be even more demand for those same workers and materials.

It is however implicit in this plan that high, forced housing targets will continue to be pursued despite their unpopularity and environmental impact. The aim continues to be to bring workers in from other parts of the country, creating population growth rates that vastly outstrip growth projections from the Office for National Statistics (ONS).

A housing needs assessment based on organic growth, and indeed, accepting organic growth for the City, is the way forward.

This implicit assumption of high housing growth threads through the plan and can be seen in these places:

PAGE 7

P7 gives an unsatisfactory explanation of why we need yet more development over the very high numbers already dictated by LP2035. Indeed this is the opportunity to *reduce* those unsustainable numbers, from 2026 onwards, taking out sensitive strategic sites such as Land North of Bayswater Brook, Northfield, Grenoble Rd and Culham.

PAGE 11

P11 states there will be 22% population growth 2020-2030 for South Oxfordshire. It should be made clear here that this extraordinary figure is from the County Council’s ‘housing-led’ estimate. It is based on the expectation that South Oxfordshire builds all the homes specified in LP2035, and that they are then filled.

How can our population rise so fast, when similar over-egged housing numbers have been forced on councils throughout the country? There are simply not enough people to go round, to fill these homes.

22% population growth cannot happen. Table 1 shows the most recent ONS projections for South Oxfordshire; with a 3% rise in population 2020-2030. That is a 7-fold difference from the housing-led estimates.

Table 1. 2020 Office for National Statistics Projections for South Oxfordshire based on 2018 data							
	2020	2030	Rise		2026	2041	Rise
Population	142,000	146,000	3%		145,000	149,000	3%
Households	57,000	61,000	6%		60,000	64,000	7%
<i>All estimates rounded to nearest thousand</i>							

Page 11 also ignores the fact that this very Local Plan (LP2041) has agency. It can alter the housing targets from its adoption onwards, ie from 2026. LP2041 can change focus away from growth for growth's sake and provide homes to be filled in accordance with our growing population.

Over the period 2026-2041, ONS project that population and households will both rise by 4000. Usually occupancy has been at 2.4 people per household, so these data allow for lower home occupancy (single, older people) and homes for previously 'hidden' households.

Of course by 2026, if housing is indeed supplied at the rate that LP2035 prescribes, we shall already have more than 4000 more homes than we need, reducing the new target to zero.

To avoid waste, mechanisms should be sought to fill all homes before new homes are built. Organic household growth in the population can be met by using second homes and empty homes including those used as investment vehicles.

To meet the needs of South Oxfordshire residents, all new homes should be for sale only for residential purposes, in perpetuity. This has been achieved through local policies in several areas of the country, starting in St Ives.

The 2021 Census will be published shortly and will update these data.

Please would you make the above clear on P11 - that the growth rate you give depends on the housing growth in LP2035; that that it is over 7x the ONS projections; and that it can be reduced, to the benefit of residents, by a sensible number such as zero going into LP2041.

4. Page by page comments on the Consultation document

PAGE 15

Green belt is important- the Green Belt should be improved to deliver nature restoration, landscape and access to nature as per Government policy

Quality of life issues- should include

- problems of poor private rental market with poor condition houses, and the
- impact of second homes (in rural areas and in Oxford) and empty homes
- Traffic in residential areas- with air, noise and light pollution
- Poor access to nature and quiet countryside

PAGE 16

Quality of life and affordability refers to being in an area of high demand but does not explain why. The only solution offered elsewhere in the document appears to be build more rather than to constrain demand.

PAGE 19 Our Vision

We welcome the vision but would want to add “ **a mass-transit network of buses and rails linking node or hubs - to facilitate modal change from commuting car to public transport**”

THEMES

PAGE 29 Reducing carbon emissions- What can Local Plan do about this?

Have much more policies focused on Transport since it is 49% of carbon emissions in SODC. So add

- **plan for mass-transit network and locate any new development close to nodes on that network**, and provide facilities to help active transport to those nodes including secure cycle parking.
- **Make car-use less attractive- reduce road space and parking available to cars, limit access to direct routes** (to facilities and employment). The direct routes should be for buses, cycling and pedestrian only or 'shared surface'. Cars have to slow down to the speed of pedestrians.

PAGE 32 Nature Recovery and landscape- What can Local Plan do about this?

Nature recovery. Please change the policies to:

- **Protect natural habitats and areas suitable for nature recovery**, not just nature reserves and SSSIs.
- **Take into account noise and light which are detrimental to nature** (in addition to air and water quality)
- **Take into account *high* visit levels with dogs from development too close to natural habitats-**
- **Have stronger commitments to nature recovery networks** (National and Local) which also need no major developments within them but also near to them where high visitor numbers could impact new habitats. Note that the lack of a statutory Local Nature Recovery Plan does not let the Councils of the hook- Government policy puts the onus on Local Authorities to identify the local nature recovery network. See NPPF para 174.
- **Give priority for nature enhancement in Green Belts as per government policy**. This is good thinking since they are areas already protected and therefore can give multi-function landscape scale action the government says is needed for nature. See the Environment Plan 2018.
- **Not automatically consider all of AONBs important for nature recovery-** they have in the past performed poorly, and large parts of the AONB are intensively farmed and have fewer opportunities to create links between existing nature reserves and habitat areas.
- **Allocate land for large-scale green infrastructure-** eg our proposal for a Regional Nature Park. This will deliver the benefit of co-ordinated action on nature and landscape recovery, and on improving access to nature in a sustainable way. Government Policy is for Local Authorities to have a District-wide Green Infrastructure Framework that local green infrastructure in and around developments link into. Local authorities need to consider cross-boundary co-ordination too. Bioabundance' proposal for a Regional Park does just this! See NPPF Paragraph 175 and the PPG on Local Plans

Landscapes

- Green Belt areas should be included as a priority for landscape protection and enhancement as per Government policy- and because they are areas already protected and therefore can give multi-function landscape scale action the government says is needed for landscape restoration. Green belt is also near to where people live, so more people will benefit from landscape action. See Environment Plan 2018.

- Access to the improved and protected landscapes need to be considered- including new footpaths, visitor facilities, ‘quiet lanes’ to encourage cycle and pedestrian access.
- Protection of views is vital- so that the landscapes are visible to the public- through protection of the high quality surrounds of the viewpoint and the foreground. New viewpoints could be made where hedges block important views, for example over Otmoor or Bernwood.
- **Creation of large-scale green infrastructure**- eg our proposal for a Regional Nature Park. This will deliver the benefit of co-ordinated action on nature and landscape recovery, and on improving access to nature in a sustainable way.
- **In areas with clear landscape character, prevent the introduction of alien landscape elements (such as tree belts to screen a nearby development or conifer arboriculture)**

PAGE 42 Protecting and Enhancing local heritage- What additional things we see the Local Plan doing:

- **Protect historic views of Oxford.** Specific policy is needed to cover the setting and foreground of the view from Elsfield and Boars Hill. As Land Use Consultant report for Heritage England (2015) showed that the view from Elsfield of Oxford is of historic importance itself as it was represented in books and art over the centuries, was still rural and has intact agrarian foreground.
- **Protect other historic views**, for example of the historic centre of Abingdon from across the Thames, and of the Wittenham clumps from both Districts.
- **Protect the small villages and hamlets from development.** Previous SODC Local Plan’s have protected small (under 100 houses) from development, and therefore they still have their historic character as agricultural settlements, and are a key element of the rural character of the District.

PAGE 48 Thriving and inclusive communities

Bioabundance asks for the option/choice to be offered to limit development to organic growth only; with an economic strategy to support full employment rather than attracting huge inward migration. This will still result in thriving communities.

This low growth option is Bioabundances’s preference since it will meet enable us to tackle the Climate and ecological emergency.

Our additional actions we want you to include in the local plan are:

- Ensure new houses are cheap to run and don’t need retrofitting- insulated, have solar panels, are not too large, are water efficient, don’t use gas boilers, keep cool in hot weather
- Reduce car use and therefore noise and air pollution within residential areas
- Take up the option to control conversion of family houses into Houses of Multiple Occupation
- Plan for access to nature and quiet countryside

PAGE 53 Transport and Facilities

Changes to your actions-

- Keep the neighbourhood to 15 minutes because research indicates that a significant proportion of the population would not walk or cycle 20 minutes to facilities or employment.
- Plan your transition to sustainable transport mode by explicitly planning a mass-transit network with transfer nodes that can actually deliver fast alternatives to the current car commutes.
- Explicitly tackle the disincentive to cycling and walking- car traffic and crossing busy roads. Do this by reducing road space for cars, and keeping the direct routes to facilities and employment for cycling and walking or as multi-user routes where cars do not have priority and reduce speed because of uncertainty about what is around the corner and other users actions!
- Use a stick as well as a carrot to get people out of cars- make it more difficult and take longer to go by car.

Additional actions-

- Tackle the proliferation of delivery trips through area depots that aggregate local deliveries

PAGE 56 Healthy lifestyles and safe communities

Please add action under the Local Plan- make provision for access to nature through a District Green Infrastructure Framework and sustainable transport access to the Countryside

PAGE 81 Context with Oxfordshire Plan 2050

It is for the districts to decide their housing numbers, not for Oxfordshire Plan 2050 (see above).

PAGE 68 Any other thoughts

1/ Bioabundance thinks that the Local Plan 2041 needs to put 'Wellbeing Before Growth'

South Oxfordshire's Corporate Plan mirrors the thinking of Doughnut Economics (DE), planning social justice within planetary boundaries. DE is 'agnostic' about growth: some sectors will grow, some will decline. The aim is for prosperity and wellbeing of the people, contingent upon living on a safe planet. Government recognises disquiet with GDP growth as the only metric of good governance and recently consulted on using a different metric such as wellbeing.

It takes some doing to turn a plan on its head and not follow well-worn tracks. We must recognise the new situation we find ourselves in and respond in a way different, not the 20th Century way of endless growth.

2/ This plan 2041 should reset expectations for growth, recognizing that politics has changed locally and nationally.

To do this the Local Plan 2041 needs to reject old political decisions around:

1. the economic strategy. This sought to create jobs to attract tens of thousands of people from elsewhere to live and work in Oxfordshire. Government now rejects this with their Levelling Up agenda to create jobs where people live.
2. the Oxfordshire Growth Deal. This committed the county to build new houses far in excess of organic population growth. Local communities rejects this, as reflected in election results in 2019 (district) and 2021 (county).

3. the expansionist strategy of Oxford City Council and the University, building into the Green Belt. A plethora of new groups of students and residents have set up. They oppose putting wealth-generation first, over and above the environment and the need for actually affordable housing.

Expansionist strategies with no limits to growth are highly responsible for the global climate catastrophe.

3/ We propose a new direction on key topics- and new thinking from the Government gives us the opportunity to go in a new direction:

Green Belt and AONB

South Oxfordshire is highly constrained in where it can build if it were to respect the constraints of the Green Belt and the Area of Outstanding Natural Beauty. Most of the LP2035 strategic sites are in the Green Belt.

This is not the intention of governance under Mr Gove. Indeed even the current NPPF (National Planning Policy Framework) states that Green Belt is to be enhanced with nature recovery programmes. Please would you emphasise the restoration of the Green Belt and the AONBs for nature. It is in these protected areas that biodiversity gain should be pursued, providing access for the City and rural parts to all the benefits that nature provides.

Furthermore, neither the Green Belt nor the AONBs have been successful even in protecting landscape; large parts of the Chilterns (and the Wiltshire Downs) feature massive industrial fields.

Affordable Housing

The housing affordability crisis could be resolved overnight by Government constraining the market. Homes in South Oxfordshire should be available for sale and rent only to those living or intending to live in an area. New housing to feed an insatiable international investment market is not desirable.

South Oxfordshire should examine what tools it has available to constrain demand. It can do as St Ives and insist that all new housing be used only for residential purposes. Can it constrain the sale of existing homes, or would that require lobbying of Government?

Meanwhile, new housing is being built. All new housing should be social housing. Community Land Trusts should be encouraged. Government should be lobbied to ensure that its new intent to force social housing providers to sell off their social housing should be discouraged.

Infrastructure: Sewage and Water

Infrastructure for new housing should go in first, before the homes, once planning permission has been granted. It should go in before development commences, before the ripping out of hedges and the turning over of the land.

Sewerage provision is of particular concern. The appalling state of our rivers caused by discharge of untreated sewage is widely acknowledged to be a national disgrace and we ask that this issues feature

more prominently in this document. The Thames is polluted and all new housing (if occupied) contributes to worsening the situation.

It is difficult for a Local Authority to put requirements upon a private organisation such as Thames Water. Nevertheless, it should be possible to insist that development cannot begin until the sewage treatment plants are first upgraded to match the anticipated housing numbers. This should be a condition arising before development starts.

LP2035, and Thames Water itself, both say that occupation of homes should not start until the sewage system has been upgraded. This has not always happened on previous housing sites in South Oxfordshire, where sewage lorries have been a normal sight. It shows lack of forward planning by Thames Water. It also indicates that this is a very difficult thing for the Local Authority to police. Much easier, then, to make provision a condition before further development.

This then, would avoid the risk that upgrades planned by Thames Water, for example at Oxford (Sandford) Treatment Works, would be in place before development commences; in this case, at Grenoble Road and Northfield.

With climate change, we expect plentiful provision of fresh water to be a challenge. Prof John Rodda, former Director for Water at the World Meteorological Organisation (and inhabitant of Brightwell) says that the southeast of England has the same per capita water as Tunisia.

Whilst Thames Water seek to ensure water provision, there can be difficulties with distribution with pumps not always adequate for need. Again this is an infrastructure issue of pipes and pumping stations that *must* be in place before development starts.

Fresh water is a limit to growth. Excess housing, beyond what is occupied for residential purposes, should be weighed against the environmental damage that comes from a huge reservoir that might not otherwise be required.

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure.

Climate Change

The Plan seeks to “Ensure that development stays in the district’s carbon budget”. Thank you for this clear intent. It will need extraordinary work to present a holistic plan that marries the corporate plan and economic strategy to achieve this. The current Climate Action Plan does not show how zero carbon will be achieved in the District by 2030 (as set in the Corporate Plan) or by any other time.

The highly reputable Tyndall Centre says this about South Oxfordshire (<https://carbonbudget.manchester.ac.uk/reports/E07000179/>):

“Based on our analysis, for South Oxfordshire to make its ‘fair’ contribution towards the Paris Climate Change Agreement, the following recommendations should be adopted”:

1. A CO₂ budget of 5.6 million tonnes (Mt CO₂) by 2100. At 2017 emission levels, South Oxfordshire would use this entire budget by 2027.

2. An immediate CO₂ emissions reduction plan, with cuts of at least 13.4% per year, to deliver a Paris-aligned carbon budget. These annual reductions in emissions require national and local action, and could be part of a wider collaboration with other local authorities.
3. Reach near zero carbon no later than 2041 (5% of the carbon budget of 5.6 Mt CO₂ is within budget at that stage).

2041 is of course the end-date of this plan.

Zero carbon can be achieved only by all homes being zero or negative carbon in their construction. Somehow the infrastructure around the home, that is roads and schools etc, which amount to at least 50T of CO₂ per home, would need to be successfully offset, ideally within the district.

Clearly all homes should also be zero or negative carbon in operation.

How will this be ensured and policed? Resource would have to be expended on increased enforcement, whereas currently, we know the District is reducing its enforcement requirements.

Beyond minimising the number of new homes and ensuring they are zero carbon, we can only stay within our carbon budget, getting the district to zero carbon, by improving our existing homes.

Retrofitting of Homes

In October 2022 it is expected by End Fuel Poverty Coalition that nearly a third of the people of the UK will be plunged into fuel poverty. The need to insulate homes and provide them with low carbon heating systems and renewables is extreme. This will reduce bills, reduce winter deaths from cold, and summer deaths from heat. It will provide healthy, comfortable homes.

We have amongst the worst housing stock in the Europe. It is responsible for high levels of CO₂ emissions.

Government Minister Neil O'Brien spoke with Councillor Dr Sue Roberts (who represented the Independent Group of the Local Government Association at a meeting 15th June 2022). The Minister suggested that UKSPF (UK Shared Prosperity Fund) money should be allocated to 'pilot' retrofit projects. Adam Scorer from National Energy Action speaking at a public meeting on the same day, says "do not wait for Government to come up with the retrofit solutions, they are waiting for you".

It will be a very complex task to upgrade our 64,000 homes and could cost £2.6bn (at £40,000 a home).

Importantly, the resource constraints are workers and materials. Four out of five construction firms say they are struggling to find workers. There is a known skills gap for retrofit. In a poverty, climate, and environmental crisis we should go on a war-footing to mobilise resources. All builders, tradespeople, and materials should be requisitioned for retrofit.

It is vital that we refocus away from unneeded newbuild to 'make do and mend' of our existing housing stock.

Already our planners offer retrofit advice to those who seek planning permission for changes to their homes. Could it become mandated upon such householders that any new planning permission is contingent upon a full retrofit of the existing building?

Planning for Renewables

Oxfordshire has created the Pathways to Zero Carbon Oxfordshire which suggests a high contribution of solar farms to our energy mix in this county. Policy DES 9 in LP2035 rightly 'encourages schemes for renewable and low carbon energy generation'.

What could not be anticipated in the writing of LP2035 was how quickly very large solar farms would become commercially lucrative. Changes in Government management has altered the viability. Now, we have the risk of unbridled growth with no stopping point.

DES9 of course seeks to avoid significantly adverse effects, but this is hard to square against the large number of applications coming in at breakneck speed for very large solar farms. It is necessary to balance our need for solar against our need for land for regenerative farming, nature restoration, and aesthetic. What we do not want is a backlash against renewables.

This is a very important planning issue.

What Bioabundance suggest is that an Oxfordshire-wide plan be made to apportion exactly how much solar provision we want from solar farms. This will take very high level thinking. It must be considered what is the contribution we expect from UK wind, nuclear and other low carbon sources, and what residual, Oxfordshire itself (as a relatively sunny part of the UK) should be responsible for providing in terms of solar. And then, in terms of solar on roofs:

- 1) It should be made a planning condition that all warehousing, other commercial, and domestic homes maximise solar on their roofs
- 2) It should be made a planning condition that any applications for modifications to a home or commercial premises should require solar on existing and new roofs
- 3) The total future buildings contribution to our solar requirement in Oxfordshire be estimated

Subtracting buildings contribution from our total requirement in Oxfordshire for local solar energy harvesting, leaves us with the amount that needs to be provided by solar farms. This then needs dividing between the districts.

It is then, please, that we need to make a *strategic plan* as to where all the solar farms should go; avoiding, for example, best and most versatile farming land and sensitive biodiverse sites.

Just as with housing, solar farms must stay within their allocated sites, and not stray.

If it is possible for community solar to be prioritised over commercial through the planning system, then that should be encouraged.

Link to the Communities Number 9 - TRAFFIC

Quite rightly the Plan is for thriving inclusive communities. That can only be achieved by retrofit and reduced newbuild.

Consideration of traffic is missing from this Plan. With housing numbers known, it is vital to plan for sustainable transport as an element of deciding on where settlements should be placed. If buses will be

the mass transit mode, then lanes are needed for them. For residents to have a role in their district, they must have sustainable transport. Different solutions will be required for urban areas and the countryside.

Traffic diminishes wellbeing, with air pollution, noise pollution and light pollution, with congestion that enrages drivers, and with danger to life to pedestrians and cyclists.

Clearly for good mobility of the populace we need an excellent planned public transport system, with frequent reliable buses and trains, ideally free to the user. We need shared cars and transport as an on-demand service with autonomous call-up pods that can take you to the fast transit buses and trains. We need active transport to be the norm within towns.

A carrot and stick approach is needed. It should be easy and cheap to travel without the use of private cars. Parking and roads for cars should be reduced, making it difficult to use this old-fashioned transit system; it should be made difficult for cars so that car drivers move about more tentatively.

This consultation considers commuting traffic to be an issue; 46% of our carbon emissions are from traffic. Travelling to work can be reduced with home-working and excellent digital services; beyond that, it is a matter of mass-transit.

Regional Nature Park

Bioabundance proposed a 100 sq mile regional nature park, based around Otmoor, some of which sits within South Oxfordshire. This has been taken up by BBOWT (Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust) for investigation.

It would be a great boost to our district to have this area protected and enhanced for a novel regional nature park (RNP). It can be conceived in 21st Century terms providing access for up to 300,000 local people in nearby conurbations, through low carbon and active transport links. It would provide a reservoir of species to feed into the nature recovery networks mandated in the Environment Act.

We should like to see the RNP outlined and specified in this plan.

ON THE SETTLEMENTS METHODOLOGY

The UK is one of the most nature-depleted countries in the world, 187th of 200-odd countries. According to Earth Trust, the people of Oxfordshire have the worst access to nature of any county in the South East outside London.

Nature recovery networks have been put together by TVERC.

Nature recovery *must go first* in an ecological emergency. Nature is fragile and we are facing the Sixth Extinction, under which we die out alongside the rest of the natural world.

Nature recovery should be planned out in detail with the help of the new Local Nature Partnership, and with HERO (Healthy Ecosystems Restoration for Oxfordshire) which is now being funded by a big Leverhulme grant.

If any new housing were to be built, and it is uncertain that it should, it should be directed *outside* of areas of nature recovery, so that it does not impinge on contiguousness of land. It is vital that nature has large uninterrupted swathes of land; otherwise species die out in smaller and smaller 'islands'.

Plan for nature first.

There is discussion here of 20min areas. This concept comes from the 15min-city. 10 to 15 minutes was chosen for a reason. Beyond 15min, people struggle to walk to places. 20min should be reduced back down to 15min!

Clearly this is not an approach for small hamlets, but for larger villages and towns. For example, the proposal presents a very serious risk to Garsington, completely subsuming the village into an expanded Oxford City.

DUTY TO COOPERATE

This paper on the duty to cooperate should be postponed. Mr Gove intimates that the duty to cooperate may change or diminish, or be scrapped.

In addition to the strategic matters covered in this paper, we would suggest four more:

1. Land Use as a fundamental limit to growth – food production, rewilding, mental health
2. Local democracy – clear messages from electorate that they want organic population growth only – not growth led by jobs and investment
3. Greater consideration to wealth distribution rather than wealth creation
4. Removal of obligations against Oxfordshire's Growth Deal - would the £215m need to be paid back?

In addition we ask, should SODC be cooperating with Oxford City in the future, if their unmet need is mostly economic growth rather than real need? Oxford's current local plan is to build 1400 homes per annum of which only 554 are actual organic growth according to the Office for National Statistics.

How does the Duty to Cooperate ensure that surrounding district's dutifully fulfilling this obligation are not 'cheated' by the possibility of Oxford City itself failing to build out its own allocation?

Please would you consider adding the following non-prescribed bodies to the list of those with whom you will be consulting:

- CPRE
- Friends of the Earth
- Bioabundance