

## Joint South and Vale Local Plan REG 18 - FEBRUARY 2024

As an individual in full-time work I am limited in the time available to consider the Options document. In what follows I make some general observations followed by some specific comments on individual policy proposals, these comments are far from exhaustive and should be seen more as examples of how the more general observations might impact on policy. I am very encouraged by the direction of movement shown in the document and consider it to be a great improvement on previous Local Plans. I also support the move to making this a Joint Plan, improving the opportunity for a more coherent and effective approach.

The Vision Statement is sound in principle but I think it needs a stronger indication of the connection between people's wellbeing and the wider flourishing of the natural environment and to emphasise that this needs to be planned for. Furthermore that this is not a matter of just protecting a few special sites but requires positive action across the whole area. For example in the first sentence of the second paragraph "For this to be a place where nature is thriving" could be replaced by "For this to be a place where we enable nature to thrive, enhancing people's wellbeing, where a flourishing natural environment permeates the whole area". In the second sentence add in ecology so it reads "where heritage, landscape character and ecology . . ."

In this regard I note that the map on p.22 identifies designated Green Belt and Natural Landscapes, but there is no map identifying Nature Reserves, Local Wildlife Sites and other areas of known special ecological significance.

For many years I have urged councils to gain a much deeper and wider understanding of the ecology of their districts, not just with regard to wildlife and biodiversity but with regard to the functioning of the whole system. For example there are significant peat deposits in both Districts that are valuable carbon sinks and have rare and fragile ecologies that depend on land management and water flows extending well beyond the deposits themselves. The concept of Wildlife Corridors is well established, but the massive decline in insect and bird numbers is having a negative impact on sustainable farming and food production as well as the wider ecology that can only be tackled by a more coherent and widespread approach to land management and use. Data on location of organic land management and local implementation of current Government supported schemes such as Countryside Stewardship and ELMS would help. As we seek to protect and enhance the capacity of our soils to act as carbon sinks and manage water flows to avoid harmful flooding our planners need a good knowledge of the geology, hydrology and ecology of the district as a whole as well as development sites in particular. The experience of the Covid pandemic and the impacts of Climate Change related weather in southern Europe have demonstrated the importance of local Growers to a resilient food supply, which needs to be encouraged and developed. If the Vision and Objectives 3, 4, 7, 9 and 10 are to be achieved the Planning Authority will need to have this data and knowledge underpinning policy making, wording, interpretation and subsequent decision making.

CE1 preferred option preferred. Suggested policy amendments:

- 1) after "greenhouse emissions" add "and enhance local natural ecology".
- 2) The explanatory remarks on CE1 should make it clear that the need for supplementary cooling/heating mechanisms beyond the design principles outlined in 2d(i) and (ii) are indicative of design weakness in the building envelope, orientation or relation to external factors.
- 4) Explanatory remarks should indicate that the principle that building elements should be multi-functional is evidence of efficient design (e.g.integrating PV as part of roof covering rather than added on top, using external wall insulation to enable the wall structure to act as a heat sink maintaining a comfortable internal temperature).

It is important that this policy (and others) are supported by an innovative and flexible approach to Building Control, recognised by developers and which might include site-specific design solutions.

CE2 preferred option preferred. Suggested policy amendments:

- 1) Strengthen the wording e.g." . . .achieve as near zero space heating demand as possible within the following specific requirements" (My experience as a Parish Councillor was that developers tend to regard parameters as goals to aim for rather than minimums to be improved on).

2) Similarly substitute “no more” with “less”.

4) The rubric for this part of the policy should state that good design and construction will minimise the need for energy demand thus minimising the requirement to provide on-site generation.

6)c) Developers need to be aware that the feasibility criteria will be technical and environmental rather than financial. The financial cost to them of making alternative provision where it is genuinely not technical feasible or environmentally desirable should not enable them to see this as a cheaper option.

CE3

Preferred option preferred. Suggested policy amendments:

1e) Add “Replacement buildings and construction should be designed to maximise re-use of the demolition arisings”

g) Add “and how any surplus or waste materials arising from construction will be re-used or recycled. The waste stream should be carefully monitored.”

CE4

Preferred option preferred. Suggested policy amendments:

Add a clause on Listed Buildings

5) Where a retro-fitting proposal includes a Listed Building the fact that the historical interest of many Listed Buildings includes evidence of their evolution over time will be taken into account.

CE5

Preferred option preferred. Suggested policy amendments:

1) Add “Schemes should be multi-functional, for example utilise existing buildings or infrastructure, are in addition to rather than replacing existing land use, or which propose a variety of simultaneous uses. This could include, for example, creating a species rich wildflower meadow with associated honey production.”

3) After “life of the renewable energy installation” add “and infrastructure associated with construction, access and maintainance is kept to a minimum”

5) Add “Schemes should be multi-functional in their design and the viability of all functions for the design life of the scheme clearly established.”

CE7

Should sufficient evidence arise to support Option D then I would prefer it, otherwise I agree with Option A. Flush toilets can account for upto 30% of household water use, to help reduce this figure and help reduce the problems associated with sewage overflow in heavy rainfall I would include the following clause in either policy option:

“Any new house with two or more bedrooms should include a waterless toilet at ground floor. There should be appropriate use or disposal facilities for the type of waterless toilet installed.”

I would also like to see encouragement of household rainwater harvest, storage and use at a scale significantly beyond a single water butt where community scale schemes are not appropriate. This is especially significant now that we already frequently have periods of a month or more in the summer with no rain at all.

If living roofs are not included in SuDS I think they should be included explicitly as an option somewhere in either general design policy, water policy or insulation policy. They are an excellent example of multi-use design.

CE9

Option A preferred. Suggested policy amendments:

I hope the explanatory rubric for section 1a) includes vehicle use since (some) petrol and diesel cars and delivery vehicles are likely to remain in use for the lifetime of this plan. It should be clear that “avoiding negative impacts” therefore includes design and infrastructure aimed at minimising vehicular traffic.

CE10

Option A preferred. Policy concerns.

Proposed policy 4a) regarding noise pollution. A significant source of noise pollution in the countryside is the traffic noise from heavily used main roads. Much of the noise is road noise and not just engine noise. EVs make as much road noise as fossil fuel vehicles, which can be considerable when moving at high

speeds. I live 1.5km from the A4074 and in certain weather conditions the noise drowns out the birdsong from my hedgerow. This impacts birdlife more than it does me, they need to hear each other more than I need to hear them. Vehicular noise pollution is therefore another reason why development should be sited and designed to minimise the creation of additional vehicular traffic. It also indicates that for any development the relationship between jobs, community infrastructure and housing type should be closely tied to active modes of transport. Research for the SODC 2011 Local Plan indicated exceptionally high commuting ratios for the district with both inward and outward commuting at the highest levels in Oxfordshire and well above national averages. If this remains the case (I can't find any more recent data), then it is very important to reduce the mismatch between housing (type and affordability) and jobs within the district in order to reduce pollution.

## CE12

It is very encouraging to see soil being specifically addressed. The degradation and depletion of our soils through human misunderstanding and misuse is now being compounded by the effects of climate change, in particular prolonged waterlogging beyond natural floodplains and intense periods of drought.

I think Option B has some merit and although I'm broadly in agreement with the proposed policy I think it could be developed further.

For example most volume builders rely on off-the-peg designs that can be built anywhere, sometimes varied with a few pastiche nods to local features informed solely by perceived aesthetics. However a good soil survey identifying depth, structure, soil type and underlying geology could inform innovative site specific design reducing the need and use of materials with high carbon emissions, thereby potentially reducing material costs; the survey would also inform and support a good SuDs plan (especially as water can flow horizontally through the soil and not merely be absorbed vertically), a good landscaping and siting plan and indicate any areas that would benefit from protection during construction. It could also inform design decisions to ensure buildings are able to withstand the changes in soil structure and behaviour that might be caused by increasingly frequent extreme weather conditions. In other words if done well it could result in better, more distinctive and interesting site-specific design that might also save on material costs and improve the quality and efficiency of delivery. I therefore prefer Option B and would aim to phrase the policy so that it did not itself specify precise survey details but refers to a supplementary document/discussion that can be easily improved and updated as all parties learn how to use it most effectively.

Draft Policy comments:

1a) Include a requirement that any large development on high quality agricultural land must include provision for allotments or a small commercial market garden with associated accomodation (at a price/rent in proportion to expected turnover).

c) substitute "Creating and taking" for "taking";

d) add "not only within the curtilage of individual buildings but also for public spaces, roads and pavements."

The explanatory notes should refer to the fact that plant roots and their exudates are essential for healthy soil biology, structure and water cycling, this should be reflected in the landscaping and minimalisation of artificial surfaces.