

## **SOUTH OXFORDSHIRE'S LOCAL PLAN 2041 CONSULTATION, JUNE 2022**

***[A Narrative Response](#) was collated by Dr Sue Roberts from Focus Group Meetings and has been used as the basis of the four responses submitted to the Planning Team. Follow this link to see the full Narrative; Bioabundance Narrative Response to South Oxfordshire's Local Plan 2041 Consultation, June 2022. Links to the four responses submitted follow this summary of the Narrative Response.***

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.

**Change the Focus from Housebuilding to Nature, Climate and Prosperity.** 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. A Local Plan should be achieving wellbeing for the district even when that involves no new built development. It is important that the plan is explicit about housing numbers at the start.

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. The Duty to Cooperate, being forced to take the growth aspirations of a neighbor, is under fire from Mr Gove, Secretary of State. Bioabundance and other actors have long-criticised the Objectively Assessed Growth Need in Oxfordshire Plan 2050, which it is based on spurious over-estimates of population growth. The Plan states there will be 22% population growth 2020-2030 for South Oxfordshire. The most recent ONS projections for South Oxfordshire; show a 3% rise in population 2020-2030. That is a 7-fold difference from the housing-led estimates.

**Wellbeing Before Growth.** South Oxfordshire's Corporate Plan mirrors the thinking of Doughnut Economics (DE), planning social justice within planetary boundaries. We must recognise the new situation we find ourselves in and respond in a way different, not the 20th Century way of endless growth. This plan should reset expectations for growth, recognising that politics has changed locally and nationally

**Green Belt and AONB.** Please emphasise the restoration of the Green Belt and the AONBs for nature.

**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.

**Infrastructure: Sewage and Water.** Infrastructure for new housing should go in first, before the homes, once planning permission has been granted. 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". It will need extraordinary work to present a holistic plan that marries the corporate plan and economic strategy to achieve this.

**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.

**Link to the Communities – TRAFFIC .** 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.

**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.

**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 *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.

**Duty to Cooperate Paper.** 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:

**Bioabundance responses to the four sections of this consultation**

[Bioabundance response to Joint Local Plan issues-plan 2041](#) consultation *June 2022*,

[Bioabundance comments on the settlements assessment methodology](#) – June 2022 consultation,

[Bioabundance comments on Sustainability Assessment](#) (SA) Scoping Consultation Response – June 2022

[Bioabundance comments on the Duty to Cooperate](#) – June 2022 consultation

**Bioabundance Comments on the Consultation on the SODC and Vale Draft Joint Design Guide.**

It is imperative that climate change is addressed throughout the guide. South and Vale are signed up to the carbon reduction target of the Oxfordshire Energy Strategy and are committed to a 50% reduction in carbon emissions by 2030. New designs must keep within these limits. To achieve this, it is essential that the construction of domestic buildings be included in a standards and certification scheme. Choosing the right set of standards must be a high priority for the design guide team. The BREAM code for sustainable homes is an option. Passivhaus could be used but is not always viable. The development of smaller affordable homes with a smaller carbon footprint is encouraged. New developments should respect Community Lead Plans. The guide should include encouraging the reduction of carbon footprint in existing dwellings.

A high quality development should be fit for purpose; minimize carbon footprint; and encourage biodiversity. Technical studies of new developments should include surveys on watercourses, trees, habitats, species, production of food, preservation of existing farmland, natural carbon sequestering, flood risk mitigation and drainage. We recommend that living walls are encouraged to absorb CO<sub>2</sub>.

The National planning framework is still focused on GDP driven growth rather than the preservation of our natural and social capital. We ask for a change mechanism to be built into this guide so that it can quickly reflect any changes in Government policy in this area.

**Consultation on the Local Transportation and Connectivity Plan**

The key point in our submission to [LCTP5](#) is that the plan must prioritise the 2050 deadline for net-zero carbon in transport in order to tackle the climate change emergency. This means building a sustainable transport network that integrates local e-bus, cycle and walking routes with the strategic rail and bus services for longer journeys. This is the only way to reduce car dependency, especially in rural areas and allow nature to recover after decades of destruction from increasing traffic and carbon emissions on our roads.

To protect nature, the Environment Bill sets out principles of Integration, Prevention, Rectification, Polluter Pays and Precaution. We have responded to the Government's consultation on the application of these

principles [here](#). In brief, the statement is supposed to be a blueprint to show how to apply these principles but it does nothing of the sort. Instead, the original meaning of these words is greatly watered down. The principles are hedged about with concepts of 'proportionality' and the aim of the paper is to promote economic development whilst trying to do less harm to nature. An already weak bill that should be replaced by the Climate and Ecological Emergency Bill is becoming increasingly toothless