

# Response 211

## Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. i) Are you responding as:

An agent, developer or landowner

[REDACTED]

I

## A little bit about you (continued...)

[REDACTED]

[REDACTED]

Q4. For further information about how we use your data below, please refer to our privacy policy, which also explains how to exercise your rights over your personal data. If relevant, please provide the details of the organisation, business or council you're representing. If relevant, please also give the details of the client your business is representing (EG if you're a planning agent responding on behalf of another organisation).

[REDACTED]	I
<b>First name</b>	David
<b>Last name</b>	Murray-Cox
[REDACTED]	I
<b>Your business or organisation (if relevant)</b>	-
<b>Business or organisation you're representing (if relevant)</b>	A2Dominion
<b>Email address</b>	-

Q6. Please select which documents you wish to comment on:

Local Plan Issues Consultation

Draft Settlement Assessment Methodology

Q39. 32. Finally, do you have any other comments?

Please see response attached.

[REDACTED]

- [REDACTED]

## Draft Settlement Assessment Methodology

Q47. Looking at the proposed scoring identified in tables 1 to 6 do you consider that the scoring reflects the weight/importance of each service or facility?

**If you have any comments on the scoring, please provide them below:**

In relation to the scoring methodology, we note that the proposed approach is not clear. For example, there is no guidance as to what the scores are out of (i.e. a settlement with a primary school will be given a score of 2 per facility but it is not clear what the maximum scoring could be). Furthermore, table 1 of the methodology gives different scores to different services and facilities (for example a primary school is scored 2 (per facility), but a playground is scored 1 (per facility). That suggests a value judgement that two playgrounds are equivalent to one primary school. As for the scoring methodology for public transport, this provides a score depending on the frequency of bus services, but does not appear to have regard to the quality of destinations of those services. In our view, further clarity is needed on the scoring system before we can comment on whether it represents an appropriate methodology.

Q49. If you have any other comments on the Draft Settlement Assessment Methodology, please provide them below.

We note that the Councils are seeking to undertake a Settlement Assessment resulting in a settlement hierarchy. We note that the methodology for the Settlement Assessment does not seem to involve a review of the settlement boundaries, but instead, is intended to include a scoring of the existing defined settlements. Whilst we are supportive of the principle of the Settlement Assessment as part of the Plan-making process, the Councils should also consider revisions to settlement boundaries to ensure that sufficient levels of development can be delivered.

If you are ready to submit your comments, please tick the box below, then select the 'Finish and submit' button. Note: once ticked you will not be able to return to your comments and they will be submitted. If not, please use the 'previous page' button to go back through the survey to amend or review your response. Alternatively you can use the 'save and continue later' so that you can save your progress, and return later to your comments. Simply provide your name and email address and you will automatically receive a link via email to return to your draft comments when you are ready.

Yes, I have finished and am ready to submit

20 June 2022

Delivered by email ([haveyoursay@southandvale.gov.uk](mailto:haveyoursay@southandvale.gov.uk))

Planning Policy  
South Oxfordshire and Vale of White Horse District Councils  
135 Eastern Avenue  
Milton Park  
Abingdon  
OX14 4SB

Ref: A2 R3001

Dear Sir / Madam

## **SOUTH OXFORDSHIRE AND VOWH JOINT LOCAL PLAN 2041 – REPRESENTATIONS ON BEHALF OF A2DOMINION**

We write on behalf of our client, A2Dominion in response to the consultation on the Joint Local Plan 2041 which has been published for consultation.

The Councils are also consulting on the following documents alongside the Joint Local Plan Issues consultation:

- Sustainability Appraisal (SA) Screening and Scoping Report (May 2022)
- Habitats Regulations Assessment (HRA) Scoping Report (May 2022)
- Draft Settlement Assessment Methodology (May 2022)
- Duty to Cooperate Scoping Document (May 2022).

At this stage we note that the Joint Local Plan consultation document does not include any specific policies and the evidence base is largely concerned with methodological matters. As such, A2Dominion reserves the opportunity to submit more a detailed commentary on such matters in due course as the policy context and supporting evidence evolves.

A2Dominion is a residential property group and award-winning housing developer. They pursue their business with a social purpose, reinvesting profits from private sales into building new affordable homes, managing existing homes and supporting local communities. They deliver on all tenures on their development sites, retaining a long term interest via the ownership and management the affordable housing and open areas.

A2Dominion's vision is to improve people's lives through high-quality homes and services. A2Dominion has over 38,000 homes across London and southern England and are committed to developing new homes that are genuinely sustainable.

The Pinnacle  
20 Tudor Road  
Reading  
RG1 1NH

T 0118 902 2830 [turley.co.uk](http://turley.co.uk)

A2Dominion have led the development of a new flagship eco town at North West Bicester; a pioneering project backed by environmental integrity and a long-term vision for the area.

A2 Dominion is promoting a number of sites across South Oxfordshire and the Vale of White Horse. The purpose of these representations is not specifically to promote those sites (as they have been promoted through other means, such as the call for sites), but A2Dominion does reserve the opportunity to promote such sites through more detailed representations as the Joint Local Plan progresses. In particular, A2Dominion are promoting:

- Land east of Sandringham Road, Didcot as a sustainable extension of the Didcot Garden Town in a location which is highly accessible to the town centre and public transport;
- Land south of B4044, Farmoor;
- Land at Rowstock; and
- Land south of the A4130, Brightwell-cum-Sotwell.

The range of sites promoted by A2Dominion reflects the diverse nature of the area covered by the Joint Local Plan. For example, SODC, the VoWHDC, Oxfordshire County Council (OCC) and the Oxfordshire Local Enterprise Partnership (OxLEP) submitted an expression of interest (EoI) in relation to the potential designation of Didcot as a Garden Town. Page 11 of the EoI explained that “As part of the Garden Town we will build over 15,000 new homes in Greater Didcot by 2031. In A2Dominion’s submission, the designation of Didcot as a Garden Town, and the significant levels of infrastructure funding which has been made available, reflects its economic significance in this part of Oxfordshire and in Science Vale and it should rightly form a focus as part of the Joint Local Plan. On the other hand, A2Dominion is promoting land at settlements such as Farmoor and Brightwell-cum-Sotwell and in locations such as these, development is often critical to ensuring the vitality of settlements, the viability of local services and facilities and to providing affordable housing.

## **REPRESENTATIONS**

The following section sets out representations on the current consultation on behalf of A2Dominion. These representations are structured to respond to specific documents, and in relation to the draft Issues Document, to the numbered sections.

As an overarching comment we would note the need for flexibility in the plan making process to allow the Joint Local Plan to respond to the wider planning context, including the Oxfordshire Plan and Oxford to Cambridge Arc Spatial Framework (if pursued), the Oxfordshire Plan 2050, as well as wider changes to the planning system. Whilst this wider context may require the Joint Local Plan process to evolve, we support the proactive approach of the Districts in commencing this work at this time which we consider to be a positive reflection of the benefits of having an up-to-date Plan in place.

## **Draft Issues Document**

### ***Section 3. How things are right now***

A2Dominion note main issues identified under heading 3. However, given the nature of Plan-making in Oxfordshire, it is essential that the Joint Local Plan is prepared in such a way that it positively responds to the needs of the area, including those identified in the Oxfordshire Housing and Growth Deal (in return for which the LPAs have received a significant amount of infrastructure and affordable housing funding) to 2031 and those to be set out in the Oxfordshire Plan 2050. A2Dominion will separately be making representations to the Oxfordshire Plan 2050 which support the principle of supporting housing and economic growth throughout Oxfordshire.

Properly addressing those needs will not be achievable within existing towns and villages and whilst A2Dominion note the heading in this section to 'Protecting the countryside', this must be in the context of a Plan which seeks to positively accommodate housing and economic needs to 2041, especially given the other identified matters such as addressing affordability.

A2Dominion also note that Section 3 is said to "set the scene around the main issues that a Local Plan might be able to influence". The delivery of housing is conspicuous by its absence from the topics mentioned in Section 3. At this point we note that each of the Oxfordshire Councils remains a party to the Oxfordshire Housing & Growth Deal and thus the commitment to deliver 100,000 homes to 2031 in return for significant levels of infrastructure funding and planning flexibilities. Notwithstanding the planning context beyond that point, it remains essential that this emerging Joint Local Plan is prepared in such a way as those commitments are achieved.

#### ***Section 4. Our Vision / Section 5. Themes***

Whilst A2Dominion has no objection to the emerging plan seeking to reduce carbon emissions, as this is in line with the approach in national policy any future policy will need to acknowledge that technical specifications are best dealt with through Building Regulations and the implications on delivering viable new development.

We welcome the fact that the Vision seeks 'A place where people can thrive' and to the recognition that this involves housing choices that people can afford. One key way in which that aspiration can be achieved is through boosting the supply of market housing and affordable housing, including thus addressing the long recognised issues of affordability. A key component of that approach should be to recognise that housing can help to support the vitality of more rural communities by providing access to new housing and supporting local services and facilities

A2Dominion raise no objections in relation to the principle of respecting landscape character. However, any future policy will need to have flexibility built in so that it is not a 'one size fits all' approach that limits development coming forward in sustainable locations or where development could help address local needs and support services and facilities.

#### ***Section 6. Reducing Carbon Emissions***

Whilst A2Dominion has no objection to the emerging plan seeking to reduce carbon emissions, as this is in line with the approach in national policy any future policy will need to acknowledge that technical specifications are best dealt with through Building Regulations and the implications on delivering viable new development.

#### ***Section 7. Nature Recovery and Landscape***

A2Dominion objection to the comment this Plan should 'minimise the use of greenfield land'. It is clear (from the adopted Local Plans in the two Districts) that development needs and housing targets cannot be addressed properly without the use of greenfield sites. In A2Dominion's submission, the Joint Local Plan should be prepared on the basis that sites in such locations will be required from the outset and that the District Council's should recognise this position. The task is to ensure that the sites which are then selected are considered on the basis of a broad range of relevant factors.

We support the principle of seeking biodiversity net gain in principle, subject to detailed policy wording which takes account of relevant factors such as the nature of individual sites and the measures proposed as part of specific schemes which deliver ecological enhancements. The selected approach should be in line with legislation, national policy and supported by evidence.

#### ***Section 8. Protecting and Enhancing Local Heritage***

We have no objection in principle with the broad opportunities identified. However, any future policy will need to have flexibility built in so that it is not a 'one size fits all' approach that limits development coming forward in sustainable locations or where development could help address local needs and support services and facilities.

## **Section 9. Thriving Inclusive Communities**

We have no objections to the principle of the opportunities identified. However, any future policy relating to affordable housing needs to be subject to robust viability assessment. This should have regard to all other policy requirements for development and ensure that the total policy 'ask' is clearly assessed as part of a robust viability model to inform the plan.

In addition, we welcome the opportunity which states, "support affordable housing on sites we'd normally protect from development". However the Council should recognise that the opportunity to deliver affordable housing largely arises from schemes which deliver both market and affordable housing.

## **Section 10. Transport and facilities**

Whilst we have no objections to the concept 20-minute neighbourhoods generally, we also note that South Oxfordshire and the Vale of White Horse are large, diverse local authorities. There may well be instances where there are opportunities for sustainable growth, and which support local communities, which do not align with the 20 minute neighbourhood aspiration.

A2Dominion support the opportunity to plan for new infrastructure alongside development, especially in Garden Communities at Didcot. This reflects its role in this part of Oxfordshire and the significant infrastructure which has been made available.

## **Section 11: Healthy lifestyles and safe communities**

Whilst A2Dominion has no objection to the principle of development adapting to Climate Change, as this is in line with the approach in national policy any future policy will need to acknowledge that technical specifications are best dealt with through Building Regulations and the implications on delivering viable new development.

## **Section 12: Jobs and Opportunities for Innovation**

A2Dominion support the approach of seeking to 'plan jobs near homes and homes near jobs'. There may be instances where homes are planned away from jobs (for example to support the vitality of settlements). But locating jobs near homes (and vice versa) in locations such as Didcot, will often ensure that various sustainability objectives are achieved.

In addition, A2Dominion support the objective of "work to support innovation in Science Vale like the fusion work at Culham Science Centre, and space technology and vaccine manufacture at Harwell". Science Vale has long been recognised as a key location for economic growth and we note that the Joint Local Plan consultation document states: "*Science Vale is one of the largest science and technology business clusters in the UK and a hotspot for enterprise and innovation.*"

## **Draft Settlement Assessment Methodology**

We note that the Councils are seeking to undertake a Settlement Assessment resulting in a settlement hierarchy. We note that the methodology for the Settlement Assessment does not seem to involve a review of the settlement boundaries, but instead, is intended to include a scoring of the existing defined settlements. Whilst we are supportive of the principle of the Settlement Assessment as part of the Plan-making process, the Councils should also consider revisions to settlement boundaries to ensure that sufficient levels of development can be delivered.

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As for the scoring methodology for public transport, this provides a score depending on the frequency of bus services, but does not appear to have regard to the quality of destinations of those services.

In our view, further clarity is needed on the scoring system before we can comment on whether it represents an appropriate methodology.

## **SUMMARY**

A2Dominion note that this consultation represents an early stage in the preparation of the Joint Local Plan and welcome the opportunity to engage with the Councils further as it progresses.

We would be grateful for confirmation that these representations have been received.

Yours sincerely

David Murray-Cox  
**Director**



# Response 212

## Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. i) Are you responding as:

A town/parish council

[REDACTED]

I

## A little bit about you (continued...)

[REDACTED]

[REDACTED]

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[REDACTED]	I
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	I
[REDACTED]	I
<b>Business or organisation you're representing (if relevant)</b>	Ashbury Parish Council
[REDACTED]	[REDACTED]

Q6. Please select which documents you wish to comment on:

Local Plan Issues Consultation

Sustainability Appraisal (SA) Screening and Scoping Report

Draft Settlement Assessment Methodology

Duty to Cooperate Scoping Document

Q39. 32. Finally, do you have any other comments?

To Planning and Policy Team Vale of White Horse District Council

Please find attached our response to the current Joint Plan 2041 Consultation - Vision and Themes and other documents included for consultation

We are sending our response in a collated comments form in this way for 2 reasons:

- 1. The survey provided does not allow for a document of comments as responses to be inserted
- 2. The survey response with instructions to make choices against questions you have generated does not allow for an overall position to be expressed

There are questions we raise about the processes being used in this plan review and development for 2041, which we hope will and would expect to lead to an informational response from those Senior level members at Vale – not only to us, but to all Neighbourhood Plan Groups and Parish Councils involved in this consultation and or those that will be affected by the new plan in the time between now and any adoption.

We will gladly continue to be involved in a consultation process for the development of this Joint plan where clarity and context of the situation is part of the brief to do so.

[Redacted]

- [Redacted]

### Sustainability Appraisal (SA) Screening and Scoping Report

Q41. If you have any comments on the Sustainability Appraisal Document, please provide them below.

This paper and contents will also likely need revising to align with the requirements of the National Bill. We would suggest the following are considered during finalisation of the Sustainability Objectives (SO) for policy appraisal:

- a. SO 5: To protect, and where possible, enhance the status of designated assets, including SACs and SSSIs.
    - i. Consideration should be given to the value of National Nature Reserves (NNRs) within this objective and within the scoping report (including the environmental baseline)
  - b. SO7: To ensure new developments are resilient and adaptable (where appropriate) to the effects of climate change, and that proposals do not weaken existing communities' and businesses' resilience to climate change.
    - i. useful to add the above words in italics to ensure that certain types of new developments are constructed in a manner that can be modified in the future (e.g. to accommodate increased flood risk etc in 50 years' time etc)
  - c. SO19: To reduce the risk of, and damage from flooding to properties and key infrastructure, and to improve resistance and resilience to flooding from all sources.
    - i. As increased flooding can be beneficial to biodiversity, it might be helpful to be more specific – suggested wording in italics
  - d. It would be useful to include a SO that considers the re-use of brownfield sites and provides greater protection to greenfield land. This would also then tie in with the LPAs statement in the scoping report relating to developing policies to reduce flood risk
- In this document there is much data and evidence that would be important for the plan development team to be seen to be using for decision making. For example, the availability of Agricultural land is laid out and graded for value in food production. As the need for land to be used for food production is now being valued and more protected, it will be important that land use for agriculture is used as a limit to growth and build in many of our settlements in Vale and South.

### Draft Settlement Assessment Methodology

Q49. If you have any other comments on the Draft Settlement Assessment Methodology, please provide them below.

Details and mapping of settlements is important to provide for a range of vitally important content/data/evidence to inform ongoing and future build and any spatial strategy. Adopted Neighbourhood plans provide much of this data already. The contents of which need to be used to populate (at last) details of settlements and how such is used to inform any build possibilities and restrictions to build.

At 1.2 the term 'such as' is used to name a few of the areas of data that will be collected and recorded. The list is very restrictive and Neighbourhood Plans depict/describe/lay out the settlements in their parish boundary with a wider range of information. Such information has been used to inform the plan of where and under what circumstances build will be agreed in their settlement areas. We request and recommend that this draft methodology is revised to include how

1. Neighbourhood plan material will be used to populate settlement details
2. To provide a more thorough and complete list of data to be used to populate each settlement and that this needs to connect with data you already have for say AONB, conservation areas and much more. This so that a more complete depiction is provided for settlements.

## Duty to Cooperate Scoping Document

Q53. If you have any other comments on the Duty to Cooperate Scoping document, please provide them below.

Much of the content of this paper, which provide details of the current 'duty to cooperate' agreements across the Oxfordshire District and City Councils and with those external to Oxfordshire will need reviewing, revising or changing to align with the National Bill. The Bill removes the 'duty to cooperate' especially in those circumstances where in a County, councils have previously agreed via a 'duty to cooperate' agreement to house build numbers. In such circumstances District councils have an agreement to pick up for their District local plan housing numbers where another part of that County is not able to meet their set target. This has been so in Oxfordshire, so the process for setting house build numbers for the local plan will need reviewing.

If you are ready to submit your comments, please tick the box below, then select the 'Finish and submit' button. Note: once ticked you will not be able to return to your comments and they will be submitted. If not, please use the 'previous page' button to go back through the survey to amend or review your response. Alternatively you can use the 'save and continue later' so that you can save your progress, and return later to your comments. Simply provide your name and email address and you will automatically receive a link via email to return to your draft comments when you are ready.

Yes, I have finished and am ready to submit

## **Introduction and context**

The following is the response from Ashbury Neighbourhood Plan Group, (NPG) Ashbury Parish Council (APC) to the Joint Local Plan 2041 Consultation 2022. The request to us is to focus, at this point, on Vision and Themes. This includes providing comments for all the supplementary papers listed for this consultation.

We very much support the move towards a zero-carbon state for our built environment and its supporting infrastructure. We would expect this to be addressed and achieved in the context of policy alignment at all levels.

We are disappointed that neither attention to, nor mention of or implications for this Joint Local plan, this consultation and how the Local plan process proceeds, is made in the context of the Levelling up and Regeneration Bill, released in May 2022.

We understand that a review of the current VWHDC Local Plan is required as part of the usual 5 year review process, but this Joint Local Plan is for moving towards 2041. While the content forwarded to us has taken account of, where needed, NPPF21, the content of this planning framework will require amendments and additions given the contents of the Bill. Equally there are likely impacts of the Bill on the current arrangements in place across the County of Oxfordshire for how build numbers are set and or agreed.

There is nothing in the accompanying Joint Plan Governance arrangements nor in the Duty to Cooperate papers, developed as part of this consultation, that provide any direction, process or plan of action for how changes will be made at any point during the consultation process. Either for during the process of producing an updated Local plan or once reaching adoption of the Local Plan (adoption projected for 2024).

Such information will be needed in the context of the changes that will be required as a consequence of this Bill (however amended or delayed this Bill becomes). There are 3 sections of the Bill (sections 3, 4 and 5) that specifically deal with changes to planning as well as that identified in the rest of the Bill content.

Until the position, context, content and process to proceed under changing circumstances for the Joint Plan 2041 because of the Bill is made clear by VWHDC and SODC via your Chief Executives and Cabinet members, we are not able to provide the necessary answers to the consultation survey questions or comments against these questions. Both vision and themes will require adjustments, as will what happens to how these are shaped into planning for build policies.

We therefore use this response to make a request for clarity of the current situation and the implications for the progression of the development of this Joint plan 2041.

We need at this point, at the very least, for statements to be made known to us all involved in the consultation, of the flux state for planning, particularly the process for generating numbers for and delivery of house build, (that will be fit for meeting sustainability, purpose, setting, population, location and all the associated factors and elements that are part of this territory).

At this point then, we provide comments on the Governance, Duty to Cooperate papers, the Sustainability Appraisal Screening and Scoping report, draft settlement assessment

methodology and comments on the process so far for the current generation of the vision and themes.

## Comments

Our key overarching comment confirms that this joint local plan process has not been set against or in recognition of the national context and changing circumstances, in particular the publication of the Levelling Up and Regeneration Bill made available in May 2022, having progressed through its second reading and now awaiting dates for the Committee stage in the House of Commons.

## Specific comments/ and or questions

### 1. Joint Local Plan Governance Arrangements 10 May 2022

**Extract: Introduction** *'The two councils are working on a Joint Local Plan. The Joint Local Plan covers the following Local Planning Authority areas: • South Oxfordshire • Vale of White Horse. Once adopted the Joint Local Plan will be a statutory planning document, forming an important part of the development plan for decision-making on development proposals -----'.*

Will this be so? If the process continues as laid out, it is unlikely in this early plan development period, with what has been produced so far for the consultation, that the content will meet the requirements set out in the National Bill, sections 3, 4 and 5. These propose significant changes to how planning take place

'It will contain site allocations, as well as both strategic and non-strategic planning policies ----'.

How these will be set and agreed is unclear at this point in time, so a statement is required that allows for how changing requirements for setting and agreeing build numbers will be made.

**Context** 'The Joint Local Plan is being prepared in the context of another joint plan the councils are working on with the other Oxfordshire districts and Oxford City Council, the Oxfordshire Plan 2050, which will contain the strategic planning framework for Oxfordshire. The government's Ox-Cam Arc Spatial Framework covers a wider geography and will provide a policy framework for both the Oxfordshire Plan and the Joint Local Plan. The Joint Local Plan will cover the period to 2041, shorter than the 30-year time horizon for the Oxfordshire Plan, which runs to 2050, and the Ox-Cam Arc Spatial Framework which will plan for 2050 and beyond. Joint Plan Decision  
The decision to progress a Joint Local Plan was taken by full Council for Vale of White Horse on 24 March 2021 and South Oxfordshire on 25 March 2021. At these meetings, the Joint Local Development Scheme was also agreed, containing the timetable for the preparation of the plan.'

No other context is mentioned, and therefore no governance arrangements have been included to allow for management of those impending changes because of the Bill, to any current context and way of working in or across Oxfordshire. Nor how the Local Plan will be altered once adopted should the passage of the Bill be delayed to 2024.

### 2. Duty to Co-operate scoping paper

Much of the content of this paper, which provide details of the current 'duty to cooperate' agreements across the Oxfordshire District and City Councils and with those external to Oxfordshire will need reviewing, revising or changing to align with the Bill.

The Bill removes the ‘duty to cooperate’ especially in those circumstances where in a County, councils have previously agreed via a ‘duty to cooperate’ agreement to house build numbers. In such circumstances District councils have an agreement to pick up for their District local plan housing numbers where another part of that County is not able to meet their set target. This has been so in Oxfordshire, so the process for setting house build numbers for the local plan will need reviewing.

### 3. The Sustainability Appraisal Screening and Scoping Report

This paper and contents will also likely need revising to align with the requirements of the Bill. We would suggest the following are considered during finalisation of the Sustainability Objectives (SO) for policy appraisal:

- a. SO 5: To protect, and where possible, enhance the status of designated assets, including SACs and SSSIs.
  - i. Consideration should be given to the value of National Nature Reserves (NNRs) within this objective and within the scoping report (including the environmental baseline)
- b. SO7: To ensure new developments are resilient *and adaptable (where appropriate)* to the effects of climate change, and that proposals do not weaken existing communities’ and businesses’ resilience to climate change.
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- d. It would be useful to include a SO that considers the re-use of brownfield sites and provides greater protection to greenfield land. This would also then tie in with the LPAs statement in the scoping report relating to developing policies to reduce flood risk

In this document there is much data and evidence that would be important for the plan development team to be seen to be using for decision making. For example, the availability of Agricultural land is laid out and graded for value in food production.

As the need for land to be used for food production is now being valued and more protected, it will be important that land use for agriculture is used as a limit to growth and build in many of our settlements in Vale and South.

### 4. Draft settlement assessment methodology

Details and mapping of settlements is important to provide for a range of vitally important content/data/evidence to inform ongoing and future build and any spatial strategy. Adopted Neighbourhood plans provide much of this data already. The contents of which need to be used to populate (at last) details of settlements and how such is used to inform any build possibilities and restrictions to build.

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We request and recommend that this draft methodology is revised to include how

1. Neighbourhood plan material will be used to populate settlement details
2. To provide a more thorough and complete list of data to be used to populate each settlement and that this needs to connect with data you already have for say AONB, conservation areas and much more. This so that a more complete depiction is provided for settlements.

### **1. Vision and themes**

Details are required for how the VWHDC will be meeting its zero-carbon target by 2030. We have not heard of any details of how VWHDC have been working with developers or any builder to make changes to the build materials and construction methods they use between now and 2030 which will produce a reduced carbon footprint.

### **2. Process for developing the vision and themes**

It is usual in the iterative process of developing vision and themes for a ‘where now, in this consultation document ‘right now’ process to take place. Such a review is usual to take place using the vision and themes as the criteria to review against – so that progress towards these is shown and a facility for the gaps in ‘right now’ to be identified.

It is then usual for ‘gap work’ to be mapped out and data and evidence collected, as on analysis this data evidence may alter the vision and themes going forward.

In this consultation document ‘right now’ for the process and the content provided, it is unclear how these review headings were chosen. They are different to the themes that support the vision. Some, probably many areas for review have been excluded by such a method – such as right now, do we have new developments and building fit for purpose? And does our house build meet the health and wellbeing needs of our population?

For example: Fit for Purpose would include our population demographics and whether there has been any or sufficient flexible build to meet the needs of an increasing ageing population, where wellbeing and health in everyday living is affected by the flexibility in that build for the following reasons: to have a stair lift installed, for widened door ways to allow wheelchair access, for showers to have room and facility for hoists and chair lifts to be installed and or for such to be installed on ground levels.

Equally purposes are part of what is the quality of our build? and what of the sustainability criteria? does it meet.

There is then a section in the consultation document that is ‘evidence gathering’ pages 72, 73. This section needs aligning to content in ‘right now’ so that the evidence gathering list is connected to a review against the vision and themes and addresses the identified gaps.

Once collected the analysis usually impacts the themes developed earlier. The themes are usually revised before releasing vision and themes for consultation.

The current and projected population until 2030 is illustrated. However, this plan consultation is for 2041. It is quite possible for data modelling to be used to project beyond 2030 even if revised frequently – as such projections will be needed to be part of how build numbers and types of dwellings are agreed beyond the current local plan agreements.

**In summary**

We request information that positions this consultation and process in the current context with the publication of the Levelling Up and Regeneration Bill. We understand the current situation for planning will be affected by the current context.

We have provided comments aligned to such a requirement for the range of documents provided for this consultation and await further information re content and process for this Joint plan 2041.

# Response 213

## Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. i) Are you responding as:

An agent, developer or landowner

[REDACTED]

[REDACTED]

## A little bit about you (continued...)

[REDACTED]

[REDACTED]

Q4. For further information about how we use your data below, please refer to our privacy policy, which also explains how to exercise your rights over your personal data. If relevant, please provide the details of the organisation, business or council you're representing. If relevant, please also give the details of the client your business is representing (EG if you're a planning agent responding on behalf of another organisation).

[REDACTED]	[REDACTED]
<b>First name</b>	David
<b>Last name</b>	Murray-Cox
[REDACTED]	[REDACTED]
<b>Your business or organisation (if relevant)</b>	-
<b>Business or organisation you're representing (if relevant)</b>	Rainier Development Ltd
[REDACTED]	[REDACTED]

Q6. Please select which documents you wish to comment on:

Local Plan Issues Consultation

Draft Settlement Assessment Methodology

Q39. 32. Finally, do you have any other comments?

Please see attachment

[REDACTED]

- [REDACTED]

## Draft Settlement Assessment Methodology

Q47. Looking at the proposed scoring identified in tables 1 to 6 do you consider that the scoring reflects the weight/importance of each service or facility?

**If you have any comments on the scoring, please provide them below:**

In relation to the scoring methodology, we note that the proposed approach is not clear. For example, there is no guidance as to what the scores are out of (i.e. a settlement with a primary school will be given a score of 2 per facility but it is not clear what the maximum scoring could be). Furthermore, table 1 of the methodology gives different scores to different services and facilities (for example a primary school is scored 2 (per facility), but a playground is scored 1 (per facility). That suggests a value judgement that two playgrounds are equivalent to one primary school. As for the scoring methodology for public transport, this provides a score depending on the frequency of bus services, but does not appear to have regard to the quality of destinations of those services. In our view, further clarity is needed on the scoring system before we can comment on whether it represents an appropriate methodology

Q49. If you have any other comments on the Draft Settlement Assessment Methodology, please provide them below.

We note that the Councils are seeking to undertake a Settlement Assessment resulting in a settlement hierarchy. We note that the methodology for the Settlement Assessment does not seem to involve a review of the settlement boundaries, but instead, is intended to include a scoring of the existing defined settlements. Whilst we are supportive of the principle of the Settlement Assessment as part of the Plan-making process, the Councils should also consider revisions to settlement boundaries to ensure that sufficient levels of development can be delivered.

If you are ready to submit your comments, please tick the box below, then select the 'Finish and submit' button. Note: once ticked you will not be able to return to your comments and they will be submitted. If not, please use the 'previous page' button to go back through the survey to amend or review your response. Alternatively you can use the 'save and continue later' so that you can save your progress, and return later to your comments. Simply provide your name and email address and you will automatically receive a link via email to return to your draft comments when you are ready.

Yes, I have finished and am ready to submit

23 June 2022

Delivered by email (haveyoursay@southandvale.gov.uk)

Planning Policy  
South Oxfordshire and Vale of White Horse District Councils  
135 Eastern Avenue  
Milton Park  
Abingdon  
OX14 4SB

Ref: RAIS3003

Dear Sir / Madam

## **SOUTH OXFORDSHIRE AND VOWH JOINT LOCAL PLAN 2041 – REPRESENTATIONS ON BEHALF OF RAINIER DEVELOPMENTS LTD**

We write on behalf of our client, Rainier Developments Ltd ('Rainier') in response to the consultation on the Joint Local Plan 2041 which has been published for consultation.

The Councils are also consulting on the following documents alongside the Joint Local Plan Issues consultation:

- Sustainability Appraisal (SA) Screening and Scoping Report (May 2022)
- Habitats Regulations Assessment (HRA) Scoping Report (May 2022)
- Draft Settlement Assessment Methodology (May 2022)
- Duty to Cooperate Scoping Document (May 2022).

At this stage we note that the Joint Local Plan consultation document does not include any specific policies and the evidence base is largely concerned with methodological matters. As such, Rainier reserve the opportunity to submit more a detailed commentary on such matters in due course as the policy context and supporting evidence evolves.

### **INTRODUCTION**

Rainier has promoted land off Watlington Road, Lewknor for a residential development of development for up to 30 new homes and circa 1 hectare of public open space. The site is 2.12 hectares in size and is currently used for equestrian purposes. Most recently to the 'Call for Land and Buildings Available for Change' in September 2021.

The Site is a relatively small parcel of land (2.12 hectares) and because of its location, size and irregular shape, for over 10 years it has not formed part of a functional farm business and is instead rented out for equestrian purposes.

The Pinnacle  
20 Tudor Road  
Reading  
RG1 1NH

T 0118 902 2830 turley.co.uk

The Strategic Housing and Economic Land Availability Assessment (SHELAA) dated October 2017, referenced the Site at 1020 - land south of Watlington Road, Lewknor. The Council's proforma included as part of the SHELAA assessed the Site as being suitable, available and achievable for housing with a possible yield of 48 dwellings.

There are no technical constraints that would prevent or delay delivery of this Site. The Site is deliverable.

The Site was subject to a previous Outline Planning Application LPA ref: P17/S37110/O for up to 40 homes. The Outline Planning Application was supported by a full suite of technical reports which confirm there are no technical matters that would constrain delivery of new homes on the Site. A copy of these reports can be provided upon request.

The Outline Planning Application did not include any objection from the following statutory consultees:

- Archaeological Services
- Conservation Officer
- Countryside Officer
- Drainage Engineer
- Forestry Officer
- Health and Housing – Environmental Protection (noise)
- Health and Housing – Air quality
- Highways and Transport (OCC)
- Housing Development
- Urban Design Officer

Despite 2 objections to the application (Chilterns AONB Conservation Board and the Landscape Consultant on behalf of SODC), regarding the impact of the development landscape and effects on the AONB, Officers recommended the Outline Planning Application for approval. The application was however refused by South Oxfordshire District Council Planning Committee and the subsequent appeal, reference APP/Q3115/W/18/3200335, was dismissed.

Notwithstanding the outcome of the appeal for up to 40 homes, the following matters from the Appeal Decision should be noted:

- There would be no harm to the AONB from the appeal scheme (paragraph 38).
- The Site does not form part of a valued landscape (paragraphs 40 and 42).
- The Site is a satisfactory location for housing in terms of access to shops and services other than by means of private car (paragraphs 57 and 58).

The Inspector's main concern regarding the appeal scheme focused on the part of that proposal located on the higher part of the Site and the associated visibility of homes located on this higher ground when viewed from the west along the B4009.

The development now being promoted, for up to 30 dwellings, would be positioned on the lower part of the Site to north and east comprising a reduced developable area compared to the appeal scheme. This would directly address the concern raised by the Inspector in the Appeal Decision for up to 40 dwellings by excluding any built development located on the higher part of the Site. Accordingly, the proposals would not be visible when viewed from the west along the B4009.

The balance of the site, circa 1 hectare, would provide a significant area of open space alongside new structural landscape planting to the south and west. This area of open space could incorporate a children play area and a community orchard as well as delivering a biodiversity net gain of at least 10%.

Such an allocation would provide a logical extension to Lewknor, delivering new housing (including affordable housing) and would support the continued vitality of the village whilst safeguarding a significant part of the Site for publicly accessible open space.

## **REPRESENTATIONS**

The following section sets out representations on the current consultation on behalf of Rainier. These representations are structured to respond to specific documents, and in relation to the draft Issues Document, to the numbered sections.

As an overarching comment we would note the need for flexibility in the plan making process to allow the Joint Local Plan to respond to the wider planning context, including the Oxfordshire Plan and Oxford to Cambridge Arc Spatial Framework (if pursued), the Oxfordshire Plan 2050, as well as wider changes to the planning system. Whilst this wider context may require the Joint Local Plan process to evolve, we support the proactive approach of the Districts in commencing this work at this time which we consider to be a positive reflection of the benefits of having an up-to-date Plan in place.

### **Draft Issues Document**

#### ***Section 3. How things are right now***

Rainier note main issues identified under heading 3. However, given the nature of Plan-making in Oxfordshire, it is essential that the Joint Local Plan is prepared in such a way that it positively responds to the needs of the area, including those identified in the Oxfordshire Housing and Growth Deal (in return for which the LPAs have received a significant amount of infrastructure and affordable housing funding) to 2031 and those to be set out in the Oxfordshire Plan 2050. Rainier will separately be making representations to the Oxfordshire Plan 2050 which support the principle of supporting housing and economic growth throughout Oxfordshire.

Properly addressing those needs will not be achievable within existing towns and villages and whilst Rainier note the heading in this section to 'Protecting the countryside', this must be in the context of a Plan which seeks to positively accommodate housing and economic needs to 2041, especially given the other identified matters such as addressing affordability.

Rainier also note that Section 3 is said to "set the scene around the main issues that a Local Plan might be able to influence". The delivery of housing is conspicuous by its absence from the topics mentioned in Section 3. At this point we note that each of the Oxfordshire Councils remains a party to the Oxfordshire Housing & Growth Deal and thus the commitment to deliver 100,000 homes to 2031 in return for significant levels of infrastructure funding and planning flexibilities. Notwithstanding the planning context beyond that point, it remains essential that this emerging Joint Local Plan is prepared in such a way as those commitments are achieved.

## ***Section 4. Our Vision / Section 5. Themes***

Whilst Rainier has no objection to the emerging plan seeking to reduce carbon emissions, as this is in line with the approach in national policy any future policy will need to acknowledge that technical specifications are best dealt with through Building Regulations and the implications on delivering viable new development.

We welcome the fact that the Vision seeks 'A place where people can thrive' and to the recognition that this involves housing choices that people can afford. One key way in which that aspiration can be achieved is through boosting the supply of market housing and affordable housing, including thus addressing the long recognised issues of affordability. A key component of that approach should be to recognise that housing can help to support the vitality of more rural communities by providing access to new housing and supporting local services and facilities

Rainier raise no objections in relation to the principle of respecting landscape character. However, any future policy will need to have flexibility built in so that it is not a 'one size fits all' approach that limits development coming forward in sustainable locations or where development could help address local needs and support services and facilities.

## ***Section 6. Reducing Carbon Emissions***

Whilst Rainier has no objection to the emerging plan seeking to reduce carbon emissions, as this is in line with the approach in national policy any future policy will need to acknowledge that technical specifications are best dealt with through Building Regulations and the implications on delivering viable new development.

## ***Section 7. Nature Recovery and Landscape***

Rainier objection to the comment this Plan should 'minimise the use of greenfield land'. It is clear (from the adopted Local Plans in the two Districts) that development needs and housing targets cannot be addressed properly without the use of greenfield sites. In Rainier's submission, the Joint Local Plan should be prepared on the basis that sites in such locations will be required from the outset and that the District Council's should recognise this position. The task is to ensure that the sites which are then selected are considered on the basis of a broad range of relevant factors.

We support the principle of seeking biodiversity net gain in principle, subject to detailed policy wording which takes account of relevant factors such as the nature of individual sites and the measures proposed as part of specific schemes which deliver ecological enhancements. The selected approach should be in line with legislation, national policy and supported by evidence.

## ***Section 8. Protecting and Enhancing Local Heritage***

We have no objection in principle with the broad opportunities identified. However, any future policy will need to have flexibility built in so that it is not a 'one size fits all' approach that limits development coming forward in sustainable locations or where development could help address local needs and support services and facilities.

## ***Section 9. Thriving Inclusive Communities***

We have no objections to the principle of the opportunities identified. However, any future policy relating to affordable housing needs to be subject to robust viability assessment. This should have regard to all other policy requirements for development and ensure that the total policy 'ask' is clearly assessed as part of a robust viability model to inform the plan.

In addition, we welcome the opportunity which states, "support affordable housing on sites we'd normally protect from development". However the Council should recognise that the opportunity to deliver affordable housing largely arises from schemes which deliver both market and affordable housing.

## ***Section 10. Transport and facilities***

Whilst we have no objections to the concept 20-minute neighbourhoods generally, we also note that South Oxfordshire and the Vale of White Horse are large, diverse local authorities. There may well be instances where

there are opportunities for sustainable growth, and which support local communities, which do not align with the 20 minute neighbourhood aspiration.

### **Section 11: Healthy lifestyles and safe communities**

Whilst Rainier has no objection to the principle of development adapting to Climate Change, as this is in line with the approach in national policy any future policy will need to acknowledge that technical specifications are best dealt with through Building Regulations and the implications on delivering viable new development.

### **Draft Settlement Assessment Methodology**

We note that the Councils are seeking to undertake a Settlement Assessment resulting in a settlement hierarchy. We note that the methodology for the Settlement Assessment does not seem to involve a review of the settlement boundaries, but instead, is intended to include a scoring of the existing defined settlements. Whilst we are supportive of the principle of the Settlement Assessment as part of the Plan-making process, the Councils should also consider revisions to settlement boundaries to ensure that sufficient levels of development can be delivered.

In relation to the scoring methodology, we note that the proposed approach is not clear. For example, there is no guidance as to what the scores are out of (i.e. a settlement with a primary school will be given a score of 2 per facility but it is not clear what the maximum scoring could be). Furthermore, table 1 of the methodology gives different scores to different services and facilities (for example a primary school is scored 2 (per facility), but a playground is scored 1 (per facility). That suggests a value judgement that two playgrounds are equivalent to one primary school.

As for the scoring methodology for public transport, this provides a score depending on the frequency of bus services, but does not appear to have regard to the quality of destinations of those services.

In our view, further clarity is needed on the scoring system before we can comment on whether it represents an appropriate methodology.

### **SUMMARY**

Rainier note that this consultation represents an early stage in the preparation of the Joint Local Plan and welcome the opportunity to engage with the Councils further as it progresses. Rainier would be happy to engage with Officers to discuss the role that this site could play in context of the emerging Local Plan.

We would be grateful for confirmation that these representations have been received.

Yours sincerely

David Murray-Cox  
**Director**

████████████████████

# Response 214

## Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. i) Are you responding as:

Another planning authority

[REDACTED]

[REDACTED]

## A little bit about you (continued...)

[REDACTED]

[REDACTED]

Q4. For further information about how we use your data below, please refer to our privacy policy, which also explains how to exercise your rights over your personal data. If relevant, please provide the details of the organisation, business or council you're representing. If relevant, please also give the details of the client your business is representing (EG if you're a planning agent responding on behalf of another organisation).

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
<b>Business or organisation you're representing (if relevant)</b>	Buckinghamshire Council Planning Policy
[REDACTED]	[REDACTED]

Q6. Please select which documents you wish to comment on:

Local Plan Issues Consultation

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Habitats Regulations Assessment (HRA) Scoping Report

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Duty to Cooperate Scoping Document

Q39. 32. Finally, do you have any other comments?

Dear Policy and Programmes team,

Thank you for the opportunity to comment on your joint local plan. Please see attached our response to your consultation.

On a side note and for your consideration, it is likely we would comment further when the New Joint Local Plan moves onto spatial distribution of growth options and sites, as there are a number of settlements in the South Oxfordshire area in close proximity with the county boundary with Buckinghamshire. We would consider it useful to have a Duty to Co-operate meeting between officers of each council before the New Joint Local Plan reaches the next formal stage and we can also share where the Local Plan For Buckinghamshire has reached at that time. There may also be technical evidence studies informing respective local plans that we can share details of where there are potential cross-boundary issues.

[Redacted]

### Habitats Regulations Assessment (HRA) Scoping Report

Q45. If you have any other comments on the Habitats Regulations Assessment (HRA) Scoping Report, please provide them below.

In appendix B of the HRA scoping report the reference to the VALP HRA for Aylesbury... needs to state that it was done in two stages; 2017 and a report in 2019 and the VALP HRA looked at all SACs within 15km not 10km.

- Wycombe Area had a final HRA report in 2019 including stage 2 Appropriate Assessment your record in Appendix B of South Oxfordshire says 2017.
- On 'Pressures and threats' at Burnham Beeches, the mitigation strategic solution set out in the SPD needs to be mentioned.
- On 'Pressures and threats' at Ashridge Commons and Tring Woodlands SAC - we support that you have covered the recent recreational pressures issue and Footprint Ecology report March 2022.

### Duty to Cooperate Scoping Document

Q52. Do you have any comments on the table regarding which strategic matters we intend to engage neighbouring authorities and prescribed bodies on (see the table starting on page 8 of the Duty to Cooperate Scoping Document)?

On the Duty to Cooperate, we have comments on Table 1:

- On 'Conserving and enhancing our natural and historic environments' in your HRA scoping you highlighted the need to assess relevant SACs within a 20km radius of your boundaries this needs to also be mentioned in your DtC scoping.
- On 'Impact of Housing need' and 'Sufficiency of infrastructure capacity' you mentioned sustainable travel however, highways capacity should be included in the DtC scoping. Specifically, the impacts on the M40 junctions.
- On 'Impact of development in existing and new retail centres...' employment growth and its cross-boundary impact should also be highlighted in your DtC scoping.
- On 'Consideration of unmet needs...' we are still assessing our housing needs, as such we are not yet in a position to know whether Buckinghamshire will be able to respond to unmet needs from elsewhere.

If you are ready to submit your comments, please tick the box below, then select the 'Finish and submit' button. Note: once ticked you will not be able to return to your comments and they will be submitted. If not, please use the 'previous page' button to go back through the survey to amend or review your response. Alternatively you can use the 'save and continue later' so that you can save your progress, and return later to your comments. Simply provide your name and email address and you will automatically receive a link via email to return to your draft comments when you are ready.

Yes, I have finished and am ready to submit



**Directorate for Planning, Growth & Sustainability  
Planning and Environment**

[REDACTED]  
Buckinghamshire Council  
The Gateway  
Gatehouse Road  
Aylesbury  
HP19 8FF

[REDACTED]  
www.buckinghamshire.gov.uk

South Oxfordshire and Vale of White Horse  
District Councils  
South Oxfordshire District Council  
135 Eastern Avenue  
Milton Park, Milton  
OX14 4SB

23 June 2022

Sent by email to: [haveyoursay@southandvale.gov.uk](mailto:haveyoursay@southandvale.gov.uk)

Dear Sir/Madam,

**South Oxfordshire and Vale of White Horse district councils –Opportunity to comment on the New Joint Local plan**

Thank you for your email notifying us of the consultation on the New Joint Local Plan for South Oxfordshire and Vale of White Horse district councils. Buckinghamshire Council (BC) welcomes the opportunity to contribute towards shaping the new Joint Local Plan. We acknowledge the importance of a digitalised and interactive approach to consulting on plan making, therefore, we appreciate the approach set out for engagement in your interactive website.

On the Duty to Cooperate, we have comments on Table 1:

- On 'Conserving and enhancing our natural and historic environments' in your HRA scoping you highlighted the need to assess relevant SACs within a 20km radius of your boundaries this needs to also be mentioned in your DtC scoping.
- On 'Impact of Housing need' and 'Sufficiency of infrastructure capacity' you mentioned sustainable travel however, highways capacity should be included in the DtC scoping. Specifically, the impacts on the M40 junctions.
- On 'Impact of development in existing and new retail centres...' employment growth and its cross-boundary impact should also be highlighted in your DtC scoping.
- On 'Consideration of unmet needs...' we are still assessing our housing needs, as such we are not yet in a position to know whether Buckinghamshire will be able to respond to unmet needs from elsewhere.

On HRA we have the following comments

- In appendix B of the HRA scoping report the reference to the VALP HRA for Aylesbury... needs to state that it was done in two stages; 2017 and a report in 2019 and the VALP HRA looked at all SACs within 15km not 10km.
- Wycombe Area had a final HRA report in 2019 including stage 2 Appropriate Assessment your record in Appendix B of South Oxfordshire says 2017.

- On 'Pressures and threats' at Burnham Beeches, the mitigation strategic solution set out in the SPD needs to be mentioned.
- On 'Pressures and threats' at Ashridge Commons and Tring Woodlands SAC - we support that you have covered the recent recreational pressures issue and Footprint Ecology report March 2022.

Thank you for this opportunity to comment, we look forward to further opportunities to engage with you both on the identified cross boundary issues and others that may present as your joint local plan progresses.

If you have any further queries, please contact the Planning Policy team via the following email address: [planningpolicyteam.bc@buckinghamshire.gov.uk](mailto:planningpolicyteam.bc@buckinghamshire.gov.uk)

Yours sincerely



Planning Policy Officer  
Planning, Growth & Sustainability

# Response 215

## Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. i) Are you responding as:

An individual/member of the public

[REDACTED]

[REDACTED]

## A little bit about you (continued...)

[REDACTED]

[REDACTED]

Q4. For further information about how we use your data below, please refer to our privacy policy, which also explains how to exercise your rights over your personal data. If relevant, please provide the details of the organisation, business or council you're representing. If relevant, please also give the details of the client your business is representing (EG if you're a planning agent responding on behalf of another organisation).

[REDACTED]	[REDACTED]
<b>First name</b>	Tony
<b>Last name</b>	Stead
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q6. Please select which documents you wish to comment on:

Local Plan Issues Consultation

Q39. 32. Finally, do you have any other comments?

It is very frustrating to see mention of re-opening the Cowley branchline to passenger services in the local plan. The Wallingford branchline would be an ideal (and relatively cheap) line to reopen and provide easier access to shops for Cholsey residents and access to the mainline routes for the thousands of Wallingford residents who, pre-Covid, commute from Cholsey or Didcot. I had the support of the local MP (David Johnstone), CEO of GWR (Mark Hopwood) and CEO of Network Rail (Sir Peter Hendy) but not the OCC transport representative (Yvonne Constance at the time). With the changes in leadership in OCC after the local elections I invited the two OCC members with responsibility for transport to a meeting with Sir Peter, Mark and David and myself and NEITHER turned up!

I wonder just how serious our local Councils are about providing public transport and reducing car journeys?

If you are ready to submit your comments, please tick the box below, then select the 'Finish and submit' button. Note: once ticked you will not be able to return to your comments and they will be submitted. If not, please use the 'previous page' button to go back through the survey to amend or review your response. Alternatively you can use the 'save and continue later' so that you can save your progress, and return later to your comments. Simply provide your name and email address and you will automatically receive a link via email to return to your draft comments when you are ready.

Yes, I have finished and am ready to submit

# Response 216

## Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. i) Are you responding as:

An agent, developer or landowner

[REDACTED]

[REDACTED]

## A little bit about you (continued...)

[REDACTED]

[REDACTED]

Q4. For further information about how we use your data below, please refer to our privacy policy, which also explains how to exercise your rights over your personal data. If relevant, please provide the details of the organisation, business or council you're representing. If relevant, please also give the details of the client your business is representing (EG if you're a planning agent responding on behalf of another organisation).

[REDACTED]	[REDACTED]
<b>First name</b>	-
<b>Last name</b>	Joanne
<b>Town/village name</b>	Jones
<b>Your business or organisation (if relevant)</b>	-
<b>Business or organisation you're representing (if relevant)</b>	Hill residential
[REDACTED]	[REDACTED]

Q6. Please select which documents you wish to comment on:

Local Plan Issues Consultation

Q17. 11. If you have any other thoughts on how we could use the Joint Local Plan to protect the natural environment, please write them here.

Fundamental to the principle of sustainable development is maximising the potential of previously developed land in meeting the development needs of the two districts. This is particularly the case given the environmental and landscape constraints which cover the JLP area. Green Belt and AONB designations cover significant parts of the JLC area, with 63% of the land in South Oxfordshire being impacted. These locations should rightly be protected. However, whilst details of the level of local housing need being covered by the JLP have not yet been published, it is highly likely that even with the maximisation of previously developed land, significant greenfield land allocations will be necessary to meet them, as was the case for the current SOLP. Where it is necessary to allocate greenfield land for housing, the potential of sustainable locations on the edge of settlements outside the constraints of the Oxford green belt and Chilterns AONB, should be maximised in order to protect the natural environment. Land to the south of Icknield Way, Chinnor offers the potential to deliver a sustainable development which is unconstrained by green belt and AONB designations, wildlife/conservation designations, and other issues such as flood risk and tree preservation orders.

Q29. 22. If you have any other thoughts on how we could use the Joint Local Plan to ensure people have easy access to the services they need to use on a day-to-day basis, please write them here.

The National Planning Policy Framework (NPPF) confirms at paragraph 8 that the provision of accessible services plays an important part of meeting the social objective – to support strong, vibrant and healthy communities – for achieving sustainable development. It further adds that “To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.” (Paragraph 79)

The current SOLP confirms that Chinnor, as one of the defined ‘Larger Villages’ in South Oxfordshire, has access to a wide range of services and facilities in a sustainable location. Providing for further development, in what is already acknowledged to be a sustainable location, can only serve to enhance and support the existing service provision in Chinnor in meeting the day-to-day needs of existing and future residents of the village.

Q39. 32. Finally, do you have any other comments?

Please see attachments for full response.

[REDACTED]

- [REDACTED]
- [REDACTED]

If you are ready to submit your comments, please tick the box below, then select the 'Finish and submit' button. Note: once ticked you will not be able to return to your comments and they will be submitted. If not, please use the 'previous page' button to go back through the survey to amend or review your response. Alternatively you can use the 'save and continue later' so that you can save your progress, and return later to your comments. Simply provide your name and email address and you will automatically receive a link via email to return to your draft comments when you are ready.

Yes, I have finished and am ready to submit

**South and Vale Consultations**

haveyoursay@southandvale.gov.uk

<By email only>

**Reading**

3rd Floor, Suite 3

Apex Plaza

3 Forbury Road

Reading RG1 1AX

[nexusplanning.co.uk](https://www.nexusplanning.co.uk)

23 June 2022

Our Ref: 36087

Dear Sir/Madam

**Joint Local Plan – Issues Consultation Response  
Land south of Lower Icknield Way, Chinnor**

On behalf of our client, Hill Residential, we provide representations in response to the Joint Local Plan Issues Consultation (JLPIC).

It is appreciated that the JLPIC represents the first stage in the production of the new Joint Local Plan (JLP) and, as such, it is necessarily high level in seeking to ask questions and fully establish the issues impacting the JLP area, rather than propose responses. Site specific matters are therefore not addressed in the JLPIC. Nevertheless, my client seeks to take the opportunity to put forward a site – Land south of Lower Icknield Way, Chinnor – which is considered to be able to contribute to addressing the issues facing the JLP area.

**The Proposed Site – Land south of Icknield Way, Chinnor**

Chinnor is defined in the existing South Oxfordshire Local Plan (SOLP) as a ‘Larger Village’, a village “with a wide range of services and facilities in sustainable locations.” Policy STRAT1 of the SOLP states that proposals for development will support and enhance the roles of the larger villages, including Chinnor. Furthermore, Chinnor is located outside the Chilterns AONB and the Oxford Green Belt. As such, Chinnor has been subject to recent housing developments, but in view of its sustainable location, it is considered that it should be subject to an appropriate level of future development also. Development at sustainable locations in Chinnor- such as that being promoted – can help the Council achieve its vision of making this village to be a place that people can thrive, by bringing forward greater housing choice, encouraging diverse and inclusive places where people of all ages and backgrounds can live together.

Land south of Icknield Way, Chinnor (“the site”) is located adjoining the built form of Chinnor at its eastern extent in a sustainable location that can contribute to the Council’s aspiration to plan for sustainable lifestyles and a “20 minute neighbourhood” where facilities are within walking or cycling distance. On the opposite side of Icknield Way is the new development off Rushland Field. The site is some 3.6ha in size and is currently in agricultural use. Access to the site is off Icknield Way. A site location plan outlining the boundary of the proposed site, is attached as Appendix 1.

The site is already known to both South Oxfordshire District Council and Chinnor Parish Council. The development potential of the site has previously been considered in both the South Oxfordshire Housing and Employment Land Availability Assessment (HELAA), which informed the SOLP, and the Chinnor Neighbourhood Plan (CNP).

The HELAA concluded that the site was suitable for further consideration in the plan-making process as it was free from intrinsic constraints, available and achievable for development. The CNP excluded the site from allocation primarily because it was not considered to have a *“fully safe and secure access to the highway network and is unlikely to be able to provide sustainable transport links”*. However, it does confirm that the site has no constraints albeit it is visible from the AONB.

Like both the HELAA and the CNP, we consider that the site is suitable, available and achievable in delivering sustainable residential development. Work has been undertaken to design a scheme that can evolve and demonstrate how any potential impacts on the setting of the AONB can be appropriately mitigated with a considered design and landscape approach, and that from a highways perspective, acceptable access arrangements can be provided. In sustainable transport and access terms, it is considered comparable to that of the new Rushland Field development on the opposite of Icknield Way.

Supporting surveys and assessments are being undertaken to demonstrate that the site can be acceptably delivered, and it is anticipated that further detail, together with masterplan proposals, can be provided for the next, more detailed stage of the JLP preparation process. Hill Residential would be delighted to meet and present these findings at an appropriate time with officers after the consultation event has closed. We would note that a submission in respect of the site was provided to the Call for Land and Buildings in September 2021. This is attached as Appendix 2 to this representation for ease of reference.

### Response to the Joint Local Plan Issues Consultation (JLPIC)

The content put forward in the consultation document, together with the questions that are being asked are clearly high level at this stage and targeted towards local residents and businesses. As such, we do not propose to respond to the majority of the consultation document. However, we would state the following:

#### Question 11 – How the Joint Local Plan (JLP) can protect the natural environment

Fundamental to the principle of sustainable development is maximising the potential of previously developed land in meeting the development needs of the two districts. This is particularly the case given the environmental and landscape constraints which cover the JLP area. Green Belt and AONB designations cover significant parts of the JLC area, with 63% of the land in South Oxfordshire being impacted. These locations should rightly be protected.

However, whilst details of the level of local housing need being covered by the JLP have not yet been published, it is highly likely that even with the maximisation of previously developed land, significant greenfield land allocations will be necessary to meet them, as was the case for the current SOLP. Where it is necessary to allocate greenfield land for housing, the potential of sustainable locations on the edge of settlements outside the constraints of the Oxford green belt and Chilterns AONB, should be maximised in order to protect the natural environment.

Land to the south of Icknield Way, Chinnor offers the potential to deliver a sustainable development which is unconstrained by green belt and AONB designations, wildlife/conservation designations, and other issues such as flood risk and tree preservation orders.

#### Question 22 – Ensure access to day-to-day services

The National Planning Policy Framework (NPPF) confirms at paragraph 8 that the provision of accessible services plays an important part of meeting the social objective – to support strong, vibrant and healthy communities – for achieving sustainable development. It further adds that *“To promote sustainable development in rural areas, housing should be*

*located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.” (Paragraph 79)*

The current SOLP confirms that Chinnor, as one of the defined ‘Larger Villages’ in South Oxfordshire, has access to a wide range of services and facilities in a sustainable location. Providing for further development, in what is already acknowledged to be a sustainable location, can only serve to enhance and support the existing service provision in Chinnor in meeting the day-today needs of existing and future residents of the village.

Please accept this submission as representations duly made to the JLPIC. We would be grateful for your acknowledgement of this in due course and to be kept informed of the next stages of the Joint Local Plan process. Should you have any queries or require anything further at this stage, please do not hesitate to contact me.

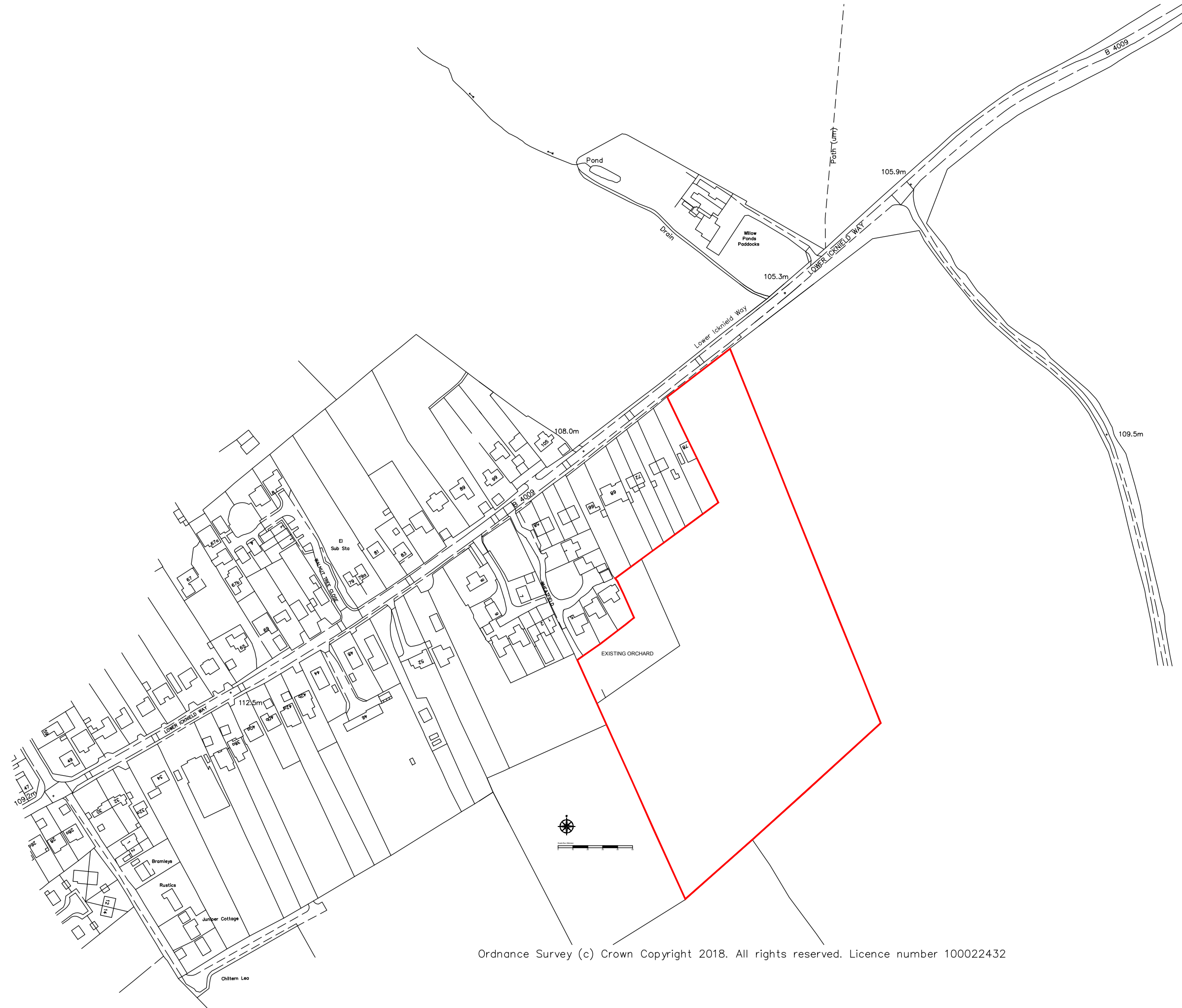
Yours faithfully



**Joanne Jones**  
Associate Director



enc. Appendix 1 – Site Location Plan  
Appendix 2 – Call for Land and Buildings Submission



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Client:  
**Hill Residential Limited**  
 The Courtyard, Abbey Barns,  
 Ickleton, CB101SX

Project:  
**Land off Lower Icknield Way**  
 Chinnor  
 Oxfordshire

Drawing:  
**Site Location Plan**

Scale: 1:2500@A3	Date: May 2018
Drawn By: GS	Checked By: MT
CAD Ref:	Drawing No: Rev. No:

PRELIMINARY

THIS DRAWING IS A COPYRIGHT  
 All dimensions to be checked on site or in the workshop before work commences.  
 Only figured dimensions to be worked to. Any discrepancies to be reported to the Architect.

# South and Vale 'Call for Land and Buildings available for Change' Form

## Part A - Personal / organisation details

Q1. Are you completing this form as:

a developer

Q2. Please provide your name, address and contact details for yourself if you are a landowner, or on behalf of the organisation you are representing:

[REDACTED]

## Section 1 - Site Details and Ownership

Q3. Please provide the name and address of the site below.

<b>Site name</b>	Land at Lower Icknield Way
<b>Address line 1</b>	Land at Lower Icknield Way
<b>Address line 2</b>	-
<b>Address line 3</b>	-
<b>Postal town</b>	Chinnor
<b>Postcode</b>	OX39 4EB
<b>Reference number (if known)</b>	1210

Q4. Has the site also been submitted through the Oxfordshire Plan 2050 'Call for Ideas' consultation in 2019?

Yes

Q5. What is the current use(s) of the land or building?

Agricultural land

Q6. If the land or building has had any previous or historic use(s), please use the space below to give details. This could include agricultural, employment or housing use.

Agricultural

Q7. Please provide the size of the site area in hectares.

3.7

Q8. If the land or building has any planning history, please use the space below to give details.

*No Response*

Q9. Is the site in single ownership?

Yes

Q10. As there is more than one site owner, please provide the name and address of the additional owner, if different from details entered at the start of the form.

*No Response*

Q11. Is there another site owner, as well as the ones already identified?

*No Response*

Q12. Please provide the name and address of the additional owner, if different from details entered at the start of the form.

*No Response*

Q13. If there are other interests in the site, such as tenancies, please specify them below:

*No Response*

Q14. If you are not the owner, have you made the owner(s) aware that you are submitting this site for consideration?

Yes

## Section 2 - Development Constraints

Q15. Does the land or building have immediate access to an adopted highway? You can view the Adopted Highways document on the government website.

Yes

Q16. Is access to the land or building required over land that is not controlled by the owner?

*No Response*

Q17. Are you aware of any potential ground contamination issues on the site?

No

Q18. Are there any legal or ownership issues that may prevent development?

No

Q19. If you are aware of any other constraints that may affect development on the site, please use the space below to tell us. e.g. Flooding; Ancient Woodland; Special Areas of Conservation; etc. If there are no other constraints, please enter 'none' in the space below.

None

Q20. If you are aware of any constraints which would restrict the site's ability to deliver policies contained in either the South Oxfordshire Local Plan 2035 or the Vale of White Horse District Council's Local Plan 2031 (part 1 and 2) depending on the site's location, please use the space below to tell us. e.g. affordable housing; density; settlement hierarchy etc. If there are no other constraints, please enter 'none' in the space below.

None

Q21. Do you have proposals to overcome the constraints identified above? Please provide details.

N/A

Q22. What do you think are the benefits of this land or building to the local area in terms of social, environmental and economic benefits? Please see the guidance note for instruction on how to respond and use the space below to provide details.

The site is considered to be in a sustainable location, on the edge of Chinnor, making it a logical and suitable location for residential development. Chinnor is a sustainable location for growth, with a range of neighbourhood facilities, services and transport links. Indeed, the site opposite that Bovis Homes is coming towards the end of construction was assessed at appeal (APP/Q3115/W/15/3097666) as a sustainable location for development, and the same can be applied to this site.

In terms of economic benefits, new housing growth in 'Larger Villages' in locations such as Chinnor is important to ensure the continued vitality and viability of the local facilities and services. The allocation and bringing forward of this site would contribute to the construction sector, in terms of the various sub-sectors required to build such a project and the jobs at Hill Residential (a local house builder) and the various trades subcontracted out. Furthermore, new economically active inhabitants would be attracted into the area contributing to the local economy, supporting services and facilities.

From a social perspective, the site would bring forward new homes of the type required at the right time and location to meet both market and affordable housing need, which will help the Council's aspirations for meeting demand and growth. Bringing forward the required level of affordable housing is a significant social benefit that should not be underestimated which meets the needs of the current and future generations. The location of the site within walking distance of Chinnor's services and facilities will help bring forward a development that positively contributes to the healthy wellbeing of residents and we are exploring other opportunities that may exist.

Whilst the site is currently in arable use, a full suite of environmental (economic and social) reports are being prepared so that the development can come forward in a way that can bring forward biodiversity net gain and also mitigate any environmental impact that the development may have in an acceptable manner. Again, we anticipate working with the Council and community on these aspects as we progress our ideas for the site.

Hill Group is making a significant contribution to protecting the environment and this is at the forefront of our operations, as a result we have made ambitious commitments to sustainability and social value, and have developed an Environmental, Social & Governance (ESG) strategy that is central to business planning and will underpin the company culture and values. This will include reaching net zero carbon in business operations and net zero operational carbon in the homes we build by 2030.

For 2020 we set stretching environmental and energy targets:

- 92% of total waste diverted from landfill
- 7.6 tonnes of waste produced per £100k of project value (10% improvement on 2020)
- 99% of timber from certified and reused sources
- Water usage on sites 3.8 m<sup>3</sup> per £100k of project value
- Energy use is lower than 236 kg/CO<sub>2</sub>e per £100k of project value

This is just a summary of the few points in which Hill Group are implementing their ESG strategy. We look forward with providing you with more information on Hill Group and Hill Residential as we promote this site through the forthcoming Joint Local Plan.

Q23. If any surveys or technical studies have been carried out on the site, please upload copies using the button below:

Surveys are currently being commissioned and Hill Residential intend to keep the Council informed of progress on these matters.

### Section 3 - Availability

Q24. Do you/the landowner intend to sell the land or building if it is allocated in a future Local Plan or subsequent development plans?

Yes

Q25. If the site is in multiple ownership, is there a formal agreement by all parties that the land or building could be promoted for development?

This doesn't apply to me

### Section 4 - Deliverability

Q26. What is the earliest you anticipate that the land or building could become available for development?

1 to 5 years from now

Q27. If you have any comments on site delivery, please use the space below to tell us:

No specific comments other than there are no known matters to prevent the site coming forward at the earliest opportunity.

### Section 5 - Preferred Uses

Q28. Please tick all of the preferred uses that apply to your site.

	Preferred use (tick all that apply)
<b>Environmental Uses</b> This can include nature reserves, nature recovery network, green buffers, allotments, parks, environmental designations or protections	

Q28. Please tick all of the preferred uses that apply to your site.

<b>Renewable Energy Uses</b> This can include solar/wind farms, biomass, geothermal or water	
<b>Housing</b> Includes typical dwelling houses, residential care homes, nursing homes, boarding schools, residential colleges, and houses in multiple occupation	X
<b>Affordable Housing</b> Small sites used for affordable housing in perpetuity where sites would not normally be used for housing; includes Rural and First Homes Exception sites.	
<b>Self and Custom Build Housing</b> We maintain a register for those who are seeking to buy land to build their own home. If there is sufficient demand, we may consider allocating land to meet this need in the local plan. We are therefore interested to see if landowners or agents would consider some or all of their land for the provision of custom and self-build homes.	
<b>Gypsy, Traveller and Travelling Showpeople (GTTS)</b> The site will be assessed for suitability for GTTS temporary and permanent pitches	

Q29. Economic

*No Response*

Q30. Mixed-Use development: Would you consider your site to be a mixed-use development?

No

Q31. Preferred or Other Uses: If you would like your site assessed for a specific type of development under one of the headings above or any other use not specified above please use the space below to give details. For example if you are promoting a site for specialist housing for the elderly or other groups or intending to promote a site for other uses include community buildings, cemetery, park and ride facilities, etc, then please add details here.

*No Response*

## Section 6 - Site Map

Q32. Please upload a map clearly identifying the boundaries of the proposed site, using the button below.

- File: L. Icknield Way Chinnor SitePlan.pdf - [REDACTED]

Q33. If you wish to provide evidence and any supporting documents regarding your site, please attach using the button below. You can provide up to 10 documents at 25MB each. If you have more than 10 documents, please use the button in the question below.

Not at this time, but we look forward to working with you and sharing our findings and ideas as the Local Plan process progresses.

Q34. If you wish to provide further evidence and any supporting documents to support your site, please attach using the button below. You can provide up to 10 documents at 25MB each.

*No Response*

## Sharing your information

Q35. Are you happy for the information on this form to be shared with the Oxfordshire Plan 2050 team if we consider the site to be strategic? For more information on the Oxfordshire Plan 2050 guidance note, please see the relevant link on their website.

Yes

Q36. Are you happy for the information on this form to be shared with Neighbourhood Planning groups who may consider allocating sites through a Neighbourhood Development Plan?

Yes

# Response 217

## Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. i) Are you responding as:

An agent, developer or landowner

[REDACTED]

[REDACTED]

## A little bit about you (continued...)

[REDACTED]

[REDACTED]

Q4. For further information about how we use your data below, please refer to our privacy policy, which also explains how to exercise your rights over your personal data. If relevant, please provide the details of the organisation, business or council you're representing. If relevant, please also give the details of the client your business is representing (EG if you're a planning agent responding on behalf of another organisation).

[REDACTED]	[REDACTED]
<b>First name</b>	Andy
<b>Last name</b>	Shepley
[REDACTED]	[REDACTED]
<b>Your business or organisation (if relevant)</b>	David Jarvis Associates
<b>Business or organisation you're representing (if relevant)</b>	Croudace Homes
[REDACTED]	[REDACTED]

Q6. Please select which documents you wish to comment on:

Local Plan Issues Consultation

Draft Settlement Assessment Methodology

Q21. This section of the survey is about thriving inclusive communities. Please visit our interactive website to find out more information about this topic and help you answer the questions below. 15. Please select the THREE opportunities that are most important to you.

Require developers to build a mixture of housing types to help first time buyers, key workers, and those on lower incomes to live in the districts

Require high quality, beautiful and sustainable design for new buildings and places

Plan new developments, town centres and buildings to be accessible for those with disability or dementia, be places for children and young people to enjoy, and to be gender neutral

Q23. 17. If you have any other thoughts on how we could use the Joint Local Plan to tackle housing inequality and affordability, please write them here.

It is clear that there is a significant affordability issue within South Oxfordshire, where the affordability ratio is 12.07x earnings compared to an England average of 7.84x. It is Croudace Homes' view that delivering the significant level of affordable housing required is best achieved through the allocation of medium - large (e.g. 50 - 200 dwellings) greenfield sites in sustainable locations on the edge of the existing larger towns and villages. Such developments are easier to deliver quickly and overall viability does not tend to be a concern; therefore, affordable housing provision can usually be delivered on a policy-compliant basis.

Allocation of such sites will also assist the Councils in maintaining a healthy five-year supply of housing, as they will be able to deliver housing quickly whilst larger strategic allocations (which can take significant time to come forward) are formulated. Therefore, the JLP should be placing less reliance on new settlements to meet housing need, as this will enable existing settlements to enhance their facilities, services and therefore sustainability.

Whilst brownfield development clearly has a very important role to play in housing delivery, this is often more difficult to bring forward with policy-compliant levels of affordable housing due to the additional site preparation costs involved. Therefore, greenfield development is likely to provide the bulk of affordable housing provision and this should be reflected in the allocations put forward.

Q29. 22. If you have any other thoughts on how we could use the Joint Local Plan to ensure people have easy access to the services they need to use on a day-to-day basis, please write them here.

The provision of additional housing at the larger towns and villages will help to support existing community facilities at these locations to hopefully ensure they remain viable for the long-term, thus ensuring that people do not necessarily have to travel further afield for schools, shops, GPs etc. Additional housing at these locations could also help to increase the overall level of facilities in the local area, which may be delivered as part of larger developments on the edge of such settlements depending on the level of existing provision.

Furthermore, the provision of additional housing at the larger towns and villages can help to support the viability of existing public transport or support new services, improving the overall accessibility of such settlements and providing local residents with the option of accessing services by means other than the private car.

Q38. 31. Have we correctly summarised the issues, challenges and opportunities for the Joint Local Plan?

**If you've said no, what do you think we've missed?**

Croudace are generally supportive of the draft JLP; however, it should reflect on the spatial approach and settlement hierarchy to ensure that there is growth within the various settlement tiers to ensure local people can access high quality, affordable homes. There should be less reliance on the creation of 'new' settlements to meet the Councils housing requirements, given the implications for delivery and overall housing land supply, with more focus towards significant growth of sustainable towns and villages, such as Benson.

Q39. 32. Finally, do you have any other comments?

It is considered to be important for the emerging JSP to take its lead from the preferred spatial strategy options being promoted through the Oxfordshire Plan 2050. Representations were submitted on behalf of Croudace Homes to the emerging Oxfordshire Plan 2050 in July 2021, advising that a combination of the following spatial strategy options is most appropriate:

- 1. A focus on opportunities in sustainable transport corridors and at strategic transport hubs
- 2. Focus on strengthening business locations
- 3. Focus on supporting rural communities

With regard to Option 1, this represents a sustainable strategy for the provision of additional development in the County to 2050 as it would ensure that development takes advantage of existing transport corridors/hubs and is likely to lead to additional investment in these areas, thus increasing the accessibility of the existing larger settlements within the corridors illustrated in the emerging Plan. This option encompasses a number of the larger towns and villages within South Oxfordshire, benefit from good communication links. It will allow some of these settlements to grow in a sustainable manner over the Plan period, in particular those settlements that lie outside the Green Belt and AONB. As the Plan advises, this greater distribution of development will also help to strengthen community services within accessible locations.

With regard to Option 2, this also represents a sustainable strategy for the provision of additional residential development in the County to 2050. In combination with Option 1 above, as well as helping to retain and strengthen the significant employment and innovation hubs in the County, this option would also ensure that the residential development required to support the strong employment base in Oxfordshire takes advantage of existing sustainable transport corridors/hubs. This spatial option is likely to lead to additional investment in these transport links, thus increasing the accessibility in particular of those settlements that lie within the general business locations illustrated in the emerging Oxfordshire Plan (e.g. Benson).

Finally, in combination with the Spatial Options referred to above, Option 3 will help to ensure that existing rural communities remain economically active by maintaining and expanding resident populations, therefore assisting with the long-term viability of rural services and facilities, as well as strengthening links to the larger settlements and employment hubs. Many such communities lie in sustainable locations outside the Green Belt and AONB, on existing transport corridors and within easy reach of existing employment hubs. Therefore, the Plan should recognise the important role that many sustainable rural communities will play in the delivery of housing in Oxfordshire to 2050.

Taking all of the above options into account, Croudace Homes' would like to emphasise the importance of the existing Large Village of Benson as a location for further growth. As referred to above, Croudace are promoting a 7.7ha plot of land on the western edge of Benson (land West of Braze Lane) for residential development of between 150 – 175 dwellings (see Appendix 1). When assessed against the draft Settlement Assessment Methodology, Benson should be viewed as a "Tier 2" settlement. It has a very good range of services/facilities, along with a local road network that will be significantly improved following completion of the by-pass around the northern edge of the town, which has increased the capacity of Benson to accommodate additional development. Benson also lies outside the Green Belt and AONB, and should therefore be viewed as an appropriate location for further growth in order to limit development in these more sensitive locations.

Please see attachment for full response.

[Redacted]

- [Redacted]

## Draft Settlement Assessment Methodology

Q47. Looking at the proposed scoring identified in tables 1 to 6 do you consider that the scoring reflects the weight/importance of each service or facility?

**If you have any comments on the scoring, please provide them below:**  
The scoring system is very subjective but appears generally sensible and consistent.

Q48. What do you consider to be a reasonable distance to walk, cycle or use public transport to access key employment sites or to access services and facilities?

With regard to walking distances, no distances have been set out in relation to reasonable walking/cycling/public transport distances. It is assumed that these would be according to CIHT and other recognised guidance, however in the absence of specifics this is not clear; therefore, clarity/guidance should be provided within the finalised methodology.

Q49. If you have any other comments on the Draft Settlement Assessment Methodology, please provide them below.

It is Croudace' view that the Methodology comes across as sound and a balanced way of categorising settlements by accessibility.

please see full response in attachment

If you are ready to submit your comments, please tick the box below, then select the 'Finish and submit' button. Note: once ticked you will not be able to return to your comments and they will be submitted. If not, please use the 'previous page' button to go back through the survey to amend or review your response. Alternatively you can use the 'save and continue later' so that you can save your progress, and return later to your comments. Simply provide your name and email address and you will automatically receive a link via email to return to your draft comments when you are ready.

Yes, I have finished and am ready to submit

**CROUDACE HOMES LTD**

**LAND WEST OF BRAZE LANE, BENSON**

**REPRESENTATIONS TO SOUTH OXFORDSHIRE DC AND VALE OF WHITE HORSE DC JOINT LOCAL  
PLAN ISSUES CONSULTATION (MAY 2022)**

**June 2022**



**RTPI**

Chartered Town Planners

**URBAN  
DESIGN  
GROUP**

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**CLIENT** Croudace Homes Ltd

**PROJECT** Land West of Braze Lane, Benson

**REPORT TITLE** Representations to South Oxfordshire DC and Vale Of White Horse DC Joint Local Plan Issues Consultation (May 2022)

**DJA Reference:** 2963

**Report Number:** T1

**Revision:** P1

**Issue Date:** June 2022

#### REPORT REVISIONS

Revision	Date	Description	Prepared	Approved
P1		FINAL	AS	

**CONTENTS:**

**1. INTRODUCTION..... 4**  
    Croudace ..... 4  
    Background ..... 4

**2. RESPONSE TO DRAFT JLP CONSULTATION QUESTIONS..... 6**

**3. EVIDENCE BASE RESPONSE..... 9**  
    Settlement Assessment Methodology ..... 9

**4. SUMMARY AND CONCLUSIONS.....10**

**Appendices:**

- 1. Site Location Plan

## 1. INTRODUCTION

- 1.1 David Jarvis Associates has been instructed by Croudace Homes Ltd ('Croudace') to prepare representations in response to the emerging South Oxfordshire District Council (SODC) and Vale of White Horse District Council (VoWH) Joint Local Plan Issues Consultation (JLP).
- 1.2 Croudace is promoting an area of land on the eastern side of the Large Village of Benson ('Land West of Braze Lane'), within the SODC area for a residential-led development of approximately 150 – 175 dwellings (see site location plan at **Appendix 1**). The land, which is currently used for agricultural purposes, extends to about 7.7ha in area, with Braze Lane running along its eastern edge and forming a strong physical boundary.

### **Croudace**

- 1.3 Croudace is a private family-owned company, founded in 1946. They have an excellent track record of successfully promoting strategic land for development. Their team has the expertise and experience necessary to deliver high quality, sustainable neighbourhoods. They are committed to the whole process, from site identification, right through to building and selling the homes, giving us expertise across the whole development cycle.
- 1.4 Croudace is committed to building quality places and works hard to develop positive and constructive relationships with local authorities, stakeholders and the community. They take care to design their masterplans to meet the needs of local people and recognise that consideration of the environment and climate change is of ever-increasing importance.
- 1.5 Croudace take their responsibility towards the immediate and wider community seriously, incorporating play areas and sports facilities, hosting community fun days and events, and raising money for charity - all part of their commitment to ensure our developments are desirable and social places to make a home.
- 1.6 Croudace design and build new homes to suit all budgets and set themselves high standards for the design and build quality of our developments, whilst also ensuring they fit well in their local environment. Using creative solutions and working to exacting standards ensures their superbly designed homes and landscapes create places of enduring value, and Benson will be no exception.

### **Background**

- 1.7 The Site has been promoted through the now adopted South Oxfordshire Local Plan 2035, as a suitable site for further growth at Benson (site ref: 1008). The site was considered unsuitable at that time only by virtue of being "disconnected from settlement"; however, it was accepted that the site was generally unconstrained and therefore suitable for further consideration.
- 1.8 It has also been promoted through the made Benson Neighbourhood Plan (BNP) 2018 (site ref: BEN6) and further representations have been submitted as part of the current BNP Review process. The site was discounted for development in the made BNP primarily due to the Parish Council's priority of enabling residential development to the north of the village to bring forward a by-pass. The majority of this development is now built and/or permitted and is likely to be completed within the next 5 years.
- 1.9 Within the BNP Site Assessment Report (October 2017), the following comments were made about the site:

*The site extends beyond BEN 5 to the east. Development would erode the rural setting of the village and detract significantly from the landscape setting of the AONBs, particularly where prominent on higher ground. The greater distance from the rest of the village and*

*community facilities, together with the poor connectivity, would result in poor integration. Development would exacerbate traffic problems entering the village on the B4009, while not contributing to the Relief Road or providing any other significant community benefits. Planning approval on this site would limit the number of school places available for allocated sites and thereby jeopardise the Benson Masterplan and delivery of the Relief Road.*

*This site does not conform to the Benson Masterplan or our preferred spatial strategy for growing the village sustainably and is therefore not allocated in this Neighbourhood Plan.*

- 1.10 It is considered that a number of these comments are now out of date, by virtue of the fact that the new Relief Road and allocated sites are already a significant way towards completion such that Croudace site will not conflict with the BNP spatial strategy. The Relief Road access onto the B4009 lies immediately adjacent to the Croudace site and so connectivity will improve. The Croudace site represents a logical rounding-off to development on the eastern side of the village.

## 2. RESPONSE TO DRAFT JLP CONSULTATION QUESTIONS

### Question 15 – Thriving Inclusive Communities – three opportunities of most importance

2.1 Croudace considers that the three most important opportunities are as follows, as these fit with Croudace' overall design principles for their developments:

- Require a mixture of housing types
- Require high quality. Beautiful and sustainable design
- Plan new developments to be accessible to all

### Question 17 - If you have any other thoughts on how we could use the JLP to tackle housing inequality and affordability, please write them here.

2.2 It is clear that there is a significant affordability issue within South Oxfordshire, where the affordability ratio is 12.07x earnings compared to an England average of 7.84x. It is Croudace Homes' view that delivering the significant level of affordable housing required is best achieved through the allocation of medium - large (e.g. 50 - 200 dwellings) greenfield sites in sustainable locations on the edge of the existing larger towns and villages. Such developments are easier to deliver quickly and overall viability does not tend to be a concern; therefore, affordable housing provision can usually be delivered on a policy-compliant basis.

2.3 Allocation of such sites will also assist the Councils in maintaining a healthy five-year supply of housing, as they will be able to deliver housing quickly whilst larger strategic allocations (which can take significant time to come forward) are formulated. Therefore, the JLP should be placing less reliance on new settlements to meet housing need, as this will enable existing settlements to enhance their facilities, services and therefore sustainability.

2.4 Whilst brownfield development clearly has a very important role to play in housing delivery, this is often more difficult to bring forward with policy-compliant levels of affordable housing due to the additional site preparation costs involved. Therefore, greenfield development is likely to provide the bulk of affordable housing provision and this should be reflected in the allocations put forward.

### Question 22 - If you have any other thoughts on how we could use the Joint Local Plan to ensure people have easy access to the services they need to use on a day-to-day basis, please write them here.

2.5 The provision of additional housing at the larger towns and villages will help to support existing community facilities at these locations to hopefully ensure they remain viable for the long-term, thus ensuring that people do not necessarily have to travel further afield for schools, shops, GPs etc. Additional housing at these locations could also help to increase the overall level of facilities in the local area, which may be delivered as part of larger developments on the edge of such settlements depending on the level of existing provision.

2.6 Furthermore, the provision of additional housing at the larger towns and villages can help to support the viability of existing public transport or support new services, improving the overall accessibility of such settlements and providing local residents with the option of accessing services by means other than the private car.

**Question 31 – Have we correctly summarised the issues, challenges and opportunities for the JLP?**

- 2.7 Croudace are generally supportive of the draft JLP; however, it should reflect on the spatial approach and settlement hierarchy to ensure that there is growth within the various settlement tiers to ensure local people can access high quality, affordable homes. There should be less reliance on the creation of ‘new’ settlements to meet the Councils housing requirements, given the implications for delivery and overall housing land supply, with more focus towards significant growth of sustainable towns and villages, such as Benson.

**Question 32 - Any other thoughts?**

- 2.8 It is considered to be important for the emerging JSP to take its lead from the preferred spatial strategy options being promoted through the Oxfordshire Plan 2050. Representations were submitted on behalf of Croudace Homes to the emerging Oxfordshire Plan 2050 in July 2021, advising that a combination of the following spatial strategy options is most appropriate:
1. A focus on opportunities in sustainable transport corridors and at strategic transport hubs
  2. Focus on strengthening business locations
  3. Focus on supporting rural communities
- 2.9 With regard to Option 1, this represents a sustainable strategy for the provision of additional development in the County to 2050 as it would ensure that development takes advantage of existing transport corridors/hubs and is likely to lead to additional investment in these areas, thus increasing the accessibility of the existing larger settlements within the corridors illustrated in the emerging Plan. This option encompasses a number of the larger towns and villages within South Oxfordshire, e.g. Benson, which benefit from good communication links. It will allow some of these settlements to grow in a sustainable manner over the Plan period, in particular those settlements that lie outside the Green Belt and AONB. As the Plan advises, this greater distribution of development will also help to strengthen community services within accessible locations.
- 2.10 With regard to Option 2, this also represents a sustainable strategy for the provision of additional residential development in the County to 2050. In combination with Option 1 above, as well as helping to retain and strengthen the significant employment and innovation hubs in the County, this option would also ensure that the residential development required to support the strong employment base in Oxfordshire takes advantage of existing sustainable transport corridors/hubs. This spatial option is likely to lead to additional investment in these transport links, thus increasing the accessibility in particular of those settlements that lie within the general business locations illustrated in the emerging Oxfordshire Plan (e.g. Benson).
- 2.11 Finally, in combination with the Spatial Options referred to above, Option 3 will help to ensure that existing rural communities remain economically active by maintaining and expanding resident populations, therefore assisting with the long-term viability of rural services and facilities, as well as strengthening links to the larger settlements and employment hubs. Many such communities lie in sustainable locations outside the Green Belt and AONB, on existing transport corridors and within easy reach of existing employment hubs. Therefore, the Plan should recognise the important role that many sustainable rural communities will play in the delivery of housing in Oxfordshire to 2050.
- 2.12 Taking all of the above options into account, Croudace Homes’ would like to emphasise the importance of the existing Large Village of Benson as a location for further growth. As referred to above, Croudace are promoting a 7.7ha plot of land on the western edge of Benson (land West of Braze Lane) for residential development of between 150 – 175 dwellings (see **Appendix 1**). When

assessed against the draft Settlement Assessment Methodology, Benson should be viewed as a “Tier 2” settlement. It has a very good range of services/facilities, along with a local road network that will be significantly improved following completion of the by-pass around the northern edge of the town, which has increased the capacity of Benson to accommodate additional development. Benson also lies outside the Green Belt and AONB, and should therefore be viewed as an appropriate location for further growth in order to limit development in these more sensitive locations.

### **3. EVIDENCE BASE RESPONSE**

#### **Settlement Assessment Methodology**

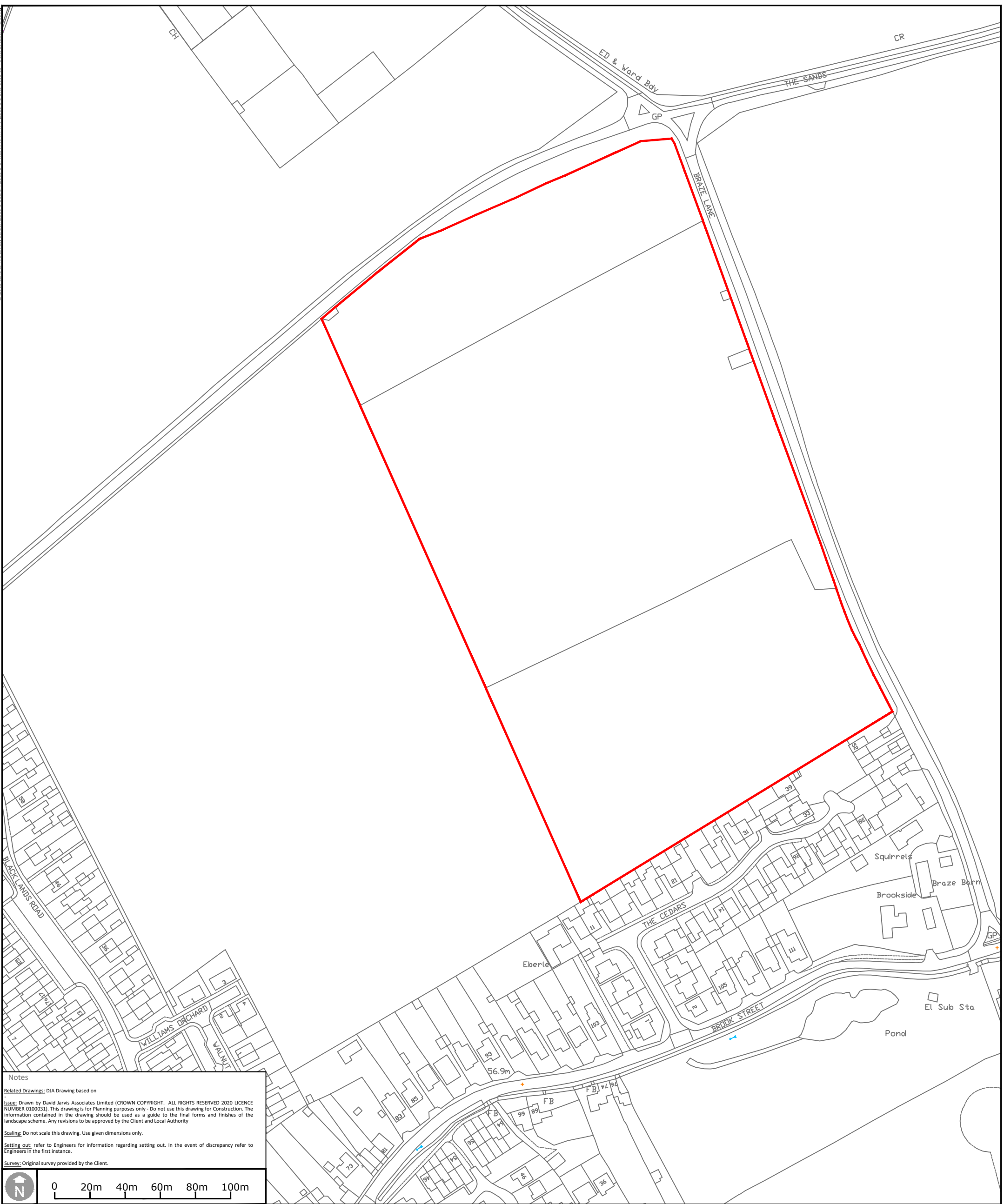
- 3.1 It is Croudace' view that the Methodology comes across as sound and a balanced way of categorising settlements by accessibility. The scoring system is very subjective but appears generally sensible and consistent.
  
- 3.2 With regard to walking distances, no distances have been set out in relation to reasonable walking/cycling/public transport distances. It is assumed that these would be according to CIHT and other recognised guidance, however in the absence of specifics this is not clear; therefore, clarity/guidance should be provided within the finalised methodology.

#### **4. SUMMARY AND CONCLUSIONS**

- 4.1 These representations have been prepared by David Jarvis Associates, on behalf of Croudace Homes in response to the JLPIC.
- 4.2 Croudace are promoting Land West of Braze Lane, Benson for housing development incorporating:
- Approximately 150 - 175 homes across a wide range of dwelling types and tenures to meet all housing needs including affordable housing, and Future Homes;
  - Open spaces and recreational areas;
  - Potentially a new allotment area;
  - Cycle and pedestrian routes connecting the site to Benson.
- 4.3 The proposals for Land West of Braze Lane would assist the Councils in meeting key objectives in relation to delivering homes, sustainability and connectivity.
- 4.4 Croudace would welcome the opportunity to meet with SODC to discuss the unique opportunity that Land West of Braze Lane provides to deliver much needed housing and affordable housing whilst meeting the objectives of the JLP.

**Appendix 1**  
**Site Location Plan**

Z:\2963 Land at The Sands, Benson\2963-5-1 PRELIMINARY\2963-5-1 DRS-0003-S0-P1 Site Location Plan.dwg



**Notes**

Related Drawings: DJA Drawing based on

Issue: Drawn by David Jarvis Associates Limited (CROWN COPYRIGHT. ALL RIGHTS RESERVED 2020 LICENCE NUMBER 0100031). This drawing is for Planning purposes only - Do not use this drawing for Construction. The information contained in the drawing should be used as a guide to the final forms and finishes of the landscape scheme. Any revisions to be approved by the Client and Local Authority

Scaling: Do not scale this drawing. Use given dimensions only.

Setting out: refer to Engineers for information regarding setting out. In the event of discrepancy refer to Engineers in the first instance.

Survey: Original survey provided by the Client.

0 20m 40m 60m 80m 100m

**KEY**

BOUNDARY:  
APPLICATION SITE

Rev.	Date	Description	Drawn	Checked
P1	16/09/21	First draft issued to client.	AS	PG

Client  
**CROUDACE HOMES**

Project  
**LAND AT THE SANDS, BENSON**

Drawing Title  
**SITE LOCATION PLAN**

Scale <b>1:2,000</b>	Sheet Size <b>A3</b>	Date <b>16/09/21</b>
Client Ref. <b>-</b>	Drawing Ref. <b>2963-5-1</b>	Drawing No. <b>DRS-0003</b>
		Status <b>S0-P1</b>

Status  
**DRAFT**

**DAVID JARVIS ASSOCIATES**  
DAVID JARVIS ASSOCIATES LIMITED  
 1 Tennyson Street Swindon Wiltshire SN1 5DT  
 t: 01793 612173  
 e: mail@davidjarvis.biz  
 w: www.davidjarvis.biz

# Response 218

## Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. i) Are you responding as:

A town/parish council

[REDACTED]

[REDACTED]

## A little bit about you (continued...)

[REDACTED]

[REDACTED]

Q4. For further information about how we use your data below, please refer to our privacy policy, which also explains how to exercise your rights over your personal data. If relevant, please provide the details of the organisation, business or council you're representing. If relevant, please also give the details of the client your business is representing (EG if you're a planning agent responding on behalf of another organisation).

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
<b>Business or organisation you're representing (if relevant)</b>	Kennington Parish Council
[REDACTED]	[REDACTED]

Q6. Please select which documents you wish to comment on:

Local Plan Issues Consultation

Q39. 32. Finally, do you have any other comments?

Kennington Parish Council was concerned that there is no mention of the green belt and the importance of protecting it to prevent the urban sprawl of Oxford, and to protect the community identity of the village of Kennington.

If you are ready to submit your comments, please tick the box below, then select the 'Finish and submit' button. Note: once ticked you will not be able to return to your comments and they will be submitted. If not, please use the 'previous page' button to go back through the survey to amend or review your response. Alternatively you can use the 'save and continue later' so that you can save your progress, and return later to your comments. Simply provide your name and email address and you will automatically receive a link via email to return to your draft comments when you are ready.

Yes, I have finished and am ready to submit

# Response 219

## Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. i) Are you responding as:

An individual/member of the public

[REDACTED]

[REDACTED]

## A little bit about you (continued...)

[REDACTED]

[REDACTED]

Q4. For further information about how we use your data below, please refer to our privacy policy, which also explains how to exercise your rights over your personal data. If relevant, please provide the details of the organisation, business or council you're representing. If relevant, please also give the details of the client your business is representing (EG if you're a planning agent responding on behalf of another organisation).

[REDACTED]	[REDACTED]
<b>First name</b>	Mary J
<b>Last name</b>	Gascoine
[REDACTED]	[REDACTED]
[REDACTED]	
[REDACTED]	
[REDACTED]	

Q6. Please select which documents you wish to comment on:

Local Plan Issues Consultation

Q7. This section of the survey is about the districts. Please visit our interactive website to find out more and to help you answer the questions below. The website will open in a new tab so once you're ready, you can close the tab down to return to this survey. 1. What three things do you value most about where you live?

- 1 Village life and community. Riverside.
- 2 Countryside. Picturesque.
- 3 Garden. Nice pubs within walking distance.

Q8. 2. In fewer than 50 words, if you could make one change to improve where you live, what would it be? Include the name of the town, village or area you're talking about.

Building of 3rd bridge outside Sonning Eye to limit traffic

Q9. This section of the survey is about how things are right now. Please visit our interactive website to find out more information and help you answer the questions below. 3. How much do you agree that these are the main issues that the Joint Local Plan should consider?

Agree

**If you think there are other issues the Local Plan should consider, please let us know in this box:**

We want a 3rd bridge from the end of the 329.  
more infrastructure  
more entertainment leisure facilities

Q11. Our vision is for carbon neutral districts, for current and future generations. For this to be a place where nature is thriving, and nature reserves are no longer isolated pockets. A place where history is still visible, where heritage and landscape character are safeguarded and valued, and the beauty and the distinctive local identity of our towns and villages have been enhanced. A place where people can thrive. Where people have housing choices they can afford, where villages, market towns and garden communities are diverse and inclusive places where people of all ages and backgrounds can live together. A place where local residents can reach the facilities they need for everyday living on foot, bicycle or by zero-emission and low carbon transport choices. Where residents and visitors can live healthy lifestyles and access greenspace. Where people are safe from pollution, flooding, and the effects of climate change. Where there are valuable and rewarding jobs, embracing clean technologies and growing the opportunities in Science Vale for the districts to contribute on a national and international scale to solving pressing global issues. 5. How much do you agree with this vision for the Joint Local Plan?

**If there is anything you disagree with in particular, or you have any other thoughts let us know here:**

There is no mention of 3rd Bridge.

Q14. 8. If you have any other thoughts on how we could use the Joint Local Plan to reduce carbon emissions, please write them here.

A third bridge is the answer  
Leave it all on motorways

Q15. This section of the survey is about nature recovery and landscape. Please visit our interactive website to find out more information about this topic and help you answer the questions below. 9. Please select the THREE opportunities that are most important to you.

Require improvements to air and water quality

Q17. 11. If you have any other thoughts on how we could use the Joint Local Plan to protect the natural environment, please write them here.

Less traffic through Sonning

Q18. This section of the survey is about protecting and enhancing local heritage. Please visit our interactive website to find out more information about this topic and help you answer the questions below. 12. Please select the THREE opportunities that are most important to you.

Utilise enabling development where this can secure heritage assets and their settings

Require beauty in design for all new buildings and places

Encourage retention and reuse of historic buildings/ heritage assets as a sustainable resource

Q19. 13. Do you disagree with any of these opportunities? Tick all that apply.

Require beauty in design for all new buildings and places

Q21. This section of the survey is about thriving inclusive communities. Please visit our interactive website to find out more information about this topic and help you answer the questions below. 15. Please select the THREE opportunities that are most important to you.

Require developers to build a mixture of housing types to help first time buyers, key workers, and those on lower incomes to live in the districts

Continue to support neighbourhood plans so housing meets local needs

Plan new developments, town centres and buildings to be accessible for those with disability or dementia, be places for children and young people to enjoy, and to be gender neutral

Q22. 16. Do you disagree with any of these opportunities? Tick all that apply.

Support affordable housing on sites we'd normally protect from development

Promote alternative housing models like self-build, custom and community-led housing

Q23. 17. If you have any other thoughts on how we could use the Joint Local Plan to tackle housing inequality and affordability, please write them here.

Don't change character and environment

Q24. 18. We'd like to hear your ideas for how we could adapt our town centres and high streets to meet our changing needs. Are there any improvements, new facilities or uses that you would like to see in the locations marked on the map?

No pedestrian towns  
Free parking

Q25. Which location(s) does your answer to question 18 above apply to?

Abingdon

Botley

Didcot

Faringdon

Grove

Henley

Thame

Wallingford

Wantage

Q26. This section of the survey is about transport and facilities. Please visit our interactive website to find out more information about this topic and help you answer the questions below. 19. Please select the THREE opportunities that are most important to you.

Safeguard shops, community facilities and services from redevelopment to new uses

Plan for new infrastructure alongside development, especially in Garden Communities at Didcot, Berinsfield and Dalton Barracks and on strategic allocation sites

Plan for sustainable travel that is reliable, integrated and accessible

Q27. 20. Do you disagree with any of these opportunities? Tick all that apply.

Restrict development in locations which are not able to function as 20 minute neighbourhoods

Plan for new technological innovation in transport and communications technologies

Q28. 21. If you currently drive, what would encourage you to drive less and/or walk, cycle or take public transport more?

Blue badge facilities

Q29. 22. If you have any other thoughts on how we could use the Joint Local Plan to ensure people have easy access to the services they need to use on a day-to-day basis, please write them here.

Cheaper Car Parking

Q30. This section of the survey is about healthy lifestyles and safe communities. Please visit our interactive website to find out more information about this topic and help you answer the questions below. 23. Please select the THREE opportunities that are most important to you.

Plan places for people to grow their own food

Avoid inappropriate development in flood risk areas

Limit and control new sources of air, water, noise and light pollution

Q32. 25. If you have any other thoughts on how we could use the Joint Local Plan to give residents and visitors the opportunity to live healthy lifestyles, please write them here.

Build more parks, sports facilities that are affordable

Q33. 26. If you have any other thoughts on how we could use the Joint Local Plan to keep residents and visitors safe from pollution, flooding and the effects of climate change, please write them here.

Reduce price of electric vehicles  
Stop water pollution + discharging sewage  
All lights off 11:00 PM  
Grants for changing boilers

Q34. This section of the survey is about jobs and opportunities for innovation. Please visit our interactive website to find out more information about this topic and help you answer the questions below. 27. Please select the THREE opportunities that are most important to you.

Plan jobs near homes and homes near jobs

Work to support innovation in Science Vale like the fusion work at Culham Science Centre, and space technology and vaccine manufacture at Harwell

Support the 'circular economy' and businesses working towards a greener future

Q35. 28. Do you disagree with any of these opportunities? Tick all that apply.

Support working from home and community based work hubs/ facilities

Q36. 29. If you have any other thoughts on how we could use the Joint Local Plan to cater for future working styles and patterns, please write them below.

Get back to the office

Q37. 30. If you have any other thoughts on how we could use the Joint Local Plan to help ensure there are valuable and rewarding jobs in the districts, please write them here.

Bus services

Q38. 31. Have we correctly summarised the issues, challenges and opportunities for the Joint Local Plan?

No

**If you've said no, what do you think we've missed?**

Need more on infrastructure schools nurseries (affordable) doctors dentists

Q39. 32. Finally, do you have any other comments?

No provision for leisure pursuits and entertainments

Please find original letter submissions attached.

•

If you are ready to submit your comments, please tick the box below, then select the 'Finish and submit' button. Note: once ticked you will not be able to return to your comments and they will be submitted. If not, please use the 'previous page' button to go back through the survey to amend or review your response. Alternatively you can use the 'save and continue later' so that you can save your progress, and return later to your comments. Simply provide your name and email address and you will automatically receive a link via email to return to your draft comments when you are ready.

Yes, I have finished and am ready to submit

# Comment form

## Joint Local Plan: Issues Consultation

### A new Joint Local Plan for our area

A Local Plan is a document which sets out planning policies and proposals for new development. South Oxfordshire and Vale of White Horse District Councils have come together to prepare a new Joint Local Plan that covers our two districts.



We're working together because our districts are quite similar and our councils have shared ambitions about how to make our areas better. Planning challenges like climate change, traffic congestion and shortage of affordable housing don't stop at district boundaries.

### What's happened so far?

We're at the early stages of creating this plan, and it's very important to us that you're part of the process from the very beginning. We're currently trying to understand the main issues facing our districts and how we might be able to use the Joint Local Plan to address them - you're the best people to help us understand this.

**We welcome your views on the issues we need to tackle in the new Joint Local Plan.** The consultation period runs from **Thursday 12 May to 11.59pm on Thursday 23 June 2022.**

You will have the opportunity to comment on the following documents in this comment form:

- Joint Local Plan Issues Consultation

### Supporting documents

- Sustainability Appraisal (SA) Screening and Scoping Report
- Habitats Regulations Assessment (HRA) Scoping Report
- Draft Settlement Assessment Methodology
- Duty to Cooperate Scoping Document

### **Alternative formats**

If you need any of the information in an alternative format, please email [haveyoursay@southandvale.gov.uk](mailto:haveyoursay@southandvale.gov.uk) or call the consultation team on **01235 422425**.

Please return this comment form to: **Freepost SOUTH AND VALE CONSULTATIONS**  
(no other address information or stamp is needed).

If you submit a comment on the Joint Local Plan Issues consultation (or a comment is submitted on your behalf), it may be published in full or as a summary alongside your name (where provided). If you submit a comment on behalf of a business/organisation or client, it may be published in full or as a summary alongside your name and the name of the business/organisation/client it is on behalf of (where details are provided).

No other personal contact details will be published. If your comment relates to matters outside the scope of planning but falls within the remit of another team at the Councils, we may share your comments with these internal teams where relevant.

To find out how your personal data is used for these consultations and for information on how the council holds, uses and stores your personal data, please refer to our Privacy Policy available on our websites at [southoxon.gov.uk/haveyoursay](http://southoxon.gov.uk/haveyoursay) or [whitehorsedc.gov.uk/haveyoursay](http://whitehorsedc.gov.uk/haveyoursay)

This comment form is separated into the following sections. You do not have to comment on all the sections, you can comment on the sections/documents that interest you:

#### **Section 1**

- A little bit about you

#### **Section 2**

- Joint Local Plan Issues Consultation

#### **Section 3: Supporting Documents**

- Sustainability Appraisal (SA) Screening and Scoping Report
- Habitats Regulations Assessment (HRA) Scoping Report
- Draft Settlement Assessment Methodology
- Duty to Cooperate Scoping Document

## Section 1

### A little bit about you

#### i. Are you responding as:

- An individual/member of the public
- An agent, developer or landowner
- A district, county or town/parish councillor
- A town/parish council
- A Neighbourhood Planning Group
- A community or interest group
- A statutory body (Environment Agency, Highways England, Natural England etc.)
- A utility company or infrastructure provider
- A business/organisation
- Another planning authority
- Other (please specify): \_\_\_\_\_

#### ii. To help us understand the geographic spread of the responses we receive, please tell us your postcode in the box below. - required

#### iv. Please provide your name and email address (or postal address if you prefer), which will be recorded alongside your responses with your consent.

We would like to keep your details in our consultation database so we can stay in touch about the Joint Local Plan and other planning policy consultations. We will not use your details to contact you about anything else.

If you would like to join, please confirm below. You have the right to withdraw your consent at any time.

- I confirm that I consent to my details being added to the consultation database.
- I do not consent to my details being added to the consultation database

**For further information about how we use your data below, please refer to our privacy policy which also explains how to exercise your rights over your personal data.**

If relevant, please provide the details of the organisation, business or council you're representing. If relevant, please also give the details of the client your business is representing (EG if you're a planning agent responding on behalf of another organisation).

[Redacted]

**First name**

MARY J

**Last name**

GASCOINE

[Redacted]

**Postal details**

If you do not have an email address, please provide your postal details below.

[Redacted]

## Section 2

### About the districts

This section of the comment form is about the districts. Please view Chapters 1 and 2 of the *Joint Local Plan – Issues Consultation* document available alongside this comment form to find out more information and help you answer the questions below.

#### 1. What three things do you value most about where you live?

1	VILLAGE LIFE AND COMMUNITY.
2	COUNTRYSIDE
3	GARDEN

#### 2. In fewer than 50 words, if you could make one change to improve where you live, what would it be? Include the name of the town, village or area you're talking about.

BUILDING OF 3rd BRIDGE OUTSIDE SONNING EYE TO LIMIT TRAFFIC.
---

## How things are right now

This section of the comment form is about how things are right now. Please view Chapter 3 of the *Joint Local Plan – Issues Consultation* document to find out more information and help you answer the questions below.

### 3. Overall, how much do you agree that these are the main issues that the Joint Local Plan should consider?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree








If you think there are other issues the Local Plan should consider, please let us know in this box:

3RD BRIDGE

MORE INFRASTRUCTURE

MORE ENTERTAINMENT LEISURE FACILITIES.

### 4. Which of these issues do you think is the most important?

- |   |  |
|---|--|
| <input type="checkbox"/>  Climate                                      | <input type="checkbox"/>  Traffic and transport                     |
| <input checked="" type="checkbox"/>  Protecting our countryside        | <input type="checkbox"/>  Employment                                |
| <input type="checkbox"/>  Our towns and villages                       | <input checked="" type="checkbox"/>  Development and Infrastructure |
| <input checked="" type="checkbox"/>  Quality of life and affordability |  |

## Our Vision

Our vision is for **carbon neutral districts**, for current and future generations.

For this to be a place where **nature** is thriving, and nature reserves are no longer isolated pockets. A place where **history** is still visible, where heritage and landscape character are safeguarded and valued, and the beauty and the distinctive local identity of our towns and villages have been enhanced.

A place where **people can thrive**. Where people have housing choices they can afford, where villages, market towns and garden communities are diverse and inclusive places where people of all ages and backgrounds can live together.

A place where local residents can reach the **facilities** they need for everyday living on foot, bicycle or by zero-emission and low carbon transport choices.

Where residents and visitors can live **healthy lifestyles** and access greenspace. Where **people are safe** from pollution, flooding, and the effects of climate change.

Where there are valuable and rewarding **jobs**, embracing clean technologies and growing the opportunities in Science Vale for the districts to contribute on a national and international scale to solving pressing global issues.

### 5. How much do you agree with this vision for the Joint Local Plan?

Please view Chapter 4 of the *Joint Local Plan – Issues Consultation*.

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

**If there is anything you disagree with in particular, or you have any other thoughts let us know here:**

FOR THE REMAINING ANSWERS  
PLEASE SEE CONSULTATION PLAN.  
INCLUDED

## Reducing carbon emissions

This section of the comment form is about reducing carbon emissions. Please view Chapter 6 of the *Joint Local Plan – Issues Consultation* to find out more information and help you answer the questions below.

### 6. Please select the **THREE** opportunities that are most important to you.

- Plan for a move away from fossil fuels and greenhouse gas emissions
- Require new homes and buildings to minimise energy use through their layout and design, and have the highest standards of fabric efficiency
- Transition to renewable forms of energy and support the districts in playing an international role in fusion energy power plant research and deployment
- Ensure the amount of development taking place stays within the districts' carbon budget
- Plan for new development in locations that enable sustainable lifestyles (20 minute neighbourhoods)
- Limit parking in new developments
- Require electric vehicle charging points
- Encourage carbon sinks and increase tree cover
- Limit developments with high greenhouse gas emissions e.g. intensive indoor livestock farming

**7. Do you disagree with any of these opportunities? Tick all that apply.**

- Plan for a move away from fossil fuels and greenhouse gas emissions
- Require new homes and buildings to minimise energy use through their layout and design, and have the highest standards of fabric efficiency
- Transition to renewable forms of energy and support the districts in playing an international role in fusion energy power plant research and deployment
- Ensure the amount of development taking place stays within the districts' carbon budget
- Plan for new development in locations that enable sustainable lifestyles (20 minute neighbourhoods)
- Limit parking in new developments
- Require electric vehicle charging points
- Encourage carbon sinks and increase tree cover
- Limit developments with high greenhouse gas emissions e.g. intensive indoor livestock farming

**8. If you have any other thoughts on how we could use the Joint Local Plan to reduce carbon emissions, please write them here.**

## Nature recovery and landscape

This section of the comment form is about nature recovery and landscape. Please view Chapter 7 of the *Joint Local Plan – Issues Consultation* to find out more information and help you answer the questions below.

### 9. Please select the **THREE** opportunities that are most important to you.

- Respect landscape character, dark skies and the natural beauty of the countryside in development decisions
- Research and map effective nature recovery networks
- Restrict the amount of development in and around our top biodiversity areas
- Require developments to generate a net gain in biodiversity
- Ensure a net gain in biodiversity takes place where it's most effective
- Require improvements to air and water quality
- Protect trees and recognise the value of nature, giving us clean air, flowing water, soils to grow food in, and enjoyment
- Support farmers, foresters and landowners committing to restore nature
- Minimise the use of greenfield land by increasing the density of developments

### 10. Do you disagree with any of these opportunities? Tick all that apply.

- Respect landscape character, dark skies and the natural beauty of the countryside in development decisions
- Research and map effective nature recovery networks
- Restrict the amount of development in and around our top biodiversity areas
- Require developments to generate a net gain in biodiversity
- Ensure a net gain in biodiversity takes place where it's most effective
- Require improvements to air and water quality
- Protect trees and recognise the value of nature, giving us clean air, flowing water, soils to grow food in, and enjoyment
- Support farmers, foresters and landowners committing to restore nature
- Minimise the use of greenfield land by increasing the density of developments

### 11. If you have any other thoughts on how we could use the Joint Local Plan to protect the natural environment, please write them here.

## Protecting and enhancing local heritage

This section of the comment form is about protecting and enhancing local heritage. Please view Chapter 8 of the *Joint Local Plan – Issues Consultation* to find out more information and help you answer the questions below.

### 12. Please select the **THREE** opportunities that are most important to you.

- Protect heritage assets from harm or loss
- Empower communities to research and protect their own heritage through Conservation Area Character Appraisals
- Utilise enabling development where this can secure heritage assets and their settings
- Plan development at a scale appropriate to market towns and villages
- Require beauty in design for new buildings and places
- Keep alive traditions of local building materials, palettes and building styles
- Encourage retention and reuse of historic buildings/ heritage assets as a sustainable resource
- Embrace our cultural heritage
- Ensure energy efficient and renewable energy measures for historic buildings adequately safeguard their heritage significance

### 13. Do you disagree with any of these opportunities? Tick all that apply.

- Protect heritage assets from harm or loss
- Empower communities to research and protect their own heritage through Conservation Area Character Appraisals
- Utilise enabling development where this can secure heritage assets and their settings
- Plan development at a scale appropriate to market towns and villages
- Require beauty in design for new buildings and places
- Keep alive traditions of local building materials, palettes and building styles
- Encourage retention and reuse of historic buildings/ heritage assets as a sustainable resource
- Embrace our cultural heritage
- Ensure energy efficient and renewable energy measures for historic buildings adequately safeguard their heritage significance

### 14. If you have any other thoughts on how we could use the Joint Local Plan to protect and enhance local heritage please write them here.

## Thriving inclusive communities

This section of the comment form is about thriving inclusive communities. Please view Chapter 9 of the *Joint Local Plan – Issues Consultation* to find out more information and help you answer the questions below.

### 15. Please select the **THREE** opportunities that are most important to you.

- Plan for housing that is genuinely affordable for our communities
- Require developers to build a mixture of housing types to help first time buyers, key workers, and those on lower incomes to live in the districts
- Retain a proportion of homes that will remain affordable forever, not just for the first buyer
- Support affordable housing on sites we'd normally protect from development
- Promote alternative housing models like self-build, custom and community-led housing
- Continue to support neighbourhood plans so housing meets local needs
- Require high quality, beautiful and sustainable design for new buildings and places
- Plan new developments, town centres and buildings to be accessible for those with disability or dementia, be places for children and young people to enjoy, and to be gender neutral
- Include plans for communities with specific needs including older people, those needing supported living, students, and Gypsies and Travellers

### 16. Do you disagree with any of these opportunities? Tick all that apply.

- Plan for housing that is genuinely affordable for our communities
- Require developers to build a mixture of housing types to help first time buyers, key workers, and those on lower incomes to live in the districts
- Retain a proportion of homes that will remain affordable forever, not just for the first buyer
- Support affordable housing on sites we'd normally protect from development
- Promote alternative housing models like self-build, custom and community-led housing
- Continue to support neighbourhood plans so housing meets local needs
- Require high quality, beautiful and sustainable design for new buildings and places
- Plan new developments, town centres and buildings to be accessible for those with disability or dementia, be places for children and young people to enjoy, and to be gender neutral
- Include plans for communities with specific needs including older people, those needing supported living, students, and Gypsies and Travellers

### 17. If you have any other thoughts on how we could use the Joint Local Plan to tackle housing inequality and affordability, please write them here.

**18. We'd like to hear your ideas for how we could adapt our town centres and high streets to meet our changing needs. Are there any improvements, new facilities or uses that you would like to see in the locations listed in the question below?**

**Which location(s) does your answer above apply to?**

- |                                   |                                    |                                      |
|-----------------------------------|------------------------------------|--------------------------------------|
| <input type="checkbox"/> Abingdon | <input type="checkbox"/> Faringdon | <input type="checkbox"/> Thame       |
| <input type="checkbox"/> Botley   | <input type="checkbox"/> Grove     | <input type="checkbox"/> Wallingford |
| <input type="checkbox"/> Didcot   | <input type="checkbox"/> Henley    | <input type="checkbox"/> Wantage     |

## **Transport and facilities**

This section of the comment form is about transport and facilities. Please view Chapter 10 of the *Joint Local Plan – Issues Consultation* to find out more information and help you answer the questions below.

**19. Please select the THREE opportunities that are most important to you.**

- Focus new development in settlements where the facilities for everyday living are available within 20 minutes' walk or cycling distance
- Restrict development in locations which are not able to function as 20 minute neighbourhoods
- Safeguard shops, community facilities and services from redevelopment to new uses
- Plan for new infrastructure alongside development, especially in Garden Communities at Didcot, Berinsfield and Dalton Barracks and on strategic allocation sites
- Plan a transition to sustainable transport modes by walking and cycling, shared transport, electric and alternative fuel cars, driverless cars, and plan for enhanced public transport including re-opening of the Cowley Branch line and a station at Grove
- Plan for safe routes for walking and cycling, new quietways, new routes between settlements, secure bike parking, cargo bikes, electric bikes and scooters, electric vehicle charging
- Plan for sustainable travel that is reliable, integrated and accessible
- Plan for new technological innovation in transport and communications technologies

**20. Do you disagree with any of these opportunities? Tick all that apply.**

- Focus new development in settlements where the facilities for everyday living are available within 20 minutes' walk or cycling distance
- Restrict development in locations which are not able to function as 20 minute neighbourhoods
- Safeguard shops, community facilities and services from redevelopment to new uses
- Plan for new infrastructure alongside development, especially in Garden Communities at Didcot, Berinsfield and Dalton Barracks and on strategic allocation sites
- Plan a transition to sustainable transport modes by walking and cycling, shared transport, electric and alternative fuel cars, driverless cars, and plan for enhanced public transport including re-opening of the Cowley Branch line and a station at Grove
- Plan for safe routes for walking and cycling, new quietways, new routes between settlements, secure bike parking, cargo bikes, electric bikes and scooters, electric vehicle charging
- Plan for sustainable travel that is reliable, integrated and accessible
- Plan for new technological innovation in transport and communications technologies

**21. If you currently drive, what would encourage you to drive less and/or walk, cycle or take public transport more?**

**22. If you have any other thoughts on how we could use the Joint Local Plan to ensure people have easy access to the services they need to use on a day-to-day basis, please write them here.**

## Healthy lifestyles and safe communities

This section of the comment form is about healthy lifestyles and safe communities. Please view Chapter 11 of the *Joint Local Plan – Issues Consultation* to find out more information and help you answer the questions below.

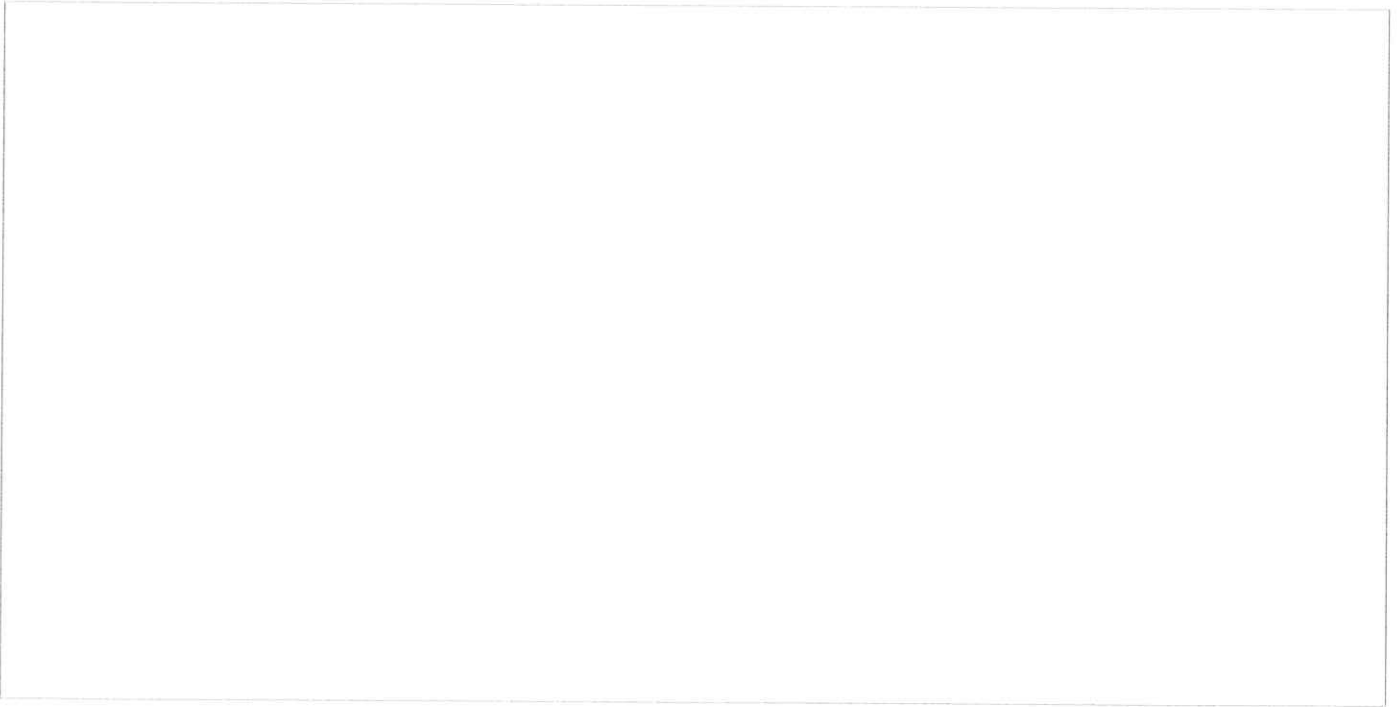
### 23. Please select the THREE opportunities that are most important to you.

- Provide opportunities for active travel, exercise, social interaction and recreation
- Enhance opportunities for exercise and enjoying high-quality open spaces and the countryside
- Places for people to grow their own food
- Avoid inappropriate development in flood risk areas
- Limit and control new sources of air, water, noise and light pollution
- Require building designs to be adapted to be resilient to climate change impacts like overheating

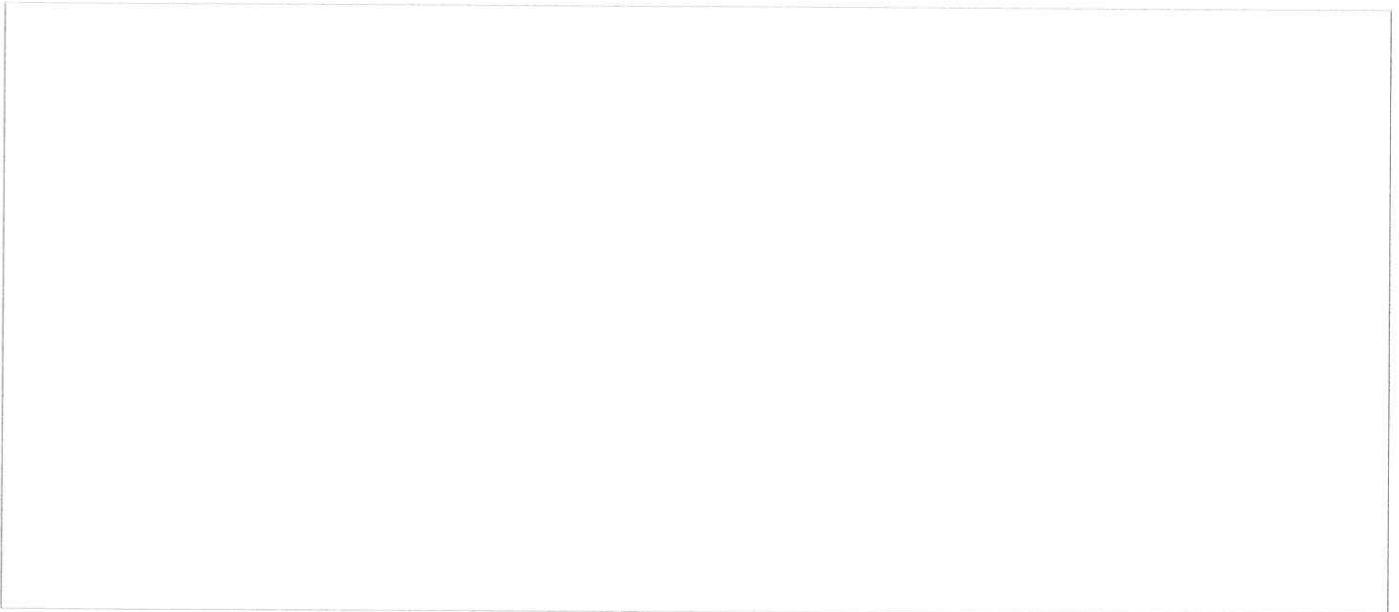
### 24. Do you disagree with any of these opportunities? Tick all that apply.

- Provide opportunities for active travel, exercise, social interaction and recreation
- Enhance opportunities for exercise and enjoying high-quality open spaces and the countryside
- Places for people to grow their own food
- Avoid inappropriate development in flood risk areas
- Limit and control new sources of air, water, noise and light pollution
- Require building designs to be adapted to be resilient to climate change impacts like overheating

**25. If you have any other thoughts on how we could use the Joint Local Plan to give residents and visitors the opportunity to live healthy lifestyles, please write them here.**



**26. If you have any other thoughts on how we could use the Joint Local Plan to keep residents and visitors safe from pollution, flooding and the effects of climate change, please write them here.**



## Jobs and opportunities for innovation

This section of the comment form is about jobs and opportunities for innovation. Please view Chapter 12 of the *Joint Local Plan – Issues Consultation* to find out more information and help you answer the questions below.

### 27. Please select the **THREE** opportunities that are most important to you.

- Plan jobs near homes and homes near jobs
- Support working from home and community based work hubs and facilities
- Provide employment opportunities for innovation in Science Vale
- Work to support innovation in Science Vale like the fusion work at Culham Science Centre, and space technology and vaccine manufacture at Harwell
- Support the 'circular economy' and businesses working towards a greener future
- Support rural land-based businesses, the local food economy and rural tourism

### 28. Do you disagree with any of these opportunities? Tick all that apply.

- Plan jobs near homes and homes near jobs
- Support working from home and community based work hubs and facilities
- Provide employment opportunities for innovation in Science Vale
- Work to support innovation in Science Vale like the fusion work at Culham Science Centre, and space technology and vaccine manufacture at Harwell
- Support the 'circular economy' and businesses working towards a greener future
- Support rural land-based businesses, the local food economy and rural tourism

### 29. If you have any other thoughts on how we could use the Joint Local Plan to cater for future working styles and patterns, please write them below.

**30. If you have any other thoughts on how we could use the Joint Local Plan to help ensure there are valuable and rewarding jobs in the districts, please write them here.**

### **Any other thoughts on the Issues Consultation document?**

Please view the *Joint Local Plan – Issues Consultation* document to find out more information and help you answer the questions below.

**31. Have we correctly summarised the issues, challenges and opportunities for the Joint Local Plan?**

- Yes
- No
- Don't know

**If you've said no, what do you think we've missed?**

**32. Do you have any other comments?**

**Section 3**

**Technical Documents**

**Sustainability Appraisal (SA) Screening and Scoping Report**

We are required by law to prepare a sustainability appraisal alongside the Joint Local Plan. Sustainability appraisals look at a wide range of environmental, social, and economic characteristics and provide plan-makers with a set of objectives to assess their emerging proposals against. The first step of a sustainability appraisal is the screening and scoping report, which identifies these objectives.

Each subsequent time we consult on our plan, we will publish a sustainability appraisal report, which will identify the options we have considered, and the mitigation measures needed to offset any harmful effects. The sustainability appraisal does not dictate the direction of the plan but is a useful tool for identifying and mitigating any potential adverse effects that a plan might otherwise have.

We are currently at the Screening and Scoping Report stage, where we set the context and objectives, establish the baseline and decide on the overall scope.

**33. If you have any comments on the Sustainability Appraisal Document, please provide them below.**

## **Habitats Regulations Assessment (HRA) Scoping Report**

We have produced an HRA Scoping Report, which identifies the habitats sites that could be affected by the Joint Local Plan and their protected characteristics, current condition and main threats. The HRA is tasked with considering the habitats sites that sit at the top of the hierarchy of biodiversity designations in England and include Special Areas of Conservation for habitats and/or terrestrial/marine species and also Special Protection Areas for birds.

We have also identified the other plans and projects that have potential to give rise to in-combination effects. This information will feed into the HRA, which will be undertaken at a later stage in the plan-making process.

A Habitats Regulations Assessment (HRA), available alongside this comment form refers to the several distinct stages of assessment which must be undertaken to determine if a plan or project (such as new development) may affect the protected features of a habitats site before deciding whether to undertake, permit or authorise it.

**34. Have we correctly identified the designated and candidate habitats sites that should be considered through the HRA of the Joint Local Plan? (See Chapter 4 and Appendices A, C & D.)**

- Yes
- No
- I don't know

### **Comments**

**35. Have we correctly identified the other plans and projects that should be considered in the assessment of potential in-combination effects? (See Chapter 5 and Appendix E.)**

- Yes
- No
- I don't know

**Comments**

**36. Do you agree with the proposed next steps for the HRA process? (See Chapter 6.)**

- Yes
- No
- I don't know

**Comments**

**37. If you have any other comments on the Habitats Regulations Assessment (HRA) Scoping Report, please provide them below.**

## Draft Settlement Assessment Methodology

Having a strong understanding of the nature of the towns and villages in South Oxfordshire and Vale of White Horse is a key part of our evidence base and essential to forming a successful strategy for the future of our districts in our Joint Local Plan.

The Settlement Assessment will look at settlements in the districts to determine their profile and the level of services each has. This assessment will therefore look at each place's population, households, employment, shops, schools and public transport, as well as other services.

The Draft Settlement Assessment Methodology, available alongside this comment form proposes how we'll undertake the settlement assessment, which will eventually result in a settlement hierarchy.

### **38. Are there any services or facilities missing from the list of services and facilities proposed to be assessed?**

- Yes
- No
- I don't know

**If yes, please provide a list of the services or facilities we have missed:**

### **39. Do you consider that any services or facilities should be removed from the assessment?**

- Yes
- No
- I don't know

### **40. If yes, please provide a list of the services or facilities you think should be removed from the assessment**

**41. Looking at the proposed scoring identified in tables 1 to 6 do you consider that the scoring reflects the weight/importance of each service or facility?**

- Yes
- No
- I don't know

**If you have any comments on the scoring, please provide them below.**

**42. What do you consider to be a reasonable distance to walk, cycle or use public transport to access key employment sites or to access services and facilities?**

**43. If you have any other comments on the Draft Settlement Assessment Methodology, please provide them below.**

### **Duty to Cooperate Scoping Document**

The district councils have a legal 'Duty to Cooperate' with other local planning authorities and organisations on strategic planning matters that are driven by larger than local issues – these are issues that are likely to have an impact beyond the immediate Local Plan area.

The strategic matters that need to be addressed through cross-boundary cooperation should be identified at the beginning of the Local Plan making process.

A strategic matter is defined as 'sustainable development or use of land that has or would have a significant impact on at least two planning areas, including, in particular, that in connection with strategic infrastructure.'

Our Duty to Cooperate Scoping document, available to view alongside this comment form identifies the strategic matters relevant to the districts. These matters will be further refined, based on Duty to Cooperate discussions over the coming months.

**44. Have we identified all the strategic planning matters? (see paragraph 3.7 of the Duty to Cooperate Scoping Document)**

- Yes
- No
- I don't know

**If no, please tell us what matters we have missed:**

**45. In respect of the Duty to Cooperate, have we identified all the local authorities and organisations that we need to engage in the plan-making process? (see paragraphs 4.2 and 4.3 and the table starting on page 8 of the Duty to Cooperate Scoping Document)**

- Yes
- No
- I don't know

**If no, what local authorities and organisations have we missed?**

**46. Do you have any comments on the table regarding which strategic matters we intend to engage neighbouring authorities and prescribed bodies on? (See the table starting on page 8 of the Duty to Cooperate Scoping Document).**

**47. If you have any other comments on the Duty to Cooperate Scoping Document, please provide them below**

### **Our commitment to equal access for all**

We are committed to making sure that residents have equal access to all council services. Please help us to keep track of how successfully we are achieving this by ticking the appropriate boxes below. All questions are optional. All information is confidential and will only be used to help us monitor whether views differ across the community.

We are especially interested in knowing whether we are hearing from younger people and other groups that don't often engage with us, so please do share this survey with anyone who might be interested (there's a link at the end you can use).

### **48. Which of the following describes how you identify yourself?**

- Male
- Female
- Neither of the above (specify below if you would like to)
- Prefer not to say
- I identify as:

**49. How old are you?**

- 16-24
- 25-34
- 35-44
- 45-54
- 55-64
- 65-74
- 75+
- Prefer not to say

**50. What is your ethnic group?**

**White**

- English, Welsh, Scottish, Northern Irish, British
- Irish
- Gypsy or Irish Traveller
- Any other white background

**Asian or Asian British**

- Indian
- Pakistani
- Bangladeshi
- Chinese
- Any other Asian background

**Black or Black British**

- Caribbean
- African
- Any other black background

**Mixed or Multiple Ethnic Groups**

- White and Black Caribbean
- White and Black African
- White and Asian
- Any other mixed background

**Other Ethnic Group**

- Arab
- Other (please specify):

**51. Are your day to day activities limited because of a health problem or disability which has lasted or is expected to last 12 months or more?**

- Yes
- No
- Prefer not to say

If yes, please specify:

**52. How did you hear about the Joint Local Plan Issues consultation?**

- |   |  |
|---|--|
| <input type="checkbox"/> District council social media accounts (e.g. Facebook, Twitter, Instagram) | <input type="checkbox"/> Another website                                 |
| <input type="checkbox"/> Other social media accounts  | <input type="checkbox"/> Word of mouth                                   |
| <input type="checkbox"/> Poster   | <input type="checkbox"/> Read it in the newspaper                        |
| <input type="checkbox"/> Newsletter   | <input type="checkbox"/> Radio/TV  |
| <input type="checkbox"/> Email  | <input type="checkbox"/> Parish Council                                  |
| <input type="checkbox"/> Letter   | <input type="checkbox"/> Other (please specify):<br><input type="text"/> |
| <input type="checkbox"/> Our website  |  |

**53. How satisfied or dissatisfied were you with the way in which you have been able to provide feedback on the Joint Local Plan?**

- Very satisfied
- Satisfied
- Neutral
- Dissatisfied
- Very dissatisfied

Our aim is to continually improve the ways in which we engage, so it would be useful if you could highlight any parts of the engagement process that you were particularly satisfied or dissatisfied with?

**Thank you for your comments.**



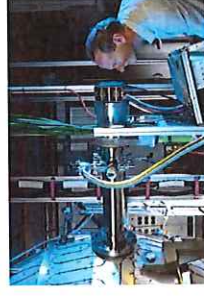
Listening Learning Leading



# Joint Local Plan - Issues Consultation

South Oxfordshire and  
Vale of White Horse  
District Councils

May 2022



# Contents

<b>1. Introduction</b> .....	<b>4</b>	<b>7. Nature Recovery and Landscape</b> .....	<b>32</b>
A new Joint Local Plan for South Oxfordshire .....		Map of Nature Recovery and Landscape .....	33
and the Vale of White Horse .....	5	Which part of the Vision does this address? .....	35
What's happening now .....	8	OPPORTUNITIES: What can the Joint Local Plan do about this? .....	36
<b>2. The Districts - Context</b> .....	<b>10</b>	<b>8. Protecting and Enhancing Local Heritage</b> .....	<b>38</b>
About the Districts .....	11	Map of Local Heritage .....	39
Map of the Districts .....	12	Which part of the Vision does this address? .....	41
<b>3. How things are right now</b> .....	<b>14</b>	OPPORTUNITIES: What can the Joint Local Plan do about this? .....	42
<b>4. Vision</b> .....	<b>18</b>	<b>9. Thriving Inclusive Communities</b> .....	<b>44</b>
Our Vision .....	19	Our towns and villages .....	46
<b>5. Themes</b> .....	<b>22</b>	Which part of the Vision does this address? .....	47
Corporate Plan themes .....	23	OPPORTUNITIES: What can the Joint Local Plan do about this? .....	48
Joint Local Plan themes .....	25	<b>10. Transport and Facilities</b> .....	<b>50</b>
<b>6. Reducing Carbon Emissions</b> .....	<b>26</b>	Which part of the Vision does this address? .....	52
Which part of the Vision does this address? .....	28	OPPORTUNITIES: What can the Joint Local Plan do about this? .....	53
OPPORTUNITIES: What can the Joint Local Plan do about this? .....	29	<b>11. Healthy Lifestyles and Safe Communities</b> .....	<b>56</b>
		Which part of the Vision does this address? .....	58
		OPPORTUNITIES: What can the Joint Local Plan do about this? .....	59

<b>12. Jobs and Opportunities for Innovation</b> .....	<b>62</b>
Map of Science Vale.....	64
Which part of the Vision does this address? .....	65
OPPORTUNITIES: What can the Joint Local Plan do about this? .....	66
<b>13. Any other thoughts?</b> .....	<b>68</b>
<b>14. Get Involved and Next Steps</b> .....	<b>70</b>
Get Involved and Next Steps .....	71
<b>15. Technical documents</b> .....	<b>74</b>
Sustainability Appraisal (SA) Screening and Scoping Report.....	75
Habitats Regulations Assessment (HRA) Scoping Report.....	75
Draft Settlement Assessment Methodology .....	76
Duty to Cooperate Scoping Document.....	76
How to comment on the technical documents .....	77

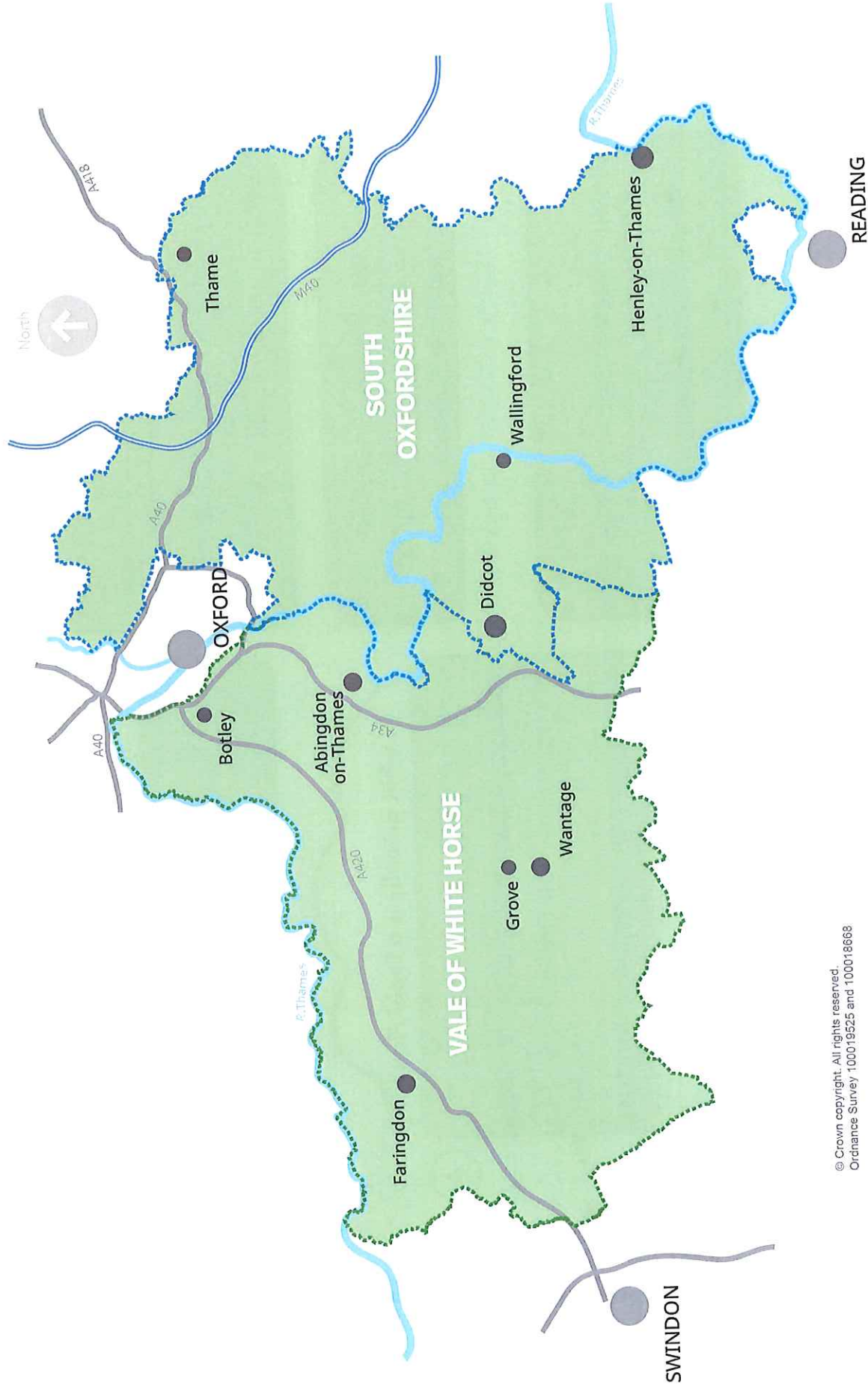
<b>16. Local Plan Explainer</b> .....	<b>78</b>
A new Joint Local Plan for our area .....	79
Existing planning documents .....	79
Future Development Plan .....	80
Oxfordshire Plan 2050 context .....	81
Oxfordshire Strategic Vision .....	82
Neighbourhood Plan Context .....	83
Map of the status of Neighbourhood Planning across the districts .....	84
The Local Plan process .....	85

<b>17. Glossary</b> .....	<b>86</b>
Map data sources.....	91



# 1. Introduction

# A new Joint Local Plan for South Oxfordshire and the Vale of White Horse



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Ordnance Survey 100019525 and 100018668

# A new joint Local Plan for South Oxfordshire and Vale of White Horse

**Our councils have come together to prepare a new Local Plan that covers our two districts – here are Councillors Debby Hallett and Anne-Marie Simpson to explain more...**



1

We're working together because our districts are quite similar and our Councils have shared ambitions about how to make our areas better. Challenges such as climate change, traffic congestion and shortage of affordable housing don't stop at district boundaries. By working together we can achieve more, while reducing costs to the taxpayer.

3

And we also recognise we have to improve social, environmental and economic wellbeing for all. These factors will influence everything we intend to do in our new Joint Local Plan.

5

Crucially, this plan will also help us identify ways we can meet our targets to make our part of the country carbon neutral, to make sure we're doing our part to tackle the climate emergency – it's a priority for both of our councils. Through the plan we can set new environmental standards for development.

2

The climate emergency is our biggest challenge, and we must plan for a future that allows us to do all we can to tackle climate change, while protecting what's special about the districts.

## So what actually is a Local Plan?

4

A Local Plan does a lot of things. One of its purposes is to guide what kinds of new housing and jobs we need and where they should go – it also helps identify what infrastructure like transport, schools and leisure facilities we need. The policies in a Local Plan are used when making decisions on planning applications in the area.



# A new joint Local Plan for South Oxfordshire and Vale of White Horse

Our councils have come together to prepare a new Local Plan that covers our two districts  
- here are Councillors Debby Hallett and Anne-Marie Simpson to explain more...

**Why do we need more development? Isn't there loads planned already?**

7 Yes, there is a lot planned already, enough until the year 2031 for Vale and 2035 for South Oxfordshire, plus some larger developments that will continue delivering homes beyond this. However, new plans need to cover at least a 15-year period and so our new local plan will cover the extra years to 2041.

**But don't you already have a Local Plan? Why do we need a new one?**

6 We do have Local Plans for South Oxfordshire and Vale of White Horse. However, we have a legal requirement to review plans at least every 5 years. It takes several years to prepare a new plan and go through all the legally required steps, so we need to start now. But more than that, we know how important it is to get this right, so we want to give ourselves as much time as possible to achieve that.

**So what's this consultation about?**

8 This early stage of a new local plan is all about issues. We're not proposing any new locations for development or asking you how much development the districts should take - that will come later. We're working out what are the issues the joint local plan should tackle before we get to writing any new policies.

9 You'll have several opportunities to comment as our new Joint Local Plan is developed. This is your first and we'd love to hear from you. Thank you for any comments you share - they will really help us.



# What's happening now?

We're at the early stages of creating this plan, and it's very important to us that you're part of the process from the beginning. This is a great opportunity to help make sure we're going in the right direction from the start.

We're currently trying to understand the main issues facing our districts and how we might be able to use the Local Plan to address them – you're the best people to help us understand this.

We've tried to avoid using planning 'jargon' as much as we can and have provided a **[glossary](#)** when we think some words or phrases might need a bit more explanation.

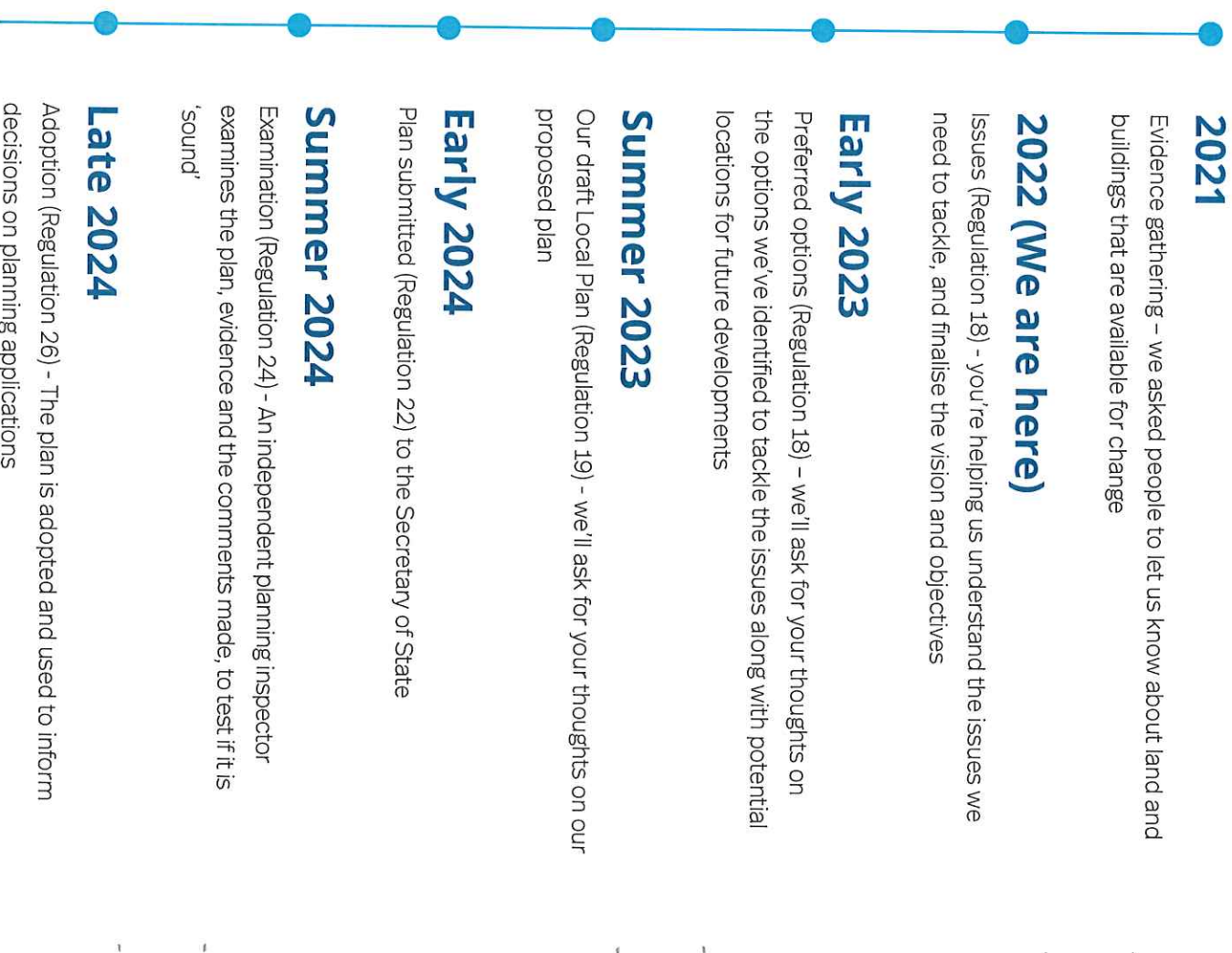
You can respond to as many questions as you like in this consultation, more details on how you can respond can be found here: **[Get Involved and Next Steps](#)**

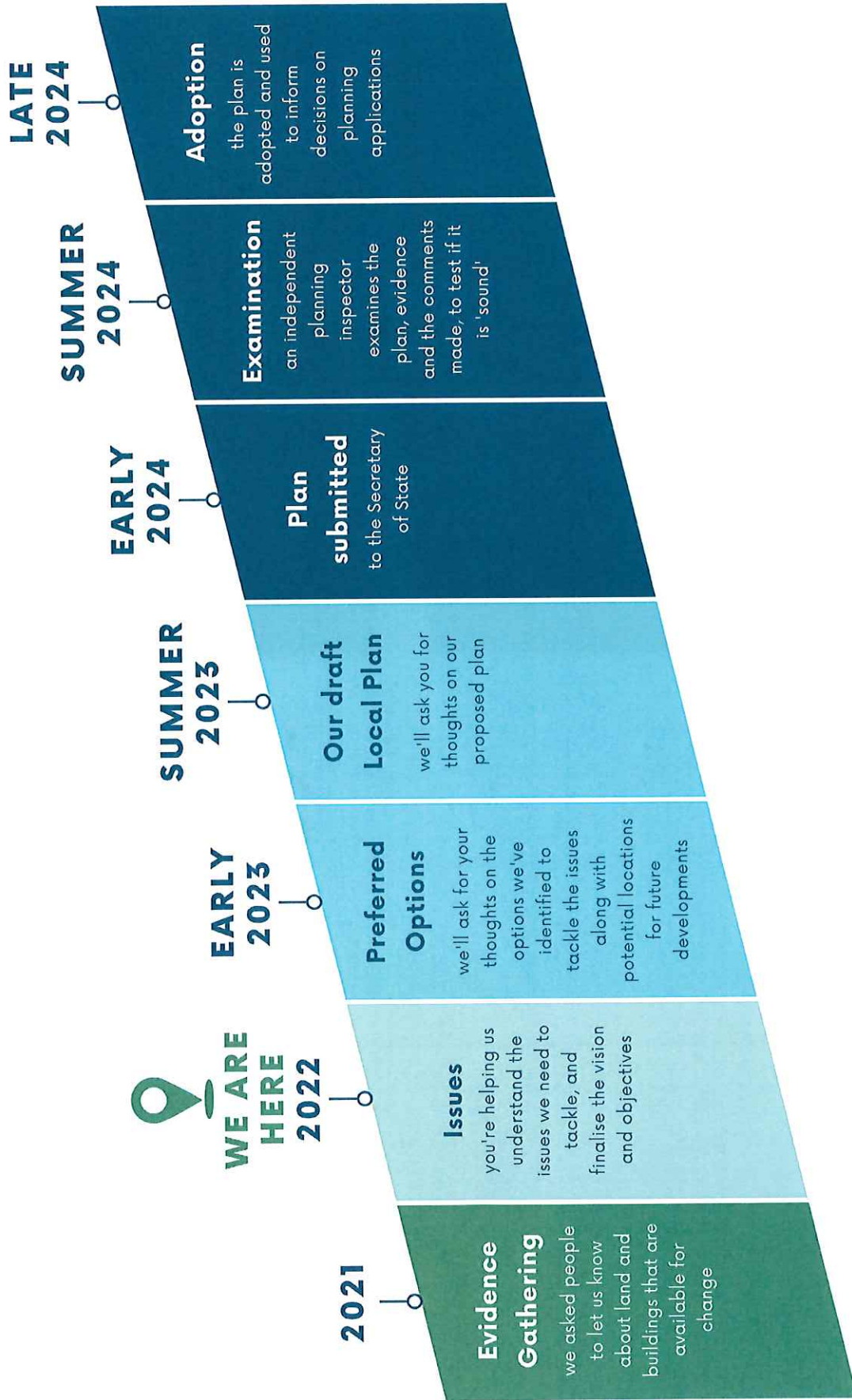
## The Local Plan process

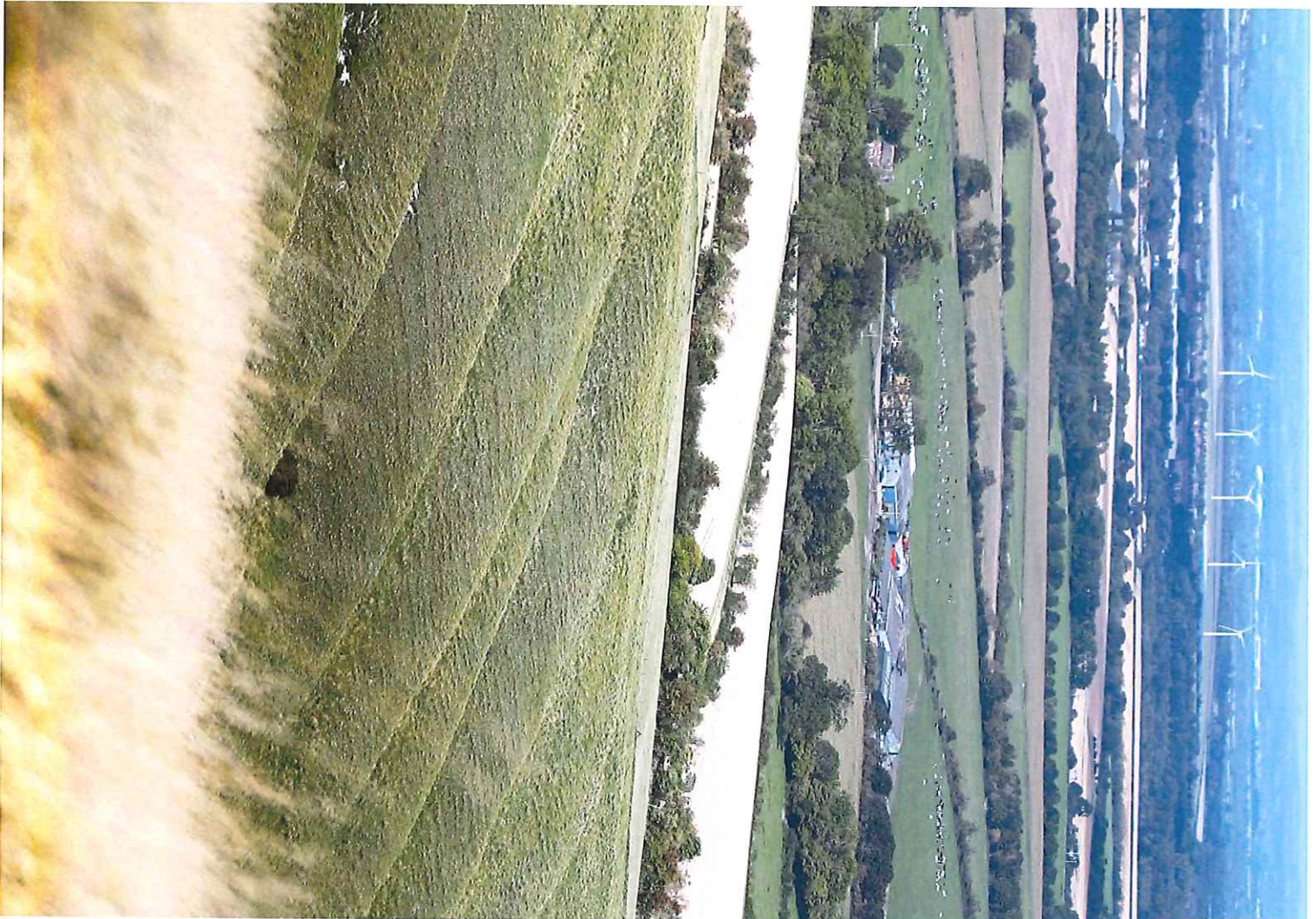
We have to follow government legislation and guidelines on creating Local Plans. It's those guidelines that mean we have to create an updated one every few years.

We want to make things as easy as we can here so lots of people can take part, including people who are new to the idea of Local Plans, and so we have simplified it a lot here. If you're interested to learn more, or you feel like you need to understand the process and context a bit better, head over to the section where we explain it in more detail: **[Local Plan explainer](#)**

Here's a quick look at a timeline of the process to create our Joint Local Plan:







## **2. The Districts**

### **- Context**

# About the Districts

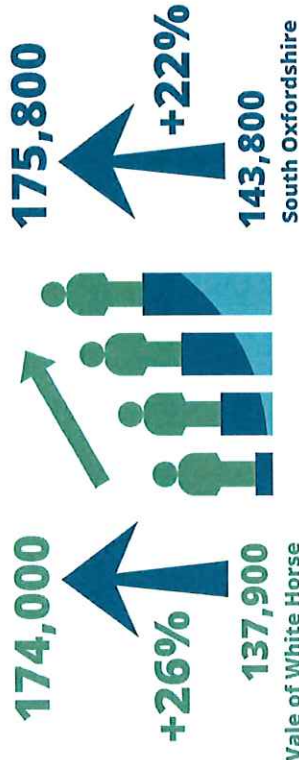
Here are some facts and figures about our districts that help set the scene and introduce challenges and opportunities that our plan could address.

Estimated population (2020)...



Vale of White Horse South Oxfordshire

Total population projections to 2030...



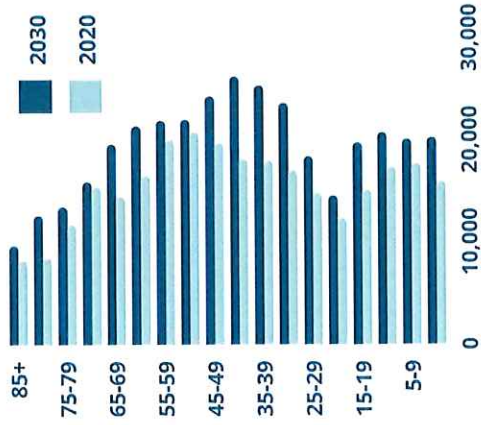
There are 3 Garden Communities in South and Vale...

**DIDCOT**  
**BERINSFIELD**  
**DALTON BARRACKS**

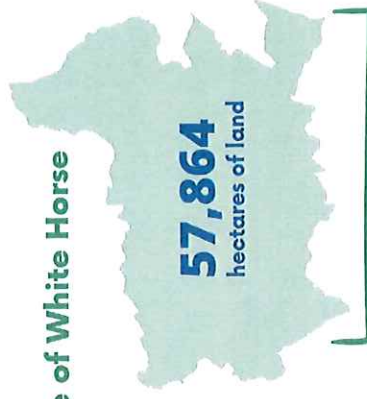


Garden communities provide new housing, infrastructure, jobs and services in sustainable settlements.

Population projections to 2030 by age...



Vale of White Horse



of which:

**14%**

is within the Green Belt

**23%**

is within an AONB

Overall totals for both districts...



of which:

**21%**

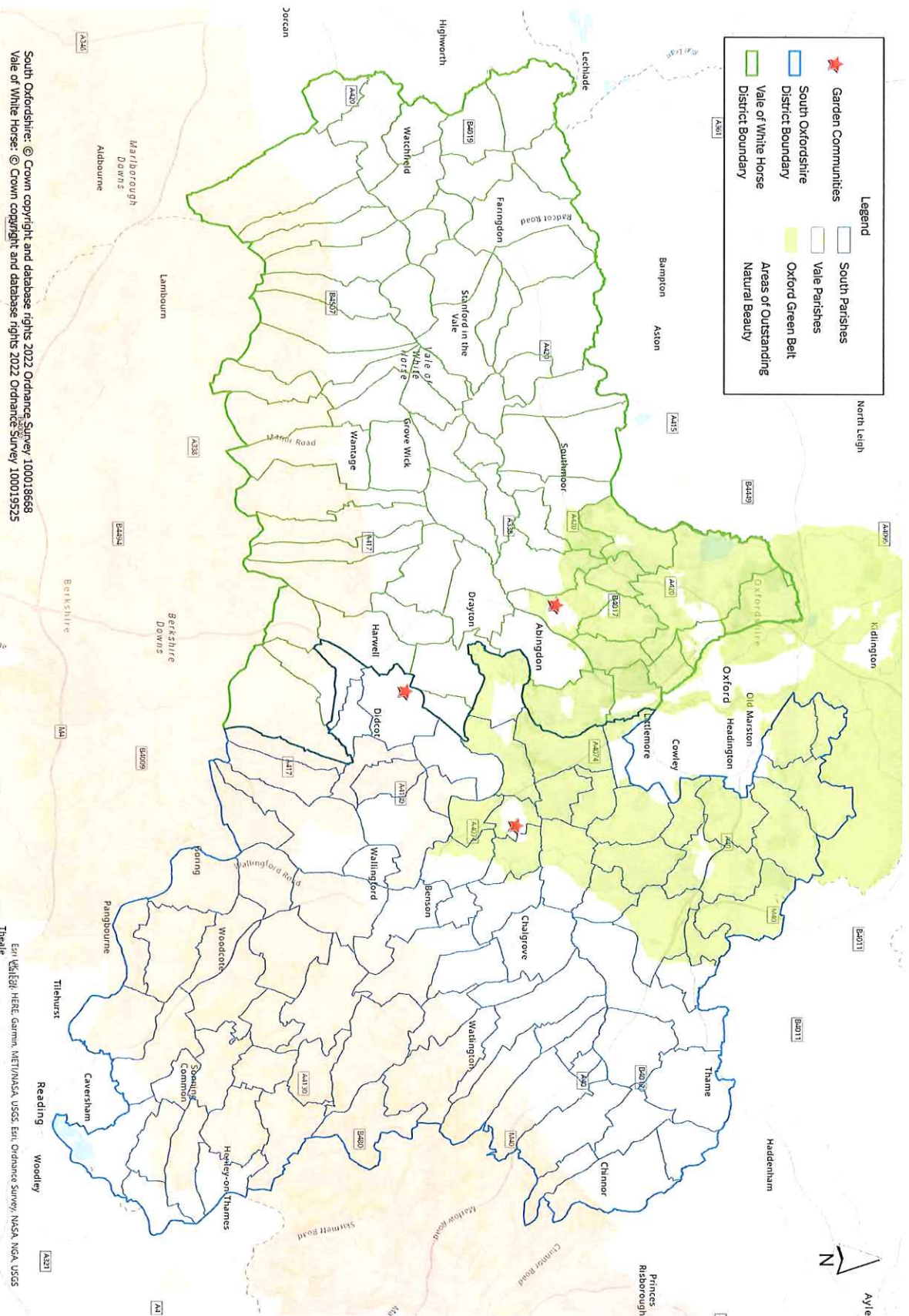
is within the Green Belt

**42%**

is within an AONB

South Oxfordshire

# Map of the districts



South Oxfordshire: © Crown copyright and database rights 2022 Ordnance Survey, 1000136688  
 Vale of White Horse: © Crown copyright and database rights 2022 Ordnance Survey, 1000135255

To explore this map in greater detail please visit our Joint Local Plan websites: <https://www.whitehorsedc.gov.uk/jointlocalplan> or <https://www.southoxon.gov.uk/jointlocalplan>. See glossary for definitions of the terms which appear in this map.

# Questions

If you would like to answer the questions shown in this document please visit the Joint Local Plan websites for details on how to respond. <https://www.whitehorsedc.gov.uk/jointlocalplan> or <https://www.southoxon.gov.uk/jointlocalplan>.

To help us understand your priorities, we'd like you to tell us...

1. What three things do you value most about where you live?

RIVERSIDE

1 PICTURESQUE

2 NICE PUBS WITHIN WALKING DISTANCE

3

2. In fewer than 50 words, if you could make one change to improve where you live, what would it be? Include the name of the town, village or area you're talking about.

NO

3RD BRIDGE



### **3. How things are right now**

# How things are right now

In this section, we'll set the scene around the main issues that a Local Plan might be able to influence. They are things we think we'll need to consider when preparing the local plan – there are two questions at the end of the section so you can let us know if you agree and which is the most important.



## Climate

We have a commitment and a duty to tackle the climate emergency, reduce carbon emissions, increase biodiversity and reverse nature's decline.



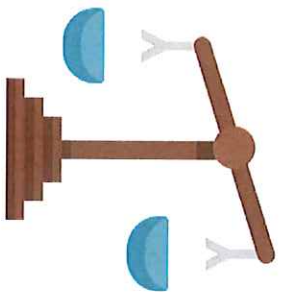
## Protecting our countryside

We live in districts of beautiful countryside that are home to two Areas of Outstanding Natural Beauty (AONB), which we have an important duty to protect. Oxfordshire is the most rural part of South-East England and we have lots of important historical and natural assets to look after, including the River Thames.



## Our towns and villages

Most of our residents live in historic villages and market towns, and we have a duty to manage any change in these locations extremely carefully. There are also a number of areas where significant growth and change is already planned or happening.



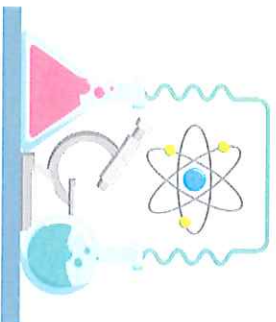
### **Quality of life and affordability**

We're an area of high demand for housing, with house prices beyond the reach of many who want to live in the district. Living in an expensive area of the country makes the lives of those with less money even more difficult. People's experiences of living in the districts vary and while we live in a relatively affluent area of the country, many households are facing a cost of living squeeze. The resident population is also getting older, which brings more challenges.



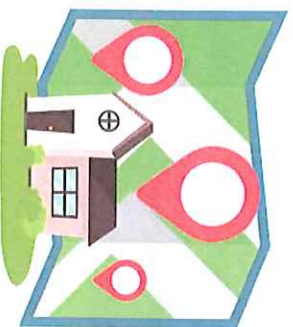
### **Traffic and transport**

Many of our roads have already reached or exceeded their maximum capacity, which causes congestion and significant air quality issues in certain areas. As a neighbour to the city of Oxford and large towns of Reading and Swindon, many people live in the districts and travel to work outside, and vice versa.



### **Employment**

There are low levels of unemployment in the districts, which are most notably home to a wide range of science and innovation businesses that are nationally and globally important. Many of these businesses are based in an area known as Science Vale that crosses the district boundary and is home to two Enterprise Zones.



### **Development and Infrastructure**

Our adopted Local Plans have already planned large quantities of new housing and employment land, much of it still to be built. It is important that new infrastructure is delivered alongside this growth, to reduce pressure on existing facilities. This will include better public transport, new schools, sewage treatment capacity, health facilities and open space.

# Questions

If you would like to answer the questions shown in this document please visit the Joint Local Plan websites for details on how to respond. <https://www.whitehorsedc.gov.uk/jointlocalplan> or <https://www.southoxon.gov.uk/jointlocalplan>.

## 3. Overall, do you agree that these are the main issues that the Joint Local Plan should consider?

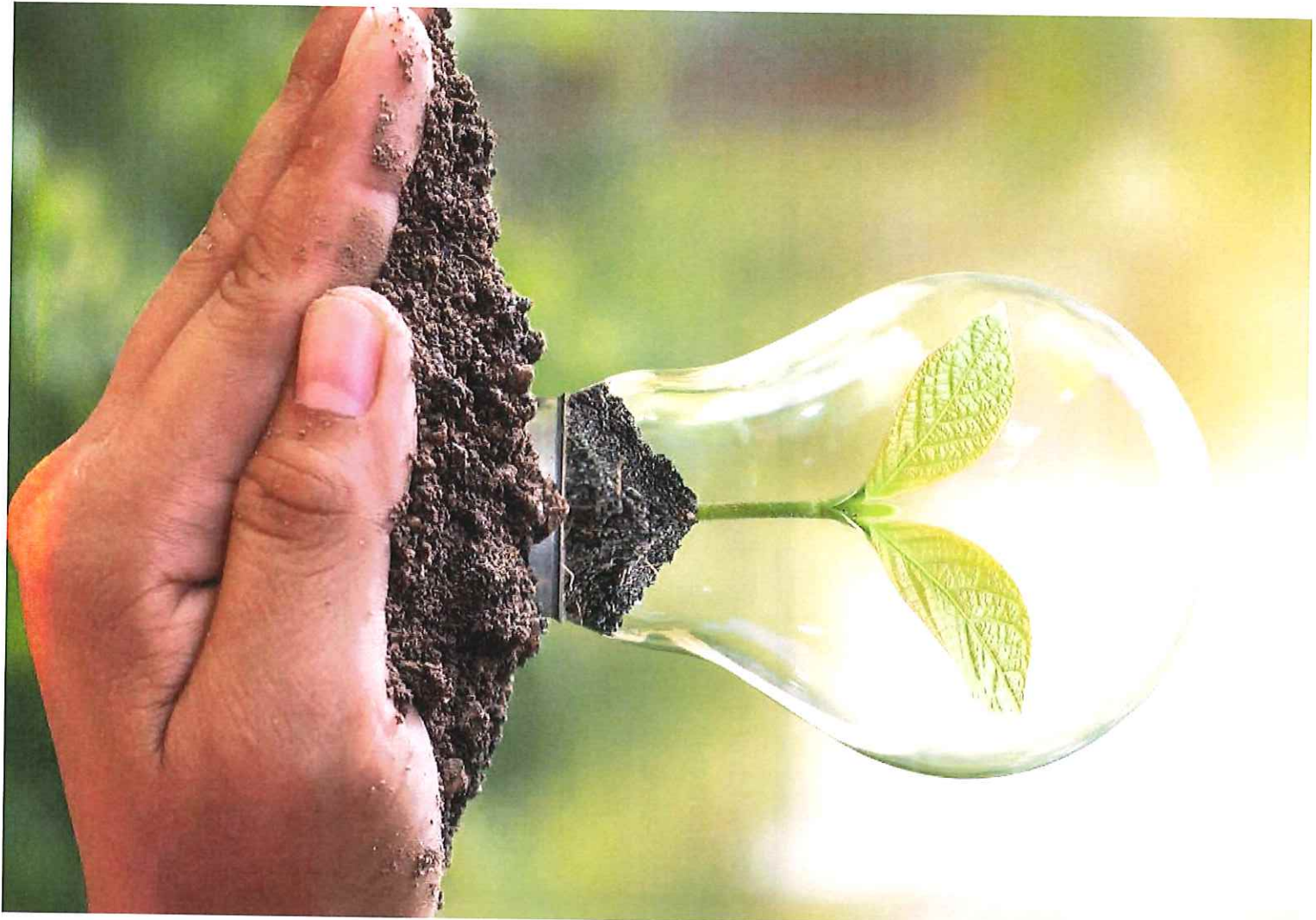
- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

If you think there are other issues the Local Plan should consider, please let us know in this box:

WE WANT A THIRD BRIDGE FROM  
THE END OF THE B29.

## 4. Which of these issues do you think is the most important?

- Climate
- Protecting our countryside
- Our towns and villages
- Quality of life and affordability
- Traffic and transport ✓
- Employment
- Development and Infrastructure



## 4. Vision

# Our Vision

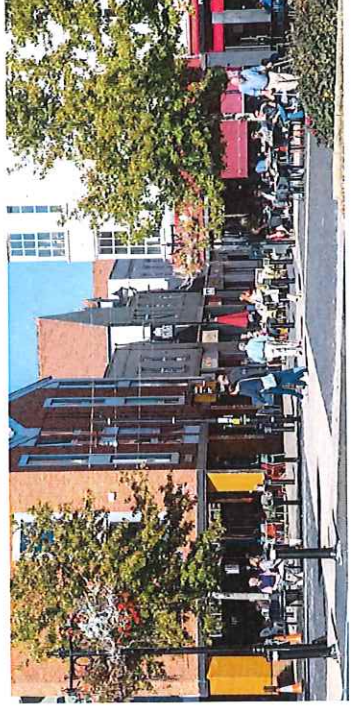
We'd like to show you our draft Vision for the Joint Local Plan – it highlights our goals for the future and what we want to achieve.



Our vision is for **carbon neutral** districts, for current and future generations.



For this to be a place where **nature** is thriving, and nature reserves are no longer isolated pockets. A place where **history** is still visible, where heritage and landscape character are safeguarded and valued, and the beauty and the distinctive local identity of our towns and villages have been enhanced.



A place where **people can thrive**. Where people have housing choices they can afford, where villages, market towns and garden communities are diverse and inclusive places where people of all ages and backgrounds can live together.



A place where local residents can reach the **facilities** they need for everyday living on foot, bicycle or by **zero-emission and low carbon transport choices**.



Where residents and visitors can live **healthy lifestyles** and access greenspace. Where **people are safe** from pollution, flooding, and the effects of climate change.



Where there are valuable and rewarding **jobs**, embracing clean technologies and growing the opportunities in Science Vale for the districts to contribute on a national and international scale to solving pressing global issues.

# Questions

If you would like to answer the questions shown in this document please visit the Joint Local Plan websites for details on how to respond. <https://www.whitehorsedc.gov.uk/jointlocalplan> or <https://www.southoxon.gov.uk/jointlocalplan>.

## 5. How much do you agree with this vision for the Joint

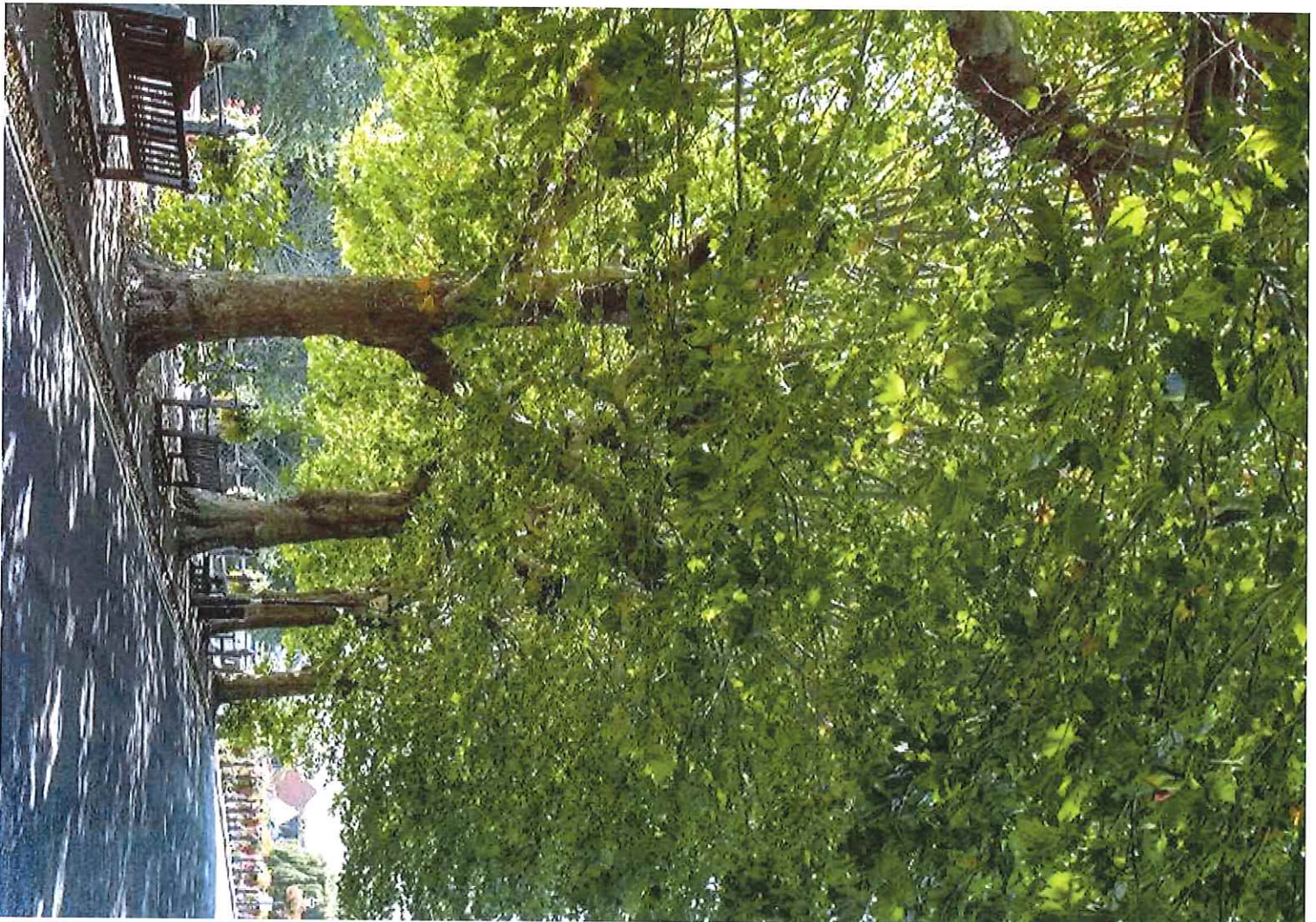
### Local Plan?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

If there is anything you disagree with in particular, or you have any other thoughts let us know here:

THERE IS NO MENTION OF  
3RD BRIDGE

## 5. Themes



# Corporate Plan themes

To start work on the Joint Local Plan, we have identified where some priorities set out in our Corporate Plans are linked to the main planning issues raised in [Chapter 3](#). These have inspired the key themes for the Joint Local Plan.

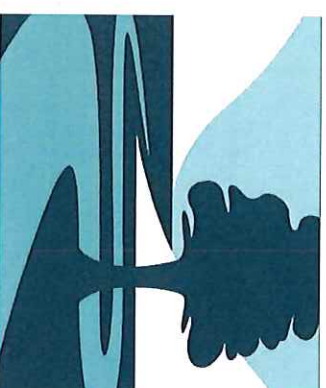


If you want to find out more about our corporate plans, please use the links below:

### **Corporate Plan - South Oxfordshire District Council**

The Corporate Plan highlights the council's priorities and strategic themes for the next few years. Following a really successful engagement exercise with residents, we reviewed hundreds of responses and our Cabinet members worked hard to finalise the plan. It was adopted at a full council meeting in October 2020.

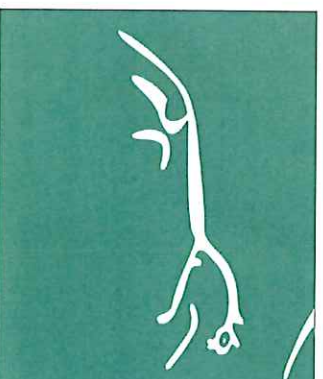
<https://www.southoxon.gov.uk/south-oxfordshire-district-council/about-the-council/corporate-plan/>



### **Corporate Plan - Vale of White Horse District Council**

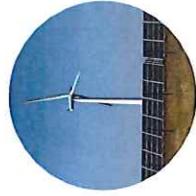
The Corporate Plan highlights the council's priorities and strategic themes for the next few years. Following a really successful engagement exercise with residents, we reviewed hundreds of responses and our Cabinet members worked hard to finalise the plan. It was adopted at a full council meeting in October 2020.

<https://www.whitehorsedc.gov.uk/vale-of-white-horse-district-council/about-the-council/corporate-plan/>



# Joint Local Plan themes

In the next chapters we look at the following themes in a bit more detail and will ask you what you think as we go.



Reducing Carbon Emissions



Transport and Facilities



Nature Recovery and Landscape



Healthy Lifestyles and Safe Communities



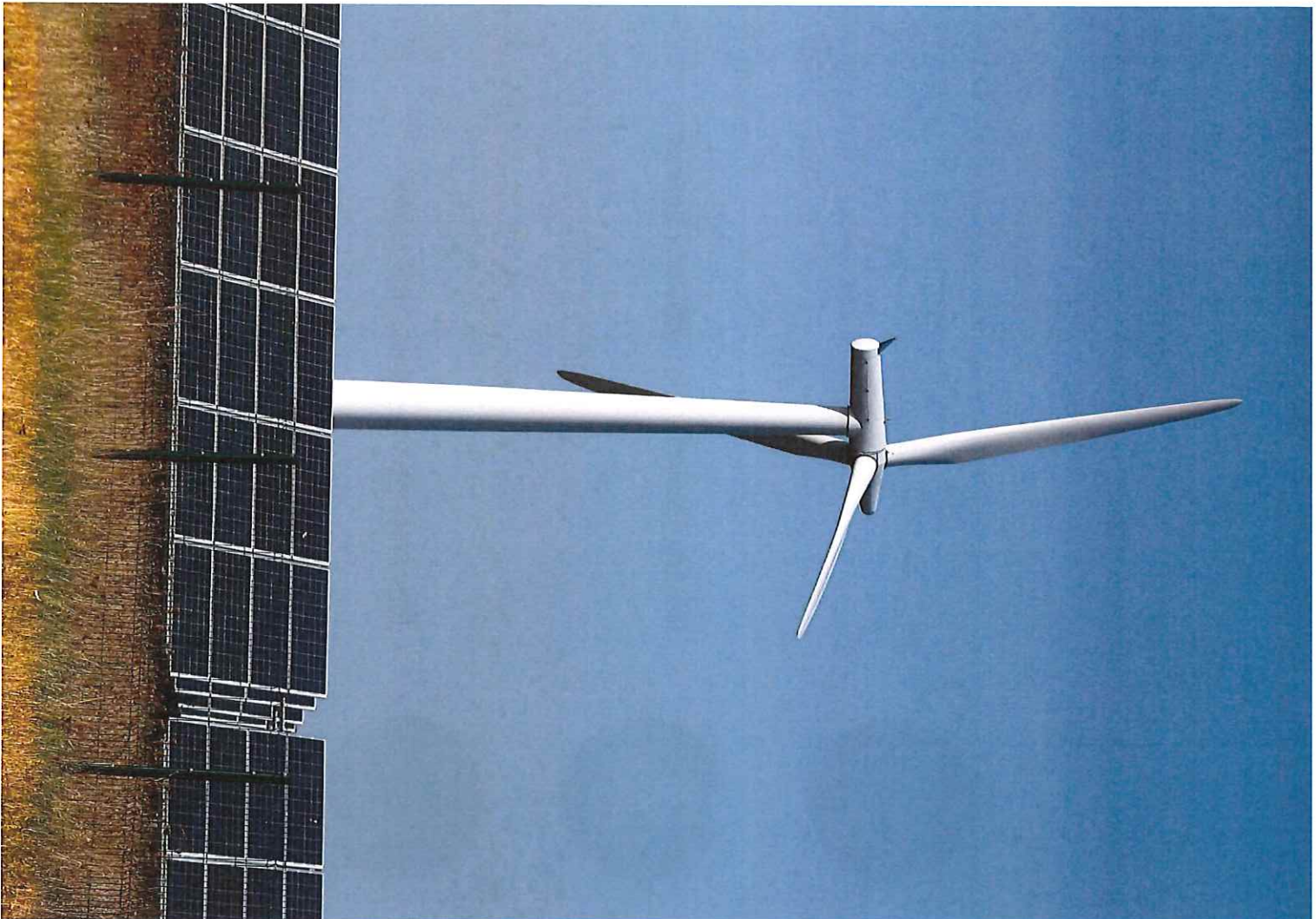
Protecting and Enhancing Local Heritage



Jobs and Opportunities for Innovation



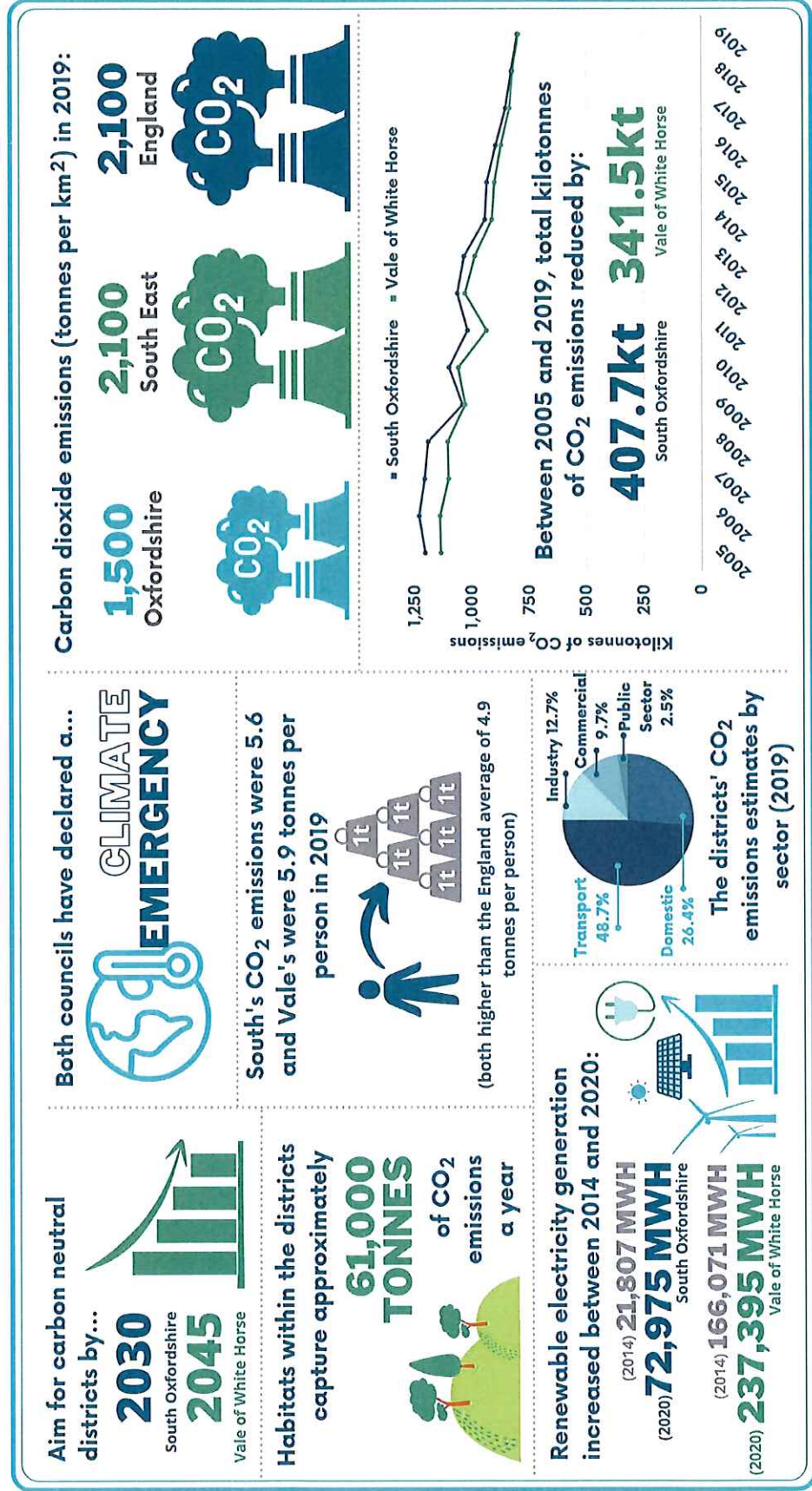
Thriving Inclusive Communities



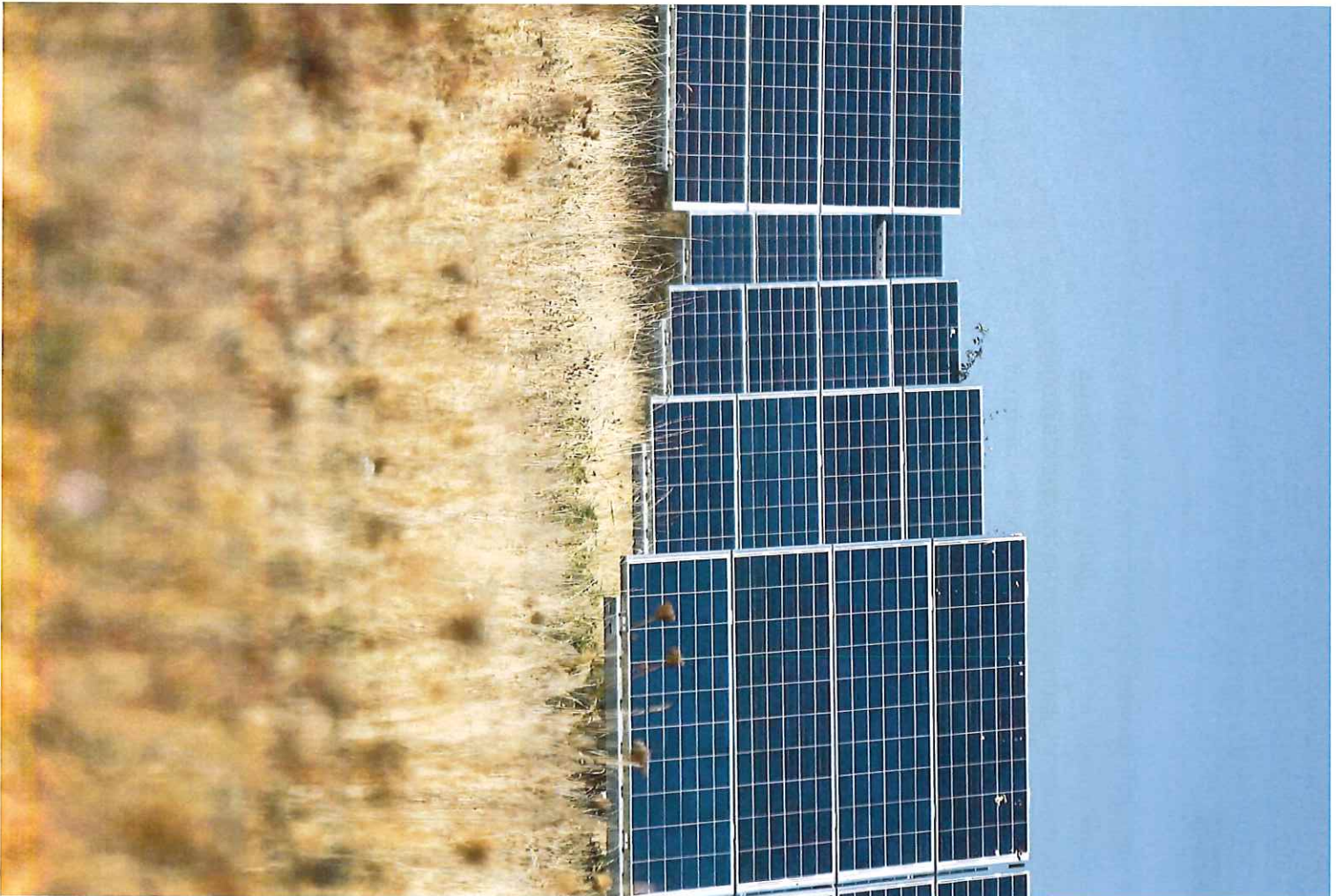
## **6. Reducing Carbon Emissions**

# Reducing Carbon Emissions

We have declared a climate emergency at both councils, and we have set targets to make our districts carbon neutral by 2030 for South Oxfordshire and 2045 for the Vale. The Government also has a target for the UK to **bring all greenhouse gas emissions to net zero carbon by 2050**<sup>1</sup>. To achieve this, we'll need to ensure developments within the districts produce as few carbon emissions as possible, both in their construction and during their use, and that the location and design of our developments encourage more sustainable lifestyles.



<sup>1</sup> <https://www.gov.uk/government/news/uk-becomes-first-major-economy-to-pass-net-zero-emissions-law>



## **Which part of the Vision does this address?**

*“Our vision is for carbon neutral  
districts, for current and future  
generations”*

# **OPPORTUNITIES: What can the Joint Local Plan do about this?**

- plan for a move away from fossil fuels and greenhouse gas emissions
- require new homes and buildings to minimise energy use through their layout and design, and have the highest standards of fabric efficiency
- transition to renewable forms of energy and support the districts in playing an international role in fusion energy power plant research and deployment
- ensure the amount of development taking place stays within the districts' carbon budget
- plan for new development in locations that enable sustainable lifestyles (20 minute neighbourhoods)
- limit parking at new developments
- require electric vehicle charging points
- encourage carbon sinks and increase tree cover
- limit developments with high greenhouse gas emissions e.g. intensive indoor livestock farming



# Questions

Thinking of the opportunities explained above, please answer the following questions.

If you would like to answer the questions shown in this document please visit the Joint Local Plan websites for details on how to respond: <https://www.whitehorsedc.gov.uk/jointlocalplan> or <https://www.southoxon.gov.uk/jointlocalplan>.

## 6. Please select the **THREE** opportunities that are most important to you.

- Move away from fossil fuels and greenhouse gas emissions
- Ensure amount of development stays within carbon budget
- Require electric vehicle charging points
- Highest standards of energy efficiency in new buildings
- New development locations to enable sustainable lifestyles
- Encourage carbon sinks and increase tree cover
- Transition to renewables and support fusion energy
- Limit parking at new developments
- Limit developments with high greenhouse gas emissions

**7. Do you disagree with any of these opportunities? Tick all that apply.**

- Move away from fossil fuels and greenhouse gas emissions
- Ensure amount of development stays within carbon budget
- Require electric vehicle charging points
- Highest standards of energy efficiency in new buildings
- New development locations to enable sustainable lifestyles
- Encourage carbon sinks and increase tree cover
- Transition to renewables and support fusion energy
- Limit parking at new developments
- Limit developments with high greenhouse gas emissions

**8. If you have any other thoughts on how we could use the Joint Local Plan to reduce carbon emissions, please write them here.**

A THIRD BRIDGE IS THE ANSWER —  
LEAVE IT ALL ON MOTO RWAY.



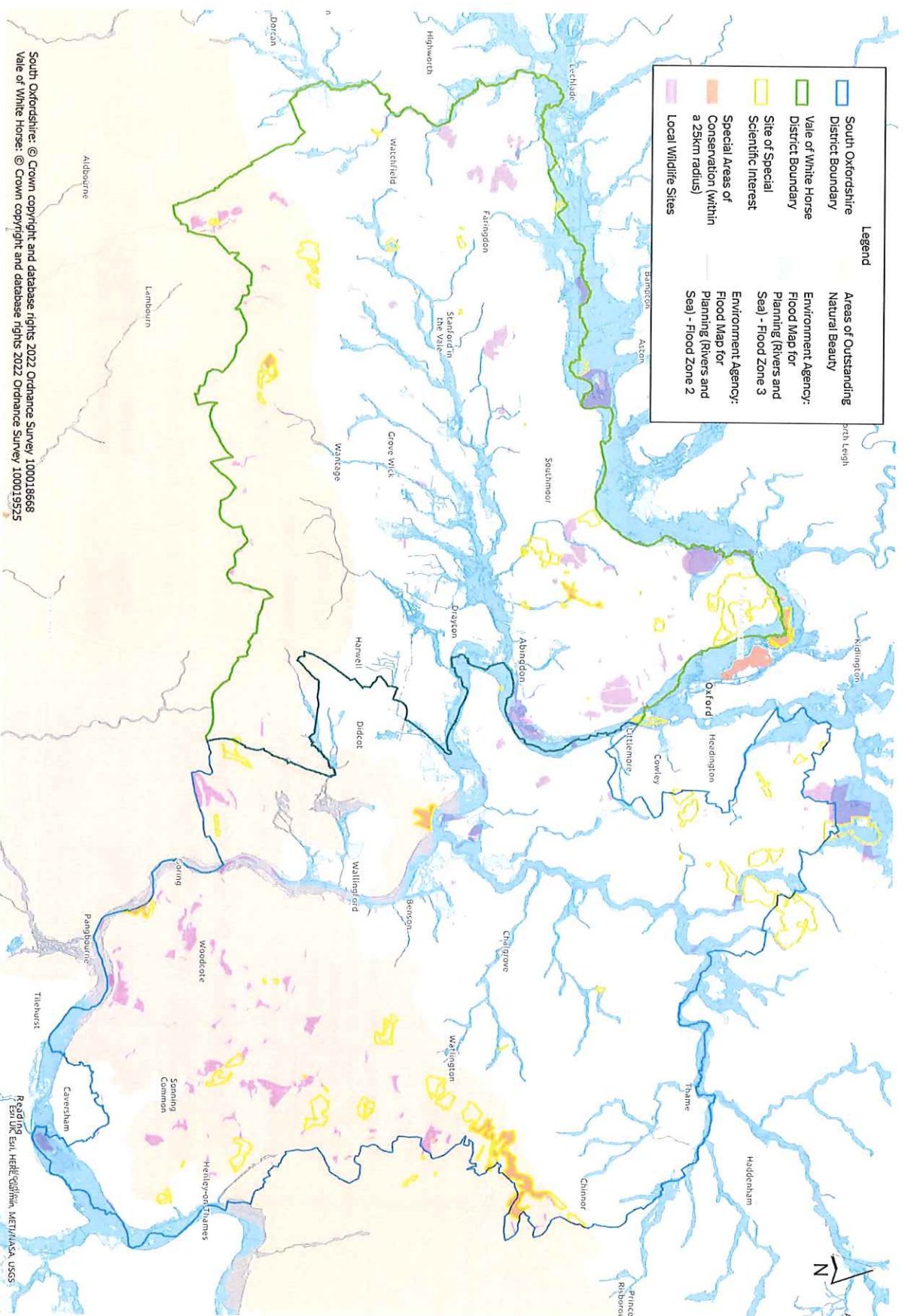
## **7. Nature Recovery and Landscape**

# Nature Recovery and Landscape

Developments and pollution can put pressure on nature and the countryside, but the planning process can help avoid, reduce and offset the harm that can occur. We want to conserve and enhance our natural environment, so new developments should make the most of opportunities to deliver benefits for wildlife and nature, whilst also meeting the needs of communities.



# Map of the Nature Recovery and Landscape



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 Vale of White Horse: © Crown copyright and database rights 2022 Ordnance Survey 100019525

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## Which part of the Vision does this address?

*“For this to be a place where nature is thriving, and nature reserves are no longer isolated pockets. A place where history is still visible, where heritage and landscape character are safeguarded and valued, and the beauty and the distinctive local identity of our towns and villages have been enhanced.”*





## **OPPORTUNITIES: What can the Joint Local Plan do about this?**

- respect landscape character, dark skies and the natural beauty of the countryside in development decisions
  - research and map effective nature recovery networks
  - restrict the amount of development in and around our top biodiversity areas
  - require developments to generate a net gain in biodiversity
  - ensure a net gain in biodiversity takes place where it's most effective
  - require improvements to air and water quality
  - protect trees and recognise the value of nature, giving us clean air, flowing water, soils to grow food in, and enjoyment
  - support farmers, foresters and landowners committing to restore nature
  - minimise the use of greenfield land by increasing the density of developments
- 

# Questions

Thinking about the opportunities explained above, please answer the following questions.

If you would like to answer the questions shown in this document please visit the Joint Local Plan websites for details on how to respond. <https://www.whitehorsedc.gov.uk/jointlocalplan> or <https://www.southoxon.gov.uk/jointlocalplan>.

## 9. Please select the THREE opportunities that are most important to you.

- Respect landscape character, dark skies and beauty of the countryside
- Research and map nature recovery networks
- Restrict development in and around top biodiversity areas
- Developments required to generate biodiversity net gain
- Biodiversity net gain where it's most effective
- Improvements to air and water quality ✓
- Protect trees and recognise the value of nature
- Support those committing to restore nature
- Minimise greenfield use by increasing density of developments

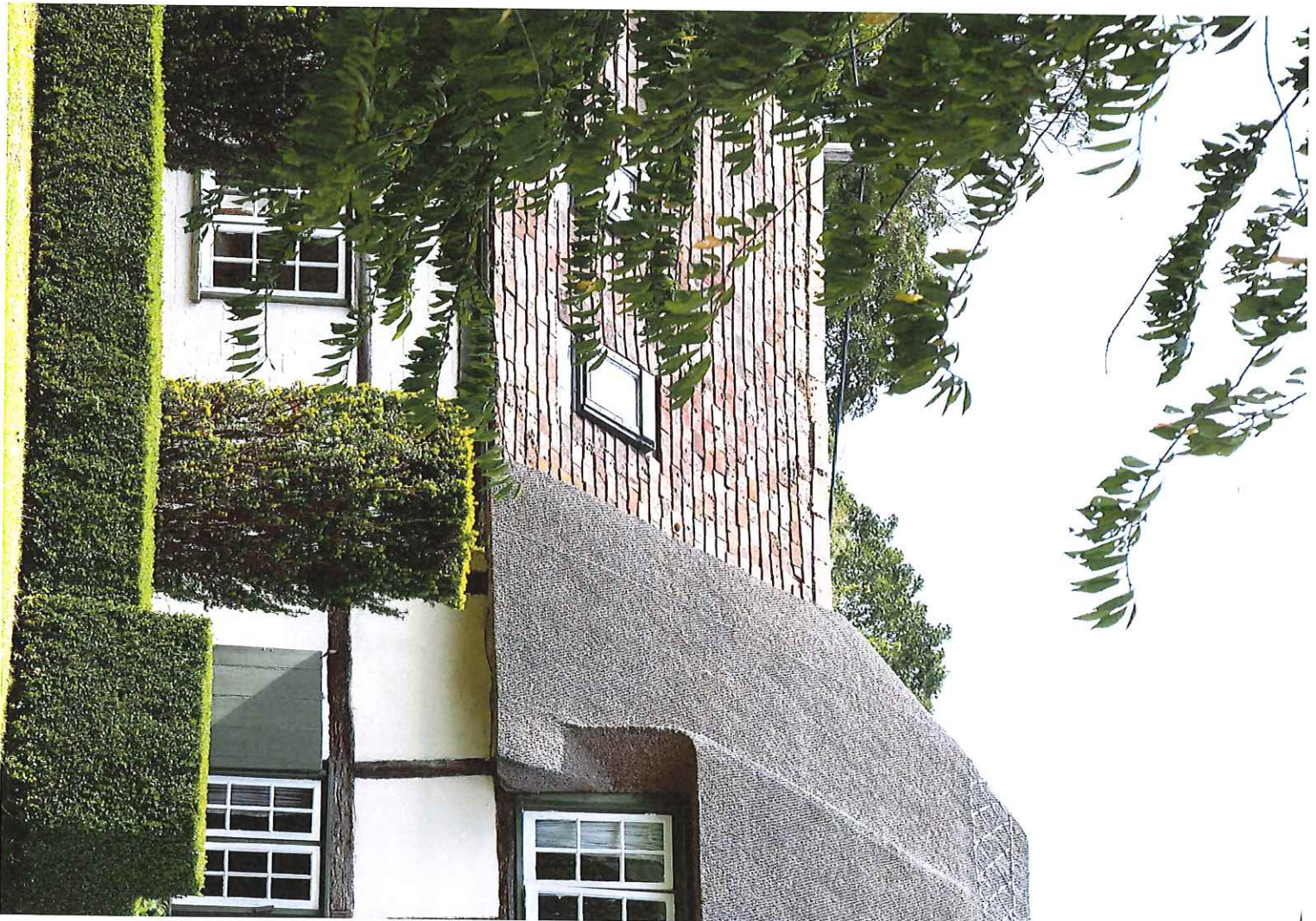
## 10. Do you disagree with any of these opportunities? Tick all that apply.

- Respect landscape character, dark skies and beauty of the countryside
- Research and map nature recovery networks
- Restrict development in and around top biodiversity areas
- Developments required to generate biodiversity net gain
- Biodiversity net gain where it's most effective
- Improvements to air and water quality
- Protect trees and recognise the value of nature
- Support those committing to restore nature
- Minimise greenfield use by increasing density of developments

11. If you have any other thoughts on how we could use the Joint Local Plan to protect the natural environment, please write them here.

LESS TRAFFIC  
THROUGH SONNING

## **8. Protecting and Enhancing Local Heritage**



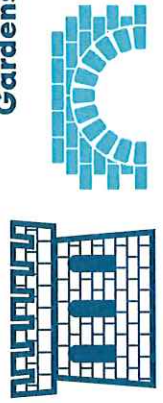
# Protecting and Enhancing Local Heritage

Our local heritage gives where we live a unique identity and helps us learn about our past. The planning process can help make sure any change that happens does so in a way that protects and enhances the significance of our historic environment. We can ensure new development fits in with the character of the local area. Any changes to historic buildings must be managed carefully, particularly while making them energy efficient.

There are **72** designated conservation areas in South Oxfordshire, over **3,000** listed buildings, **54** Scheduled Monuments and **13** Registered Parks and Gardens



There are **51** designated conservation areas in Vale of White Horse, over **2,000** listed buildings, **75** Scheduled Monuments and **8** Registered Parks and Gardens



The Vale is home to the **UFFINGTON WHITE HORSE**  
A pre-historic figure of a horse cut into the chalk hillside over 3000 years ago.



The site of the Civil War **BATTLE OF CHALGROVE 1643** in South Oxfordshire, is included on the Register of Historic Battlefields



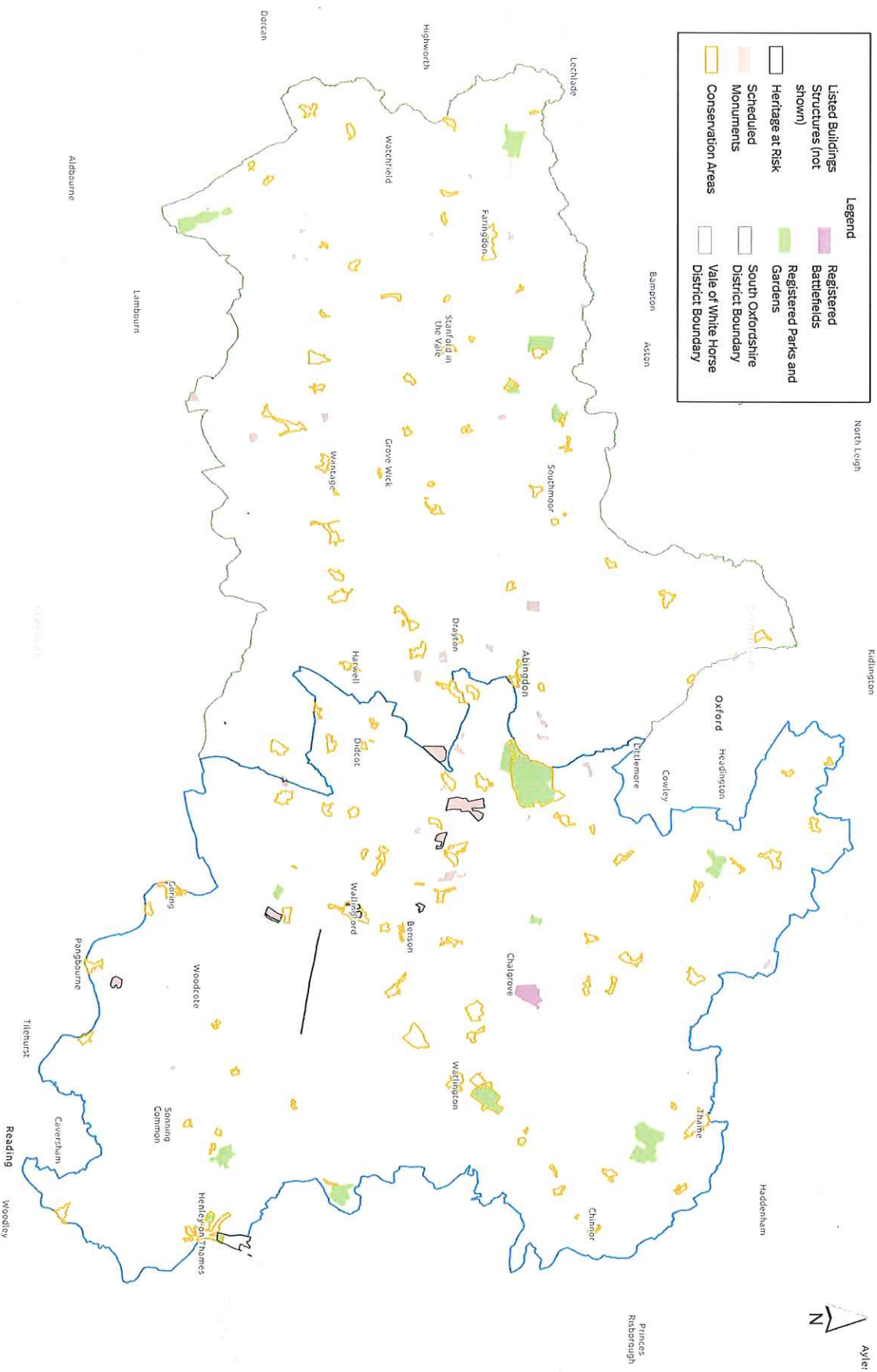
The famous Henley Royal Regatta has been running since 1839...



The Heritage at Risk Register identifies:



# Map of Local Heritage



South Oxfordshire: © Crown copyright and database rights 2022 Ordnance Survey 100018668  
 Vale of White Horse: © Crown copyright and database rights 2022 Ordnance Survey 100015252  
 Ordnance Survey: © Crown copyright and database rights 2022 Ordnance Survey 100015252  
 Ordnance Survey: © Crown copyright and database rights 2022 Ordnance Survey 100015252

To explore this map in greater detail please visit our Joint Local Plan websites: <https://www.whitehorsedc.gov.uk/jointlocalplan> or <https://www.southoxon.gov.uk/jointlocalplan>. See glossary for definitions of the terms which appear in this map.

## Which part of the Vision does this address?

*“A place where history is still visible, where heritage and landscape character are safeguarded and valued, and the beauty and the distinctive local identity of our towns and villages have been enhanced.”*





## OPPORTUNITIES: What can the Joint Local Plan do about this?

- protect heritage assets from harm or loss
- empower communities to research and protect their own heritage through Conservation Area Character Appraisals
- utilise enabling development where this can secure heritage assets and their settings
- plan development at a scale appropriate to market towns and villages
- require beauty in design for all new buildings and places
- keep alive traditions of local building materials, palettes and building styles
- encourage retention and reuse of historic buildings/ heritage assets as a sustainable resource
- embrace our cultural heritage
- ensure energy efficient and renewable energy measures for historic buildings adequately safeguard their heritage significance

# Questions

Thinking about the opportunities explained above, please answer the following questions.

If you would like to answer the questions shown in this document please visit the Joint Local Plan websites for details on how to respond. <https://www.whitehorsedc.gov.uk/jointlocalplan> or <https://www.southoxon.gov.uk/jointlocalplan>.

## 12. Please select the THREE opportunities that are most important to you.

- Protect heritage assets from harm or loss
  - Empower communities through use of Conservation Area Character Appraisals
  - Utilise enabling development to secure heritage assets
  - Plan development at appropriate scales
  - Retaining and reusing historic buildings as a sustainable resource
  - Require beauty in design for new buildings and places
  - Keep alive traditions of local building materials, palettes and building styles
  - Embrace our cultural heritage
  - Energy efficient measures for historic buildings to safeguard heritage significance
- IN KEEPING WITH ORIGINAL CHARACTER*

## 13. Do you disagree with any of these opportunities? Tick all that apply.

- Protect heritage assets from harm or loss
- Empower communities through use of Conservation Area Character Appraisals
- Utilise enabling development to secure heritage assets
- Plan development at appropriate scales
- Require beauty in design for new buildings and places
- Keep alive traditions of local building materials, palettes and building styles
- Retaining and reusing historic buildings as a sustainable resource
- Embrace our cultural heritage
- Energy efficient measures for historic buildings to safeguard heritage significance

14. If you have any other thoughts on how we could use the Joint Local Plan to protect and enhance local heritage please write them here.



## **9. Thriving Inclusive Communities**

# Thriving Inclusive Communities

We know that many people face difficulties finding an affordable home in our districts compared with other parts of the country. We want to make sure the districts get the right size and type of housing that different groups in the community need. Our town centres and villages are also changing after the pandemic as many of us change how and where we work, shop and spend our leisure time.

## A) Median house prices in 2020...



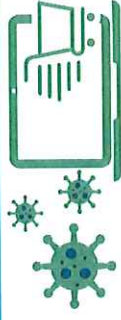
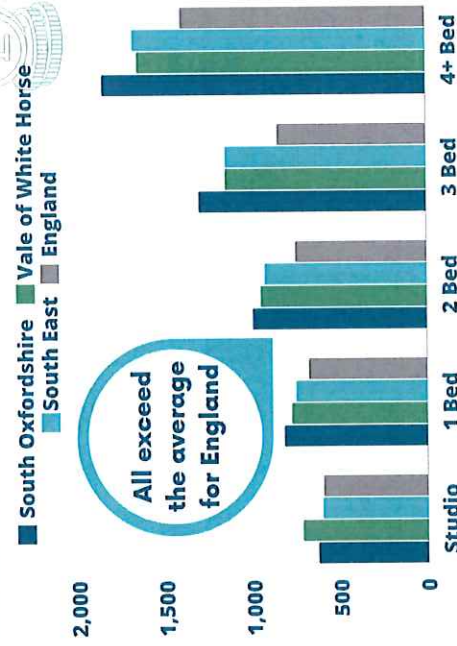
## B) Median gross annual workplace earnings in 2020...



## C) Affordability ratio (based on A and B above)...



## Median monthly rents (October 2020 - September 2021)



National planning, the Covid-19 pandemic and the rise of online shopping will all influence the future of our 9 town and local service centres (see map below)

**DID YOU KNOW?**

In 2020-21, the average age of first time buyers was 52 years (in England)

**8,046**  
South Oxfordshire

↑14% increase

↑20% increase

**10,214**  
Vale of White Horse



...new homes have been built between 2011 and 2021

**4 X EARNINGS** is generally considered an affordable house price




## Which part of the Vision does this address?

*“A place where people can thrive. Where people have housing choices they can afford, where villages, market towns and garden communities are diverse and inclusive places where people of all ages and backgrounds can live together.”*





## OPPORTUNITIES: What can the Joint Local Plan do about this?

- plan for housing that is genuinely affordable for our communities
  - require developers to build a mixture of housing types to help first time buyers, key workers, and those on lower incomes to live in the districts
  - retain a proportion of homes that will remain affordable forever, not just for the first buyer
  - support affordable housing on sites we'd normally protect from development
  - promote alternative housing models like self-build, custom and community-led housing
  - continue to support neighbourhood plans so housing meets local needs
  - require high quality, beautiful and sustainable design for new buildings and places
  - plan new developments, town centres and buildings to be accessible for those with disability or dementia, be places for children and young people to enjoy, and to be gender neutral
  - include plans for communities with specific needs including older people, those needing supported living, students, and Gypsies and Travellers
- 

# Questions

Thinking about the opportunities explained above, please answer the following questions.

If you would like to answer the questions shown in this document please visit the Joint Local Plan websites for details on how to respond.

<https://www.whitehorsedc.gov.uk/jointlocalplan> or

<https://www.southoxon.gov.uk/jointlocalplan>.

## 15. Please select the THREE opportunities that are most important to you.

IN KEEPING

- Plan for genuinely affordable housing
- Support affordable housing on sites we'd normally protect
- Require a mixture of housing types
- Promote self-build, custom and community-led housing
- Retain some homes that will be affordable forever
- Continue to support Neighbourhood Plans
- Plan for communities with specific needs
- Require high quality, beautiful and sustainable designs
- Plan new developments to be accessible to all

## 16. Do you disagree with any of these opportunities? Tick all that apply.

- Plan for genuinely affordable housing
- Support affordable housing on sites we'd normally protect
- Require a mixture of housing types
- Promote self-build, custom and community-led housing
- Retain some homes that will be affordable forever
- Continue to support Neighbourhood Plans
- Plan for communities with specific needs
- Require high quality, beautiful and sustainable designs
- Plan new developments to be accessible to all

17. If you have any other thoughts on how we could use the Joint Local Plan to tackle housing inequality and affordability, please write them here.

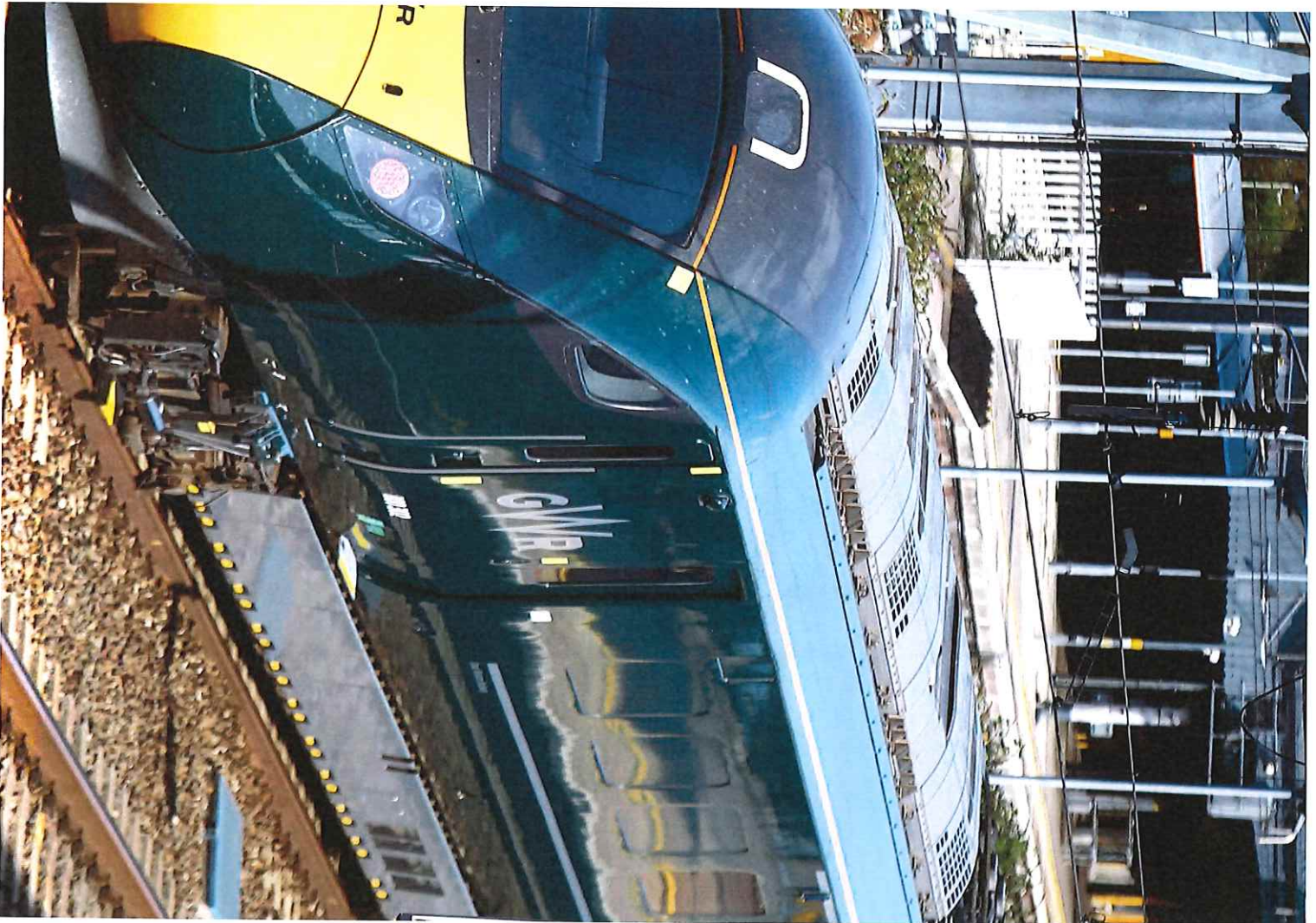
DONT CHANGE CLARKER AND ENVIRONMENT

18. We'd like to hear your ideas for how we could adapt our town centres and high streets to meet our changing needs. Are there any improvements, new facilities or uses that you would like to see in the locations marked on the map?

NO PEDESTRIAN ZONES  
FREE PARKING

Which location(s) does your answer above apply to?

- Abingdon  Faringdon  Thames
- Botley  Grove  Wallingford
- Didcot  Henley  Wantage



## 10. Transport and Facilities

# Transport and Facilities

In rural districts like ours, many people have to rely on private car travel to get around. We need to ensure that developments are within easy reach of jobs and services people need for their day-to-day lives and are supported by appropriate, low and zero-carbon transport options. We want to take the opportunity to improve active and sustainable travel infrastructure to make it the most attractive, reliable, and accessible choice.



## Most residents travel to work by driving...



## There are 8 rail stations in the districts:



## Percentage of users within a 15/60 minute journey from facilities and services by different methods of travel\*

Method of Travel	Primary Schools	Secondary Schools	GP Surgeries	Food stores	Hospitals
Public transport/walk	79%	27%	40%	76%	56%
Cycle	100%	82%	63%	82%	36%
Car	93%	46%	96%	100%	100%
Walk	74%	24%	37%	68%	0%

Please note that the car or van availability data and mode of travel to work data is from the 2011 Census and therefore may have changed over time. The equivalent 2021 Census data has not yet been published. More recent data regarding home-working patterns can be found on the 'Jobs and Opportunities for Innovation' page.

\*These statistics are presented as % of users within 15 minutes' (60 minutes' for hospitals) travel time of facilities and services. For primary schools, the users are defined as 'population aged 5-10 years'; for secondary schools, the users are 'population aged 11-15 years'; for the three remaining services the users are defined as households. Data from 2019.



## **Which part of the Vision does this address?**

*“A place where local residents can reach the facilities they need for everyday living on foot, bicycle or by zero-emission and low carbon transport choices.”*



## OPPORTUNITIES: What can the Joint Local Plan do about this?

- focus new development in settlements where the facilities for everyday living are available within 20 minutes' walk or cycling distance
- restrict development in locations which are not able to function as 20 minute neighbourhoods
- safeguard shops, community facilities and services from redevelopment to new uses
- plan for new infrastructure alongside development, especially in Garden Communities at Didcot, Berinsfield and Dalton Barracks and on strategic allocation sites
- plan a transition to sustainable transport modes by walking and cycling, shared transport, electric and alternative fuel cars, driverless cars, and plan for enhanced public transport including re-opening of the Cowley Branch line and a station at Grove
- plan for safe routes for walking and cycling, new quietways, new routes between settlements, secure bike parking, cargo bikes, electric bikes and scooters, electric vehicle charging
- plan for sustainable travel that is reliable, integrated and accessible
- plan for new technological innovation in transport and communications technologies

# Questions

Thinking of the opportunities explained above, please answer the following questions.

If you would like to answer the questions shown in this document please visit the Joint Local Plan websites for details on how to respond. <https://www.whitehorsedc.gov.uk/jointlocalplan> or <https://www.southoxon.gov.uk/jointlocalplan>.

## 19. Please select the THREE opportunities that are most important to you.

- Focus new developments where facilities are within 20 minutes walk/cycle
- Plan for new infrastructure alongside development
- Plan for safe walking and cycling routes and electric vehicle charging
- Restrict development in locations that don't function as 20 minute neighbourhoods
- Plan a transition to sustainable transport modes and enhanced public transport
- Plan for reliable, integrated and accessible sustainable travel
- Safeguard shops, community facilities and services
- Plan for technological innovation in transport and communications

## 20. Do you disagree with any of these opportunities? Tick all that apply.

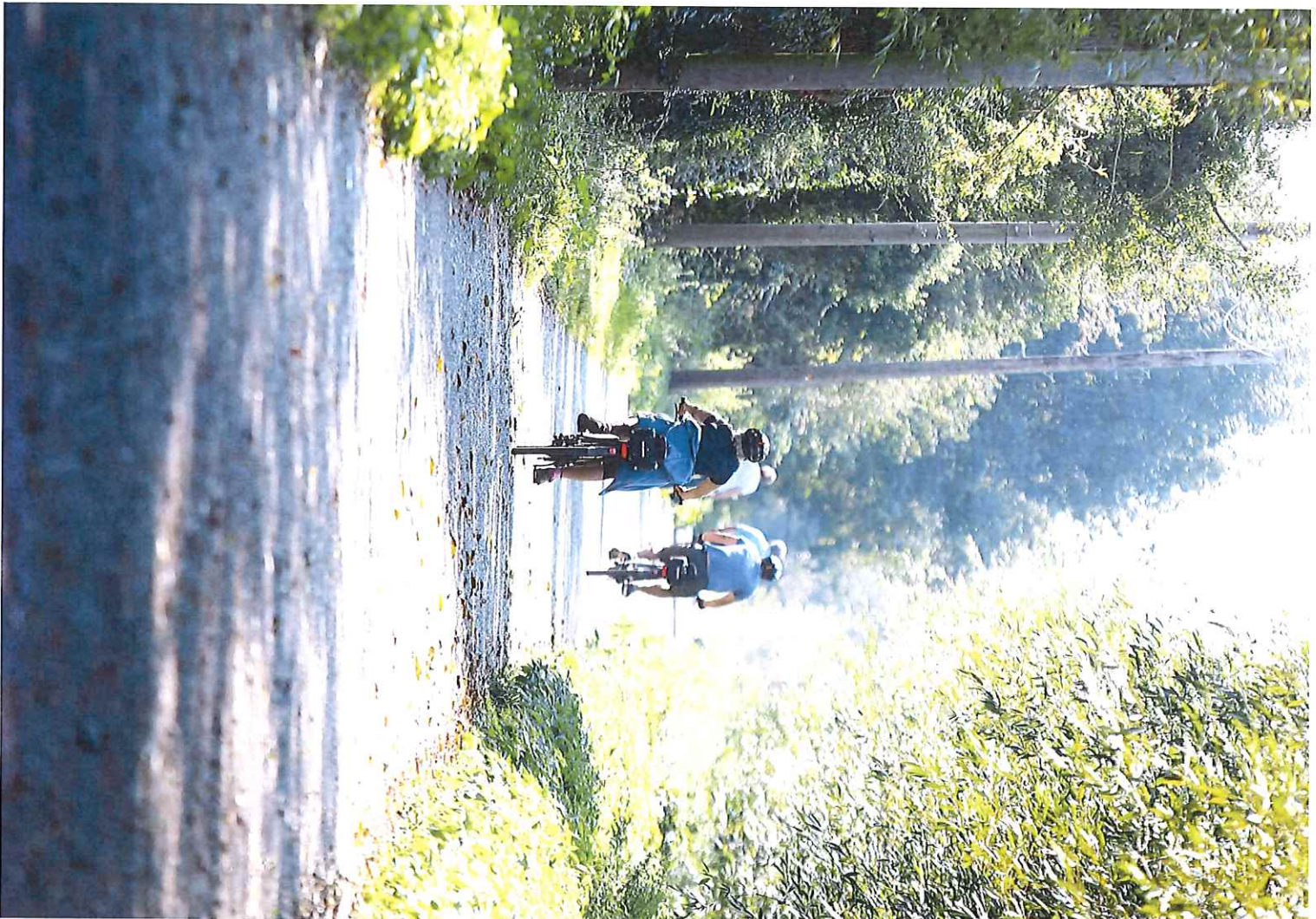
- Focus new developments where facilities are within 20 minutes walk/cycle
- Plan for new infrastructure alongside development
- Plan for safe walking and cycling routes and electric vehicle charging
- Restrict development in locations that don't function as 20 minute neighbourhoods
- Plan a transition to sustainable transport modes and enhanced public transport
- Plan for reliable, integrated and accessible sustainable travel
- Safeguard shops, community facilities and services
- Plan for technological innovation in transport and communications

21. If you currently drive, what would encourage you to drive less and/or walk, cycle or take public transport more?

BLUE BADGE FACILITIES

22. If you have any other thoughts on how we could use the Joint Local Plan to ensure people have easy access to the services they need to use on a day-to-day basis, please write them here.

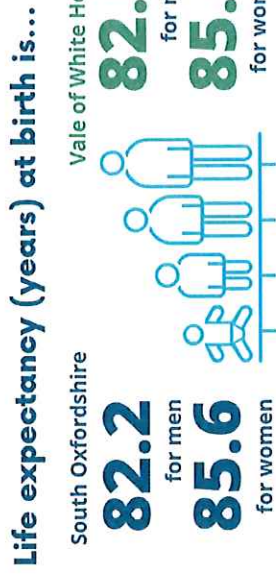
CHEAPER CAR PARKING



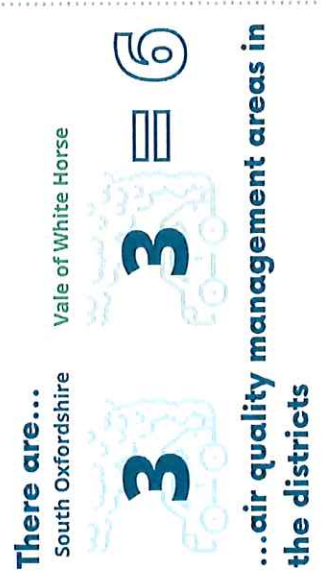
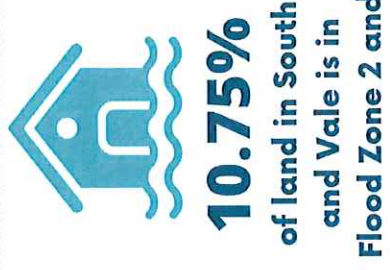
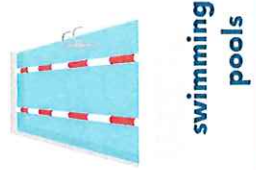
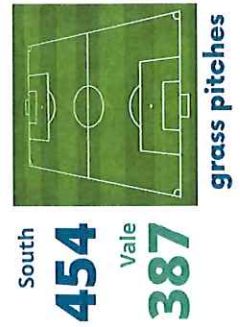
## **11. Healthy Lifestyles and Safe Communities**

# Healthy Lifestyles and Safe Communities

We want to encourage healthy lifestyle choices, by providing opportunities for walking and cycling, exercise, social interaction and access to healthy food. We also want to keep our communities safe from pollution, flooding and the effects of climate change.



**The districts have many sports facilities with community access, including...**





## Which part of the Vision does this address?

*“Where residents and visitors can live healthy lifestyles and access greenspace. Where people are safe from pollution, flooding, and the effects of climate change.”*



## **OPPORTUNITIES: What can the Joint Local Plan do about this?**

- provide opportunities for active travel, exercise, social interaction and recreation
- enhance opportunities for exercise and enjoying high-quality open spaces and the countryside
- plan places for people to grow their own food
- avoid inappropriate development in flood risk areas
- limit and control new sources of air, water, noise and light pollution
- require building designs to be adapted to be resilient to climate change impacts like overheating

# Questions

Thinking of the opportunities explained above, please answer the following questions.

If you would like to answer the questions shown in this document please visit the Joint Local Plan websites for details on how to respond. <https://www.whitehorsedc.gov.uk/jointlocalplan> or <https://www.southoxon.gov.uk/jointlocalplan>.

## 23. Please select the THREE opportunities that are most important to you.

- Provide opportunities for active travel, exercise and recreation
- Plan places for people to grow their own food
- Enhance opportunities for exercise in high-quality open spaces and countryside
- Avoid inappropriate development in flood risk areas
- Building designs to be adapted to climate change impacts
- Limit and control new sources of air, water, noise and light pollution

## 24. Do you disagree with any of these opportunities? Tick all that apply.

- Provide opportunities for active travel, exercise and recreation
- Plan places for people to grow their own food
- Limit and control new sources of air, water, noise and light pollution
- Enhance opportunities for exercise in high-quality open spaces and countryside
- Avoid inappropriate development in flood risk areas
- Building designs to be adapted to climate change impacts

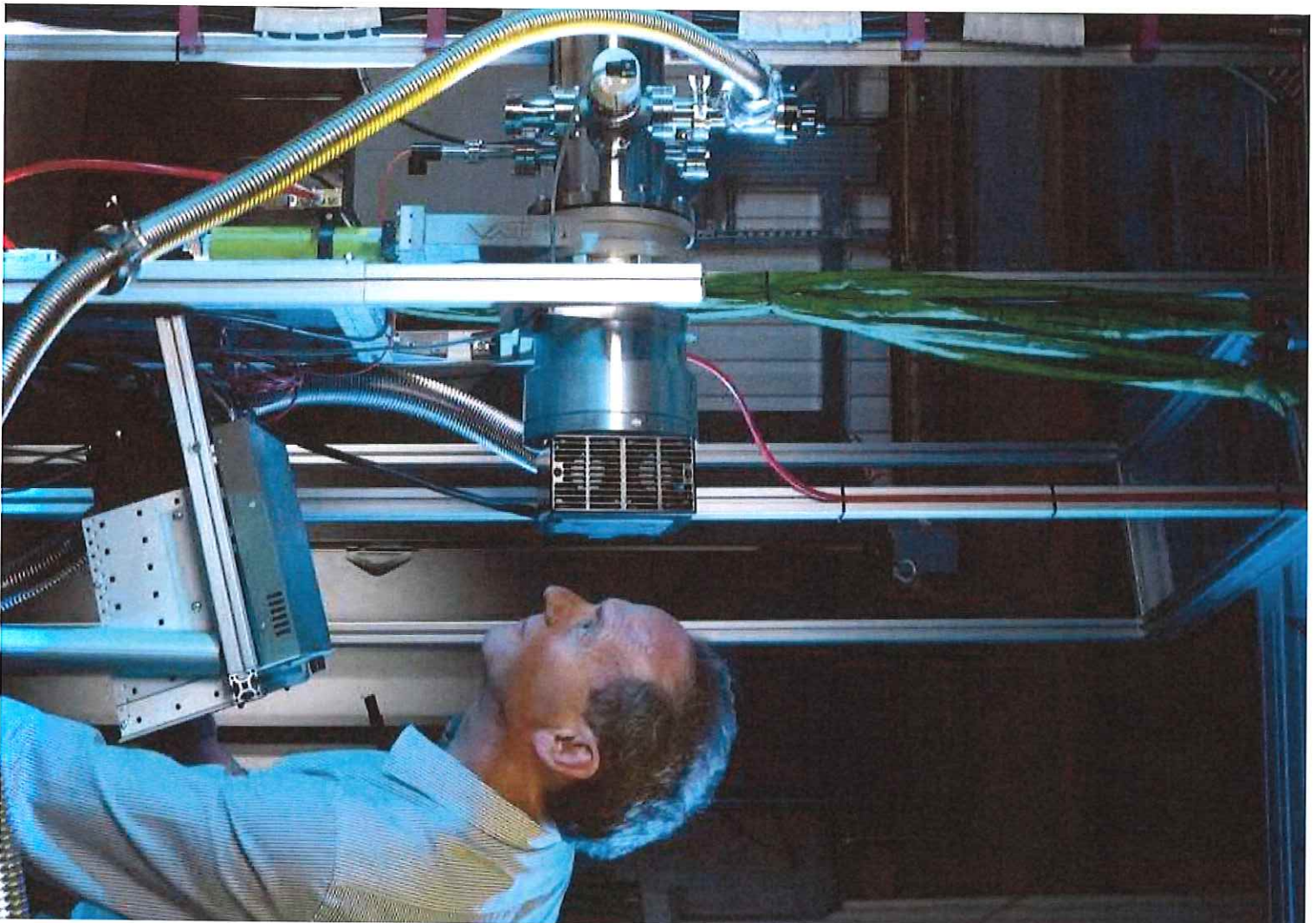
25. If you have any other thoughts on how we could use the Joint Local Plan to give residents and visitors the opportunity to live healthy lifestyles, please write them here.

BUILD MORE PARKS, SPORTS FACILITIES THAT ARE AFFORDABLE

26. If you have any other thoughts on how we could use the Joint Local Plan to keep residents and visitors safe from pollution, flooding and the effects of climate change, please write them here.

REDUCE PRICE OF ELECTRIC VEHICLES  
STOP WATER POLLUTION TO DISCHARGING SEWAGE  
ASK LIGHTS OFF 11.00 PM  
GRANTS FOR CHARITABLE BOILERS

## **12. Jobs and Opportunities for Innovation**



# Jobs and Opportunities for Innovation

We want to provide opportunities for jobs, located in the right places, and continue to support and encourage innovation within Science Vale.

Science Vale is a global hotspot for **ENTERPRISE & INNOVATION**



**79.3%** South Oxfordshire  
**82.5%** Vale of White Horse  
**78.5%** Great Britain  
 of the population are economically active (October 2020 - September 2021)

For five seconds one day last December, Culham (JET) became the hottest place in the universe, at...



**150 MILLION DEGREES CELSIUS**



**37%** of the working age population in South and Vale are educated to degree level and above. (around 10% higher than the England average of 27.4%)

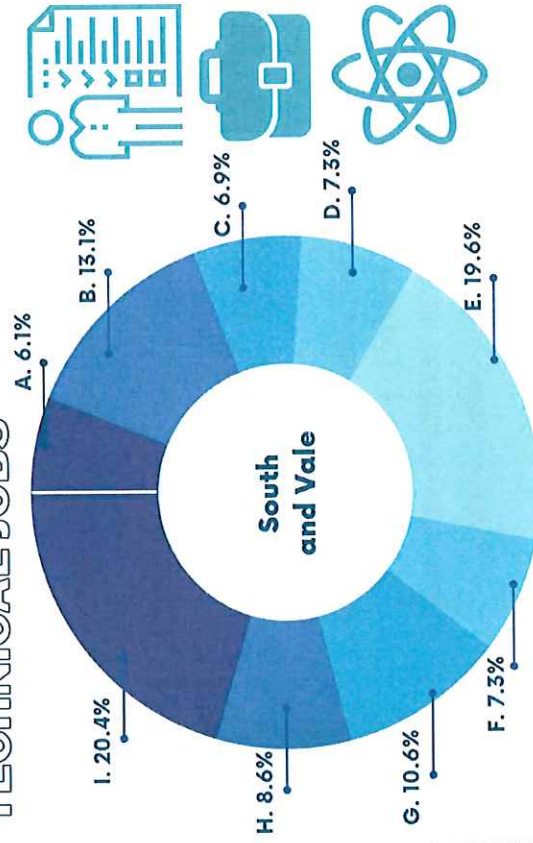
**78.6%** South Oxfordshire

**81.4%** Vale of White Horse

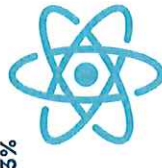
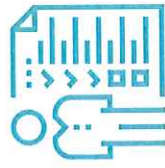
**74.6%** Great Britain

of people (aged 16-64) are in employment, which is higher than the average for Great Britain.

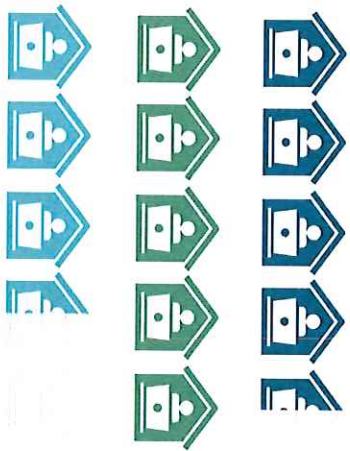
Both districts are heavily represented by...  
**PROFESSIONAL, SCIENTIFIC AND TECHNICAL JOBS**



- A. Construction
- B. Wholesale and retail trade, repair of motor vehicles and motorcycles
- C. Accommodation and food service activities
- D. Information and communication
- E. Professional, scientific and technical activities
- F. Administrative and support service activities
- G. Education
- H. Human health and social work activities
- I. Other industries combined

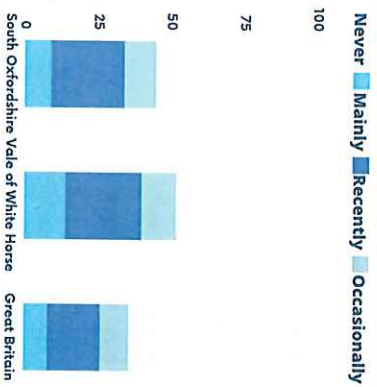


Both districts had higher proportions of home-workers on average across 2020 than the Great Britain average...  
 (Proportion of workers that completed any work from home are shaded in colour below)



South Oxfordshire  
 Vale of White Horse  
 Great Britain

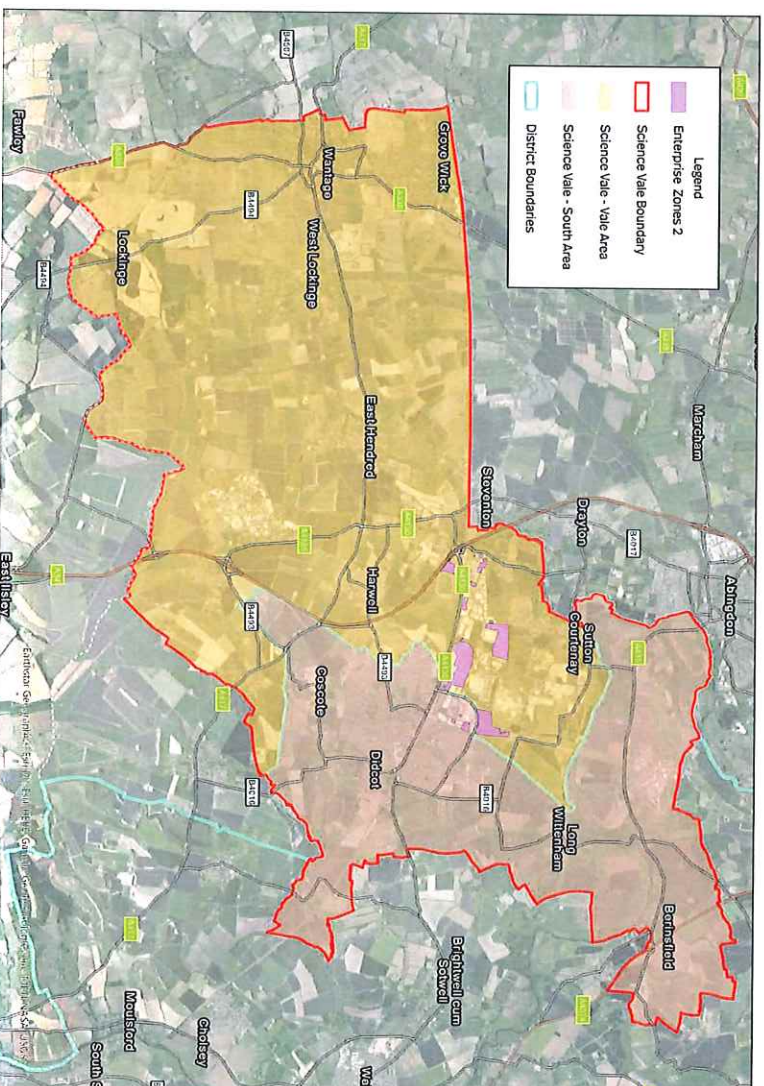
Percentage of workers that completed work from home



# Map of Science Vale

Science Vale is one of the largest science and technology business clusters in the UK and a hotspot for enterprise and innovation. It spans the Wantage/Grove area of the Vale of White Horse, across Harwell Campus and Milton Park through to Culham, Didcot and Berinsfield in South Oxfordshire.

It also includes two Enterprise Zones: 'Science Vale Oxford' and the 'Didcot Growth Accelerator'. Enterprise Zones are areas offering government support to encourage business investment and enable local economic growth.



## **Which part of the Vision does this address?**

*“Where there are valuable and rewarding jobs, embracing clean technologies and growing the opportunities in Science Vale for the districts to contribute on a national and international scale to solving pressing global issues.”*





## OPPORTUNITIES: What can the Joint Local Plan do about this?

- plan jobs near homes and homes near jobs
- support working from home and community based work hubs/ facilities
- provide employment opportunities for innovation in Science Vale
- work to support innovation in Science Vale like the fusion work at Culham Science Centre, and space technology and vaccine manufacture at Harwell
- support the 'circular economy' and businesses working towards a greener future
- support rural land-based businesses, the local food economy and rural tourism

# Questions

Thinking of the opportunities explained above, please answer the following questions.

If you would like to answer the questions shown in this document please visit the Joint Local Plan websites for details on how to respond. <https://www.whitehorsedc.gov.uk/jointlocalplan> or <https://www.southoxon.gov.uk/jointlocalplan>.

## 27. Please select the THREE opportunities that are most important to you.

- Plan jobs near homes and homes near jobs
- Provide employment opportunities for innovation in Science Vale
- Support home working and community-based work hubs
- Support innovation like fusion/spacé technology/vaccine manufacture in Science Vale
- Support circular economy and greener businesses
- Support rural land-based businesses, local food economy and rural tourism

29. If you have any other thoughts on how we could use the Joint Local Plan to cater for future working styles and patterns, please write them below.

GET BACK TO THE OFFICE

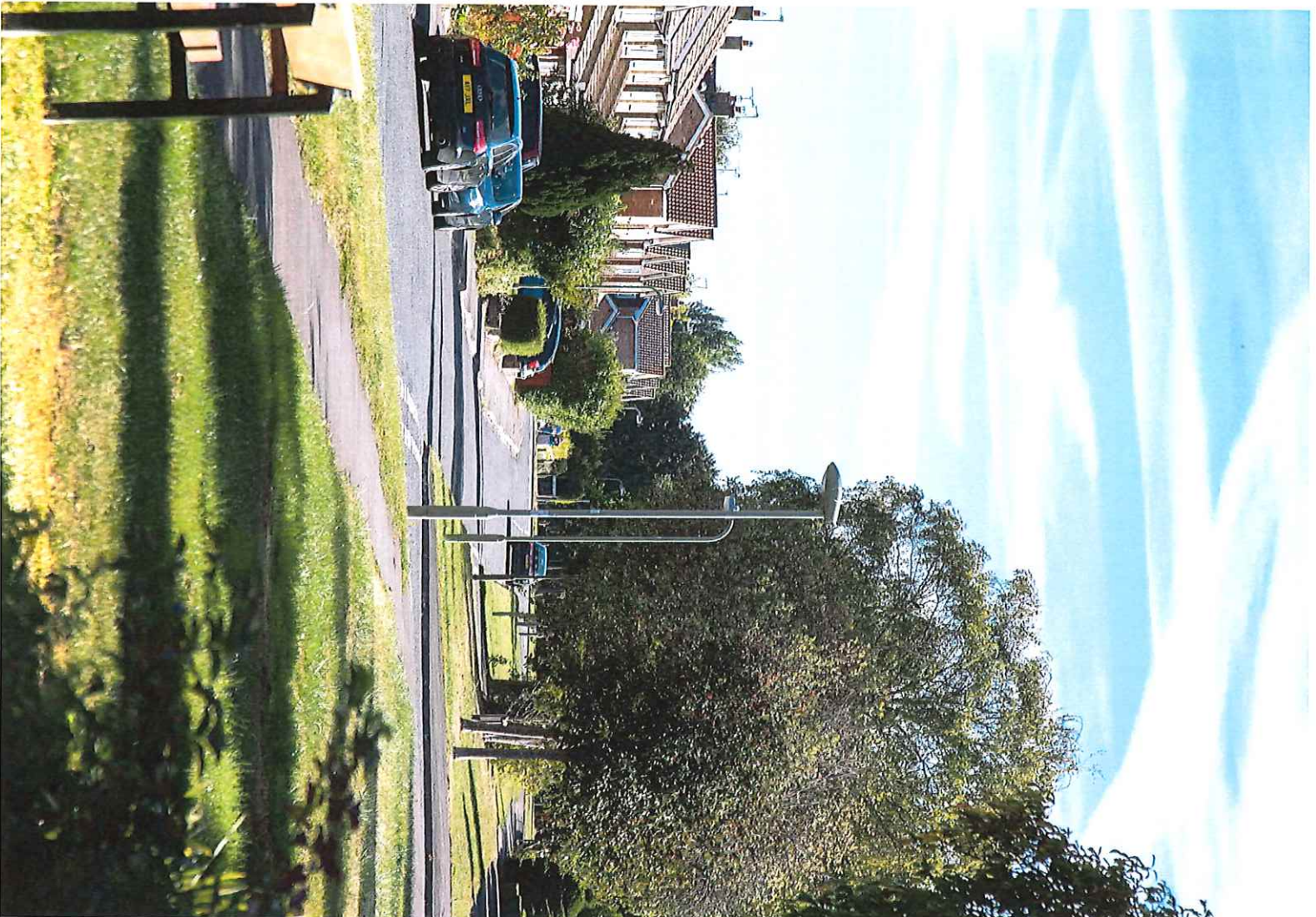
## 28. Do you disagree with any of these opportunities? Tick all that apply.

- Plan jobs near homes and homes near jobs
- Provide employment opportunities for innovation in Science Vale
- Support home working and community-based work hubs
- Support circular economy and greener businesses
- Support rural land-based businesses, local food economy and rural tourism

30. If you have any other thoughts on how we could use the Joint Local Plan to help ensure there are valuable and rewarding jobs in the districts, please write them here.

BUS SERVICES

## 13. Any other thoughts?



In the sections so far we've summarised the key issues, challenges and opportunities surrounding each of the following themes we think the Joint Local Plan should cover:



Reducing Carbon Emissions



Nature Recovery and Landscape



Protecting and Enhancing Local Heritage



Thriving Inclusive Communities



Transport and Facilities



Healthy Lifestyles and Safe Communities



Jobs and Opportunities for Innovation

# Questions

We've also shown you our draft Vision and asked for your thoughts about how we might address the issues and challenges and make best use of the opportunities, including how we might address Government policies, targets and legislation.

If you would like to answer the questions shown in this document please visit the Joint Local Plan websites for details on how to respond.

<https://www.whitehorsedc.gov.uk/jointlocalplan> or  
<https://www.southoxon.gov.uk/jointlocalplan>.

## 31. Have we correctly summarised the issues, challenges and opportunities for the Joint Local Plan?

- Yes
- No
- Don't know

NEED MORE ON INFRASTRUCTURE SCHOOLS  
NURSERIES(AFFORDABLE) DOCTORS DENTISTS.

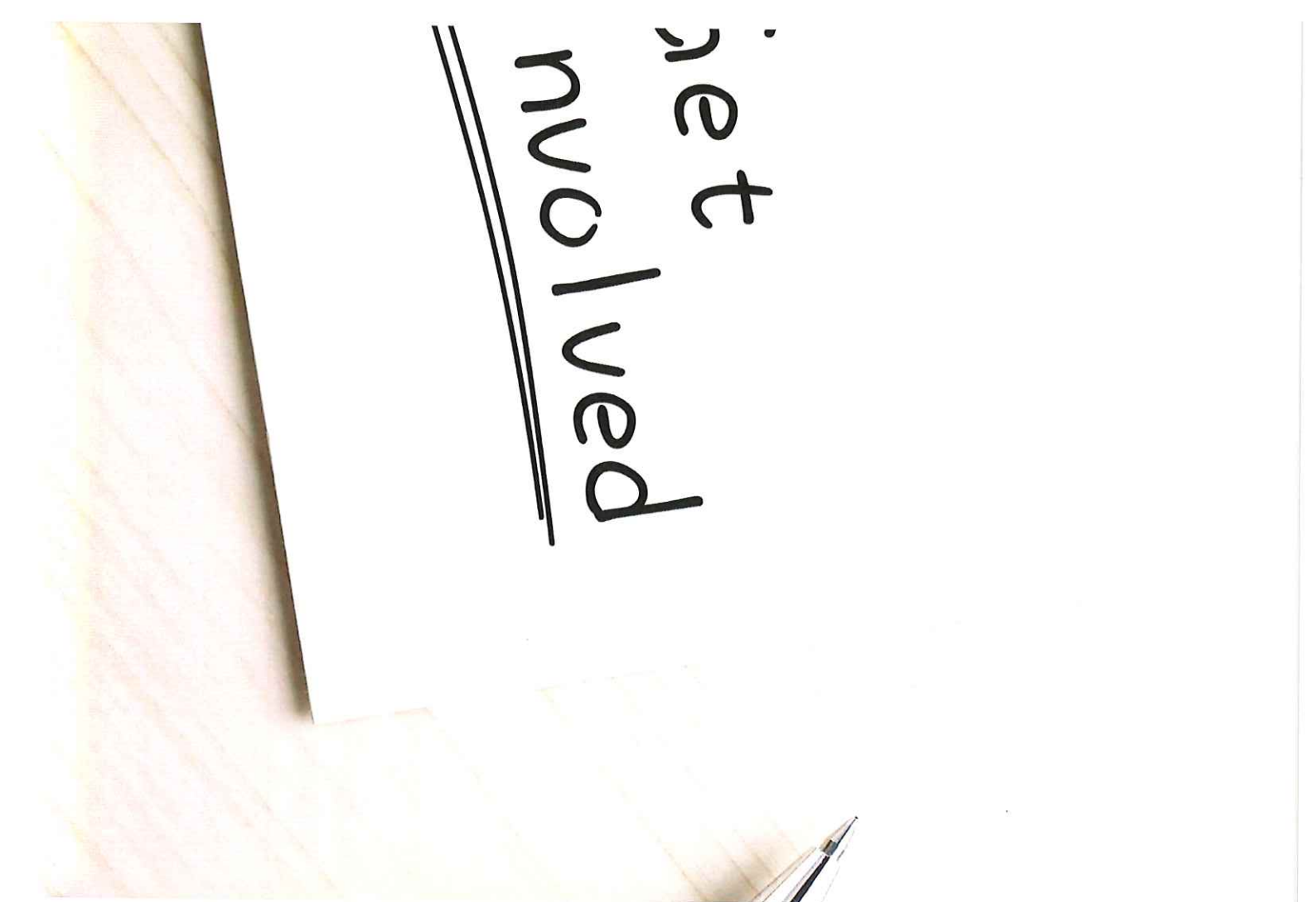
If you've said no, what do you think we've missed?

## 32. Finally, do you have any other comments?

NO PROVISION FOR LEISURE  
PERSUITS AND ENTERTAINMENTS

## 14. Get Involved and Next Steps

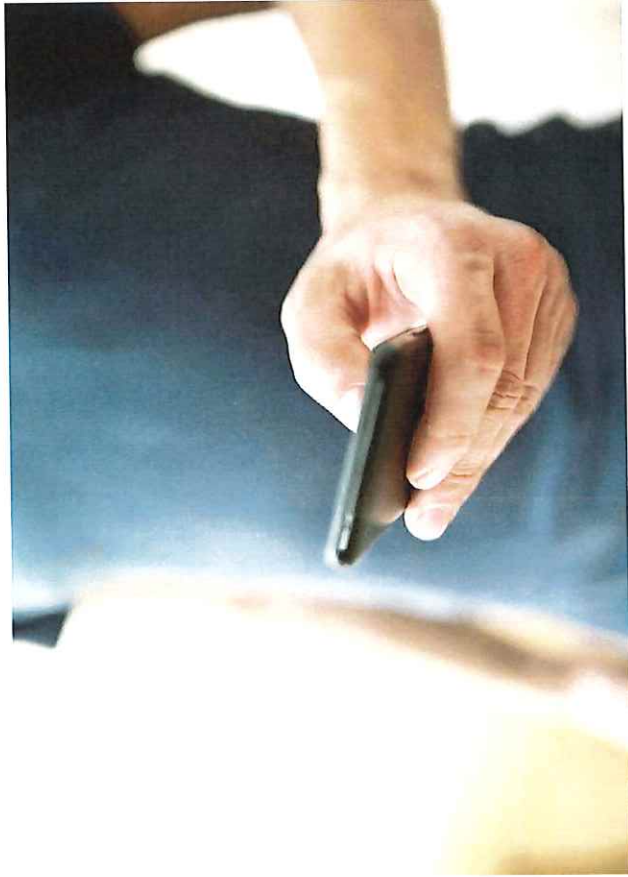
get  
involved



# Get Involved and Next Steps

Your views on this document will help shape the draft of the Joint Local Plan for South Oxfordshire and Vale of White Horse. We've designed the survey questions to be a quick and easy way to reply to this consultation. You can respond to as many questions as you like.

We will review all the comments we receive, and summarise the main issues in a consultation statement. In early 2023, we expect to publish a Joint Local Plan 'Preferred Options' document for consultation on proposed policies and sites for development.



## To respond, please:

Visit the Local Plan websites for details on the response options and to complete a response form:

<https://www.whitehorsedc.gov.uk/jointlocalplan> or

<https://www.southoxon.gov.uk/jointlocalplan>

If you are reading this document from one of our deposit locations, you can fill in a paper comment form and send it back to us, please see the public notice or ask a staff member for details.

At the websites above you can access all the consultation material.

Comments not relevant to planning issues will be shared with other teams in the council where they could help with them. If you would like to stay in touch about the Joint Local Plan and other planning policy consultations, please register your details here so that we can let you know about the next stages:

- **Have your say: consultation sign up**<sup>2</sup>

Please respond by **11.59pm Thursday 23rd June 2022**

If you have any questions on the consultation, please contact the planning policy team on [planning.policy@southandvale.gov.uk](mailto:planning.policy@southandvale.gov.uk) or call 01235 422600. If you have any questions on the comment form or require any of the consultation material in an alternative format (for example large print, Braille, audio, email, Easy Read and alternative languages) please email [haveyoursay@southandvale.gov.uk](mailto:haveyoursay@southandvale.gov.uk) or call 01235 422425.

<sup>2</sup> <https://survey.southandvale.gov.uk/s/consultationsignup/>

We are in the process of gathering evidence to support the plan. We expect to prepare assessments and evidence on the topics below. We will refine this list following your comments and further scoping work.



Air Quality Evidence



Built and Historic Environment Evidence



Climate Change Evidence



Employment Land Assessment



Green Belt Evidence



Habitats Regulations Assessment




Health Impact Assessment



Housing and Economic Land Availability Assessment and Capacity Evidence



Housing Needs Evidence (such as housing mix and tenure)



Landscape Evidence



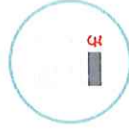
Natural Environment Evidence



Transport Evidence



Open Space/Sports/Leisure Evidence



Viability



Strategic Flood Risk Assessment



Water Cycle Study



Sustainability Appraisal



Town Centres and Retail Evidence



## **15. Technical documents**

# Technical Documents

We are consulting on other documents alongside the Joint Local Plan Issues Consultation - these are:

## Sustainability Appraisal (SA) Screening and Scoping Report

We are required by law to prepare a sustainability appraisal alongside the Joint Local Plan. Sustainability appraisals look at a wide range of environmental, social, and economic characteristics and provide plan-makers with a set of objectives to assess their emerging proposals against. The first step of a sustainability appraisal is the screening and scoping report, which identifies these objectives.

Each subsequent time we consult on our plan, we will publish a sustainability appraisal report, which will identify the options we have considered, and the mitigation measures needed to offset any harmful effects. The sustainability appraisal does not dictate the direction of the plan but is a useful tool for identifying and mitigating any potential adverse effects that a plan might otherwise have.

We are currently at the Screening and Scoping Report stage, where we set the context and objectives, establish the baseline and decide on the overall scope.

## Habitats Regulations Assessment (HRA) Scoping Report

We have produced an HRA Scoping Report, which identifies the habitats sites that could be affected by the Joint Local Plan and their protected characteristics, current condition and main threats. The HRA is tasked with considering the habitats sites that sit at the top of the hierarchy of biodiversity designations in England and include Special Areas of Conservation for habitats and/or terrestrial/marine species and also Special Protection Areas for birds.

We have also identified the other plans and projects that have potential to give rise to in-combination effects. This information will feed into the HRA, which will be undertaken at a later stage in the plan-making process.

A Habitats Regulations Assessment (HRA) refers to the several distinct stages of assessment which must be undertaken to determine if a plan or project (such as new development) may affect the protected features of a habitats site before deciding whether to undertake, permit or authorise it.

## **Draft Settlement Assessment Methodology**

Having a strong understanding of the nature of the towns and villages in South Oxfordshire and Vale of White Horse is a key part of our evidence base and essential to forming a successful strategy for the future of our districts in our Joint Local Plan.

The Settlement Assessment will look at settlements in the districts to determine their profile and the level of services each has. This assessment will therefore look at each place's population, households, employment, shops, schools and public transport, as well as other services.

The Draft Settlement Assessment Methodology proposes how we'll undertake the settlement assessment, which will eventually result in a settlement hierarchy.

## **Duty to Cooperate Scoping Document**

The district councils have a legal 'Duty to Cooperate' with other local planning authorities and organisations on strategic planning matters that are driven by larger than local issues – these are issues that are likely to have an impact beyond the immediate Local Plan area.

The strategic matters that need to be addressed through cross-boundary cooperation should be identified at the beginning of the Local Plan making process.

A strategic matter is defined as 'sustainable development or use of land that has or would have a significant impact on at least two planning areas, including, in particular, that in connection with strategic infrastructure.'

Our Duty to Cooperate Scoping document identifies the strategic matters relevant to the districts. These matters will be further refined, based on Duty to Cooperate discussions and feedback.

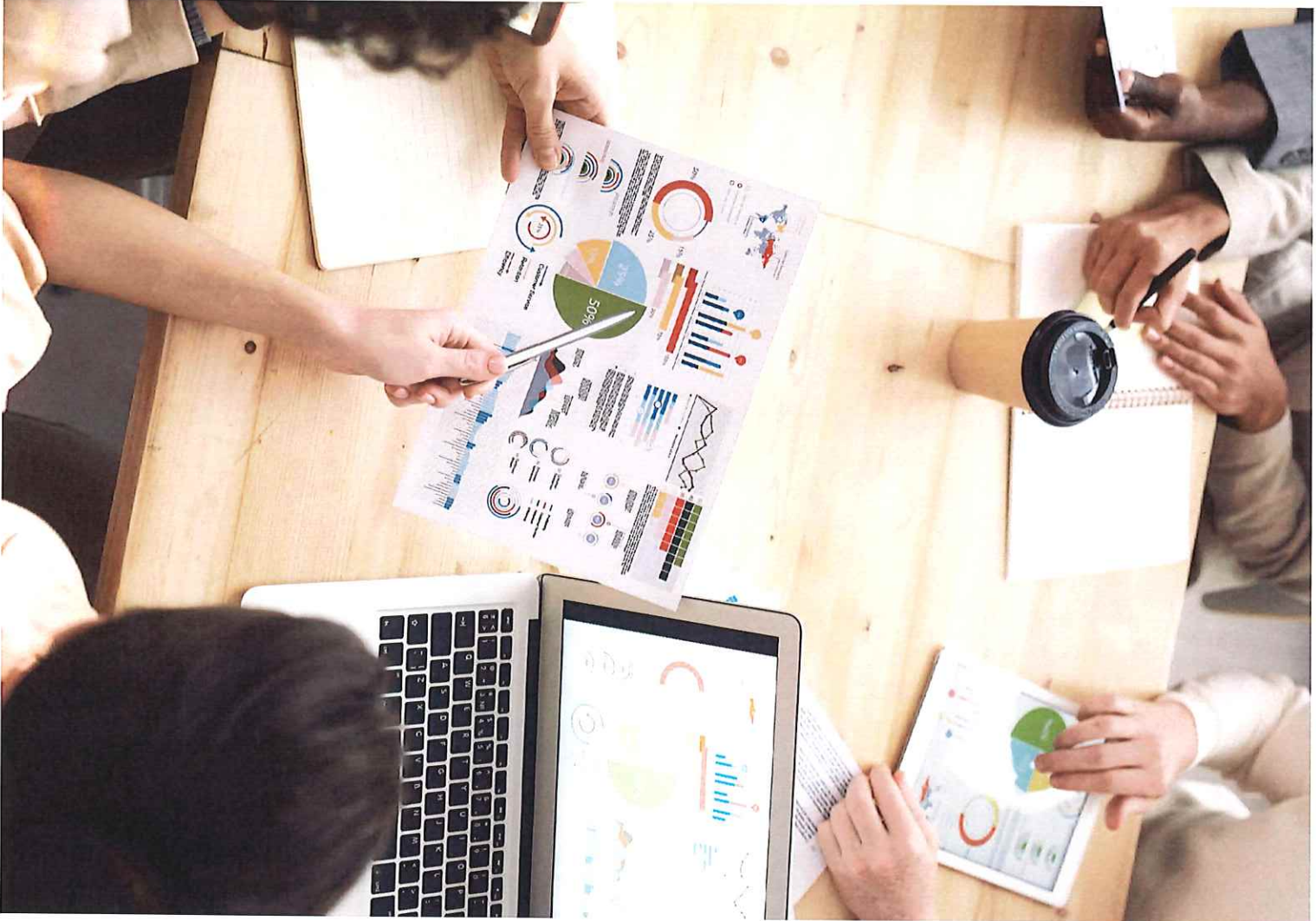
## **How to comment on the technical documents**

You can find and comment on these documents here:

<https://www.whitehorsedc.gov.uk/jointlocalplan> or

<https://www.southoxon.gov.uk/jointlocalplan>

If you are reading these documents from one of our deposit locations, you can fill in a paper comment form and send it back to us, please see the public notice or ask a staff member for details.



# 16. Local Plan Explainer

# A new Joint Local Plan for our area

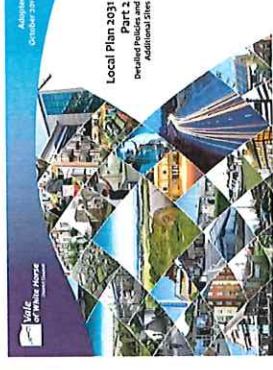
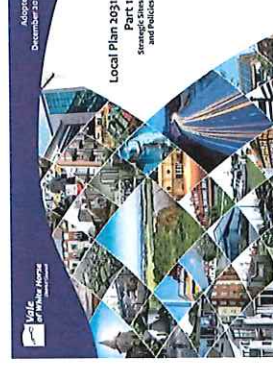
South Oxfordshire and Vale of White Horse District Councils have come together to work on a new Joint Local Plan to 2041.

The Joint Local Plan will take account of the emerging strategic plan for Oxfordshire: the Oxfordshire Plan 2050.

The Joint Local Plan will contain policies that will help to guide planning application decisions for the districts.

Once adopted, the Joint Local Plan will replace the current South Oxfordshire Local Plan 2035 and Vale of White Horse Local Plan 2031, Parts 1 and 2.

# Existing planning documents



Once the new Joint Local Plan is adopted, it will replace the current Local Plans for South Oxfordshire (Local Plan 2035) and Vale of White Horse (Local Plan 2031: Parts 1 and 2). While we are preparing the new Joint Local Plan, nearly all of the existing policies and site allocations within these current documents remain relevant and will continue to be used to determine planning applications until replaced.

Vale of White Horse District Council undertook a review of the Local Plan Part 1, before it became 5 years old – that review is available here:

<https://www.whitehorsedc.gov.uk/wp-content/uploads/sites/3/2021/12/Local-Plan-Part-1-Review-Dec-2021..pdf>

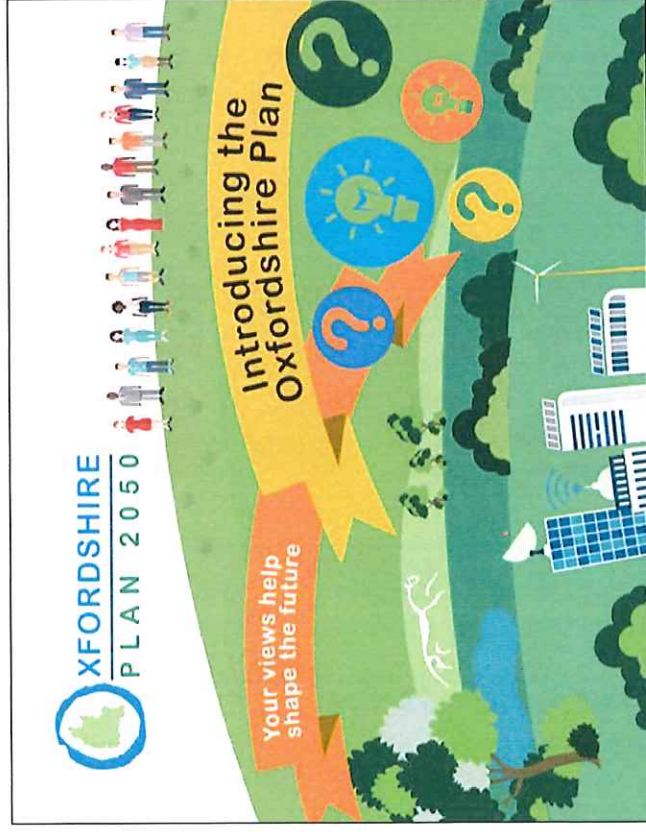
Neighbourhood planning will remain in place and used when determining planning applications. They should be reviewed to ensure conformity with the Joint Local Plan when it is adopted.

Existing Supplementary Planning Documents will also remain in place and be used to support the determination of planning applications, unless they are inconsistent with the new policies of the Joint Local Plan.

The diagram below shows what our Future Development Plan will look like, you can find out more in the [Local Development Scheme](#):<sup>3</sup>



# Oxfordshire Plan 2050 context



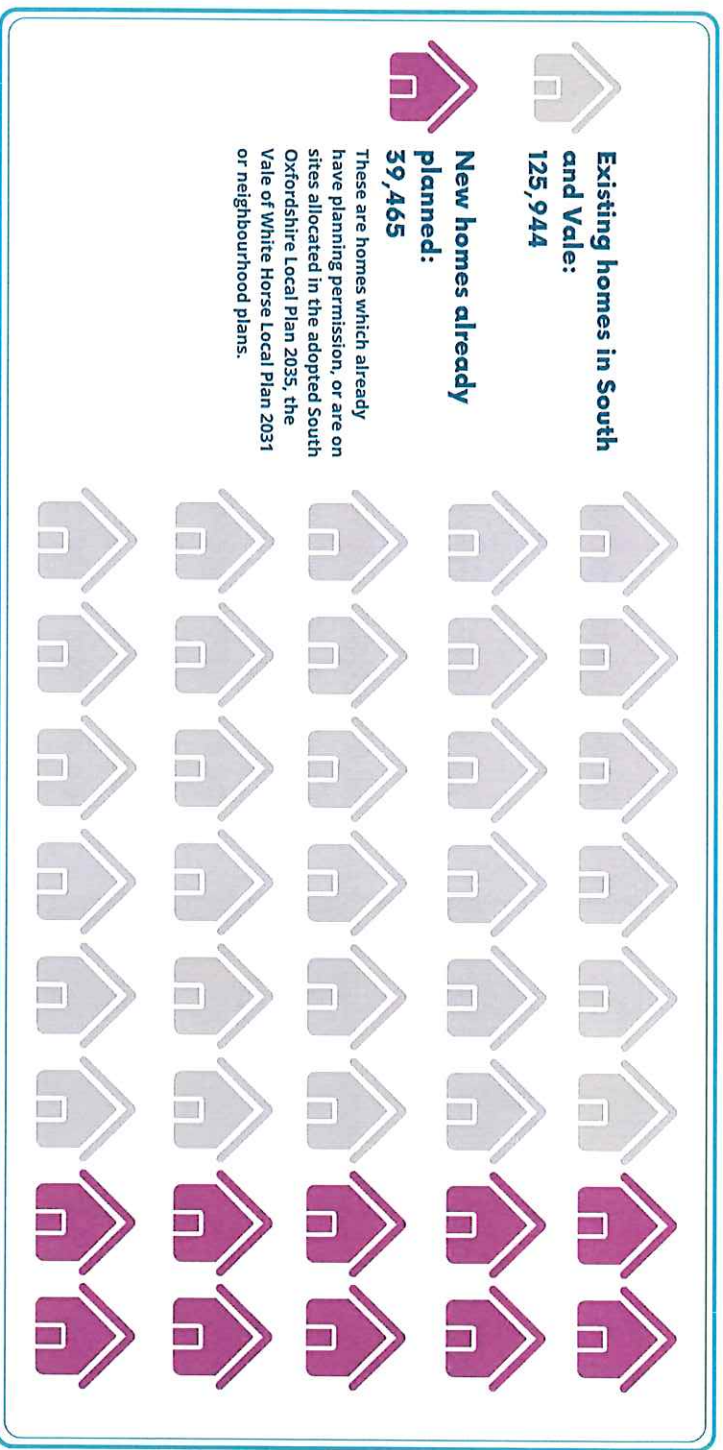
A countywide plan, known as the Oxfordshire Plan 2050, is currently being prepared.

The five Oxfordshire authorities of Cherwell District Council, Oxford City Council, South Oxfordshire District Council, Vale of White Horse District Council and West Oxfordshire District Council, in partnership with Oxfordshire County Council, have committed to producing the Oxfordshire Plan 2050, which will be a joint Strategic Plan. We committed to producing this as part of the 2018 Oxfordshire Housing and Growth Deal with the Government. You may have already responded to consultations on this Plan, the latest one being an options consultation in July 2021.

The Oxfordshire Plan will set out the overall development requirement and identify broad areas for development across Oxfordshire. South and Vale will develop detailed planning policies and site allocations at a district level in the Joint Local Plan. Updates and details of progress on the Oxfordshire Plan can be found on the [Oxfordshire Plan 2050 website](#).<sup>4</sup>

Currently we envisage that 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 needed until 2041. This current consultation doesn't ask questions about the amount of housing to be delivered in the districts because the Oxfordshire Plan still needs to identify this. Our existing Local and Neighbourhood Plans already plan for new homes which are still to be built. Once built, these new homes will increase the number of homes we had in 2021 by almost another third.

<sup>4</sup> <https://oxfordshireplan.org/>



# Oxfordshire Strategic Vision

All the Councils in Oxfordshire (including South Oxfordshire and Vale of White Horse) have signed up to the **Strategic Vision for Oxfordshire**<sup>5</sup>, which sets out where the county needs to be in 2050. Achieving this will require bold, collaborative and inclusive thinking, with decisions and actions that deliver real and lasting change in ways that build resilience and enhance our shared prospects for the future. It is already influencing the direction of both the Oxfordshire Plan 2050 and our Joint Local Plan vision.

<sup>5</sup> <https://futureoxfordshirepartnership.org/projects/oxfordshire-strategic-vision/>

# Neighbourhood Plan Context

## Neighbourhood planning in the districts:

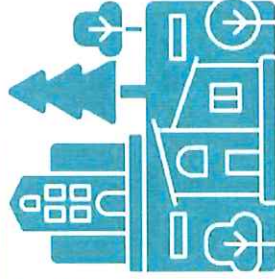
### South Oxfordshire

**26**

made  
neighbourhood  
plans

**17**

currently  
being  
prepared



**9**

made  
plans  
under  
review

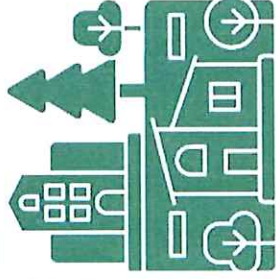
### Vale of White Horse

**15**

made  
neighbourhood  
plans

**9**

currently  
being  
prepared



**1**

plan  
review  
made

**1**

plan  
review in  
progress

Neighbourhood planning allows communities to develop a shared vision for their neighbourhood and shape the development and growth of their local area.

Our councils strongly advocate neighbourhood planning and offer a range of support to neighbourhood planning groups, via advice and guidance throughout plan-making and the preparation of neighbourhood plan reviews. The Joint Local Plan will set the overall context for future Neighbourhood

Development Plans. Neighbourhood plans empower

communities by giving them the opportunity to allocate sites for development, protect demonstrably special open spaces, identify opportunities for renewable energy schemes and nature recovery as well as develop policies to protect and enhance the character of towns and villages.



# The Local Plan process

Local Plan preparation must follow a process as set out by Government and new policies must be consistent with the [National Planning Policy Framework](#)<sup>6</sup>. Plans should provide a positive vision for the future of each area and the framework for addressing housing needs and other economic, social and environmental priorities, being based on robust evidence.

Alongside the Joint Local Plan, we will prepare a 'Sustainability Appraisal' (SA) and a 'Habitats Regulations Assessment' (HRA). These documents make sure the Joint Local Plan considers the relevant environmental, social, and economic issues and minimises any potential negative impacts. The progress on these documents and our evidence base can be found at: <https://www.whitehorsedc.gov.uk/jointlocalplan> and <https://www.southoxon.gov.uk/jointlocalplan>

While evidence gathering takes place, it is important to understand people's views now, to help shape our approach before we propose preferred options for detailed policies and allocations of sites for development. We hope to share our recommendations for policy options and site allocations in 2023.

We will consider feedback, finalise our plan and give you the opportunity to comment on the final draft.

An independent planning inspector will then consider your final comments and assess the final draft version of the Joint Local Plan to ensure it meets legal requirements and by using the 'four tests of soundness' - whether it has been positively prepared, is justified, effective and consistent with national planning policy.

Here are some useful resources with more information about Local Plan processes:

- [Planning Practice Guidance \(PPG\)](#)<sup>7</sup>
- [PAS Guidance on Local Plans](#)<sup>8</sup>
- [PINS Local Plan Examination Guidance](#)<sup>9</sup>

<sup>6</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005759/NPPF\\_July\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf)

<sup>7</sup> <https://www.gov.uk/government/collections/planning-practice-guidance>

<sup>8</sup> <https://www.local.gov.uk/pas/plan-making>

<sup>9</sup> <https://www.gov.uk/government/publications/examining-local-plans-procedural-practice>



## **17. Glossary**

## **20 minute neighbourhoods**

Areas to live in where people can meet their everyday needs like shopping and primary schools within 20 minutes' walk or cycle of their home.

## **Area of Outstanding Natural Beauty (AONB)**

A national designation to conserve and enhance the natural beauty of the landscape. The AONBs in South Oxfordshire and Vale of White Horse are the North Wessex Downs and the Chilterns.

## **Biodiversity net gain**

Biodiversity net gain is an approach to development, and/or land management, that aims to leave the natural environment in a measurably better state than it was beforehand.

## **Carbon budget**

A carbon budget places a restriction on the total amount of greenhouse gases a place or organisation can emit over a certain time period.

## **Carbon neutral**

Balancing of the carbon dioxide released into the atmosphere with the amount absorbed or removed from the atmosphere.

## **Carbon sinks**

A carbon sink is a living system that absorbs more carbon from the atmosphere than it releases – for example, trees, other plants, the ocean and soil.

## **Circular economy**

In a circular economy, every item or material is useful and valuable to another part of the economy. The two main ways to create a circular economy are to: design products for maximum value/life; and set up systems to deal with products in a way which retain maximum value, preventing products from being disposed of or downcycled.

## **Clean technologies**

Technology which avoids environmental damage at the source through use of materials, processes, or practices to eliminate or reduce the creation of pollutants or wastes.

## **Conservation Area**

An area designated by the District Council under Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as an area of special architectural or historical interest, the character or appearance of which it is desirable to preserve or enhance.

## **Conservation Area Character Appraisal**

A document which identifies the special architectural or historic interest of a Conservation Area.

## **Cultural heritage**

Ways of living or traditions developed in an area and passed on from generation to generation, and also the books, poems, music and art made in or about a local area.

## **Density**

The number of dwellings per hectare.

## **Development Plan**

A document setting out the local planning authority's policies and proposals for the development and use of land and buildings in the area. This includes adopted Local Plans, neighbourhood plans, and is defined in section 38 of the Planning and Compulsory Purchase Act 2004.

## **Electric vehicle charging points**

Connect an electric vehicle (EV) to a source of electricity, to recharge electric cars, and plug-in hybrids.

## **Enabling development**

Enabling development is development that would not be in compliance with local and/or national planning policies, so would not normally be given planning permission, but a case is made that it would secure the future conservation of a heritage asset.

## **Fabric efficiency**

The performance of the components and materials that make up a building's fabric. Having the highest standards of performance, before considering the use of mechanical or electrical building services systems, can assist with reducing capital and operational costs, improve energy efficiency and reduce carbon emissions.

## **Flood risk areas**

Flood Risk Areas identify locations where there is a significant flood risk.

## **Flood Zone 2**

Land having between a 1 in 100 and 1 in 1,000 annual probability of river flooding; or Land having between a 1 in 200 and 1 in 1,000 annual probability of sea flooding.

## **Flood Zone 3**

Land having a 1 in 100 or greater annual probability of river flooding; or Land having a 1 in 20 or greater annual probability of sea flooding. This is the zone at the highest flood risk.

## **Fusion energy power**

Fusion power is a form of power generation using heat from nuclear fusion reactions to make electricity.

## **Garden Communities**

A holistically planned new or regenerated settlement which enhances the natural environment, tackles climate change and provides high quality housing and locally accessible jobs in beautiful, healthy and sociable communities.

## **Green Belt**

Designated land around a town or city where land is kept permanently open and where development is severely restricted.

## **Greenfield land**

Land that has not been previously developed.

## **Greenhouse gas emissions**

Greenhouse gas emissions from human activities strengthen the greenhouse effect, causing climate change. The most well-known greenhouse gas is carbon dioxide, which comes from burning fossil fuels like coal, oil, and gas.

## **Heritage assets**

A building, monument, site, place, area or landscape identified as having a degree of significance worthy of consideration in planning decisions, because of its heritage interest.

## **Heritage at Risk**

The Heritage at Risk (HAR) programme identifies those designated heritage sites that are most at risk of being lost as a result of neglect, decay or inappropriate development. The Register includes buildings, places of worship, monuments, parks and gardens, conservation areas, battlefields and wreck sites that are listed and have been assessed and found to be at risk.

## **Intensive indoor livestock**

Intensive animal farming or industrial livestock production, an approach to animal husbandry designed to maximise production, while minimising costs.

## **Landscape character**

The distinct, recognisable and consistent pattern of elements in the visible features of an area of land.

## **Listed Buildings**

Buildings and structures which are listed by the Department for Digital, Culture, Media and Sport as being of special architectural and historic interest and whose protection and maintenance are the subject of special legislation.

Listed building consent is required before any works are carried out on a listed building.

## **Local Wildlife Sites (LWS)**

Local Wildlife Sites are areas of land that are especially important for their wildlife. Local Wildlife Sites are identified and selected locally using scientifically-determined criteria and surveys.

## **Mixture of housing types**

Developments which combine a range of tenure options like owner-occupier housing, shared ownership housing and rental properties (social, intermediate and private).

## **Nature recovery networks**

A joined up network of wildlife-rich places to increase and restore nature.

## **Oxfordshire Housing and Growth Deal**

In March 2017 the Government committed to the Oxfordshire housing and growth deal (the deal), to support ambitious plans to deliver 100,000 homes by 2031. The deal committed to an Oxfordshire-wide joint statutory spatial plan to be adopted by 2021, and to be supported by £215 million of funding to help deliver more affordable housing and infrastructure improvements to support development across the county.

## **Quietways**

Walking and cycling routes that have been identified where traffic is generally quieter.

## **Registered Battlefields**

Historic England's Register of Historic Battlefields identifies 47 important English battlefields. Its purpose is to offer them protection through the planning system, and to promote a better understanding of their significance and public enjoyment. There is one Registered Battlefield in South Oxfordshire, the site of the Battle of Chalgrove.

## **Registered Parks and Gardens**

Historic England is enabled by government to compile the 'Register of Parks and Gardens of Special Historic Interest in England' to identify those sites which are of particular historic significance. Registration means that planning authorities must consider the impact of any proposed development on the landscapes' special character.

## **Regulation 18, 19, 22, 24 and 26**

Formal stages of Local Plans preparation, examination and adoption identified by The Town and Country Planning (Local Planning) (England) Regulations 2012.

## **Safeguard**

A measure taken to protect someone or something or to prevent something undesirable.

## **Scheduled Monuments**

Scheduling is the selection of nationally important archaeological sites. Scheduled monuments are not always ancient, or visible above ground

## **Self-build, custom and community-led housing**

Custom and self-build housing is housing built by groups or individuals for their own use. Those groups or individuals must have primary input into the homes final design and layout.

- Self-build is where a person directly organises the design and construction process of their own home, which can include building the home themselves or employing someone to build the home for them
- A custom-build home is where a person is working with a developer, who takes on more responsibility e.g. finding land to build on, constructing the home and arranging finance
- Community-led housing projects are led by community groups determined to make sure that new homes are built and empty homes and buildings can be brought back into use to meet local housing needs.

## **Site allocation**

A site allocation is a site that is earmarked in a local plan for a particular type of development or use, such as housing, employment and leisure.

## **Sites of Special Scientific Interest (SSSI)**

Identified protected areas of nature conservation and scientific value identified by Natural England as being of national (and sometimes international) importance.

## **Special Area of Conservation (SAC)**

An area designated to protect the habitats of those threatened species of wildlife that are considered to be most in need of conservation at a European level. Designed under EU Directive 92/43.

## **Strategic Plan**

The Oxfordshire Strategic Plan aligns the strategies of authorities within the county so that future housing and infrastructure is more joined up.

## **Sustainable resource**

A sustainable resource is a resource that can be continuously replenished, or there is an endless amount of it that can be captured or harnessed without decreasing the supply.

## **Zero-emission and low carbon transport**

Ways to get around which involve low or zero greenhouse gas emissions, for example walking and cycling, or vehicles which use alternative fuels.

# Map data sources

**Area of Outstanding Natural Beauty: (AONB)**  
Natural England

**Enterprise Zones**  
Vale of White Horse and South Oxfordshire

**Flood Zones 2 and 3**  
Environment Agency

**Conservation Areas**  
Historic England

**Green Belt**  
Oxford Green Belt: Ministry of Housing, Communities and Local Government  
Vale of White Horse and South Oxfordshire

**Heritage Assets at Risk 2021**  
Historic England

**Historic Parks and Gardens**  
Historic England

**Listed Buildings**  
Historic England

**Local Wildlife Sites (LWS)**  
Thames Valley Environmental Records Centre (TVERC)

**Parish and District Boundary**  
Ordnance Survey

**Scheduled Monuments**  
Historic England

**Science Vale**  
Vale of White Horse and South Oxfordshire

**Site of Special Scientific Interest (SSSI)**  
Natural England

**Special Area of Conservation**  
Natural England

**Registered Battlefields**  
Historic England

**Registered Parks and Gardens**  
Historic England

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100018668

Vale: © Crown copyright and database rights 2022 Ordnance Survey  
100019525

Esri UK Esri, HERE, METI/NASA, UGS, Esri, Ordnance Survey, NASA, NGA, USGS

All data is subject to change. For the latest information go to the source providers.



**Vale  
of White Horse**  
*District Council*



**South Oxfordshire  
District Council**  
*Listening Learning Leading*

**Alternative formats of this publication, a summary of its contents or specific sections, are available on request.**

**These include large print, Braille, audio, email, easy read and alternative languages.**

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[www.whitehorsedc.gov.uk](http://www.whitehorsedc.gov.uk)



# Response 220

## Respondent Details

[Redacted]

[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]

Q1. i) Are you responding as:

An agent, developer or landowner

[Redacted]

[Redacted]

## A little bit about you (continued...)

[Redacted]

[Redacted]

Q4. For further information about how we use your data below, please refer to our privacy policy, which also explains how to exercise your rights over your personal data. If relevant, please provide the details of the organisation, business or council you're representing. If relevant, please also give the details of the client your business is representing (EG if you're a planning agent responding on behalf of another organisation).

[Redacted]	-
<b>First name</b>	Aline
<b>Last name</b>	Hyde
[Redacted]	-
<b>Your business or organisation (if relevant)</b>	-
<b>Business or organisation you're representing (if relevant)</b>	-
[Redacted]	[Redacted]

Q6. Please select which documents you wish to comment on:

Local Plan Issues Consultation

Sustainability Appraisal (SA) Screening and Scoping Report

Q39. 32. Finally, do you have any other comments?

Please find response attached.

[Redacted]

- [Redacted]

## Sustainability Appraisal (SA) Screening and Scoping Report

Q41. If you have any comments on the Sustainability Appraisal Document, please provide them below.

Please see attachment for comments on the Sustainability Appraisal document.

If you are ready to submit your comments, please tick the box below, then select the 'Finish and submit' button. Note: once ticked you will not be able to return to your comments and they will be submitted. If not, please use the 'previous page' button to go back through the survey to amend or review your response. Alternatively you can use the 'save and continue later' so that you can save your progress, and return later to your comments. Simply provide your name and email address and you will automatically receive a link via email to return to your draft comments when you are ready.

Yes, I have finished and am ready to submit

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**By email**

Our ref ENO001/0001

21 June 2022

Dear Sir or Madam

**Representation to Reg. 18 consultation on Joint Local Plan 2041**

1. We are instructed by Ms Anthea Eno (of Stonehill House, Drayton, Oxfordshire OX14 4AA) to write with reference to the Regulation 18 consultation on issues relating to the Joint Local Plan 2041 being prepared by Vale of White Horse and South Oxfordshire District Councils.
2. Our client's property is located to the south of Abingdon, within an area currently safeguarded by Policy CP12 of Vale of White Horse District Council's Local Plan 2031. Land within South Oxfordshire District Council's jurisdiction is safeguarded by Policy TRANS3 of its Local Plan 2035. Both policies safeguard land for the delivery of a bypass.
3. We respond below to specific questions asked in the consultation document and comment also on the draft Sustainability Appraisal Screening and Scoping Report.

*Questions 19 and 20 – Transport and facilities*

4. Our client is broadly supportive of the opportunities listed within this section of the document, and agrees that development should be focused in sustainable locations. Ms Eno is particularly supportive of the promotion of active modes of travel and reducing reliance on the private vehicle. To achieve this, it is necessary to locate new development in places which are in close proximity and well-linked to the range of facilities and services provided by Oxford and the larger towns of Abingdon, Wantage and Faringdon, with existing facilities and infrastructure in those locations enhanced as required to support the needs of the population. Our client is most concerned, however, that any new infrastructure provided for strategic development should not increase or encourage car usage and thereby work against the sustainable objectives of the Plan and the Council's declared Climate Emergency agenda.
5. We append the representations made by i-Transport LLP on behalf of our client to the recent consultation by Oxfordshire County Council on the draft Local Transport and Connectivity Plan

Partners: Elizabeth Christie, Mary Cook, Duncan Field, Clare Fielding, Michael Gallimore,  
Raj Gupta, Meeta Kaur, Simon Ricketts, Patrick Robinson, Louise Samuel

21 June 2022

(“LTCP”). The LTCP notes that the construction of roads is not a sustainable option, with evidence indicating that they generate demand and quickly reach capacity.

6. The Planning Practice Guidance<sup>1</sup> confirms that “an assessment of the transport implications should be undertaken at a number of stages in the preparation of a Local Plan:...as part of the initial evidence base in terms of issues and opportunities...”. We note, with a degree of concern, that no transport evidence appears to have been commissioned (or alternatively, made publicly available) to inform this consultation. We request that the full evidence base is published on the Council’s website ahead of the next Regulation 18 consultation so that it may be considered and commented upon.
7. *Questions 27 and 28 – Jobs and Opportunities for Innovation*
8. Our client does not disagree with the general principle of locating homes where they are close to jobs. Ms Eno does not, however, support the delivery of significant development within the part of Science Vale to the south of Abingdon. The siting of development in this area would be inherently unsustainable, relying as it would on largescale new infrastructure provision (with the associated expense) and dependence on the private vehicle, in direct conflict with the sustainability objectives of the Plan.
9. *Question 32 – other comments*
10. Our client supports the environmental focus of the issues identified within the consultation document. A plan built on these foundations will promote self-sufficient neighbourhoods, promote active travel options and work towards achieving carbon net zero.
11. The Oxfordshire Infrastructure Strategy 2021, which seeks to meet the county’s needs in the period up to 2040, excluded the possibility of a bypass south of Abingdon. That document did note that some of the county’s needs in respect of connectivity would not be met, but none of these unmet needs would be addressed by the provision of the bypass.
12. The land currently safeguarded is afflicted with numerous constraints, including the floodplains associated with the River Ock and the River Thames, a number of statutorily-listed historic buildings and a scheduled monument, and two recently-confirmed Public Rights of Way. Clearly, the continued safeguarding of land for a bypass is entirely inconsistent with the Councils’ environmental commitments and recognition of the Climate Emergency.

*The draft Sustainability Appraisal Screening and Scoping Report*

13. Our client is supportive of the sustainability objectives identified in Table 26 within the document and in particular, wishes the Councils to promote a strategy which reduces reliance on the private vehicle per objective 3 and which contributes to the achievement of carbon net zero per objective 6. It is evident that a strategy which is reliant on the provision of a bypass to deliver significant development to the south of Abingdon would not support these objectives and would not,

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<sup>1</sup> ‘Transport evidence bases in plan making and decision taking’: Paragraph: 004 Reference ID: 54-004-20141010

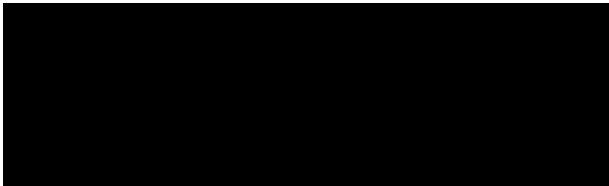
21 June 2022

therefore, allow the Council to discharge its duty under Section 39 of the Planning and Compulsory Purchase Act 2004.

*Conclusion*

14. The safeguarding of land has significant implications for those who own or occupy land that is safeguarded in that it becomes in practice blighted (although often not formally qualifying for any form of blight compensation). Accordingly, there is properly an onus on policy makers to consider the implications of including or retaining policies entailing the safeguarding of land for infrastructure schemes.
15. It is clear from the foregoing that the retention of the safeguarding policies would be injurious to the delivery of a sustainable development strategy and that it would actively inhibit the achievement of the Councils' expressed environmental objectives. Accordingly, the Joint Local Plan 2041 should clearly identify that the safeguarding policies are no longer required.
16. We look forward to the Councils' response in due course.

Yours faithfully



Town Legal LLP

Encs



Representations to the Oxfordshire County Council  
Draft Local Transport and Connectivity Plan on  
behalf of Ms Anthea Eno (Anthea Norman-Taylor)  
of Stonehill House, Drayton, near Abingdon.

i-Transport Ref: SAW/RW/ITB16406-002A R

Date: 21 February 2022

Representations to the Oxfordshire County  
Council Draft Local Transport and Connectivity  
Plan on behalf of Ms Anthea Eno (Anthea  
Norman-Taylor) of Stonehill House, Drayton, near  
Abingdon.

i-Transport Ref: SAW/RW/ITB16406-002A R

Date: 21 February 2022

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## Quality Management

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ITL16406-002A R	Final	21/02/2022	RW/SAW	SAW

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## Contents

<b>SECTION 1</b>	<b>INTRODUCTION</b>	<b>1</b>
<b>SECTION 2</b>	<b>BACKGROUND TO ROAD BUILDING</b>	<b>3</b>
<b>SECTION 3</b>	<b>DISCUSSION</b>	<b>5</b>
<b>SECTION 4</b>	<b>CONCLUSIONS</b>	<b>11</b>

## SECTION 1 INTRODUCTION

1.1.1 This statement is submitted in response to the consultation on the Oxfordshire County Council (OCC) - Draft Local Transport and Connectivity Plan (October 2021).

1.1.2 It has been prepared by i-Transport LLP on behalf of Ms Anthea Eno (Anthea Norman-Taylor) of Stonehill House, Drayton, near Abingdon. It considers and responds to Policy SV4.2 which is identified in Oxfordshire County Council's Local Transport Plan 4 (2016) and referred to in the Draft Local Transport and Connectivity Plan (October 2021). Appendix B, page 152 states the following:

***"Policy SV4.2: Safeguarding and protecting the ability to provide a South Abingdon road if significant additional development is allocated to the south of the town in the future. This will provide a direct link from west Abingdon to the A415 to the east and relieve congestion in Abingdon town centre."***

1.1.3 The Draft Local Transport and Connectivity Plan (LTCP) provides an update on the Policy and states at page 152 that:

***"Policy SV4.2: Position to be reviewed in Area Strategy updates and with the District Council's Joint Local Plan work."***

1.1.4 The same policy presumption is also present within the Vale of White Horse District Council (VOWHDC) Local Plan 2031 at Policy CP12 which states:

***"Land is safeguarded to support the delivery of the South Abingdon-on-Thames Bypass linking the A415 to the West and South East of the town, including a new River Thames crossing."***

1.1.5 It is also found within South Oxfordshire District Council's (SODC) Local Plan 2041 as Policy TRANS3 which states:

***"Land is safeguarded to support the delivery of ... a Bypass for South Abingdon."***

1.1.6 These policies are based upon the possible delivery of a bypass to the south of Abingdon that was historically considered to alleviate congestion issues in Abingdon and to unlock land to the south of Abingdon for possible development.

1.1.7 This statement has been prepared having regard to the following documents that form part of the evidence base for the Draft LTCP and Local Plans for the relevant authorities:

- Local Transport Plan 4, 2015-2031 (September 2015, and updated 2016) – prepared by OCC;

- Draft Local Transport and Connectivity Plan (October 2021) – prepared by OCC;
- Evaluation of Transport Impacts Study to inform the Vale of White Horse District Council Local Plan 2031: Part 1 Strategic Sites and Policies (November 2014) – prepared by Atkins and OCC;
- High-Level Transport Assessment of Spatial Options (May 2016) – prepared by Integrated Transport Planning on behalf of Oxfordshire Growth Board;
- Oxfordshire Infrastructure Strategy (November 2017) – prepared by AECOM on behalf of Oxfordshire Growth Board; and
- Abingdon Bypass Initial Route Assessment (June 2009) – prepared by Halcrow Group Limited.

**1.1.8** It is structured as follows:

- Section 2 provides background on the proposed vision and relevant policies set out in the Draft LTCP;
- Section 3 considers the deliverability of a potential bypass to the south of Abingdon based on studies undertaken on behalf of OCC, and provides a critique of the work undertaken that purports to underpin the policy; and
- Section 4 provides a conclusion on the appropriateness of retaining Policy SV 4.2 in the submitted version of the Local Transport and Connectivity Plan.

**1.1.9 This representation concludes that the basis for the safeguarding Policy SV 4.2 is fundamentally flawed as it is based on an incomplete assessment by Halcrow in 2009 some 13 years ago which did not in fact at all consider a bypass south of Abingdon.** Moreover, a proposal for such a bypass scheme is antiquated in its thinking and conflicts with the thrust of the County's current transport policies which seek to deliver a carbon zero transport network by 2040.

## SECTION 2 BACKGROUND TO ROAD BUILDING

### 2.1 Introduction

2.1.1 The LTCP seeks to move away from a carbon-based transport system to a zero carbon Oxfordshire transport system. These overarching aims are fully supported as is the move away from the private car and road building towards more sustainable, carbon neutral modes of transport. This section briefly considers the background under the headings of the Climate Emergency, the Draft Local Transport and Connectivity Plan and the need for road building.

### 2.2 Climate Emergency

2.2.1 It is clear that there is increasing and urgent desire across all levels of society to address and overcome the causes of anthropogenic Climate Change, with irreversible warming continuing to increase. The Oxfordshire Climate Action Framework highlighted this issue with all Oxfordshire local authorities having now declared a Climate Emergency. South Oxfordshire District Council and the Vale of White Horse District Council both declared this in February 2019, and Oxfordshire County Council declared it in April 2019.

2.2.2 The transport sector is responsible producing some 29% of the UK's emissions in 2019 (DfT, 2021)<sup>1</sup> with this figure stated at 36% within Oxfordshire (Draft LTCP, page 21). There is clearly an urgent requirement to decarbonise transport and reduce road travel, with 91% of the UK's current transport emissions attributed to car use according to the DfT<sup>1</sup>.

### 2.3 Draft Local Transport and Connectivity Plan

2.3.1 The UK government has made a legal commitment to deliver net-zero emissions by 2050 to limit global warming to 1.5°C and tackle climate change. Based on this, OCC has begun to deliver their targets for transport in Oxfordshire through a Local Transport and Connectivity Plan, a draft of which was published in October 2021. The Draft LTCP sets out the following headline net-zero transport targets:

- By 2030, replace or remove one out of every four current car trips in Oxfordshire;

---

1

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/984685/transport-and-environment-statistics-2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/984685/transport-and-environment-statistics-2021.pdf)

- By 2040, deliver a zero-carbon transport network; Replace or remove one out of every three current car trips in Oxfordshire; and
- By 2050, deliver a transport network that contributes to a climate positive future.

2.3.2 Reduction in the usage of the private car has been cited as one of the solutions to reduce emissions from transport and achieve net-zero targets, by moving journeys from private cars to sustainable and active travel promoted as a critical approach. Behavioural change initiatives and significant funding are required to encourage motorists to change their travel patterns and to adopt these more sustainable modes.

## 2.4 Road Building

2.4.1 In recent years, there has been a move away from road building because the additional capacity created is now understood to induce traffic growth and because of the adverse environmental impacts associated with the increased use of the motor car. Indeed, all new road building in Wales has been frozen while the Welsh Government undertakes a review. Additionally, the decarbonisation of transport at a national policy level is encouraging the uptake of active travel opportunities, car sharing, autonomous vehicles, and shared mobility.

2.4.2 These themes are found in the Draft LTCP which states '**...there are situations where new roads, or widening roads and junctions may be necessary but this is not a sustainable long-term solution because we have found that road schemes often generate new demand and quickly reach capacity again**' (Pg. 90). This is a clear indication that road building is no longer deemed a viable long-term option within the county. Consequentially, any new road scheme must be considered against this background.

2.4.3 The Draft LTCP qualifies its position on road building by also stating '**...there are examples where road schemes may be required and will deliver improvements. This includes where access is needed to new developments.**' (Pg. 90) What is clear however is that any new road building will be an exception and will need to be carefully justified.

## SECTION 3 DISCUSSION

### 3.1 Introduction

3.1.1 This section considers the safeguarding policy, what has been said to date about development to the south of Abingdon and then sets out a critique of a bypass scheme.

### 3.2 Safeguarding Policy & Development

3.2.1 Policy SV4.2 safeguards and protects the ability to provide a road to the south of Abingdon but only '**...if significant additional development is allocated**' to the south of the town in the future. The provision of any new road was to be conditional on 'significant' development to the south of Abingdon coming forward. Having reviewed the 2009 Halcrow report it is clear that no assessment at all was carried out of the extent of any route south of Abingdon and which is now the subject of the safeguarding envelope.

3.2.2 The Vale of White Horse Evaluation of Transport Impacts (November 2014) produced by OCC and Atkins was undertaken to inform the selection of strategic development sites to be allocated in the VOWHDC Local Plan 2031 and to help identify a package of highway mitigation to ensure delivery of sustainable development.

3.2.3 Stage 2 of the assessment set out and considered 27 potential site options, to help inform the selection of new proposed strategic development sites for inclusion in the Housing Delivery Update in February 2014 and it assumed no changes to the existing transport network. A location south of Abingdon was assessed in Scenario 4, and the report stated that "**The council have consistently stated that development to the south of Abingdon could only take place if a new South Abingdon bypass is delivered, for which there is currently no identified funding.**" (Page 24).

3.2.4 The safeguarding of land has significant implications for those who own or occupy land that is safeguarded in that it becomes in practice blighted (although often asserted by the authorities as not formally qualifying for any form of blight compensation). Accordingly, there is properly an onus on policy makers to consider the implications of including or retaining policies entailing the safeguarding of land for infrastructure schemes. The discussion below establishes that there is no reasonable prospect whatsoever that the land which has until now been safeguarded will actually be required for road building in the future and the plan should clearly identify that the safeguarding is no longer required

### 3.3 Possibility of Development South of Abingdon

- 3.3.1 As stated in the policy, any possible requirement for a bypass is wholly dependent on the allocation of major development to the south of Abingdon. However, there are numerous considerations that must be taken into account.
- 3.3.2 Integrated Transport Planning (ITP) was commissioned by the Oxfordshire Growth Board (now known as Future Oxfordshire Partnership) to undertake a High-Level Assessment of Spatial Options (May 2016) to determine the transport implications of development at 36 sites in Oxfordshire that could potentially accommodate Oxford City's unmet housing needs.
- 3.3.3 A Red/Amber/Green assessment of the transport implications associated with housing development at each option was undertaken against seven metrics, including Sustainable Location; Proximity to existing sustainable transport; Walk & Public Transport Accessibility; Highway accessibility; Congestion; Proximity to all proposed future transport investments; and proximity the future transport investment needed for other strategic development.
- 3.3.4 An allocation of some 1,100 dwellings in the South Abingdon (identified as Location 22 in the report) achieved Red in all seven metrics used to assess the location (outlined in Table 3-2 of the report), which scored the lowest possible score out of all the locations, even with a proposed South Abingdon bypass included in the 'proximity to all proposed future transport investments' metric.
- 3.3.5 Appendix G of the report provided further commentary on the assessment and stated that ***"[poorly scoring] sites that could accommodate Oxford's unmet housing needs, but which are likely to require considerable unprogrammed investment and ultimately expected to achieve less sustainable transport outcomes from Oxfordshire."*** (Paragraph 2.10). It is clear therefore that, at that time, providing a large bypass to deliver major housing development to the south of Abingdon was inherently unsustainable and expensive.

### 3.4 Critique of the Case for a Bypass of Abingdon

- 3.4.1 As part of the evidence base for determining transport infrastructure projects, the Oxfordshire Growth Board and Oxfordshire Local Enterprise Partnership commissioned AECOM to produce the Oxfordshire Infrastructure Strategy (OxIS) (November 2017). This provided a view of emerging development and infrastructure requirements to support growth from 2016 onwards. It provided an agreed template for planning and directing around £9 billion of central government investment to support Oxfordshire's growth to 2040 and beyond.

3.4.2 The report used a Multi Criteria Assessment (MCA) tool to assess multiple infrastructure projects.

The key criteria the projects were assessed on were:

- 1 Type of project proposed;
- 2 Scale of housing and growth associated with the project;
- 3 The deliverability of the project; and
- 4 The social and economic impacts or the project.

3.4.3 South Abingdon Bypass received an MCA score of **14** (page 37) – this was the third lowest score out of 14 road network projects proposed in the Science Vale area, where the scores ranged from 12 (lowest) to 25. It is evident from this assessment that a bypass to the south of Abingdon would not bring about the scale of housing growth that makes it worthwhile delivering, nor would it provide beneficial social and economic impacts.

**Abingdon Bypass Initial Route Assessment (June 2009) – OCC & Halcrow Group Limited**

3.4.4 This report, which is 13 years old, is the only study relied upon by relevant authorities as a basis for safeguarding policies in VOWHDC, SODC and OCC plans for the full bypass of Abingdon.

3.4.5 The assessment is however fundamentally flawed as, putting aside the age of the study, it only considered a 2.0km link road between A415 March Road and B4017 Drayton Road, thus failing to consider land to the east of Drayton Road and a full southern bypass. The document specifically stated:

***‘The Abingdon Bypass (sic) is sited to the west of Abingdon and would link the A415 Marcham Road at its northern end with the B4017 Drayton Road at its southern end, a distance of 2.0km. It has two strategic objectives, firstly to provide congestion relief to the centre of Abingdon and secondly to facilitate development to the west of Abingdon if the land is zoned accordingly’ (paragraph 1.1.1).***

3.4.6 The report clearly stated that the objective of the bypass would be to facilitate development to the west of Abingdon, with no mention of land to the south of Abingdon. It is therefore fundamentally flawed and most unusual that land to the east of Drayton Road which was not included in the study was however included within the safeguarding envelope, as no assessment at all had been undertaken for this part of the safeguarded route.

- 3.4.7 Paragraph 2.1.2 of the Halcrow report stated that the first principal objective was “...**to provide an alternative route for traffic that currently uses Ock Street/B4107 junction in the centre of Abingdon this proving relief this congested junction and surrounding area.**” The first stage of a bypass will not, on its own, deliver relief to the town centre. Such a scheme would only remove A415 – B4017 turning movements from the existing junction and nowhere in the report were these movements quantified. Consequently, it is not clear how much betterment the first stage would actually deliver.
- 3.4.8 Further, as stated in paragraphs 1.1.1 and 2.1.2, the report noted that the scheme is to facilitate development ‘...**if the land is zoned for development...**’ which again compounds the issue that a bypass can only come forward if land is allocated for development to the west of Drayton Road.
- 3.4.9 The report went on to state that at paragraph 1.1.4 that “...**one of the main drivers in locating the route is the wish to provide as much land as possible for new housing between the road and existing western edge of Abingdon**”. Again, this highlighted that only the western section of the safeguarded route was assessed for delivery of a bypass and associated development.
- 3.4.10 Further issues are raised within the report regarding its deliverability due to the environmental constraints, including routing through the River Ock floodplain, stating that new flood storage areas will be required elsewhere. This would require extensive discussions with numerous stakeholders including the Environment Agency.
- 3.4.11 What the report also failed to consider is the river crossing that would be required over the River Thames at the eastern end of the safeguarded route. This is likely to be extremely expensive and complex, being located in the River Thames floodplain.
- 3.4.12 Based on the above analyses, the safeguarding policy is fundamentally flawed, as there is no evidence to demonstrate that sufficient work has been undertaken to assess a potential bypass to the east of Drayton Road in terms of environmental constraints, identified costs or its deliverability. This report does not provide a sound basis for safeguarding the land for a bypass.

#### **Technical and Environmental Considerations**

- 3.4.13 In addition to the issues outlined above, there are further technical and environmental constraints that significantly complicate the construction of a bypass to the south of Abingdon. These include:

#### **Listed Buildings & Scheduled Monument**

- 3.4.14 The Halcrow report and safeguarded route failed to consider the impact that a bypass would inevitably have on Listed Buildings, including Stonehill House to the east of Drayton Road. Sutton Wick Scheduled Monument is also situated to the west of Drayton Road within the safeguarding envelope.

#### **Modified Footpath Route**

- 3.4.15 Two new linked Public Rights of Way – Drayton Footpath 31 and Abingdon Footpath 32 – have recently been confirmed within the safeguarded route envelope, routing eastbound around the southeastern boundary of Stonehill House. Works are currently being undertaken to open the paths. It would be contradictory to designate a road building project over newly modified Public Rights of Way routes.

#### **Registered Charities**

- 3.4.16 Stonehill Community Gardens is a registered charity within the safeguarding envelope, providing outdoor learning experiences and therapeutic gardening for communities, of which equivalent opportunities are few in number, and a vital green space for Abingdon,

#### **Engineering Complexities**

- 3.4.17 Much of the safeguarded land to the east of Drayton Road is within flood zones 2 and 3, which would require expensive and expensive engineering solutions. Additionally, there are currently sewage works located further east of Drayton Road within the safeguarded envelope, reducing the effective area for a bypass to be constructed.

#### **Funding**

- 3.4.18 As stated earlier, there has been no funding identified for any bypass. Within Oxfordshire, funding for highway infrastructure usually comes from the local highway authority, Oxfordshire Local Enterprise Partnership and its development schemes, or the Oxfordshire Growth Board. At a national level, authorities apply for funding from the Housing Infrastructure Fund (HIF), of which there has been no application. It therefore appears unlikely that there would be any public funding for the scheme particularly having regard to society's attitude to road building and the road being required to access major development.

3.4.19 It is more likely that funding for such a scheme would come from developers looking to build upon the south of Abingdon, but as mentioned previously, there has been no land allocated thus far; the site has been assessed to be highly unsustainable site within the ITP and Oxfordshire Growth Board report; and the land itself presents numerous technical and environmental constraints and challenges which will limit development.

#### **Cost**

3.4.20 As with funding, there has been no costs identified for a proposed bypass, other than those presented in the Halcrow report for the 2.0km link road to the west of Drayton Road. Indeed, this report is dated 2009, and costs for such a scheme will likely have increased significantly.

3.4.21 A comparison has been undertaken to the funding provided by the UK Government to provide infrastructure for a Didcot Garden Town Infrastructure Project. That proposal includes a highway of around 3.5km length and a river crossing of the River Thames between Didcot and Culham. The funding provided was some £218m, of which £125m alone is estimated to be required for the river crossing scheme.

3.4.22 Comparatively, a bypass to the south of Abingdon would need to be circa 4-4.5km in length and also include a river crossing, over land that is within the floodplain. It is likely that this scheme would cost significantly more than the Didcot-Culham scheme, and both the scale and lack of any proposed funding throws into doubt whether a bypass scheme would ever be viable.

### **3.5 Development Access**

3.5.1 The ITP and Oxfordshire Growth Board stated that the land to the south and west of Abingdon could potentially support up to 1,100 residential dwellings. Using the cost of the Didcot – Culham road scheme which is an underestimate, it can be calculated that an on cost of almost £200,000 for each dwelling would be required to fund a bypass. Clearly, this is unrealistic without significant other funding.

3.5.2 Constructing a bypass to serve a development of this scale will not provide value for money. The construction of access roads for developments are acceptable in policy terms, although it is for the development to deliver its own access strategy. The local area and wider society should not have to pay in economic terms and adverse environmental terms for a road scheme that quite clearly conflicts with local and national policy.

## SECTION 4 CONCLUSIONS

4.1.1 This statement concludes that:

- i Oxfordshire County Council (OCC) has set out a vision of net-zero targets for 2030, 2040 and 2050 within the Draft Local Transport and Connectivity Plan (LTCP), which are in line with national guidance and the declaration of a climate emergency within the local authorities and presumption against road building;
- ii In the Evaluation of Transport Impacts undertaken for VOWHDC Local Plan (2014), it was stated by Atkins that development could only come forward to the south of Abingdon if a bypass was provided, for which no funding had been identified;
- iii Significant development to the south of Abingdon has so far failed to be allocated, and the Oxfordshire Growth Board & ITP report assessed the site as highly unsustainable for future development – the lowest scoring site in the assessment;
- iv A potential bypass option scored poorly in Oxfordshire’s Infrastructure Strategy undertaken by AECOM;
- v **The Initial Route Assessment Report (2009), on which the safeguarded route is predicated, does not consider a bypass option to the south of Abingdon but instead to the west of Drayton Road, only assessing a potential 2.0km link road between the A34 and Drayton Road. The assessment clearly stated that the road would facilitate development to the west of and not south of Abingdon;**
- vi There are inherent complexities to the scheme, including the route passing through flood zones, near to listed buildings and a scheduled monument, and a river crossing. The costs associated with such a scheme are substantial, and no funding has been identified;
- vii Road building for residential development should only include an access, which should be provided by the development and not wider society; and

- viii The safeguarding of land has significant implications for those who own or occupy land that is safeguarded in that it becomes in practice blighted (although often asserted by the authorities as not formally qualifying for any form of blight compensation). Accordingly, there is properly an onus on policy makers to consider the implications of including or retaining policies entailing the safeguarding of land for infrastructure schemes. Here there is no reasonable prospect whatsoever that the land which has until now been safeguarded will actually be required for road building in the future and the plan should clearly identify that the safeguarding is no longer required.

4.1.1.2 In conclusion, this submission finds that:

- i Any bypass to the south of Abingdon will conflict with the regional net-zero carbon targets set out in the Draft LTCP;**
- ii The technical work that supposedly underpins any bypass proposal is outdated and fatally flawed. It assessed only a short 2.0km section of the route to the west of the town and it did not investigate the suitability of a route between Drayton Road eastwards and over the River Thames;**
- iii The evidence in this representation demonstrates that the social, environmental, and economic costs would heavily outweigh the purported benefits of the construction of a bypass; and therefore**
- iv The safeguarding of land for a bypass to the south of Abingdon within the LTCP is not justified and should be removed from Oxfordshire County Council's Local Transport Connectivity Plan, and furthermore the Local Plans of VOWHDC and SODC.**



# Response 221

## Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. i) Are you responding as:

A community or interest group

[REDACTED]

I

## A little bit about you (continued...)

[REDACTED]

[REDACTED]

Q4. For further information about how we use your data below, please refer to our privacy policy, which also explains how to exercise your rights over your personal data. If relevant, please provide the details of the organisation, business or council you're representing. If relevant, please also give the details of the client your business is representing (EG if you're a planning agent responding on behalf of another organisation).

[REDACTED]	I
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	I
[REDACTED]	I
<b>Business or organisation you're representing (if relevant)</b>	Bioabundance CIC
[REDACTED]	[REDACTED]

Q6. Please select which documents you wish to comment on:

Local Plan Issues Consultation

Sustainability Appraisal (SA) Screening and Scoping Report

Draft Settlement Assessment Methodology

Duty to Cooperate Scoping Document

Q39. 32. Finally, do you have any other comments?

Please see attachments.

[Redacted]

- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]

## Sustainability Appraisal (SA) Screening and Scoping Report

Q41. If you have any comments on the Sustainability Appraisal Document, please provide them below.

please see full response in attachment

## Draft Settlement Assessment Methodology

Q49. If you have any other comments on the Draft Settlement Assessment Methodology, please provide them below.

please see full response in attachment

## Duty to Cooperate Scoping Document

Q53. If you have any other comments on the Duty to Cooperate Scoping document, please provide them below.

please see full response in attachment

If you are ready to submit your comments, please tick the box below, then select the 'Finish and submit' button. Note: once ticked you will not be able to return to your comments and they will be submitted. If not, please use the 'previous page' button to go back through the survey to amend or review your response. Alternatively you can use the 'save and continue later' so that you can save your progress, and return later to your comments. Simply provide your name and email address and you will automatically receive a link via email to return to your draft comments when you are ready.

Yes, I have finished and am ready to submit

# 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.

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

*All estimates rounded to nearest thousand*

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 Bioabundance'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 CO<sub>2</sub> budget of 5.6 million tonnes (Mt CO<sub>2</sub>) by 2100. At 2017 emission levels, South Oxfordshire would use this entire budget by 2027.
2. An immediate CO<sub>2</sub> 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 CO<sub>2</sub>, 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 CO<sub>2</sub> 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 CO<sub>2</sub> 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

**BIOABUNDANCE COMMENTS ON THE DUTY TO COOPERATE  
VALE AND SOUTH JOINT PLAN 2041 June 2022 consultation**

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# Sustainability Assessment (SA) Scoping Consultation Response

## Joint South and Vale Local Plan 2041

### Bioabundance Community Interest Company

23<sup>rd</sup> June 2022

#### EXECUTIVE SUMMARY

##### Overall conclusions

Without the major changes to the SA that we set out in this document, the Local Plan will not deliver on the Climate and Ecological emergencies, and the Local Plan process will (unintentionally) not be transparent. These conclusions come despite many good objectives and analysis in the SA scoping.

These are big claims so we have set out subject-by-subject our detailed analysis and reasoning, alongside the changes needed to deliver those pledges and improve transparency and fairness.

We recommend testing policies first against Climate and Ecological objectives.

This will ensure that all policies and strategic allocations fit in with the Districts' carbon budgets, climate adaptation, and action to halt and reverse the ecological emergency; fail on them and we have failed to deliver a future to our children.

We therefore propose that any policy that results in a net increase in carbon emissions, preventing the Districts from meeting their carbon budget allocations (for example through increases that cannot be linked to reductions in emissions elsewhere, or through creating knock-on impacts on transport emissions) is **Red Flagged** as not sustainable and be ruled out. We propose a similar approach for water quality, food security and key measures of ecological recovery.

The SA, to tackle the Climate and Ecological emergency, needs new baseline information and objectives to test policies against.

For example the objective on carbon emissions needs a clear result that can be measured. We recommend it is changed to: **Limit net carbon emissions resulting from policies to a level that enables the Districts to achieve its carbon budget.** Amazingly the SA does not have the District carbon budgets:

The Tyndall Centre says for South Oxfordshire to make its 'fair' contribution towards the Paris Climate Change Agreement, it needs a Paris aligned carbon budget:

1/ The CO<sub>2</sub> budget is 5.6 million tonnes (Mt CO<sub>2</sub>) by 2100. At 2017 emission levels, South Oxfordshire would use this entire budget by 2027.

- 2/ It should immediately start reducing CO<sub>2</sub> emissions, cutting at least 13.4% per year. These annual reductions in emissions require national and local action, and could be part of a wider collaboration with other local authorities.
- 3/ It must reach near zero carbon no later than 2041 (5% of the carbon budget of 5.6 Mt CO<sub>2</sub>, is within budget at that stage).

To be transparent and enable full discussion, the way housing need is assessed needs to be clearer and put in context, *and alternatives considered*.

The SA in the ‘baseline section’ presents housing need only as extrapolated from housing-allocation projections. The Joint Plan Vision Document fails to reveal that Councillors in Vale and SODC will be voting on the housing-need target set for Districts in Oxfordshire Plan 2050. Nothing is set now. There is a valid argument that the SA should use the latest ONS figures and projections, using a housing-need assessments based on the latest projected household numbers (Table 1). These projections *are significantly lower* than housing-allocation based numbers. Essentially, 2026-2041, only 4000 new homes would be required in South Oxfordshire. Indeed, taking a longer timeframe 2011-2041, none would be needed.

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

Changes in central government’s interpretation of the NPPF on housing need, and its new instructions to the Planning Inspectorate mean that it should be possible for Vale and South 2024 Plan to have these lower figures. (See the Population Section for details)

While we believe the Strategic Appraisal Framework, if used as intended, will guide the Local Plan process, the process could be made more transparent and more likely to be correctly applied.

- 1/ Change the objectives and extend the baseline information:** currently key objectives and baseline information are missing; wording of objectives should be strengthened to meet the key challenges.
- 2/ For each objective, make clear the criteria and evidence (including the quality of the evidence) used to judge if the policy will help or prevent delivery of the objective.**
- 3/ Make it an explicit rule that users should not aggregate the + and – scores to identify the relative sustainability of policy options.**
- 4/ Have a clear rule that two objectives cannot be combined in any use of the Framework, thereby obscuring significant negative impacts.**

## DETAILED ANALYSIS OF THE SUSTAINABILITY ASSESSMENT (SA)

### Page 11 Air Quality

The PPP Section makes worrying reading since the targets are all rather lenient and worse than the WHO levels

The baseline section needs

- interpretation of the significance of the data and
- a statement of the gaps in data and/or understanding of the impact of air pollution.

Recent research is linking closely air pollution to learning in children and dementia in adults.

One example of interpretation needed is that the background rate of 9.64 micro g per m<sup>3</sup> PM2.5 is associated with 3.5% of deaths

<https://www.theguardian.com/environment/2022/mar/16/proposed-air-pollution-limit-england-environment-act>

The objectives can only be effective with much better baseline information and targets that deliver significantly better air quality. Relying on existing mechanisms and targets is not working.

### Page 22 Biodiversity

**We want to see significant changes to the Objectives because they will not halt and reverse decline in biodiversity.**

Both the '*Relevant plans, projects and programme*' (PPP) section and the *baseline section* are comprehensive. However they fail to set out the effect of the gaps in policies and baseline information. There are also some additional gaps we want to mention.

The *key challenges* section fails to include all the challenges that flow from the policies and baseline sections and the additional gaps we identified.

The *objectives* chosen fail to cover the key challenges (both given in the document or those that should be there, considering the PPP section and baseline information and gaps). One objective in the SA scoping must be removed as it uses a mechanism (net gain in biodiversity) which cannot on its own guarantee the landscape-scale action needed to deliver nature recovery of biodiversity in the Districts

We suggest new objectives reflecting the universal priority given to reversing ecological decline, and the national policy emphasis on landscape-scale action, ecological networks and large-scale habitat creation.

The *PPP and baseline section* need to make clear that the Districts lack key policies and baseline information, and needs clearer policies on the impact of light and noise, dog faeces enrichment and nearby major development on Priority habitats.

**The *baseline section* needs to highlight that the two Districts together lack evidence on:**

- **supporting national planned targets on habitat creation:** to contribute to the national goal of 500,000 ha, and woodland habitat creation of 180,000ha by end of 2042. In proportion to the two-Districts' area, that is 1,746 ha of new woodland habitat by 2042, and 4,800 ha of new wildlife habitats.
- **making wildlife flourish in the Green Belt and giving access to nature for urban dwellers** (in the Environment Plan and the PPP section of the SA scoping).
- **delivering Green infrastructure at a District level.** The NPPF says the Councils should have a strategic approach to Green infrastructure including across borders, and PPG on Plans recommends a Green Infrastructure framework for development site based green infrastructure to link into.
- **protecting and promoting both national and local ecological networks** (nature recovery networks). Saying that the Oxfordshire Nature Recovery Network proposal has little weight in Planning is not enough - Districts have a duty to have their own local recovery network and take into account the National Network. The NPPF is clear the Districts need to map ecological networks. The PPG on Plans states Districts need to take into account national nature recovery networks.
- **tackling the threats to biodiversity thrown up by recent research:** that we have underestimated the impact of noise and light and dog interference on wildlife, and on the impact of major development within 1 ½ miles of sensitive habitats (due to visitor pressure including dog faeces enriching soil).

**The Challenges section** must be extended to cover the policies and baseline information more fully and respond to the extra points made above:

Add to the second challenge the list of possible secondary impacts,.

- 'Protect...all biodiversity assets...from direct and indirect impacts including through air and water pollution, water quantity and timing, noise, light, excess visitor (and dog) pressure, and soil enrichments from dogs.

Set out new challenges:

- Achieving protection and enhancement of National and a Local Nature Recovery networks, including contributing to national habitat creation targets.
- Achieving increases in the population, extent and resilience of Priority species
- Achieving significant increases in wildlife value of Green belt, while providing enhanced public access
- Achieving strategic network of Green Infrastructure that links up with Green Infrastructure in development sites

**The objectives section needs to be changed** to reflect changes to local and national policies on biodiversity. Objectives need to relate to the overall goals of biodiversity policy and not to only one single mechanism, that is, 'biodiversity net gain'. The current proposed objectives fail to cover all wildlife assets, and protection and enhancement for priority species that could be found anywhere in the Districts.

We need objectives that reflect the new focus of Plans, Programmes and Projects to act at a landscape-scale. Just applying the hierarchical approach (as the current objectives do) of most protection for the best biodiversity sites has failed to stop the decline.

We recommend a new Objective:

**To achieve nature recovery at a landscape-scale, by:**

- protecting and enhancing National and Local Nature Recovery Networks
- achieving the fair share of new substantial areas of natural habitat, for both Districts
- achieving flourishing wildlife in the green belt

As priority species are found all across the Districts, not just in natural habitats, they need their own objective.

A new objective

**For Priority species increase their resilience to climate change and risk of local extinction, by:**

- delivering protection of their habitats: their feeding, breeding and overwintering places
- achieving larger populations over an increased range

We need an objective that reflects the Government's pursuit of the mental and physical health benefits of being in nature through Green infrastructure and the green belt:

A new objective

**To deliver the health benefits of being in nature, by:**

- creating district frameworks and local provision of Green Infrastructure
- securing access to flourishing wildlife in the Green Belt for urban dwellers

Objective 5 in the SA scoping document should be broadened out to cover all biodiversity assets to reflect the SA's own assessment of the challenges to deliver biodiversity policy:

Modified Objective Five:

**To protect, and where possible, enhance the status of all wildlife assets, including SACs and SSSIs, local wildlife sites and priority habitats.**

We recommend *removing* Objective 4 (10% net biodiversity gain of development) because on its own cannot guarantee adequate or strategic allocation of spending to deliver nature recovery. The test of whether the plan is supporting nature recovery is the protection and enhancement of National and Local Nature Recovery Networks, substantial increase in natural habitat, wildlife flourishing in the green belt, and growing and expanding populations of Priority Species.

## **Page 58 Climate Factors**

Baseline information

**We are concerned that this section needs to work out what carbon budget can be allocated to development can if the District is to meet its carbon budget goal.**

This will require understanding the likely contribution of renewable energy production, the scope for carbon sinks and modal transport change (the County is now modelling this), as well as scope for retrofit of domestic houses.

Only then will development have a carbon budget and the SA can make judgements whether the policies in the Local Plan will deliver the carbon reduction to limit climate change to 1.5 degrees. Timing will be a key part of this- for example if retrofit takes longer, then new housing will have to be delayed.

As the UK 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 CO<sub>2</sub> budget of 5.6 million tonnes (Mt CO<sub>2</sub>) by 2100. At 2017 emission levels, South Oxfordshire would use this entire budget by 2027.
2. An immediate CO<sub>2</sub> 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 CO<sub>2</sub>, is within budget at that stage).

**We also think the baseline needs to look at water supply issues** so that development will not result in a reduced resilience to drought for existing residents, with long periods of standpipe only use. Timing here is important because of the lead time for the provision of a new reservoir or long distance pipeline. Again this will delay the provision of new development.

**We think you should add the embodied carbon in houses and roads when assessing the emissions of development**

**We support your list of challenges** but would add the challenge of 1) providing fresh water to existing and future residents and 2) maintaining our capacity to produce food by protecting the best agricultural land, especially as climate change kicks in and global breadbasket failures occur.

**We would like to see a change in wording for two of your Objectives on Climate Change:**

**Objective 6** needs a major rewrite to make it clear that the policies and development allocated in the Local Plan have to limit carbon emissions to a level that enables the Council to meet its carbon budget. A possible wording would be:

Change objective 6

**Limit net carbon emissions resulting from policies to a level that enables the Council to achieve its carbon budget**, taking into account likely reduction in carbon emissions from existing carbon emitters.

**Objective 5** we believe needs to make clear that policies have to combine a carrot and stick approach to move journeys from the car to active travel and mass-transit network. A possible wording would be:

Change objective 5

**Achieve a mode change from journeys by car to walking, cycling and public transport.** Facilitating actions include siting services and facilities within active transport journey distances, providing a mass-transit network. Deterring car journeys would involve giving other forms of transport priority through junctions, making road access longer, reducing both road space and parking for cars.

We think that there needs to be an objective here on water supply - as highlighted by your own baseline section and stated under your Flooding section. However the wording needs to be changed to make it clear that new development should not worsen the water supply for existing residents (resulting in extended use of standpipes):

Add and change Objective Eighteen:

**To achieve secure sustained water supply for existing communities and new developments in the face of climate change.** This can be done by maximising efficient use of water and water-collection for grey water use.

We also want to see protection of the best agricultural land for food production; this is vital for food security as climate change hits:

Add new Objective

**To protect our food production capabilities by maintaining our best soils in agricultural production.**

## Page 89 Human Health and Wellbeing

**PPP section:** please include the mentions about access to nature and Green Infrastructure in the NPPF and the Environment Plan.

**Baseline:** Please give baseline information on access to nature and tranquillity, as well as a strategic approach to Green Infrastructure, or identify any gaps that need to be filled.

### Challenges need to include

- Please add **making wildlife flourish in the Green Belt and give access to nature for urban dwellers** (in the Environment Plan and the PPP section of the SA scoping).
- **delivering Green infrastructure at a District level.** The NPPF says the Councils should have a strategic approach to Green infrastructure including across borders, and PPG on Plans recommends a Green Infrastructure framework for development site-based green infrastructure to link into.

### Objectives

Please add the objective about human health and nature:

**To deliver the health benefits of being in nature, by:**

- creating a district framework and local provision of Green Infrastructure
- securing access to flourishing wildlife in the Green belt for urban dwellers

## Page 118 Population

**PPP section:** please add the paragraphs in the NPPF that allows the reduction in housing need numbers where there are environmental and other constraints.

### Baseline section

We welcome your use of these independent data sources for the current and future trends on population characteristics.

We believe the SA needs to use the ONS date for setting the housing numbers to achieve the sustainable social and economic objectives. We would like to see those figures in the Baseline section.

	<b>2020</b>	<b>2030</b>	<b>Rise</b>		<b>2026</b>	<b>2041</b>	<b>Rise</b>
<b>Population</b>	142,000	146,000	3%		145,000	149,000	3%
<b>Households</b>	57,000	61,000	6%		60,000	64,000	7%

*All estimates rounded to nearest thousand*

We believe there is no logical reason for using the housing-led population numbers. The SA should not use them because:

- They are very misleading as SODC has not been able to build all the houses it allocates in its Local Plans
- ONS and the latest Housing Need Assessment give lower housing need
- We are facing a unforeseen deep recession with high costs and limited supply of building workforce and materials, that will reduce demand and supply of built homes

We also believe that the use of the housing-build target-led estimate of population is a political decision that should be taken by all councillors because:

- All districts have reserved the right to set housing targets in relation to the Oxfordshire Local Plan 2050 (do check with the team in County Hall)
- A majority of councillors were elected on a platform of lower, environmentally sustainable growth
- There is scope for the councillors to decide lower housing figures because of changes announced by the Secretary of State Mr Gove at the second reading of the Levelling Up and Regeneration Bill in parliament where he said:

- He (Mr Gove) was re-instating the power of local communities to reduce housing targets where there are environmental and other constraints. It is in the NPPF but has been rejected by Inspectors and the SoS in the past.
- He was instructing the Planning Inspectorate not to impose higher housing figures on to local communities and on their Local Plans
- SODC and Vale politicians should not be bound by the Oxford City Council decision to pursue a very high growth rate above that through natural growth

Therefore the housing-led growth should not be used unless the politicians decide to use it.

### **Objectives**

We agree with your objectives

## **Page 134 Soils**

### **Introduction**

This should state the importance of best agricultural land, to reflect all the policies in the policy section, and the fact that food security is vital with Climate Change

### **PPP section and baseline**

We are concerned that importance of the best agricultural land needs to be explored more in the Baseline section considering Climate Change induced uncertainty in food supply and the need for keeping the best land in agricultural in all circumstances.

We think there is a good argument that in an unstable world set to become more uncertain with Climate Change that securing the highest food production for our population is an essential sustainability measure - if we don't eat we die. The baseline section needs to reflect this.

We also believe that the current targets on air, water and soils are not ambitious enough to be sustainable and that the SA should set a higher bar based on current research.

We agree with the **Challenges** section that states the importance of best agricultural land and contamination. How about the other problems of soils: compaction, loss of organic matter etc. identified in the Baseline section?

### **Objectives**

We think it is vital to add an objective on protecting best land. It is perverse that after all the Policies and the key challenges stating the importance of best agricultural land, there is no objective covering it.

New objective:

**To protect our food production capabilities by maintaining our best soils in agricultural production.**

We would want to see the Objective on pollution to set the reduction to lower targets; t to a level reflecting current research. It is clear that the targets are lagging behind our knowledge, and the SA regulations do require an assessment to take into account up-to-date knowledge. And we need mention of physical damage to soils through compaction and loss of organic matter:

Changed objective

**To reduce pollution to safe levels, and reverse the compaction and loss of organic matter of the Districts' soils, based on best current knowledge.**

The Objective on sustainable management for land for 'multiple benefits' needs explaining: it comes out of the blue. How does it relate to baseline information in the PPP section? How does it meet the challenges you have identified?

Changed objective

**To support sustainable management for land that delivers multiple benefits for flood control, soil condition, biodiversity, landscape, access to nature and carbon sequestration.**

## Page 148 Flooding

### Baseline

We think this section needs to have some information and assessment on the impact of Surface and groundwater flooding, and on the risk from heavy sustained downpours of rain made much likely by Climate Change; awaiting the County Council plan to deal with this may not be sufficient to meet the SA regulations.

### Objectives

We welcome the inclusion of an objective on water supply. However the wording needs to be changed to make it clear that new development should not worsen the water supply for existing residents (resulting in extended use of standpipes):

Add and change Objective Eighteen:

**To achieve secure sustained water supply for existing communities and new developments in the face of climate change.** This can be done by maximising efficient use of water and water collection for grey water use.

## Page 152 Sustainability Appraisal Framework

We can see that the Framework is a useful tool to focus and guide the SA process and identify where policies need mitigation or further scrutiny. However from experience when this framework was used in previous Local Plans and following our analysis of the objectives, we believe application of this Framework will be very detrimental to a sustainable outcome without major changes:

Changes that we think are necessary are:

**1/ Use of climate change and biodiversity objectives as Red Flags.** If the policy or strategic allocation negatively impacts these objectives it does not go forward, even if there are strong positives for other sustainability objectives:

Red Flag climate change objectives:

- Limit net carbon emissions resulting from policies, to within the Council's carbon budget,
- Achieve modal change from journeys by car to walking, cycling and public transport
- Achieve secure sustained water supply for existing communities and new developments in the face of climate change.
- Ensure new developments are resilient to the effects of climate change, and that proposals do not weaken existing communities' and businesses' resilience to climate change.
- Support the development of appropriately scaled, and well-designed renewable energy schemes, through strategic planning

Red Flag ecological emergency objectives

- Achieve nature recovery at a landscape-scale
- Increase Priority Species' resilience to climate change and minimise risk of local extinction
- Protect, and where possible, enhance the status of all wildlife assets, including SACs and SSSIs, local wildlife sites and priority habitats.

**2/ Change objectives and baseline information used to reflect our detailed arguments set out above under subject headings.** The main reasons for changes in objectives are to put right omissions of key objectives, and the weakness of the wording to meet the key challenges.

A key change to baselines is the basis of assessing meeting housing need; setting aside housing-allocation based growth-targets because they a) are unrealistic and b) based on outdated housing needs assessments, and c) do not reflect ONS data.

**3/ For each objective, make clear the criteria and evidence (including the quality of the evidence) used to judge if the policy will help or prevent delivery of the objective.**

Currently the scoping document does not provide enough baseline information. It also fails to make clear how consideration of baseline information informs how the projects will be assessed against the objectives, leaving the Framework lacking openness in its decision making.

**4/ Make an explicit rule that users should not aggregate the + and – scores to identify the relative sustainability of policy options.** It is clear from your paragraph 14.3 that this should not happen, but from our experience with other SAs and Local Plans this is exactly the approach used.

**5/ Have a clear rule that two objectives cannot be combined in any use of the Framework.**

We have direct experience of this where Protecting best agricultural land (which a strategic allocation scored very badly on) was combined with another objective that the allocation had a strong positive effect, with the result the District lost 25ha of Grade 2 land.

# Response 222

## Respondent Details

[REDACTED]

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. i) Are you responding as:

An agent, developer or landowner

[REDACTED]

[REDACTED]

## A little bit about you (continued...)

[REDACTED]

[REDACTED]

Q4. For further information about how we use your data below, please refer to our privacy policy, which also explains how to exercise your rights over your personal data. If relevant, please provide the details of the organisation, business or council you're representing. If relevant, please also give the details of the client your business is representing (EG if you're a planning agent responding on behalf of another organisation).

[REDACTED]	[REDACTED]
<b>First name</b>	Alice
<b>Last name</b>	Davidson
[REDACTED]	[REDACTED]
<b>Your business or organisation (if relevant)</b>	Boyer
<b>Business or organisation you're representing (if relevant)</b>	Countryside Properties (UK) Ltd.
[REDACTED]	[REDACTED]

Q6. Please select which documents you wish to comment on:

Local Plan Issues Consultation

---

Sustainability Appraisal (SA) Screening and Scoping Report

---

Habitats Regulations Assessment (HRA) Scoping Report

---

Draft Settlement Assessment Methodology

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Duty to Cooperate Scoping Document

Q14. 8. If you have any other thoughts on how we could use the Joint Local Plan to reduce carbon emissions, please write them here.

2.3 The JLP should include a policy seeking the reduction of carbon emissions over the plan period in a deliverable and viable way.

2.4 Countryside is a developer with a proven track record of delivering high quality homes and places and they are targeting achieving Net Zero Carbon by 2030. They are utilising innovative methods to achieve this, including Countryside factories to build modular timber framed homes, which have 30% less embodied carbon when compared with traditional bricks and mortar. The target is for 50% of all homes to be built using this method by 2025.

2.5 Countryside are seeking to reduce carbon across their supply chain and are working towards 75% less CO2 emissions through improved fabric efficiency and renewable heat and energy sources by 2025.

2.6 Further information is provided in the Countryside Reports at Appendix 2 and 3.

2.7 Countryside is founded on being regarded as a responsible developer, working closely with local authorities and communities.

Q17. 11. If you have any other thoughts on how we could use the Joint Local Plan to protect the natural environment, please write them here.

2.8 Countryside support the need to protect the natural environment through planning policies. However, while there is clearly a need to prioritise protection of designated environments there is also a need to balance this with the need to deliver much needed housing and associated facilities and infrastructure.

2.9 Strategic scale sites, such as Land at Wicklesham Lodge Farm are of a significantly large to be able to deliver as part of the development, open space, recreational facilities and wildlife areas of a sufficient scale to provide meaningful levels of biodiversity net gain.

Q23. 17. If you have any other thoughts on how we could use the Joint Local Plan to tackle housing inequality and affordability, please write them here.

2.10 The JLP should utilise the Standard Method to calculate the housing need across the districts. The VOWH Annual Monitoring Report 2020/21 notes that the basis for the housing requirement update will be based on the Standard Method which is supported. It is stated that the annual housing requirement will be 819 dpa (although it is noted it will change on a yearly basis).

2.11 In terms of affordable housing, the AMR at Table 22 shows the affordable housing delivery since 2011/12 against the 35% affordable housing target. Whilst this has varied over the last 10 years, recent delivery has been below the 35% target required (24% in 2019/20 and 34% in 2020/21). Under delivery of affordable housing is one of the exceptional circumstances justifying an alternative approach from the standard method (i.e. an increase), as set out in Chapter 5 of the NPPF (2021). The JLP should therefore be seeking to increase their housing need requirement to ensure the affordable housing targets are met.

2.12 Strategic scale sites have the benefit of being able to deliver higher levels of affordable housing and a mix of housing, including homes of different sizes and tenures, homes for older people and also self and custom build homes, which can be challenging to deliver on smaller sites. Strategic sites also have the scale to be able to deliver on Government requirements such as First Homes.

Q24. 18. We'd like to hear your ideas for how we could adapt our town centres and high streets to meet our changing needs. Are there any improvements, new facilities or uses that you would like to see in the locations marked on the map?

2.13 Countryside consider that opportunities to improve pedestrian and cycle links to the south of Faringdon and across the A420 should be provided for, particularly given that the Neighbourhood Plan allocates land for employment purposes south of the A420 and the opportunity presented for residential development at Wicklesham Lodge Farm on the land adjacent to the employment area and quarry beyond. The site can also provide pedestrian and cycle links to the wider countryside and can ensure better connections between existing footpaths and the town, improving access to open space for residents of Faringdon.

2.14 Faringdon would also benefit from improved bus linkages to Oxford and Swindon via a Mobility Hub providing for a Mass Rapid Transit service which would provide an East West connection – connecting the community to Oxford and London to the east and Swindon to the west. This aligns with the aim for improved connections sought through the Faringdon Neighbourhood Plan.

2.15 These improvements could all be delivered as part of the development of Land at Wicklesham Lodge Farm.

2.16 The Land at Wicklesham Lodge Farm proposals could deliver a safe pedestrian and cycle connection across the A420, ensuring that existing and future residents of Faringdon as well as those working in the employment area, would have greater access to the countryside to the south (and connections to the Public Right of Way network) and to the proposed infrastructure which includes a Mobility Hub (delivering a sustainable east west connection).

2.17 Faringdon is the only Market Town within the Western Sub Vale area and it is therefore important for it to be a service hub, responding to the principles of the Oxford-Cambridge Arc and opening this up towards the western part of Oxfordshire and indeed to Swindon beyond. Despite the fact it is one of the major towns in the western area, Faringdon does not benefit from a railway station and therefore bus linkages are key to ensuring accessibility and achieving a reduction in car travel. This can be delivered through the proposed mobility hub on Land at Wicklesham Lodge Farm.

2.18 The proposals would also deliver the following community benefits:

- c. 2,500 homes (including affordable housing, retirement living, First Homes and self and custom build homes)
- Improved access to existing green spaces including a north/south green way along a historic railway route
- A Local Centre linked to existing retail provision on Park Road and existing employment and future employment within the quarry
- Two new Primary Schools and potential for a Secondary School serving both the existing and new community.
- A Neighbourhood Centre providing community, leisure and sports facilities
- An integrated Mobility Hub (bus linkages, electric vehicle charging points and cycle parking)
- Improved pedestrian and cycle connections to Faringdon including across the A420
- Open spaces, play areas and informal green space delivering Biodiversity Net Gain

Q25. Which location(s) does your answer to question 18 above apply to?

Faringdon

Q29. 22. If you have any other thoughts on how we could use the Joint Local Plan to ensure people have easy access to the services they need to use on a day-to-day basis, please write them here.

2.19 Access to day to day services is only possible when development is of a scale to sustain the services, which can be achieved through policies allocating sustainable sites. Achieving this aim therefore requires the delivery of strategic scale development. Delivering extensions to existing settlements (such as Market Towns) which have a level of existing services will also ensure accessibility. As strategic developments can take many years to deliver, being able to utilise existing facilities in the short term is a significant benefit.

2.20 In terms of proposals for Land at Wicklesham Lodge Farm, the site could deliver 2 x on-site Primary Schools and could also accommodate a Secondary School if required. This would limit the distance required to travel and walking and cycling from Faringdon and within the site would be prioritised through design and layout.

2.21 In terms of access to health services, there is existing GP provision within Faringdon (White Horse Medical Practice) but access to GP facilities are known to be stressed across the country. If further provision was required, this could be delivered on the site within the Neighbourhood Centre.

2.22 In terms of hospitals, there is a major hospital with A&E in Swindon (approximately 25 minutes by main roads (a route which could be delivered as a bus route from the on-site mobility hub). There is also Wantage Community Hospital (located less than 20 minutes by road).

2.23 Within Faringdon itself Faringdon Health Centre also provides some limited health services (it is understood that a Podiatry clinic is located here). An increased population for Faringdon may be able to support an increase in services at this site.

2.24 In relation to access to Food Stores, there is a Waitrose and Aldi just across the A420 from the site (to which pedestrian and cycle links could be provided as part of the development).

There is also a Tesco store located a 15 minute walk or short bus ride from the site. The site itself would also deliver convenience stores within the Neighbourhood Centre and Local Centres.

Q32. 25. If you have any other thoughts on how we could use the Joint Local Plan to give residents and visitors the opportunity to live healthy lifestyles, please write them here.

2.25 The NPPF talks about enabling and supporting healthy lifestyles (para. 92c). It references provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

2.26 The key to delivering on this aim is strategic development of a scale that can accommodate these facilities and ensure their vitality and viability.

2.27 A strategic site allocated through the JLP, such as Land at Wicklesham Lodge Farm, could deliver a significant quantum of open space and sports facilities to serve the wider community. The Illustrative Masterplan demonstrates that approximately 70ha of open space could be delivered as part of this site.

Q33. 26. If you have any other thoughts on how we could use the Joint Local Plan to keep residents and visitors safe from pollution, flooding and the effects of climate change, please write them here.

2.28 In order to keep people safe from pollution and the effects of climate change, suitable sites should be allocated through the JLP such as on Land at Wicklesham Lodge Farm which would seek to address the opportunities identified on page 59 of the draft JLP (as set out below):

Opportunities for active travel, exercise, social interaction and recreation

2.29 The proposals would encourage active travel through the site and into Faringdon through design and layout and by providing safe and pleasant pedestrian and cycle connections, including across the A420 for both accessing services and for recreation and exercise.

2.30 Opportunities for social interaction can be designed as part of the layout, particularly in relation to communal areas, public open spaces and within Local and Neighbourhood Centres.

Opportunities for exercise and enjoying high quality open spaces and countryside

2.31 The site has the capacity to deliver around 70ha of open space which would include parks, play areas, informal open space, woodland and green links. This will allow for exercise and recreation within the site. There is also an opportunity to provide connections to the existing public right of way network within the surrounding countryside from the site.

Places for people to grow their own food

2.32 The site could deliver allotments for local residents. There may also be wider opportunities to plant community orchards within the site.

Avoid inappropriate development in flood risk areas

2.33 The majority of the site is within Flood Zone 1 (other than a small swathe which runs across the width of the site following the line of an existing watercourse running north of Wicklesham Copse (an existing area of woodland close to the A420)). The remainder of the site is at the lowest risk from flooding.

2.34 Residential development would be planned well away from this area, and indeed the watercourse provides an opportunity for biodiversity net gain and ecological enhancement as well as being a pleasant landscape feature.

Limit and control new sources of air, water, noise and light pollution

2.35 Air pollution from vehicles can be minimised by locating development within sustainable locations with public transport linkages.

2.36 Water pollution can be minimised by ensuring good construction practices which can be controlled via a Construction Management Plan.

2.37 Noise pollution can be minimised through modern methods of construction and through consideration of the layout (for example providing noise buffers to noise sensitive development).

2.38 Light pollution can be minimised by using ecology friendly lighting which ensures any lighting required for safety and security is angled downwards and of low lux levels. This can be controlled by condition at the application stage.

Require building designs to be adapted to be resilient to climate change impacts like overheating

2.39 Modern methods of construction and materials as well as consideration regarding layout and building orientation can ensure that buildings are resilient to climate change. Countryside are committed to working towards a target of achieving net zero by 2030 and are designing and building with the future net zero home in mind.

2.40 In relation to mitigation and adaptation to climate change the NPPF notes at para. 131 that new streets should be tree-lined, 'that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible.'

2.41 The Wicklesham Lodge Farm proposals seek to retain existing landscape features and trees as much as possible and will seek to integrate them into the development. The Illustrative Masterplan demonstrates the quantum of green space envisaged which could incorporate parks, orchards, allotments and play space.

Q37. 30. If you have any other thoughts on how we could use the Joint Local Plan to help ensure there are valuable and rewarding jobs in the districts, please write them here.

2.42 Countryside support the proposal to locate jobs near to homes and community based work hubs, which can be delivered within a sustainable extension to Faringdon at Wicklesham Lodge Farm.

2.43 The site benefits from access to existing employment opportunities within Faringdon as well as the adjacent Neighbourhood Plan site allocation for employment on the former quarry as well as the active Quarry to the west.

Q38. 31. Have we correctly summarised the issues, challenges and opportunities for the Joint Local Plan?

No

**If you've said no, what do you think we've missed?**  
2.44 Countryside are supportive of the draft JLP, however, the next iteration needs to consider areas for growth. It should also reflect on the spatial approach and settlement hierarchy to ensure that there is growth within the various settlement tiers to ensure local people can access high quality, affordable homes. The next iteration of the JLP should also consider the importance of expanding the Oxford Cambridge Arc to the west towards Swindon and the opportunities this provides.

Q39. 32. Finally, do you have any other comments?

Please see attachments for full response.

[Redacted]

- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]

### Sustainability Appraisal (SA) Screening and Scoping Report

Q41. If you have any comments on the Sustainability Appraisal Document, please provide them below.

Please see attachments.

### Habitats Regulations Assessment (HRA) Scoping Report

Q45. If you have any other comments on the Habitats Regulations Assessment (HRA) Scoping Report, please provide them below.

Please see attachments

### Draft Settlement Assessment Methodology

Are there any services or facilities missing from the list of services and facilities proposed to be assessed?

Yes

Q46. Do you consider that any services or facilities should be removed from the assessment?

No

Q47. Looking at the proposed scoring identified in tables 1 to 6 do you consider that the scoring reflects the weight/importance of each service or facility?

No

Q49. If you have any other comments on the Draft Settlement Assessment Methodology, please provide them below.

Please see responses in attachments.

## Duty to Cooperate Scoping Document

Q50. Have we identified all the strategic planning matters? (see paragraph 3.7 of the Duty to Cooperate Scoping Document)

No

Q51. Have we identified all the local authorities and organisations that we need to engage in the plan-making process? (see paragraphs 4.2 and 4.3 and the table starting on page 8 of the Duty to Cooperate Scoping Document)

Yes

Q53. If you have any other comments on the Duty to Cooperate Scoping document, please provide them below.

Please see attachments.

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

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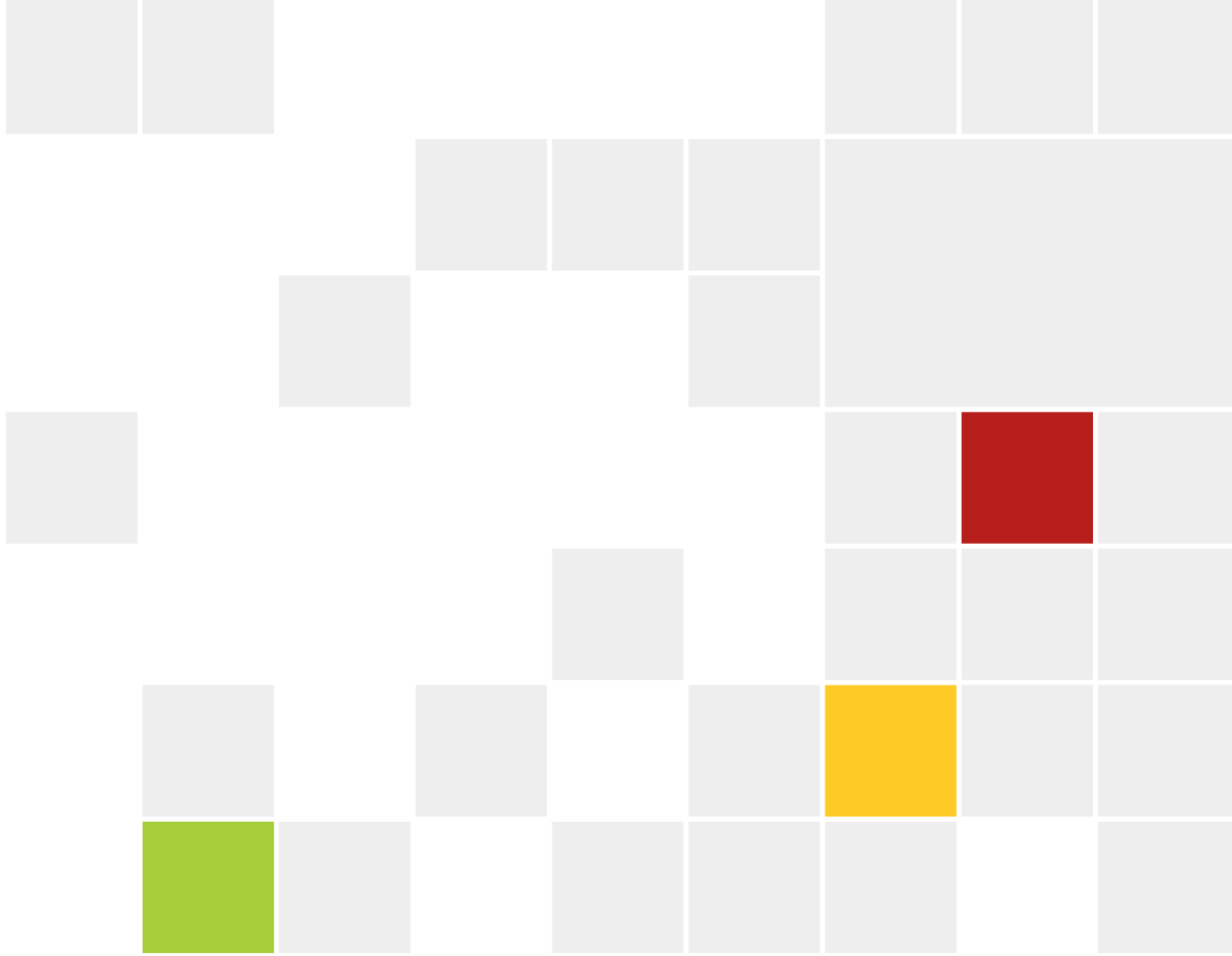
[Redacted]

Q59. How satisfied or dissatisfied were you with the way in which you have been able to provide feedback on the Joint Local Plan?

Satisfied

If you are ready to submit your comments, please tick the box below, then select the 'Finish and submit' button. Note: once ticked you will not be able to return to your comments and they will be submitted. If not, please use the 'previous page' button to go back through the survey to amend or review your response. Alternatively you can use the 'save and continue later' so that you can save your progress, and return later to your comments. Simply provide your name and email address and you will automatically receive a link via email to return to your draft comments when you are ready.

Yes, I have finished and am ready to submit



## Land at Wicklesham Lodge Farm, Faringdon



Representations to the South Oxfordshire and Vale of White Horse Joint Local Plan Issues Consultation May/June 2022



# Boyer

## Report Control

Project:	Land at Wicklesham Lodge Farm
Client:	Countryside Properties (UK) Ltd.
Reference:	21.1018
File Origin:	<a href="https://lrgcouk.sharepoint.com/sites/BoyerProjects2021/Wokingham/21.1018/4%20Boyer%20Planning/4.02%20Reports/Joint%20Local%20Plan%20Reps%20May%2022/220531%20Draft%20Reps%20-%20Faringdon.docx">https://lrgcouk.sharepoint.com/sites/BoyerProjects2021/Wokingham/21.1018/4 Boyer Planning/4.02 Reports/Joint Local Plan Reps May 22/220531 Draft Reps - Faringdon.docx</a>
Primary Author	Alice Davidson
Checked By:	██████████

<i>Issue</i>	<i>Date</i>	<i>Status</i>	<i>Checked By</i>
V1	31/05/22	Draft	AJ
V2	09/06/22	Draft	AJ
V3	15/06/22	Final Draft	



## **TABLE OF CONTENTS**

1. Introduction	2
2. Response to Draft Local Plan & the Consultation Questions	3
3. Evidence Base Response	12
4. The Site & Surrounding Area	22
5. A Sustainable Extension to Faringdon	25
6. Summary & Conclusions	27

## **APPENDIX**

Appendix One – Red Line Plan

Appendix Two – Sustainability Report

Appendix Three – Route to Net Zero Report

Appendix Four – Promotion Document

# 1. INTRODUCTION

- 1.1 These representations have been prepared by Boyer on behalf of Countryside Properties (UK) Ltd ('Countryside') in response to the Vale of White Horse (VOWH) and South Oxfordshire Joint Local Plan Issues Consultation (May 2022) (JLPIC).
- 1.2 Countryside are promoting **Land at Wicklesham Lodge Farm, Faringdon** for mixed use development (see red line plan at Appendix 1). There is a hybrid option/promotion agreement in place.

## **Countryside**

- 1.3 Countryside is a developer with a proven track record of delivering high quality homes and places. Its experience has been gained over the past 60 years and is founded on being regarded as a responsible developer, working closely with local authorities and communities with honesty and integrity. Engagement is at the heart of the company's ethos, with the core of their business being creating 'Places People Love'.
- 1.4 Countryside has a lengthy track record of delivery. Through a design-led approach, they create visually stimulating homes which sit well within their surroundings. Countryside's achievements are exemplified by the receipt of more than 380 sustainability and design-related awards since 2000. Countryside has won more Housing Design Awards than any other housebuilder and is a leader in design, engagement and sustainable development.

## **Scope of Representations**

- 1.5 These representations respond to the draft Joint Local Plan (JLP) and also respond to the issues and questions raised for consultation in the order as they appear in the JLPIC. Comments are also made in relation to the evidence base documents.
- 1.6 In addition, these representations also set out the vision for the site as a sustainable extension to Faringdon at Wicklesham Lodge Farm for approximately 2,500 new homes with associated facilities and infrastructure, as detailed further in Section 5.
- 1.7 The proposals for the site have also been submitted to the Oxfordshire Plan 2050 Call for Ideas (2021) the Oxfordshire Plan Regulation 18 Part 2 consultation (2021) and to the Vale of White Horse Call for Land and Buildings (2021).

## 2. RESPONSE TO DRAFT LOCAL PLAN & THE CONSULTATION QUESTIONS

### JLP Vision

2.1 The JLPIC sets out the draft vision for the JLP. The Vision comprises the following key themes:

- Carbon neutrality
- Nature thrives and history, heritage and landscape character are safeguarded and valued and beauty and local identity is enhanced
- People can thrive with housing choices they can afford and communities are diverse and inclusive
- Facilities can be reached on foot, bicycle or by low carbon transport choices
- People are safe from pollution, flooding and effects of climate change and can live healthy lifestyles
- There are rewarding and valuable jobs, embracing clean technologies and growing opportunities in Science Vale

JLP Vision	How Countryside and Land at Wicklesham Lodge Farm respond to this theme
Carbon neutrality	<p>Countryside are committed to working towards carbon neutrality by 2030 (as set out in their Building the Future Sustainability Report (Appendix 2) and Marking out the route to Net Zero Report Appendix 3)). They aim to reduce carbon emissions through the build process, the life of the development and within their wider business as a whole. Homes will be designed for a net zero future (as detailed in Appendix 3).</p> <p>The proposals would align with Countryside's standards and use sustainable materials, reduce construction waste, provide improved water efficiency and EV charging and would encourage walking/cycling and sustainable modes of transport.</p>
Nature thrives and history, heritage and landscape character are safeguarded and	Countryside consider these are key to the JLPIC vision. The proposals seek to

JLP Vision	How Countryside and Land at Wicklesham Lodge Farm respond to this theme
valued and beauty and local identity is enhanced	enhance the existing landscape features within the site to provide a strong identity and sense of place. Important views (such as to the Faringdon Folly Tower) would be preserved and celebrated. Countryside are also championing design coding which is key to delivering the Government's agenda on beauty in development. Countryside are participating in the Office for Place's Design Code Pathfinder project in relation to its strategic development in Bourn Airfield, South Cambridgeshire. The lessons and approaches utilised through the pathfinder will be applied for future development at Wicklesham Lodge Farm.
People can thrive with housing choices they can afford and where communities are diverse and inclusive	The proposals for the Land at Wicklesham Lodge Farm site would deliver c. 2,500 homes to form an intergenerational community, including affordable housing, first homes, c. 200 homes for retirement living and self/custom build homes and with a mix of housing sizes and types including flats and houses reflecting local need.
Facilities can be reached on foot, bicycle or by low carbon transport choices	Countryside agree that sustainable modes of transport are important. The proposed extension to Faringdon would provide a safe pedestrian/cycle link across the A420 to Faringdon and would also provide strong pedestrian/cycle connections within the site itself. A key aspect of the proposals is a Mobility Hub within the site which could house a Mass Rapid Transit service which would provide an East West connection – connecting the community to Oxford and London to the east and Swindon to the west.

JLP Vision	How Countryside and Land at Wicklesham Lodge Farm respond to this theme
	<p>Encouraging walking and cycling, along with the on-site leisure routes and sports facilities will ensure low carbon choices for getting around the site and into Faringdon.</p>
<p>People are safe from pollution, flooding and effects of climate change and can live healthy lifestyles</p>	<p>Countryside are committed to sustainable development which is resilient to the impact of climate change. Countryside are targeting being Net Zero by 2030 by increasing efficiency (75% less CO<sub>2</sub> emissions through fabric efficiency and renewable energy and by reducing on-site emissions). Homes will be designed for a net zero future (as detailed in Appendix 3).</p> <p>In addition to building efficiently and building to last, an important element of the proposals is the pedestrian and cycle connectivity both within the site itself and to Faringdon and further afield via sustainable modes of transport.</p> <p>Encouraging walking and cycling, along with the on-site leisure routes and sports facilities will aim to ensure residents can live a healthy lifestyle.</p>
<p>There are rewarding and valuable jobs, embracing clean technologies and growing opportunities in Science Vale</p>	<p>The proposals include c. 6,000m<sup>2</sup> of employment and retail space – delivering a range of employment options within the site. There will also be further employment opportunities within the on-site community facilities and schools.</p> <p>The site would deliver safe pedestrian and cycle connections to Faringdon which would provide further employment opportunities.</p> <p>For those needing to travel further afield a Mobility Hub within the site could house a Mass Rapid Transit service which would provide an East West connection – connecting the community to Oxford and</p>

JLP Vision	How Countryside and Land at Wicklesham Lodge Farm respond to this theme
	London to the east and Swindon to the west. There is potential for this hub to provide a park and ride facility which the wider community could utilise and minimise commuter vehicle traffic in the Western Vale area.

2.2 In this section relevant questions from the consultation are responded to.

**Question 8 – If you have any thoughts on how we could use the JLP to reduce carbon emissions please write them here**

2.3 The JLP should include a policy seeking the reduction of carbon emissions over the plan period in a deliverable and viable way.

2.4 Countryside is a developer with a proven track record of delivering high quality homes and places and they are targeting achieving Net Zero Carbon by 2030. They are utilising innovative methods to achieve this, including Countryside factories to build modular timber framed homes, which have 30% less embodied carbon when compared with traditional bricks and mortar. The target is for 50% of all homes to be built using this method by 2025.

2.5 Countryside are seeking to reduce carbon across their supply chain and are working towards 75% less CO<sub>2</sub> emissions through improved fabric efficiency and renewable heat and energy sources by 2025.

2.6 Further information is provided in the Countryside Reports at Appendix 2 and 3.

2.7 Countryside is founded on being regarded as a responsible developer, working closely with local authorities and communities.

**Question 11 – If you have any thoughts on how we could use the JLP to protect the natural environment please write them here**

2.8 Countryside support the need to protect the natural environment through planning policies. However, while there is clearly a need to prioritise protection of designated environments there is also a need to balance this with the need to deliver much needed housing and associated facilities and infrastructure.

2.9 Strategic scale sites, such as Land at Wicklesham Lodge Farm are of a significantly large to be able to deliver as part of the development, open space, recreational facilities and wildlife areas of a sufficient scale to provide meaningful levels of biodiversity net gain.

**Question 17 - If you have any thoughts on how we could use the JLP to tackle housing inequality and affordability please write them here**

- 2.10 The JLP should utilise the Standard Method to calculate the housing need across the districts. The VOWH Annual Monitoring Report 2020/21 notes that the basis for the housing requirement update will be based on the Standard Method which is supported. It is stated that the annual housing requirement will be 819 dpa (although it is noted it will change on a yearly basis).
- 2.11 In terms of affordable housing, the AMR at Table 22 shows the affordable housing delivery since 2011/12 against the 35% affordable housing target. Whilst this has varied over the last 10 years, recent delivery has been below the 35% target required (24% in 2019/20 and 34% in 2020/21). Under delivery of affordable housing is one of the exceptional circumstances justifying an alternative approach from the standard method (i.e. an increase), as set out in Chapter 5 of the NPPF (2021). The JLP should therefore be seeking to increase their housing need requirement to ensure the affordable housing targets are met.
- 2.12 Strategic scale sites have the benefit of being able to deliver higher levels of affordable housing and a mix of housing, including homes of different sizes and tenures, homes for older people and also self and custom build homes, which can be challenging to deliver on smaller sites. Strategic sites also have the scale to be able to deliver on Government requirements such as First Homes.

**Question 18 – Are there any improvements you would like to see in Faringdon?**

- 2.13 Countryside consider that opportunities to improve pedestrian and cycle links to the south of Faringdon and across the A420 should be provided for, particularly given that the Neighbourhood Plan allocates land for employment purposes south of the A420 and the opportunity presented for residential development at Wicklesham Lodge Farm on the land adjacent to the employment area and quarry beyond. The site can also provide pedestrian and cycle links to the wider countryside and can ensure better connections between existing footpaths and the town, improving access to open space for residents of Faringdon.
- 2.14 Faringdon would also benefit from improved bus linkages to Oxford and Swindon via a Mobility Hub providing for a Mass Rapid Transit service which would provide an East West connection – connecting the community to Oxford and London to the east and Swindon to the west. This aligns with the aim for improved connections sought through the Faringdon Neighbourhood Plan.
- 2.15 These improvements could all be delivered as part of the development of Land at Wicklesham Lodge Farm.
- 2.16 The Land at Wicklesham Lodge Farm proposals could deliver a safe pedestrian and cycle connection across the A420, ensuring that existing and future residents of Faringdon as well as those working in the employment area, would have greater access to the countryside to the south (and connections to the Public Right of Way network) and to the proposed infrastructure which includes a Mobility Hub (delivering a sustainable east west connection).

2.17 Faringdon is the only Market Town within the Western Sub Vale area and it is therefore important for it to be a service hub, responding to the principles of the Oxford-Cambridge Arc and opening this up towards the western part of Oxfordshire and indeed to Swindon beyond. Despite the fact it is one of the major towns in the western area, Faringdon does not benefit from a railway station and therefore bus linkages are key to ensuring accessibility and achieving a reduction in car travel. This can be delivered through the proposed mobility hub on Land at Wicklesham Lodge Farm.

2.18 The proposals would also deliver the following community benefits:

- c. 2,500 homes (including affordable housing, retirement living, First Homes and self and custom build homes)
- Improved access to existing green spaces including a north/south green way along a historic railway route
- A Local Centre linked to existing retail provision on Park Road and existing employment and future employment within the quarry
- Two new Primary Schools and potential for a Secondary School serving both the existing and new community.
- A Neighbourhood Centre providing community, leisure and sports facilities
- An integrated Mobility Hub (bus linkages, electric vehicle charging points and cycle parking)
- Improved pedestrian and cycle connections to Faringdon including across the A420
- Open spaces, play areas and informal green space delivering Biodiversity Net Gain

**Question 22 - If you have any thoughts on how we could use the JLP to ensure people have easy access to the services they need to use on a day-to day basis please write them here**

2.19 Access to day to day services is only possible when development is of a scale to sustain the services, which can be achieved through policies allocating sustainable sites. Achieving this aim therefore requires the delivery of strategic scale development. Delivering extensions to existing settlements (such as Market Towns) which have a level of existing services will also ensure accessibility. As strategic developments can take many years to deliver, being able to utilise existing facilities in the short term is a significant benefit.

2.20 In terms of proposals for Land at Wicklesham Lodge Farm, the site could deliver 2 x on-site Primary Schools and could also accommodate a Secondary School if required. This would limit the distance required to travel and walking and cycling from Faringdon and within the site would be prioritised through design and layout.

2.21 In terms of access to health services, there is existing GP provision within Faringdon (White Horse Medical Practice) but access to GP facilities are known to be stressed across the country. If further provision was required, this could be delivered on the site within the Neighbourhood Centre.

- 2.22 In terms of hospitals, there is a major hospital with A&E in Swindon (approximately 25 minutes by main roads (a route which could be delivered as a bus route from the on-site mobility hub). There is also Wantage Community Hospital (located less than 20 minutes by road).
- 2.23 Within Faringdon itself Faringdon Health Centre also provides some limited health services (it is understood that a Podiatry clinic is located here). An increased population for Faringdon may be able to support an increase in services at this site.
- 2.24 In relation to access to Food Stores, there is a Waitrose and Aldi just across the A420 from the site (to which pedestrian and cycle links could be provided as part of the development). There is also a Tesco store located a 15 minute walk or short bus ride from the site. The site itself would also deliver convenience stores within the Neighbourhood Centre and Local Centres.

**Question 25 - If you have any thoughts on how we could use the JLP to give residents and visitors the opportunity to live healthy lifestyles please write them here**

- 2.25 The NPPF talks about enabling and supporting healthy lifestyles (para. 92c). It references provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.
- 2.26 The key to delivering on this aim is strategic development of a scale that can accommodate these facilities and ensure their vitality and viability.
- 2.27 A strategic site allocated through the JLP, such as Land at Wicklesham Lodge Farm, could deliver a significant quantum of open space and sports facilities to serve the wider community. The Illustrative Masterplan demonstrates that approximately 70ha of open space could be delivered as part of this site.

**Question 26 - If you have any thoughts on how we could use the JLP to keep residents and visitors safe from pollution and the effects of climate change please write them here**

- 2.28 In order to keep people safe from pollution and the effects of climate change, suitable sites should be allocated through the JLP such as on Land at Wicklesham Lodge Farm which would seek to address the opportunities identified on page 59 of the draft JLP (as set out below):

*Opportunities for active travel, exercise, social interaction and recreation*

- 2.29 The proposals would encourage active travel through the site and into Faringdon through design and layout and by providing safe and pleasant pedestrian and cycle connections, including across the A420 for both accessing services and for recreation and exercise.

- 2.30 Opportunities for social interaction can be designed as part of the layout, particularly in relation to communal areas, public open spaces and within Local and Neighbourhood Centres.

*Opportunities for exercise and enjoying high quality open spaces and countryside*

- 2.31 The site has the capacity to deliver around 70ha of open space which would include parks, play areas, informal open space, woodland and green links. This will allow for exercise and recreation within the site. There is also an opportunity to provide connections to the existing public right of way network within the surrounding countryside from the site.

*Places for people to grow their own food*

- 2.32 The site could deliver allotments for local residents. There may also be wider opportunities to plant community orchards within the site.

*Avoid inappropriate development in flood risk areas*

- 2.33 The majority of the site is within Flood Zone 1 (other than a small swathe which runs across the width of the site following the line of an existing watercourse running north of Wicklesham Copse (an existing area of woodland close to the A420)). The remainder of the site is at the lowest risk from flooding.

- 2.34 Residential development would be planned well away from this area, and indeed the watercourse provides an opportunity for biodiversity net gain and ecological enhancement as well as being a pleasant landscape feature.

*Limit and control new sources of air, water, noise and light pollution*

- 2.35 Air pollution from vehicles can be minimised by locating development within sustainable locations with public transport linkages.
- 2.36 Water pollution can be minimised by ensuring good construction practices which can be controlled via a Construction Management Plan.
- 2.37 Noise pollution can be minimised through modern methods of construction and through consideration of the layout (for example providing noise buffers to noise sensitive development).
- 2.38 Light pollution can be minimised by using ecology friendly lighting which ensures any lighting required for safety and security is angled downwards and of low lux levels. This can be controlled by condition at the application stage.

*Require building designs to be adapted to be resilient to climate change impacts like overheating*

- 2.39 Modern methods of construction and materials as well as consideration regarding layout and building orientation can ensure that buildings are resilient to climate change. Countryside are committed to working towards a target of achieving net zero by 2030 and are designing and building with the future net zero home in mind.
- 2.40 In relation to mitigation and adaptation to climate change the NPPF notes at para. 131 that new streets should be tree-lined, 'that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible.'
- 2.41 The Wicklesham Lodge Farm proposals seek to retain existing landscape features and trees as much as possible and will seek to integrate them into the development. The Illustrative Masterplan demonstrates the quantum of green space envisaged which could incorporate parks, orchards, allotments and play space.

**Question 30 - If you have any thoughts on how we could use the JLP to ensure there are valuable and rewarding jobs in the districts please write them here**

- 2.42 Countryside support the proposal to locate jobs near to homes and community based work hubs, which can be delivered within a sustainable extension to Faringdon at Wicklesham Lodge Farm.
- 2.43 The site benefits from access to existing employment opportunities within Faringdon as well as the adjacent Neighbourhood Plan site allocation for employment on the former quarry as well as the active Quarry to the west.

**Question 31 – Have we correctly summarised the issues, challenges and opportunities for the JLP?**

- 2.44 Countryside are supportive of the draft JLP, however, the next iteration needs to consider areas for growth. It should also reflect on the spatial approach and settlement hierarchy to ensure that there is growth within the various settlement tiers to ensure local people can access high quality, affordable homes. The next iteration of the JLP should also consider the importance of expanding the Oxford Cambridge Arc to the west towards Swindon and the opportunities this provides.

### 3. EVIDENCE BASE RESPONSE

#### Sustainability Appraisal

- 3.1 The Sustainability Appraisal (SA) Screening and Scoping Report sets out the methodology for undertaking the assessment and provides further detail on the various topic areas to be assessed. These comprise:
- Air Quality
  - Biodiversity, Flora and Fauna
  - Climatic Factors
  - Cultural Heritage and Townscape
  - Human Health and Wellbeing
  - Landscape
  - Material Assets
  - Population
  - Soil Quality
  - Water Quality
- 3.2 Each of the topic areas are assessed (in terms of baseline information) to determine current performance. This has then informed the sustainability objectives within the Draft Plan.
- 3.3 The Sustainability Appraisal Framework based upon the Sustainability Objectives is noted. However, it is considered essential that at a more strategic level the SA assesses the strategic growth at the various settlement hierarchy levels to ensure that housing delivery is achieved with appropriate distribution based upon the level of services within the existing settlement as well as future potential as part of any development.
- 3.4 Growth is likely to need to occur across the settlement hierarchies to deliver the required levels of housing and affordable housing. Whilst there should be growth at the major settlements, and limited growth at smaller settlements, the majority of growth should be aimed at Market Towns. The SA must assess the merits of particular Market Towns, such as Faringdon, for strategic growth.
- 3.5 Figure 4 of the VOWH AMR (2020/21) for the Western Vale Sub Area shows that the majority of housing delivery has been in the Larger Villages (47%) and Market Towns (38%). Going forwards, more emphasis should be made on delivery within the Market Towns, given their higher rating in terms of settlement hierarchy and the level of services and facilities that this provides.

#### *Air Quality*

- 3.6 Air quality impacts can be minimised by ensuring development is located at sustainable locations with good public transport connections, to reduce the need to travel by car.
- 3.7 In relation to Air Quality, it is noted that Faringdon has not been identified as an Air Quality Management Area.

- 3.8 Faringdon's location on the A420 which runs between Oxford and Swindon provides a unique opportunity to deliver a sustainable mass rapid transit hub which could deliver a bus linkage between Oxford and Swindon via the site which would assist in delivering the JLP's draft Objectives 1 (to reduce pollution), 2 (to safeguard health and wellbeing and plan for healthy places) and 3 (to reduce the need to travel by car) as set out on page 21 of the SA. This in turn would reduce any adverse impact on Air Quality.
- 3.9 Land at Wicklesham Lodge Farm provides an excellent opportunity to deliver such a sustainable connectivity hub.

*Biodiversity, Flora and Fauna*

- 3.10 The SA (Figure 5) appears to show Faringdon as being located within a Nature Recovery Zone.
- 3.11 The map includes broad areas and it is not entirely clear what the Land at Wicklesham Lodge Farm would fall within. It appears that it may include a mixture of recovery zone, wider landscape zone with some areas of core zone. It is acknowledged that there are important landscape features, biodiversity features and key views within the site that need to be respected and maintained. Countryside will seek to work with the Councils to deliver a high quality development which makes the most of its unique landscape setting and opportunities to deliver nature recovery. However, it is important that this map is more easily readable to be able to more easily identify which zones fall within which areas. The map should be amended to reflect this.
- 3.12 Para. 5.23 notes that development is discouraged within the 'Core Zones' and 'Recovery Zones' *'with only smaller developments being appropriate in the latter'*.
- 3.13 It is important to note that the presence of identified 'Core Zones' or 'Recovery Zones' does not preclude development from happening, although it may be that extra care is taken in relation to the design, layout and materiality of a development within these areas. In order to meet housing requirements, development may be necessary within these areas, and suitable mitigation can be provided to address any adverse impacts. The emerging national requirements for all new developments to achieve at least a 10% Biodiversity Net Gain will go a long way to addressing the impact of development.
- 3.14 The proposals for Land at Wicklesham Lodge Farm comprise large areas of landscaping and green buffers and links which will provide wildlife corridors and enhanced areas of biodiversity.
- 3.15 Figure 13 of the SA shows the Conservation Target Areas (CTAs) within the Plan area. Para. 5.50 notes that these areas are identified as *'some of the most important areas for wildlife conservation, where targeted conservation action will have the greatest benefit.'*

- 3.16 It appears that some or all of the Land at Wicklesham Lodge site may be included within one of these CTAs. It is important that development is not precluded on an otherwise suitable, available, deliverable and sustainable site simply because of the presence of a draft CTA. Countryside's vision for the site is to deliver a high quality, sustainable extension to Faringdon which would complement and respect the natural environment and would provide significant ecological benefits and biodiversity net gain.
- 3.17 As required by the NPPF (para. 175) Local Plans should distinguish between the hierarchy of international, national and locally designated sites. The draft designations as detailed above should not be given the highest level of protection, which is reserved for AONB and National Parks. As much of the district is impacted by AONB, those areas that are not (such as Faringdon) should be strongly considered for development.
- 3.18 Figure 14 shows a small area of the site as being a SSSI (the Wicklesham and Coxwell Pits SSSI). This SSSI forms part of the active quarry and disused pit. The reason for its designation is the presence of palaeontology (fossils). This is acknowledged and respected within the proposed Masterplan for the site by safeguarding this area as an employment zone (as is its current use). The important ecological elements of the SSSI can be protected in the same manner that they are currently protected. The site's active status as a quarry does not adversely impact the SSSI and it would continue to be protected as part of any development. Indeed, buffers to the site and information boards could provide useful additions.
- 3.19 The proposal for Land at Wicklesham Lodge Farm can therefore positively work towards achieving Objective 4 (to achieve at least 10% biodiversity net gain) and Objective 5 (to protect and enhance designated assets including SACs and SSSIs) as detailed on page 55 of the SA.

#### *Climatic Factors*

- 3.20 Countryside support the JLP's aim to reduce greenhouse gas emissions and aspirations for development that is resistant to climate change. Countryside as a business are working towards reducing their carbon footprint both within their business and as a developer and within the homes they build and to working towards a target of achieving net zero by 2030.
- 3.21 In order to be able to achieve ambitious sustainability targets, it will be important for strategic development to occur in areas where there is already an element of existing infrastructure, allowing future residents to walk and cycle to work, local facilities and services that are already in the area. The scale of proposed development also needs to be such that it is large enough to support sufficient services including schools, retail and employment alongside the residential. This will ensure that neighbourhoods are genuinely walkable and will reduce the use of the car.

- 3.22 Countryside's vision for Land at Wicklesham Lodge Farm is to provide an extension to Faringdon which is connected via safe and secure walking and cycling routes. There would also be walking and cycling connections within the site as well as a sustainable transport hub connecting the site to the wider area using sustainable modes of transport. This hub could include electric vehicle charging, mass rapid transit bus hub, cycle parking etc. These proposals fully align with the objectives of the JLP as set out in the SA at para. 6.35.
- 3.23 Overall the proposals for Land at Wicklesham Lodge Farm can assist in delivering upon Objective 3 (reduce the need to travel by car, improve access to services, facilities and public open space by active modes of travel), Objective 6 (significant contributions to achieving net zero carbon), Objective 7 (resilience to climate change) and Objective 20 (renewable energy) as set out on page 71 of the SA.

#### *Cultural Heritage and Townscape*

- 3.24 Land at Wicklesham Lodge Farm is not in a Conservation Area and contains no at risk properties. There is a Conservation Area (Little Coxwell) to the west of the site and a Scheduled Ancient Monument to the south of the site. However, these are located at significant distances from the site.
- 3.25 In relation to Objective 8 (to conserve and where possible enhance heritage assets and their settings) the site provides an opportunity to positively respond to the wider context of the area, and indeed there are opportunities to celebrate heritage, for example by providing a green link along an old railway line within the site and by preserving and highlighting views to the Faringdon Folly Tower to the north east of the site.

#### *Human Health and Wellbeing*

- 3.26 In relation to health and wellbeing, para. 8.38 of the SA notes that the key sustainability objectives will be used to test the JLP:
- Objective 1: To reduce pollution of kinds and meet environmental targets for air, water and soil quality
  - Objective 2: To safeguard the health and wellbeing of the population, ensuring new developments plan for "healthy places", with sufficient social, physical and health infrastructure in place
  - Objective 3: To reduce the need to travel by car, and improve access to services, facilities, and publicly accessible open space by active modes of travel
  - Objective 9: To improve pockets of income, education, skills and training across the plan area, while also improving access to services and facilities in remote areas.
  - Objective 10: To create safe places that are free from crime and free from the fear of crime, and protected from acts of terror.

- 3.27 The proposed development on Land at Wicklesham Lodge Farm will deliver a sustainable extension to Faringdon which will ensure the vitality and viability of existing services in Faringdon as well as delivering new services and facilities including employment, retail, community facilities, sports facilities, open space and schools. The proposals would reduce the need to travel by car, and the quantum of development (when taken with the existing residents of Faringdon) would provide the required numbers of people to ensure the viability for a sustainable mass rapid transit hub and routes.
- 3.28 The proposals will be designed to deliver a high quality place which takes into consideration designing out crime and provides a safe and desirable place to live, work, play and do business.
- 3.29 The Land at Wicklesham Lodge Farm proposals will assist in delivering the objectives identified above.

*Landscape*

- 3.30 Land at Wicklesham Lodge Farm is not located within a protected landscape area and is therefore free of many of the constraints of the wider district.
- 3.31 The SA identifies 2 JLP objectives in relation to landscape; Objective 11 (to protect and manage the character and appearance of the landscape, maintaining and strengthening local distinctiveness and sense of place, the countryside, Green belt and landscape quality) and Objective 12 (great weight to be given to conserving and enhancing AONB).
- 3.32 The site is not within the AONB and the proposals provide an opportunity to retain important landscape features whilst creating a sustainable next extension to Faringdon. The development can enhance access to the surrounding countryside and will protect any important landscape and biodiversity features within the site, ensuring a strong sense of place and landscape character.

*Material Assets*

- 3.33 In relation to Material assets, the JLP will have 2 objectives; Objective 13 (ensuring the extraction of resources takes place prior to any development in identified resource areas and to avoid development in mineral infrastructure zones) and Objective 14 (minimise the use of new materials and prioritise the reuse and recycling of existing materials and aggregate).
- 3.34 Land at Wicklesham Lodge Farm is not designated as a Mineral resource area, meeting Objective 13. In relation to Objective 14 Countryside are committed to reusing and recycling as much on site as possible, and to utilising modern methods of construction to minimise waste. Indeed this forms part of the company wide strategy to targeting achieving net zero by 2030.

### *Population*

3.35 As noted at para. 11.46 of the SA, housing led forecasts anticipate that the population of the VOWH will increase by 26% between 2020 and 2030. It is therefore essential that the JLP plans for sufficient homes in sustainable locations which will ensure the JLP objectives are achieved.

3.36 The JLP Population objectives are as follows:

- Objective 2: To safeguard the health and wellbeing of the population, ensuring new developments plan for “healthy places”, with sufficient social, physical and health infrastructure in place
- Objective 3: To reduce the need to travel by car, and improve access to services, facilities, and publicly accessible open space by active modes of travel
- Objective 9: To improve pockets of income, education, skills and training across the plan area, while also improving access to services and facilities in remote areas.
- Objective 10: To create safe places that are free from crime and free from the fear of crime, and protected from acts of terror.
- Objective 15: To plan for enough housing to meet the needs of our residents, including the provision of affordable housing
- Objective 16: To maintain, and where possible, increase job opportunities across the districts.

3.37 The Wicklesham Lodge Farm proposals seek to assist in delivering all the above objectives – delivering a sustainable new extension to Faringdon which encourages a healthy lifestyle, with sustainable modes of transport at its heart. The site would improve safe access to existing facilities and would deliver new services and facilities. The site would also deliver a wide range of housing (designed to reduce crime) to meet all needs as well as job opportunities close to home.

### *Soil Quality*

3.38 Figure 32 of the SA notes the Agricultural Land Classifications across the districts. Although the map is not entirely clear it appears that Land at Wicklesham Lodge Farm is within a Grade 3 or Grade 4 area (lower quality land).

3.39 As detailed within these representations, the proposals for Land at Wicklesham Lodge Farm would assist in delivering against Objective 1 (to reduce pollution and meet environmental targets for air, water and soil quality) and Objective 2 (support the sustainable management of land for multiple benefits).

### *Water Quality*

- 3.40 Figure 34 of the SA shows the water network and flood risk areas across the districts. This demonstrates that Land at Wicklesham Lodge Farm is at the lowest risk from flooding. There is a watercourse running through part of the site with a small area at medium risk from flooding, however, housing would be located well away from this area, and this watercourse also provides an opportunity for ecological enhancement and biodiversity net gain.
- 3.41 In relation to water quality the SA identifies 3 JLP objectives; Objective 1 (reduce pollution and meet environmental targets for air, water and soil quality), Objective 18 (maximise efficient water use and aspirations for water neutrality) and Objective 19 (reduce risk of flooding and improve resistance and resilience to flooding).
- 3.42 Land at Wicklesham Lodge Farm is mostly located within Flood Zone 1 (lowest risk of flooding). There is a small swathe adjacent to a watercourse at medium risk –however development would be located outside this area and mitigation would be provided through the use of SuDs.
- 3.43 Countryside are committed towards building sustainable homes which reduce the need for water consumption. For example, they are seeking to reduce water consumption for their homes to 105 litres per person per day or lower by 2025.

### **Settlement Assessment Methodology**

- 3.44 Fig. 2 of the Settlement Assessment Methodology includes a map showing the current settlement hierarchies across the districts. Faringdon is currently considered a Town/Market Town.
- 3.45 The Methodology proposes a new approach to settlement hierarchy for the SA; organising the settlements into numbered tiers. Settlements with the highest levels of services and facilities will be the highest tier and those with the lowest level of services and facilities will be classed as the lowest tier. Town and Parish Councils will be asked to respond providing information on the services and facilities. Each type of service or facility will be given a numerical score (for example a Primary School will score 2 and a Secondary School will score 4). Numerical scores will also be given for walkability (or access via other modes of transport) to key employment sites and accessibility to higher tier settlements and to major settlements outside the district. Scores will also be given in relation to broadband coverage quality.
- 3.46 The methodology notes that the hierarchy will not be purely based on its score, and that planned growth and recent growth will be taken into account. Countryside support this approach, but consider that the ability to support future growth which would include services and facilities is also taken into consideration as part of the settlement hierarchy process.

3.47 The spatial strategy for the JLP should ensure that development is distributed across the districts. Strategic scale developments provide the scale to ensure infrastructure and significant community benefits can be provided. When these strategic developments are extensions to existing settlements there is the further benefit not only of new facilities for existing residents, but a scale of new residents to ensure the vitality and viability of any existing services and facilities. The VOWH should consider the use of Faringdon as an extension of the Oxford-Cambridge Arc to the key settlement of Swindon.

3.48 The Settlement Assessment Methodology includes the following questions:

*1. Are there any services or facilities missing from the list of services and facilities proposed to be assessed?*

3.49 Access to public transport interchanges should be included within Table 1.

*2. Do you consider that any services or facilities should be removed from the assessment?*

3.50 The services and facilities listed are considered appropriate other than the suggested changes above.

*3. Looking at the proposed scoring identified in tables 1 to 6 do you consider that the scoring reflects the weight/importance of each service or facility?*

3.51 In relation to indicators such as hospitals, the nature of these is that they will only be located within major cities and large towns. However, the same score is given to GP surgeries and also supermarkets – clearly these facilities will be in many more locations than hospitals. The methodology behind the scoring therefore isn't clear and this should be clarified as part of the evidence base.

*4. What do you consider to be a reasonable distance to walk, cycle or use public transport to access key employment sites or to access services and facilities?*

3.52 A sustainable settlement should provide a range of options for travelling to work; both walking and cycling but also easy access to sustainable modes of transport to access employment further afield. It is not realistic that all residents would walk to work (outside of major cities) and therefore mass rapid transit provides an opportunity to encourage people to leave their cars at home. The use of electric vehicles should also be considered as a positive move in sustainability terms and therefore it is important that EV charging infrastructure is delivered.

### **Duty to Co-operate**

3.53 The Duty to Co-operate Scoping Document sets out the proposed approach to cross boundary working. The strategic planning issues identified are as follows:

- Housing need and supply, including affordable housing, and the provision of sites for Gypsies and Travellers

- The supply of retail and employment land
- The provision of infrastructure, including health, education, utilities, flood risk and strategic sustainable transport links
- Conserving and enhancing our natural and historic environments
- Addressing climate change

3.54 Countryside are in agreement in relation to the above strategic planning issues. However, they consider, particularly in light of the Oxford Cambridge Arc, that Sustainable Transport Links should form its own issue (rather than being included within the general infrastructure section).

3.55 Countryside are in full agreement with the list of Authorities that the JLP should seek to co-operate with. In particular with Wiltshire Council, given the unique opportunity provided by Faringdon to connect this area of the VOWH with the major settlement of Swindon and it's many services and facilities via a sustainable transport link.

#### **Habitat Regulations Assessment**

3.56 The evidence base includes a Habitat Regulations (HRA) Scoping Report. The Scoping Report identifies the Natura 2000 sites (Special Protection Areas (SPA), Special Areas of Conservation (SAC) and by extension Ramsar Sites) that may be affected by the Joint Local Plan. The Scoping Report also list plans and projects from neighbouring districts that may need to be considered throughout the HRA Process.

3.57 The scope of the HRA seeks to consider all of the Natura 2000 sites wholly or partially within South Oxfordshire and Vale of White Horse. In addition, adopting a precautionary approach, all Natura 2000 sites within a 20km radius of the JLP boundary will also be considered at the early stage in the HRA process. The 20km distance was adopted as it aligns with that chosen for the Oxfordshire Plan 2050.

3.58 Whilst we agree with the precautionary approach adopted at the early stages of the HRA process, it is hoped that the distances to specific sites can be reduced when impact pathways are examined in more detail. For example, if recreational pressure is identified as a potential impact upon a SAC or SPA, the distance at which impacts could be screened out is reduced in line with similar adopted strategies, such as the 5km zone in the case of the Thames Basin Heath SPA.

3.59 It may be worth noting at this is stage that using the precautionary policy adopted within the Joint Local Plan scoping report, only four Natura 2000 sites within a 20km radius of the site are highlighted, as summarised in the table below.

Site	Distance/km	Threats	Comments
<b>Within the Plan Area</b>			
Cothill Fen SAC	16.7	<ol style="list-style-type: none"> <li>1. Water pollution.</li> <li>2. Hydrological changes.</li> <li>3. Air pollution - impact of atmospheric nitrogen deposition.</li> </ol>	No direct hydrological connectivity between the site and the SAC
Hackpen Hill SAC	10.7	No current issues affecting the Natura 2000 features have been identified on this site	
<b>Outside Plan Area</b>			
North Meadow and Clattinger SAC	20.0	<ol style="list-style-type: none"> <li>1. Inappropriate water levels</li> <li>2. Habitat fragmentation</li> <li>3. Commons management</li> <li>4. Public access/disturbance</li> <li>5. Water pollution</li> </ol>	Different water catchment area – no direct hydrological connectivity
River Lambourne SAC	14.7	<ol style="list-style-type: none"> <li>1. Siltation</li> <li>2. Water pollution</li> <li>3. Invasive species</li> <li>4. Hydrological changes</li> <li>5. Inland flood defence works</li> <li>6. Inappropriate cutting/mowing</li> </ol>	Site is within the River Ock Catchment, which is part of the larger Gloucestershire and the Vale Catchment. The Lambourne SAC is within the Kennet Catchment.

3.60 From an initial analysis, it would appear possible that many of the potential impacts upon the Natura 2000 site could easily be screened out when the impact pathways are examined in more details, such as no direct or indirect hydrological connection between the proposed site and hydrologically sensitive SACs, such as the River Lambourne.

## 4. THE SITE & SURROUNDING AREA

### The Vision

- 4.1 Land at Wicklesham Lodge Farm has the ability to deliver much needed housing, infrastructure, services, recreational facilities and employment opportunities as well as potential to incorporate a mass rapid transit interchange and mobility hub, facilitating an improved, fast connection east and west, opening up the Oxford-Cambridge Arc towards Swindon, addressing the Council's connectivity and sustainability aspirations. Discussions with the bus operator have highlighted a keen appetite for this kind of infrastructure, to facilitate improved connectivity.

### The Site

- 4.2 The site, Wicklesham Lodge Farm comprises approximately 152 hectares of land immediately to the south of the A420, which runs to the south east of the settlement of Faringdon. It is located to the north east of Swindon and the south west of Oxford.
- 4.3 The adopted VoWH Local Plan 2031 Part 1 contains the 'spatial strategy' policies for the district up to 2031. The district is divided into three sub-areas:
- Abingdon-on-Thames and Oxford Fringe;
  - South East Vale; and
  - Western Vale.
- 4.4 The settlements are defined as one of four types:
- Market Towns;
  - Local Service Centres;
  - Larger Villages; and
  - Smaller Villages.
- 4.5 Faringdon is identified as the only Market Town within the Western Vale sub-area. It is therefore the main settlement within the sub-area. Faringdon is the main settlement west of Oxford in the gap to Swindon.
- 4.6 Large parts of the district are subject to the constraints of either the Oxford Green Belt or the Wessex Downs Area of Outstanding Natural Beauty (AONB). Positively, Faringdon is not constrained by these designations so offers a less restrictive opportunity to accommodate some of the District's housing growth.
- 4.7 The site comprises predominantly agricultural land. In the centre there is a cluster of existing buildings, together with farm buildings as well as a series of small scale business premises/office buildings, these do not form part of the site but masterplanning of the site will integrate these uses within the wider vision. Across the site there are areas of existing woodland and tree planting as well as tree and hedgerow planting along existing field boundaries.

4.8 The site is within the Faringdon Neighbourhood Plan Area, but is not subject to any designations. There are 2 Neighbourhood Plan employment site allocations relevant to the site; one being Wicklesham Quarry (to the south west of the site) which is to be safeguarded for B2 and B8 use and also Wicklesham Farm for limited B1 expansion (located at the centre of the site).

4.9 There is a swathe of the site located within Flood Zones 2 and 3. This area runs across the width of the site following the line of an existing watercourse running north of Wicklesham Copse (an existing area of woodland close to the A420). The remainder of the site is located within Flood Zone 1.

### **Surrounding Area**

4.10 On the other side of the A420 from the site lies the settlement of Faringdon, which is well served by services and facilities. Part of the site comprises the Wicklesham and Coxwell Pits Site of Special Scientific Interest (SSSI). There is a Grade II Listed Building (Barn and Granary associated with Wicklesham Lodge) within the centre of the site. The Little Coxwell Conservation Area lies to the west of the site. To the south of the site (approximately 600m away) lies the Scheduled Ancient Monument of 'Little Coxwell Camp'.

4.11 The settlement of Faringdon is well served by services and facilities which include but are not limited to:

- Faringdon Community College
- Infant School
- Nursery School
- Waitrose Supermarket
- Aldi Supermarket
- Tesco Supermarket
- Costcutters Convenience Store
- Leisure Centre
- Faringdon Town Football Club / Tucker Park
- Tennis Club
- Cricket Club
- Park including areas dedicated as a Cycle Park and Skate Park
- Doctors Surgery
- Pharmacy
- Veterinary Surgery
- A range of restaurants and takeaways
- Public Houses; 'The Folly Inn' and 'The Swan'
- Business Park
- Allotments
- Church

- 4.12 To the south east and north east of the site lie further agricultural fields. Immediately to the west of the site, adjacent to the A420 is a sand and gravel extraction operation (the quarry). Beyond this lies the hamlet of Little Coxwell and the village of Great Coxwell. Immediately to the north of the site lies the A417 Stanford Road which provides links to Wantage and Grove.

## 5. A SUSTAINABLE EXTENSION TO FARINGDON

- 5.1 Land at Wicklesham Lodge Farm is located adjacent to the existing settlement of Faringdon, just on the opposite side of the A420, and is therefore an appropriate location for development. The site provides an exciting opportunity to deliver a sustainable extension to Faringdon, which is well connected to the existing services and facilities, and provides new homes, services and facilities for new and existing residents.
- 5.2 In particular this site provides a unique opportunity to address the JLP's connectivity and sustainability objectives by opening up connectivity from the Oxford-Cambridge Arc west towards Swindon. The site could provide a sustainable transport hub, allowing for mass rapid transit connections between Swindon, Oxford and London.
- 5.3 The site is located in a highly sustainable location and benefits from the following opportunities:
- Due to its location within the Vale of White Horse, the site offers a unique opportunity to provide housing growth to the west of Oxfordshire;
  - The site is not constrained by Green Belt or the Wessex Downs Area of Outstanding Natural Beauty (AONB);
  - Strong highway network connections make this an ideal location for a mass rapid transit hub;
  - The site is well served by existing local services and facilities;
  - The site provides the opportunity to deliver new services and facilities including Primary and Secondary Schools, employment opportunities (including linking to existing employment designations/allocations), open space, a Neighbourhood Centre and transport hub;
  - Highly desirable location between Swindon and Oxford;
  - The site benefits from existing landscape features including woodland areas which would be retained and create character;
  - Biodiversity Net Gain and habitat enhancement opportunities; and
  - Zero/low carbon opportunity
- 5.4 Land at Wicklesham Lodge Farm is a highly sustainable site, which is relatively unconstrained and has the ability to bring significant benefits to the local area and more widely within the Oxford-Cambridge Arc area. There are no overriding physical or environmental constraints that would prevent the site from being delivered.
- 5.5 The site is available and deliverable and Countryside anticipate that the site could deliver between 250 – 300 homes per year for a 10 – 15 year period. The masterplanning work demonstrates that the number of units proposed would be achievable. This is set out in more detail in the submitted Promotion Document (see Appendix 4).

## **The Vision**

- 5.6 Countryside's vision for the site is to deliver a sustainable extension to Faringdon that will build upon and enhance the existing facilities. The site could deliver the following:
- Up to 2,500 homes across a wide range of types and tenures to meet all housing needs including affordable housing, First Homes, private rented, self-build and c. 200 homes for retirement living;
  - Employment opportunities including linking to the existing employment designations adjacent/within the site of Wicklesham Quarry which is safeguarded for B8 use and Wicklesham Farm offices which are designated for limited expansion;
  - 2 new Primary Schools;
  - Potential for a Secondary School;
  - A Neighbourhood Centre and Local Centre;
  - An integrated sustainable transport mobility hub providing cycling, car charging and an increased bus service (including potential for future mass rapid transit);
  - Improved access to existing green spaces including a north/south green route along the historic railway line;
  - Pedestrian and cycle connections within the site and to Faringdon; and
  - Open spaces and recreational areas including retaining the existing woodland areas.

## **Sustainability**

- 5.7 Countryside are committed to efficiently and responsibly building new sustainable homes. They have produced Sustainability Reports to set out their ambitions and targets (see Appendix 2 and 3). This document sets out their commitments which include:
- Using 100% sustainably sourced timber
  - Reduce construction waste by 20% and divert at least 98% from landfill
  - Achieve water efficiency of at least 105 litres per person per day
  - Achieve at least 10% Biodiversity Net Gain
  - Plant 250,000 trees across developments by 2025
  - Build at least 15,000 affordable homes
  - More than 10,000 homes to have accessible EV charging
  - Develop local job creation, training and employment

## 6. SUMMARY & CONCLUSIONS

- 6.1 These representations have been prepared by Boyer on behalf of Countryside in response to the JLPIC.
- 6.2 Countryside are promoting Land at Wicklesham Lodge Farm, Faringdon for mixed use development comprising:
- Up to 2,500 homes across a wide range of types and tenures to meet all housing needs including affordable housing, First Homes, private rented, self-build and c. 200 homes for retirement living;
  - Employment opportunities including linking to the existing employment designations adjacent/within the site of Wicklesham Quarry which is safeguarded for B8 use and Wicklesham Farm offices which are designated for limited expansion;
  - 2 new Primary Schools;
  - Potential for a Secondary School;
  - A Neighbourhood Centre and Local Centre;
  - An integrated sustainable transport mobility hub providing cycling, car charging and an increased bus service (including potential for future mass rapid transit);
  - Improved access to existing green spaces including a north/south green route along the historic railway line;
  - Pedestrian and cycle connections within the site and to Faringdon; and
  - Open spaces and recreational areas including retaining the existing woodland areas.
- 6.3 These representations respond to the vision and the key issues identified in the consultation.
- 6.4 These representations set out the background to this site, the constraints and opportunities and the potential that this site provides to deliver development in accordance with the JLP vision and objectives.
- 6.5 The proposals for Land at Wicklesham Lodge Farm would assist the Councils in meeting key objectives in relation to delivering homes and jobs, sustainability and connectivity.
- 6.6 Countryside would welcome the opportunity to meet with the Councils to discuss the unique opportunity that Land at Wicklesham Lodge provides to deliver much needed housing, affordable housing, employment and improved sustainable transport connections whilst meeting the objectives of the JLP.

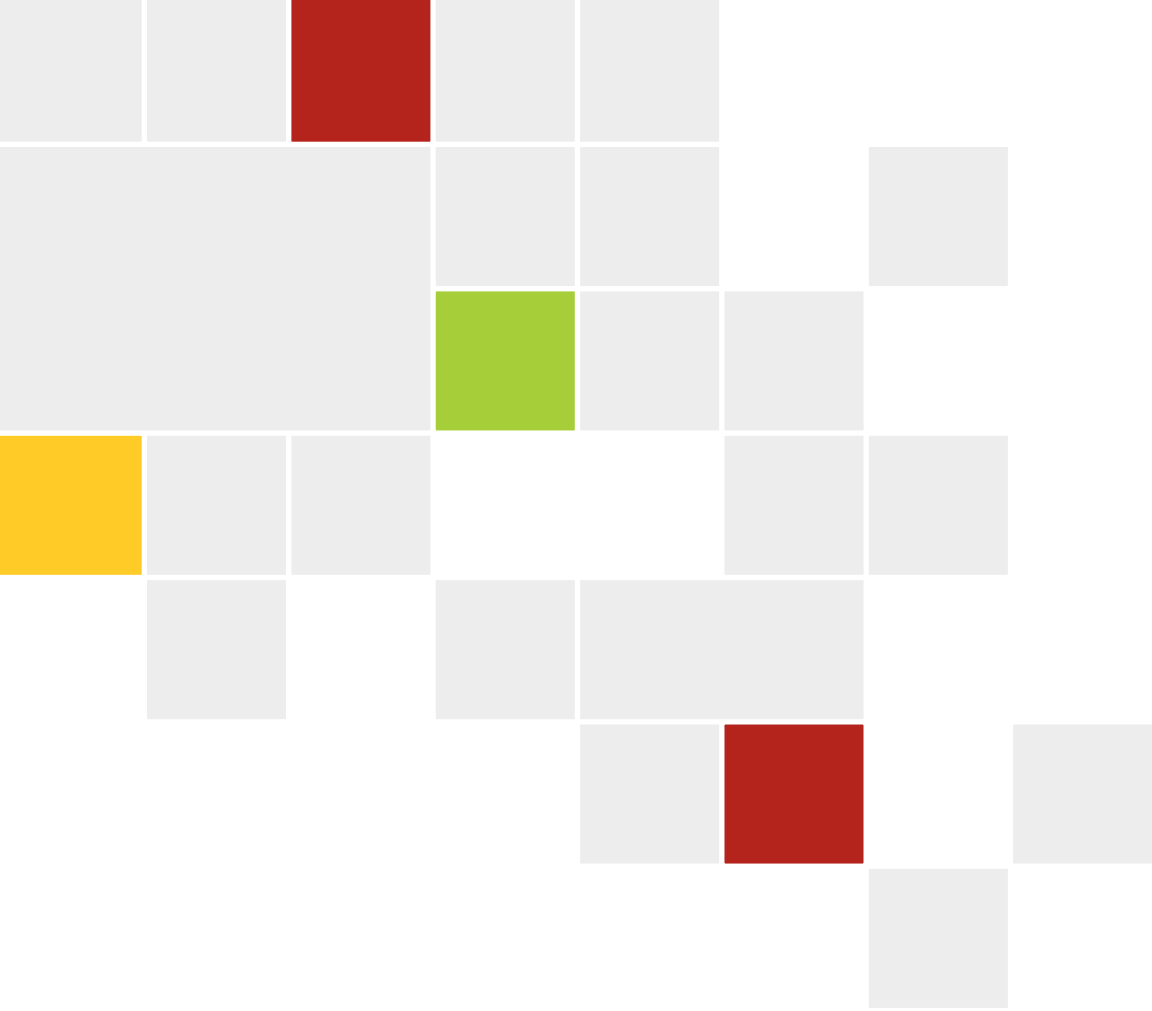
# **APPENDIX ONE – RED LINE PLAN**

## **APPENDIX TWO – SUSTAINABILITY REPORT**

# **APPENDIX THREE – ROUTE TO NET ZERO REPORT**

## **APPENDIX FOUR – PROMOTION DOCUMENT**





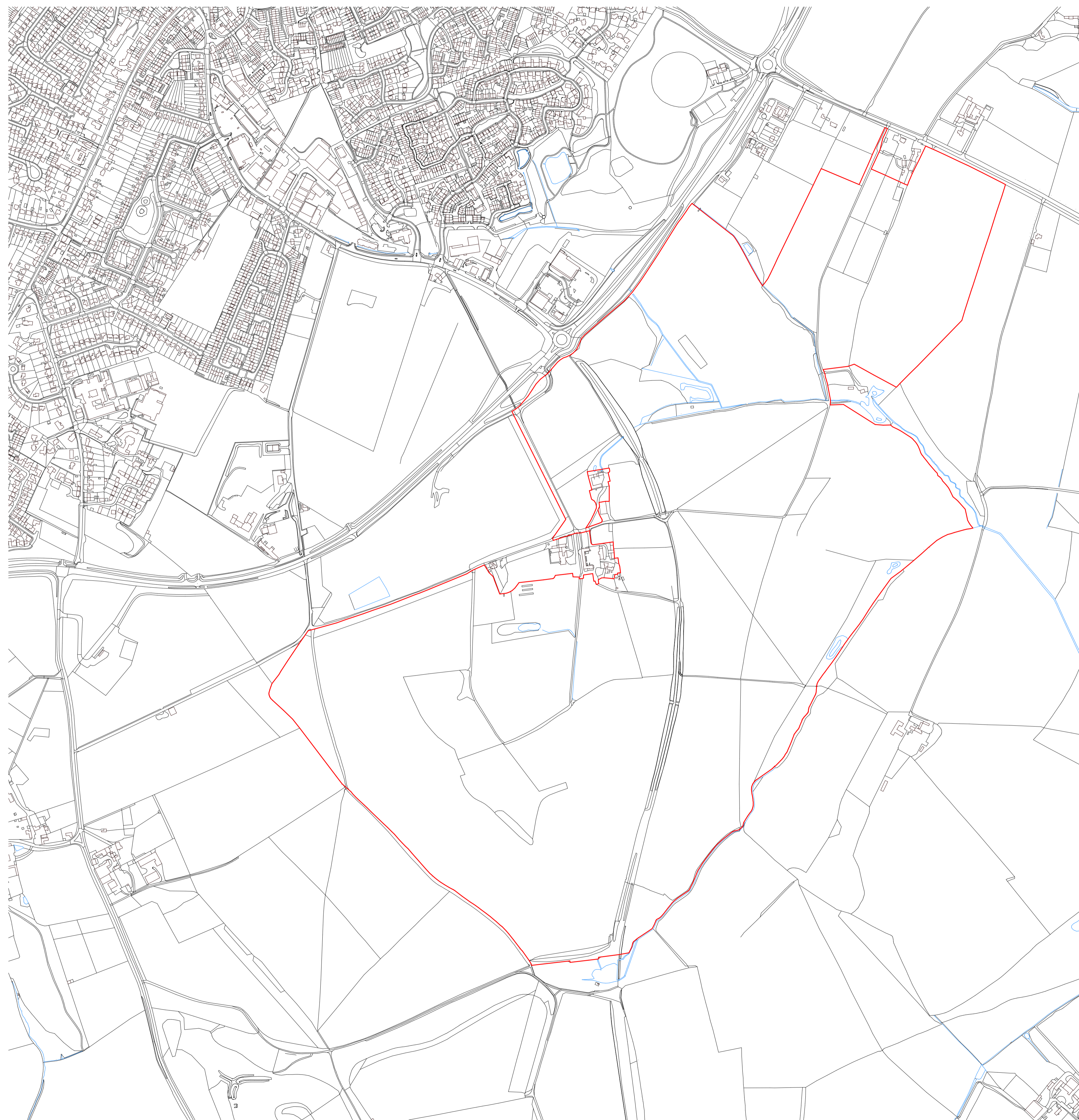
# Boyer

Crowthorne House, Nine Mile Ride, Wokingham, RG40 3GZ | 01344 753 220  
wokingham@boyerplanning.co.uk | boyerplanning.co.uk

DO NOT SCALE THIS DRAWING

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Rev	Description	Date	Checked
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Status  
**FOR INFORMATION**

Client  
**Countryside**

Project  
**Wicklesham Lodge Farm, Faringdon**

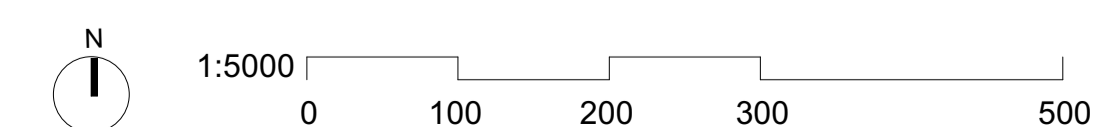
Drawing  
**Site Location Plan**

Scale	Drawn	Date	Checked
1 : 5000	JM	28/09/21	SEB

Project no.	Dwg	Revision
15443	A - (03) - 102	

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**COUNTRYSIDE**  
Places People Love

# **BUILDING THE FUTURE**

CountrySide Properties PLC  
Sustainability Report 2021





# 1 ABOUT US

Countryside at a glance

# Who are we?

Countryside is a leading mixed-tenure developer with over 60 years' experience of collaborative working with partners to create places that people love.

We are committed to providing a balanced mix of tenure types, from homes for private sales, to affordable homes and homes for the private rented sector.


## What sets us apart


### Dedication to excellence and quality


Our developments are recognised for their excellence. We hold more Housing Design Awards than any other housebuilder. Our continued dedication to outstanding design and quality resulted in being awarded the Housing Design Awards "Winner of Winners" for our Rochester Riverside flagship regeneration scheme this year.

**5\*** Awarded five-star builder status by the HBF

 91.6% of customers would recommend us to a friend

 Our unique partnership model supports our commitment to delivering developments that are tenure blind with high proportions of affordable homes

 We were one of the earliest adopters of modern methods of construction and now have three timber frame factories

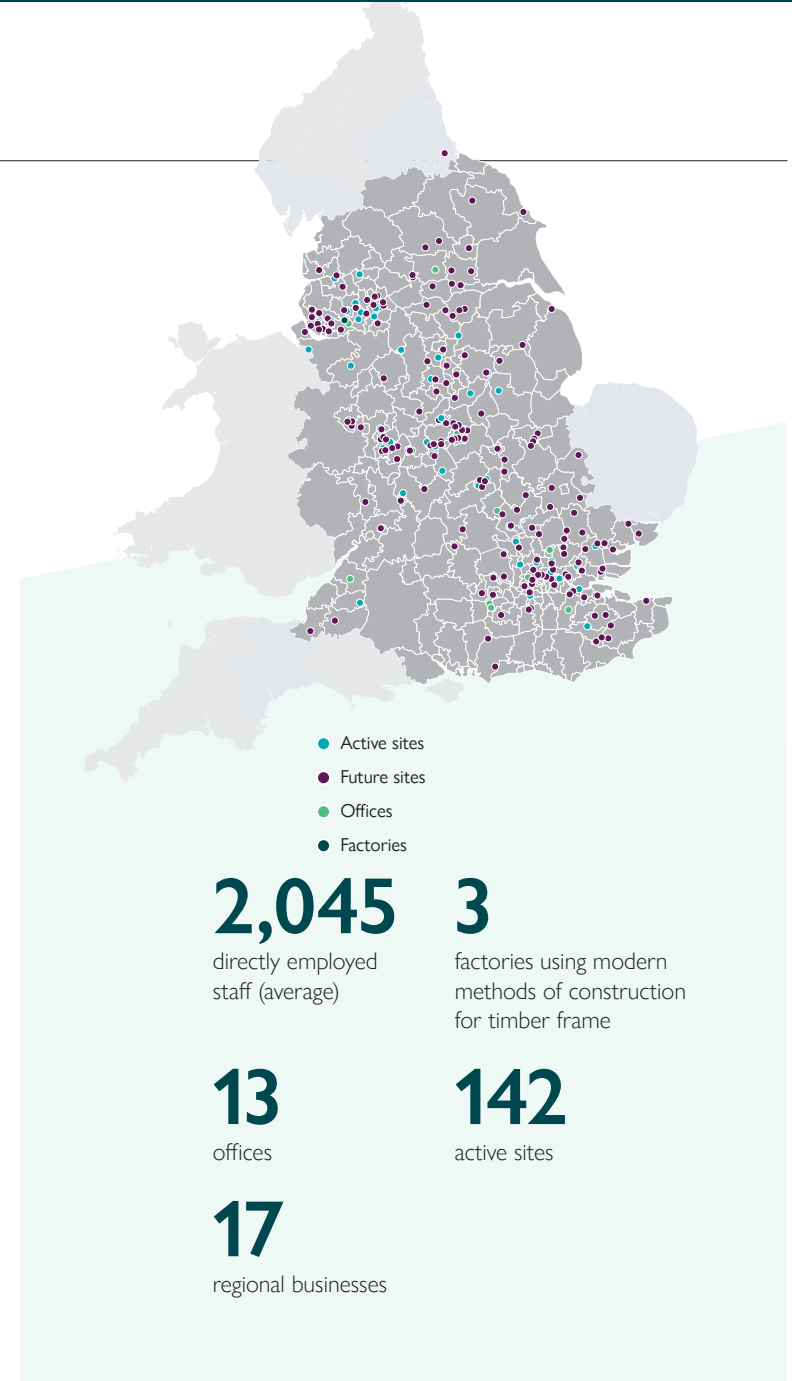
 Our approach to sustainability is impact driven with 31 ambitious targets, including becoming net zero by 2030



Carbon (B)



MSCI ESG Rating of AA



Countryside at a glance continued

# Our purpose and values

Countryside’s purpose is to create places where people love to live with sustainable communities built to last.

This is underpinned by our values of caring, growing together, taking pride and always delivering. Together our purpose and values help to create a culture of excellence and commitment.

## How we deliver our purpose

Creating places people love is what we do, day in, day out. This goes beyond simply building high-quality homes and developments. It’s about improving the quality of life for whole communities. To do this we use a placemaking approach that considers the social, digital and natural infrastructure needed to support our communities today and tomorrow. Our stakeholder engagement is essential to delivering these long-term positive outcomes and the depth of our involvement sets us apart in the industry.

<p><b>WE REALLY CARE</b></p> <p>about each other, our customers, partners, and everyone who deals with Countryside.</p>	<p><b>WE GROW TOGETHER</b></p> <p>as one solid team, overcoming shared challenges and achieving shared goals.</p>
<p><b>WE TAKE PRIDE</b></p> <p>in everything we do to make places and communities people love.</p>	<p><b>WE ALWAYS DELIVER</b></p> <p>in the right way, the Countryside way.</p>



### Scope of the report

Our 2021 Sustainability Report provides verified information on our environmental, social and governance performance across our financial year (October 2020 to September 2021). It illustrates the success of our new sustainability approach and discusses our aspirations for the future. This report covers Countryside operations in our offices, our sites and our factories.


Investment case

# Key performance and highlights

**5,385**  
homes completed



**91.6%**  
Recommend a Friend score



**71.7%** of suppliers joined the Supply Chain Sustainability School

**884**  
homes for the Private Rented Sector completed



**1,814** homes delivered through our factories

**163** Annual Injury Incidence Rate ("AIIR")




**2,107**  
affordable homes completed




**112** employee Mental Health First Aiders

**5,718** trees planted



**£243.3m** in social value delivered



**99.5%** of construction waste diverted from landfill



### Group Chief Executive's statement

## Forward as one

In many respects 2021 was a seminal year for Countryside. After a strategic review of our business, we announced that the Group would focus entirely on partnerships and that we would no longer operate a two-division model. As a partnership business, the highly differentiated mixed-tenure model we operate reinforces our commitment to delivering positive social change through the homes and communities we create. Please see more on page 8.

During the year, we completed construction of our second modular panel factory in Bardon, Leicestershire. This investment in off-site manufacturing supports delivery of high-quality developments in a highly energy-efficient and sustainable manner. We also published our framework this year for building sustainable communities by placing people and communities at the heart of our decision-making process. Our Building Communities framework sets out the principles that we consistently embed across all developments, keeping us true to our values and maximising socio-economic value for the communities we're here to support.

### New approach to sustainability – putting people at the heart of our homes

In the summer we launched a new approach to sustainability that set out high-level ambitions for our contribution to a sustainable built environment, driven by more than 30 stretching targets. This included a commitment to setting science-based carbon targets. In November we delivered on this commitment releasing a report that details our 2030 pathway to net zero. The new approach to sustainability is focused, ambitious and, most importantly, impact driven. Our vision for the future is that every act of planning, design and construction we carry out creates positive impacts for people and places. To achieve that we configured a sustainability blueprint that faces up to the challenges we need to tackle – globally and locally. We are resolutely committed to working together with our partners, local communities, supply chain and others to achieve positive outcomes. For more information, please see page 9.

We have established a clear structure of roles and responsibilities through our governance framework that will underpin our commitment to sustainability. Non-Executive Director Simon Townsend has assumed responsibility as the Board sustainability representative and Chair of the Group's new Sustainability Committee.



Our vision for the future is that every act of planning, design and construction we carry out creates positive impacts for people and places."

Iain McPherson  
Group Chief Executive

#### Five-star builder



91.6%

NHBC Recommend a Friend score

#### AIRR



56%

better than the HSE national average

#### Social value



£243m

We generated £243m of social value

Group Chief Executive's statement continued

New approach to sustainability – putting people at the heart of our homes continued

The Committee focuses on assessing our sustainability approach and how it identifies and prioritises sustainability issues material to the business strategy, including climate change. To find out more, please see page 24.

Becoming net zero

2021 was also a formative year for tackling climate change with the UN Climate Change Conference in Glasgow (COP-26). As we transition towards a low-carbon society, we are seeing an unprecedented flow of regulatory change. Changes to Building Regulations Parts F and L in England will come into effect in 2022 requiring new homes to achieve a 31% reduction in carbon emissions compared to current standards. This will increase to 75%-80% under the 2025 Future Homes Standard. As a result, failure to adequately prepare for the impacts of climate change has, for the first time, become a principal risk for the Group. As part of addressing this risk, we launched our pathway to achieving net zero emissions by 2030, supported by science-based reduction targets. More information available on page 27.

A considerable amount of time and effort has gone into repositioning our sustainability approach and configuring our route to net zero. I'm proud to announce that this has resulted in Countryside achieve a B in our CDP Climate Change response in 2021. But, all of this work has not distracted us from continuing to create positive social and environmental outcomes.

Constructing quality homes that are built to last

For the second consecutive year we have been awarded five-star builder status by the HBF demonstrating the exceptional attention that goes into planning, designing and constructing our homes. As a responsible developer the health and safety of our colleagues, customers and subcontractors remains a key priority. Our Annual Injury Incidence Rate was 163 this year, compared to 224 in 2020. This is 56% better than the Health and Safety Executive national average of 372 (2020: 416). Please see page 38.



Modern methods of construction

At Countryside, we bring together modern and efficient delivery methods to create sustainable communities where people love to live. We were one of the first housebuilders to invest in modern methods of construction and today we have three modular panel factories in Bardon, Narborough and Warrington. Our off-site timber frames were used in 33.7% of our homes this year. We are aiming for 17,500 homes to be built by our factories by 2025.

We are using modern methods of construction to tackle some of the industry's major environment challenges. The UKGBC estimates that the built environment contributes to around 40% of the UK's carbon footprint, with huge impacts on nature and our health. If the UK and Countryside are to achieve net zero, the industry needs to evolve. Modern methods of construction not only allow us to reduce our build time while maintaining quality, they also give us greater ownership of our resources, emissions and waste.

Building sustainable communities

We use the lens of social value to better understand how our actions deliver positive social, environmental and economic benefit. We generated £243m of social value, which is 16% of adjusted revenue. This includes £73.7m being spent by us in local economies. We use a tenure-blind approach to our master planning, ensuring a good mix of homes for people. In 2021, we built 2,107 affordable homes. To find out more, please see page 43.

Thriving together

Not only do we create places where people love to live, we are doing all we can to ensure our people thrive. We supported approximately 100 apprentices, two-thirds of whom work directly for us and one-third of whom work with contractors. Our graduate programme continues to attract high-calibre candidates and has grown this year from 24 spots in 2020 to 32 this year. In March we appointed a Head of Culture and Inclusion with a key focus on developing a Group-wide strategy for diversity, equity and inclusion. We have also become members of Black

People in Construction, a charity working in the built environment to improve ethnic minority representation in construction. Please see page 48.

It is my belief that pushing forward our partnership approach, along with the investment we've made in modern methods of construction and our commitment to becoming a net zero business will cement our position as one of the most sustainable, and responsible developers in the industry.

Iain McPherson  
Group Chief Executive

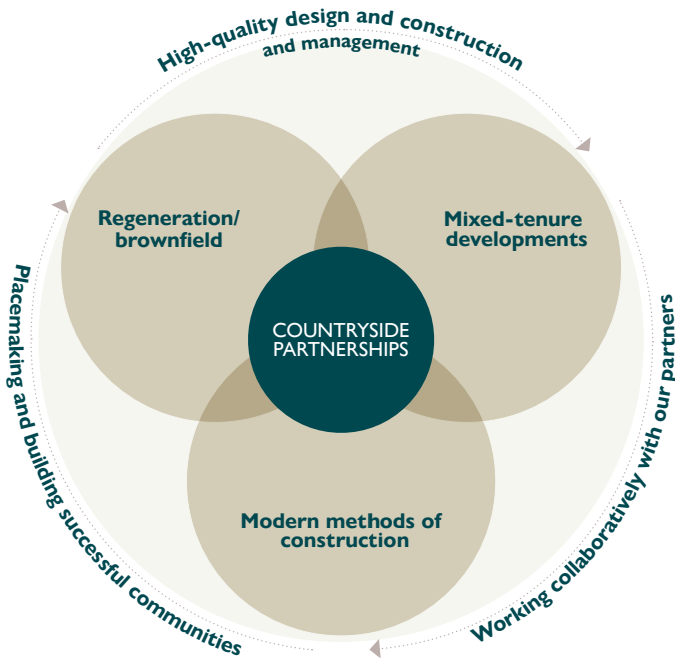
# 2 APPROACH



Our business model

# Partnering to deliver results

Our mixed-tenure model and track record for collaborative working with partners mean we are well placed to meet the demand for high-quality homes and communities across the UK as well as delivering real and lasting sustainability in the built environment.



## Our key resources



### Land

Excellent visibility of future growth with embedded value from strategic land and long-term development agreements.



### People

Highly experienced and motivated employees together with strong supply chain relationships.



### Partnerships

Enduring relationships with local authorities, housing associations and major land owners.



### Reputation

Built on transparency, proven development expertise and delivery through the cycle.



### Financial strength

Strong balance sheet with net cash and debt capacity when required.

## Our partnerships model is built around six key pillars

### Mixed-tenure development

Our mixed-tenure approach offers choice to individuals as to how they want to live with a mix of private for sale, affordable and Private Rented Sector ("PRS") homes on a single development. This also increases the speed of delivery on our developments.

### Modern methods of construction

Countryside's manufacturing capabilities are spread across three locations across the UK. Being the only major housebuilder with this capability we can achieve our net zero carbon goals faster.

Our factories can supply our sites with panels for up to 6,000 homes p.a., 4,600 of which are our advanced closed-panel systems. In addition, we have capacity to produce 6,000 floor cassettes from our factories with further innovation planned for future years.

### Regeneration and brownfield land

We target 60% of our land to come from brownfield sources, looking to use space efficiently through design that minimises environmental impact whilst maximising urban regeneration.

Our approach to urban regeneration involves remodelling existing estates to increase quality and the numbers of homes. Previously industrial suburban brownfield sites are redeveloped to improve the environment and communities, rather than encroaching on greenfield sites.

### Placemaking and building successful communities

Creating places people love means thinking critically about the social and digital infrastructure, transport and using green spaces wisely. It is more than just creating quality, sustainable buildings.

We engage with our communities at every stage, working closely with our partners to empower communities through the whole development process, placing them at the heart of everything we do.

### Collaborative working with partners

We have a strong track record working with a range of partners from local authorities and housing associations to community groups and other key stakeholders in a local community.

In our estate regenerations, we seek to involve residents throughout the development to ensure that we provide the best mix of services and public open space for that community, and that the community feels part of creating the new development.

### High-quality design and construction

With over 40 years' experience of masterplanning and placemaking, we pride ourselves on the quality of the places we create.

We provide homes built to a high standard and this has been recognised by our customers, over 90% of whom would recommend Countryside to a friend.

Our approach to sustainability

# Creating truly positive impacts drive our approach to sustainability

Sustainability has always been important to Countryside. We couldn't create places people love without thinking carefully about the critical environmental and social issues in our communities.

Having an ambitious approach to sustainability with quantitative targets gives our people, partners and stakeholders a clear vision of our sustainability goals and how they integrate within our wider business strategy.

Our values are critical in delivering our approach to sustainability acting as a guide for our day-to-day decision making.

To ensure that our approach remains focused and impact driven, the Sustainability Committee reviews its efficacy and progress through three lenses each year:

**Materiality**

Is it addressing our material issues?


Read more about these on page 17.

**Intentionality**

Are our sustainability intentions being met?

**Additionality**

What have our efforts added to society or the environment?

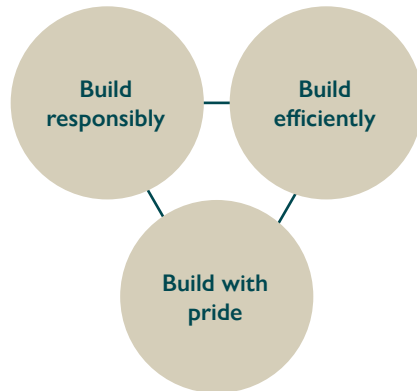
 Find out more about the Sustainability Committee on page 25.

## Built to Last



We will take pride in efficiently and responsibly building 40,000 new sustainable homes by 2025

Our commitments



Targets to drive action

18

## Sustainable Communities



We will work with our partners to deliver sustainable communities that enhance the quality of life for over one million people by 2030

Our commitments



Targets to drive action

7

## Thriving Together



We will create an inclusive, rewarding and caring workplace where all our people feel they can thrive and create places people love by 2025

Our commitments



Targets to drive action

6

### Our approach to sustainability continued

Countryside wants to play its part to respond to the big challenges affecting the health and happiness of our people, our communities and our environment.

In May 2021, we published our approach to sustainability. This strategic framework, with 31 quantitative targets, provides a clear vision of what we want to achieve over the next nine years.

To develop our approach, we engaged with a variety of stakeholders over the course of 2020–2021. This included commissioning Brunswick Group to undertake a review of existing and emerging sustainability and business trends, as well as public awareness and appetite for sustainability in the summer of 2020.

Employees across Countryside were engaged in a variety of ways, including attendance at regional board meetings, business function forums, and Group-wide networks, such as the Values Champions Network<sup>1</sup>. Through participation in the Sustainability Committee and other committees, such as the Health, Safety, Environment and Quality Committee (HSEQ), members of the Board and Executive Committee were regularly involved in the development of the approach.

We also engaged with external stakeholders, including investors and local authorities, through one-on-one meetings, participation in bid submissions and public meetings.

The result is a strategic framework and vision that focuses on the areas where we and our stakeholders believe we can make the most positive impact, while also supporting our business strategy of growth, partnerships and modern methods of construction.

### Embedding our approach to deliver results

For our approach to sustainability to succeed, we must have the right systems, programmes and reporting in place to both drive action and measure our impact. Numerous activities have already taken place to support this.

We have reviewed and refined our key performance measures to ensure we accurately reflect and report progress against our targets. See more on page 11.

We have enhanced engagement and reporting, including reconfiguring the Sustainability Committee and regular attendance at regional board meetings by the Sustainability Director and Associate Director.

We have created a detailed work programme with key priorities for the next two years, which will include enhancing our policies to align with our approach and targets. We are working closely with Group Communications to put in place a plan to effectively communicate and manage this programme of change.

Existing forums within Countryside will work closely with the sustainability team to develop the projects and initiatives set out in our work programme, as well as to act as internal feedback loops. Where an existing forum doesn't exist or where the sustainability issue is cross-functional, like waste and resource efficiency, we are creating Task and Finish groups. To find out more about how we are embedding the delivery of our sustainability approach in the business, see page 25.

### OUR APPROACH TO SUSTAINABILITY IN ACTION



In the spring of 2021, we updated Countryside's company car policy to incentivise employees to select fully electric or hybrid vehicles by offering a discount on the monthly lease cost. We are pleased to report there has been significant uptake.



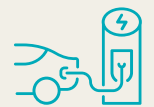
7%

of cars ordered in 2021 were fully electric



24%

of cars ordered in 2021 were hybrid



59%

of cars on order for 2022 are EVs or PHEVs

1. The Values Champions Network was set up in 2021 with employees at all levels across Countryside to ensure that the four corporate values are supported and embedded in any new Group-wide initiatives.

Our targets and performance

# Measuring the impact we make


When we launched our approach to sustainability in May 2021, we set out 25 quantitative targets we wanted to achieve over the next four to nine years. We added to this in October 2021 with the publication of our science-based emissions targets in our report Pathfinder: Marking out the Route to Net Zero.

The table outlines these targets as well as our performance against them in the year where reporting is possible. It also gives other key


performance indicators for our commitments where we felt these were important to report.

Our approach was finalised halfway through the financial year and, therefore, there are some targets where we have not previously acquired the data necessary to report performance. This is noted in the table.

Over the next year, we will conduct an in-depth review of the environmental and social data we gather from across our operations to ensure we can accurately report our performance against our targets. This may result in the introduction or refinement of our performance measures in future years.

Pillar	Commitment	Target	2021 outcome	Secondary measures	2021 results	Commentary
 <p><b>Built to Last</b></p>	<b>Build responsibly</b>	Achieve at least 10% better than the HSE National Incident and HBF Incident rates	56.0% better than HSE rate 38.0% better than HBF rate	Number of health and safety training days for employees	2,629	We maintained our Annual Injury Incidence Rate ("AIIR") below the industry average for the 18th consecutive year: Overall, our AIIR was 163 (2020: 224) compared to the Health and Safety Executive national average of 372 (2020: 416). To find out more about health and safety, please see page 38.
		85% of the supply chain to be signed up to the Supply Chain Sustainability School by 2025	71.7%	Percentage of supply chain partners who have achieved bronze, silver or gold status at the School	Gold = 4.5% Silver = 5.2% Bronze = 0.9%	We are pleased to see that 71.7% of our supply chain are now members of the Supply Chain Sustainability School.  Our target of 85% remains in place as we continue to encourage our supply chain to join the School. But we will also begin to encourage our top 20 suppliers (by spend) to work towards the Bronze level this year, as well as engaging with those supply chain partners who have become inactive members.
		60% of supply chain (based on spend) to set science-based targets by 2025	N/A			This is a brand new target set in October 2021 with the launch of our net zero strategy. We will report progress in the next financial year.  For more information about our net zero strategy, please see page 26.
		100% sustainably sourced timber procured for building operations per year	99.6%			The 0.4% of timber sold to Countryside, while not certified to FSC or PEFC, was legally compliant with UK Timber Regulations.  Our target applies to timber procured both directly through suppliers as well as indirectly through our subcontractors. We do not currently acquire sufficient data to report on the latter, but we are working to be able to provide this in future years.  For more details on our timber procurement, please see page 39.


Our targets and performance continued

Pillar	Commitment	Target	2021 outcome	Secondary measures	2021 results	Commentary	
 <p><b>Built to Last</b> continued</p>	Build efficiently	At least 50% of all homes built using MMC by 2025	33.7%	% of Pre-Manufactured Value as proportion of build cost on sites adopting MMC	N/A	This is a brand new target set in the launch of our approach in May 2021. We will report progress in the next financial year.	
		At least 17,500 homes built by our factories by 2025	1,814 homes erected				This year saw the construction of our third manufacturing facility in Bardon, Leicestershire, which is our largest and most sophisticated facility, capable of delivering 3,200 closed panel modular homes per year. Together with our facilities in Warrington and Narborough this new factory will help us meet the ambitious target we have set. We have a dedicated Chief Executive of Manufacturing and Operations to ensure consistent processes and quality control across this part of our business. For more information about our factories, please see page 42.
		40% less embodied carbon in our factory-built timber frame homes by 2025	30% less embodied carbon achieved				In 2020, we undertook a carbon lifecycle assessment to understand and compare the embodied carbon levels of our modular timber frame home against traditional brick and block construction. It concluded that the embodied carbon levels were 30% lower in the materials used to build our modular timber frame home.
		31% less CO <sub>2</sub> emissions from our homes (in use) by 2022 and 75% less emissions by 2025	N/A				This is a brand new target set in October 2021 with the launch of our net zero strategy. We will report progress in the next financial year. For more information about our net zero strategy, please see page 26.
		Reduce construction waste intensity by 20% by 2025 <sup>1</sup>	39.0% increase in site waste intensity				Reducing the volume of waste created from our site remains a key focus for us and is a key discussion topic at monthly Board meetings. In 2022, we are rolling out Site Waste Management Plans for all new development sites as well as launching a Task and Finish group. For more information on our Task and Finish groups, please see page 25.
		Maintain at least 98% of waste diverted from landfill on construction sites and from manufacturing	99.5% diverted from our construction sites 99.4% diverted from manufacturing				Effective waste segregation is key to meeting this target each year. As part of our site audits, waste management is reviewed with any observations or non-compliances discussed with site teams and action plans put in place to remedy ongoing issues. To find out more about waste, please see pages 40 and 41.
		Reduce absolute Scope 1 and 2 emissions by 42% by 2030 <sup>2</sup>	15.2% increase in absolute emissions	Normalised Scope 1 and 2 emissions (by £m revenue and by employee)	5.25 tCO <sub>2</sub> e/employee 7.03 tCO <sub>2</sub> e/£m revenue		Our year-on-year comparisons have undoubtedly been influenced by the Covid-19 pandemic and improving the scope and quality of our disclosures has contributed to an increased carbon footprint this year. Reporting is an iterative journey for Countryside, and we are working hard to ensure that we put in place the right mechanisms to affect change, not just tick a box.

1. In 2019, the total waste produced on our construction sites was 6.90 tonnes per 100m<sup>2</sup> built. This is our baseline year.

2. In 2020, our absolute Scope 1 and 2 emissions were 9,316 tCO<sub>2</sub>e. This is our baseline year.


Our targets and performance continued

Pillar	Commitment	Target	2021 outcome	Secondary measures	2021 results	Commentary	
 <p><b>Built to Last</b> continued</p>	<p><b>Build efficiently</b> continued</p>	Reduce Scope 3 emissions by 52% per m <sup>2</sup> by 2030 <sup>3</sup>	1,841.6%			In 2021, we significantly improved the data we capture for our Scope 3 emissions. Where our 2020 Scope 3 data only related to transmission and distribution losses, the 2021 Scope 3 data includes Well to Tank, emissions from waste and water and some business travel. These additions account for the significant increase in our emissions this year. For more information on our carbon footprint, please see pages 40 and 41.	
		80% less CO <sub>2</sub> emissions from directly hired plant and generators on site by 2023	2.5% reduction			In 2020, our baseline year, 4,130 tCO <sub>2</sub> e were emitted by our directly hired plant and generators on site. We piloted the use of hydrotreated vegetable oil (“HVO”) as a low-carbon alternative to diesel in 2021, which helped to reduce our emissions by 104 tCO <sub>2</sub> e. To find out more about our HVO trial, please see page 39.	
	<p><b>Build with pride</b></p>	Maintain 5* customer satisfaction rating per year	5*				We have again been awarded five-star builder status by the HBF. This rating is underpinned by our build quality score, which is measured independently by the NHBC at key stages during the construction process. To find out more about our commitment to excellent customer service, please see page 42.
		1,000 homes to undergo a Building Performance Evaluation <sup>4</sup> (BPE) by 2025	N/A				This is a brand new target set in the launch of our approach in May 2021. We will report progress in the next financial year.
		Achieve water efficiency of at least 105 litres/person/day or lower by 2025	N/A				This is a brand new target set in the launch of our approach in May 2021. We will report progress in the next financial year.
		Achieve NHBC Construction Quality Review scores of at least 4 per year	4.23				Our average Construction Quality Review (“CQR”) score increased in the year from 4.13 in 2020. We ran a series of workshops with the NHBC in April 2021 to explore the root causes for build quality issues highlighted by past CQR results, which were well attended. To find out more about our construction quality management programme, please see page 42.
Achieve 20% better than industry peer group on NHBC Reportable Items per inspection	22% higher than the industry average					Our average NHBC Reportable Items rate was 0.28 in 2021. We measure our Reportable Items (“RIs”) over a 12-month rolling period. In response to the Covid-19 pandemic our build volumes reduced in 2020, especially through April to September. In returning to increased monthly volumes this year, several regions’ RI rates increased. We have conducted a Group-wide build quality audit in response, with recommendations and action plans in place with these regions to reduce their RI rates over the next 12 months.	


3. In 2020, our normalised Scope 3 emissions were 151.0 tCO<sub>2</sub>e. This is our baseline year.

4. BPE is a form of Post-Occupancy Evaluation (POE) that is used to assess a building’s energy performance and occupant comfort, allowing for comparisons with design targets.

Our targets and performance continued

Pillar	Commitment	Target	2021 outcome	Secondary measures	2021 results	Commentary	
 <p><b>Sustainable Communities</b></p>	Community embrace	Generate 30% in social value across Countryside annually from 2021 (based on adjusted revenue)	15.9%	Total donations made to local charities, including the Communities Fund, in the year	£697,833.78	<p>This is the first year that Countryside is reporting its total social value contribution for the year. To find out more about what is included in this figure, please see page 44.</p> <p>Our adjusted revenue has increased by 54% in the year, which explains the lower than expected total % of social value.</p> <p>Over the next several years, we will be implementing Group-wide processes to enhance the way in which we develop social value strategies for the developments we deliver in order to achieve our target of 30% in addition to making better use of our Communities Fund.</p>	
		Undertake three Post-Occupancy Evaluations ("POE") per year to ensure a cycle of continual learning and development from 2022	1 POE undertaken			<p>This is a brand new target set in the launch of our approach in May 2021. This POE took place at our Beaulieu development in Chelmsford, Essex. To find out more, please read page 45.</p>	
	Nature-rich and healthy space	Achieve a net biodiversity gain of at least 10% across our developments by 2025	N/A		% of developments with a Biodiversity Action Plan in place	44.0%	<p>This is a brand new target set in the launch of our approach in May 2021. We will report progress in the next financial year.</p>
		Plant 250,000 trees across our developments by 2025	5,718 trees planted in the year				<p>This target was only set in May 2021 when we launched our approach to sustainability. As part of a wider biodiversity strategy being set across Countryside, we will significantly increase the number of trees we plant.</p>
		More than 10,000 homes to have access to electric vehicle charging facilities by 2025	N/A		% of developments with 1km of public transport	96.0%	<p>This is a brand new target set in the launch of our approach in May 2021. For the past two years, we have been gathering data for electrical vehicle charging at a development level. In FY21, we put in EV charging facilities at 35% of our developments. In future years, we will gather and report at a plot level.</p>
	Affordable and thriving place	Build at least 15,000 affordable homes by 2025	2,107 affordable homes delivered in the year				<p>39% of the homes we delivered this year were affordable. This is a strong demonstration of Countryside's commitment to creating tenure-blind developments and to seeking collaborative partnerships with housing associations to bring the right mix of homes to local communities.</p>
		Develop local job training and employment support plans across Countryside by 2025	N/A		Total number of working days completed by supply chain employees local to the site	186,061 working days	<p>Developing employment support plans is a brand new target set in the launch of our approach in May 2021. We will report progress in the next financial year.</p>

Our targets and performance continued

Pillar	Commitment	Target	2021 outcome	Secondary measures	2021 results	Commentary
	Develop, grow and thrive	5% of our workforce in apprenticeship trainee and graduate roles per year from 2022	7.0%			We have around 100 apprentices throughout the Group, two-thirds of whom are employed directly and one-third through third parties. Our graduate programme continues to attract high-calibre candidates. We currently have 32 in our programmes, versus 24 in 2020.
		Maintain an employee turnover rate of ≤15% per year from 2022	19.7%	% of employees who were promoted in the year	11.0%	In the last five years, we have more than trebled our employee numbers and now have just over 2,100 people working for us (at year end). Our aim is to offer internal movement and progression as much as we can, together with a healthy balance of new recruits. While we are disappointed to have not achieved our target for the year, we believe that our programmes for development, promotion and wellbeing will help to reduce this rate over time. For more information, please see our Thriving Together section on page 48.
		Provide, on average, three days of training and development per employee per year from 2022	N/A	% of employees who completed a Professional Development Review in the year	N/A	Countryside offers a wide variety of training and development opportunities for employees. Our e-learning platform, SID, was launched in 2021. 92.5% of users logged in to the system in the year to view content or complete training. 52,965 content views were logged. 60 employees participated in our leadership training programmes and a further 37 employees received coaching. For more details on training and development, see page 48.
		Provide, on average, one day of sustainability training per employee per year from 2022	0.03 days			This is a brand new target set in the launch of our approach in May 2021. We are developing a range of training videos as well as a training matrix to support employees in enhancing their knowledge about sustainability in the built environment. For more information, please see page 48.
	Happy, healthy and engaged	Ensure at least one Mental Health First Aider on every site per year from 2022	52 Mental Health First Aiders are site-based	Total number of newly trained employees as Mental Health First Aiders	59	We now have 112 Mental Health First Aiders working across Countryside, up from 70 in 2020. We are continuing to invest in supporting our employees' wellbeing through a number of initiatives. Please see page 48 for more details.
				Total number of offices and factories with Mental Health First Aiders	10 out of 13 offices 2 out of 3 factories	
	Inclusive, diverse and fair	Achieve the Living Wage Foundation accreditation	N/A	% of Countryside employees who are paid the Living Wage Foundation rate in the year	N/A	This is a new target announced in May 2021 with the launch of our approach to sustainability. We will report progress in the next financial year.



# 3 GOVERNANCE AND RISKS

Our materiality framework

# Focusing on what is material to us

Addressing our material issues and creating positive impact are at the core of our approach to sustainability. This is why the Sustainability Committee's first meeting each year is designated to reviewing and discussing material issues. Chaired by a Non-Executive Board Director, the Committee is attended by senior members of Countryside, including the Executive Committee. To find out more about this Committee, please see page 25.

The corporate risk assessment process further informs our annual materiality assessment. This includes the risks and opportunities identified by our Risk Management Committee, Investment Committee, Executive Committee and Health, Safety, Environment and Quality Committee.

We actively engage with a range of key stakeholders, including customers, local communities, supply chain partners, policymakers and investors to help inform the view of our material issues and ensure that they accurately reflect the landscape in which we operate. Please see pages 33 to 36 for more details on our stakeholder engagement.

### Our materiality assessment

The breadth of our engagement, as well as geo-political and macro-economic factors, has resulted in several material issues increasing in importance this year. The effects of the global pandemic are still being felt with significant shortages in materials and challenging international logistics, while labour shortages on site are becoming increasingly challenging post-Brexit. Impending changes to UK Building Regulation (Part L and Part F) and the introduction of the Future Homes Standard will require significant investment and collaboration across the industry, as well as raise questions around how to support our customers in adapting to new technologies in their homes.




With the UN Climate Change Conference and the recent report by the International Panel for Climate Change, we have heard increasing concerns being voiced by stakeholders and investors. See pages 29 to 32 to see how we are addressing and responding to climate change risks and opportunities, including requirements of the Task Force on Climate-Related Financial Disclosures.

“Addressing our material issues and creating positive impact are at the core of our approach to sustainability.”

**COLLABORATING TO SUCCEED**

We have joined several industry networks to help us respond to our critical sustainability issues. This includes the UK Green Building Council and the HBF Future Homes Task Force, both of which are working across the built environment to address climate change, biodiversity and more. We have also become partners in the Supply Chain Sustainability School to help upskill our supply chain for the challenges ahead.

Our materiality framework continued

Material issues	Level of importance	Movement	Built to Last 	Sustainable Communities 	Thriving Together 
Availability and affordability of housing	Very high	↔	●	●	
Health, safety and well-being; Covid-19		↔	●	●	●
Skilled labour force & being a good employer		↔	●		●
Financial stability and good governance		↔	●	●	●
Legal and regulatory compliance		↑	●	●	●
Responding to climate change		↑	●	●	
Effective partnerships and supply chain; innovation	High	NEW	●	●	●
Placemaking & community development		↔		●	
Increasing biodiversity & wildlife		↔		●	
Resource efficiency and waste		↔	●		
Sustainable and stable procurement of materials and labour		↑	●		
Infrastructure and sustainable transport	Moderate to high	↔		●	
Reputation, product quality and customer care		↑	●		

UN Sustainable Development Goals aligned to our material issues and approach to sustainability.



Our risk management framework

# How we manage risk

At a corporate level, the Board is responsible for managing the key sustainability risks that may impact business strategy. Oversight is delegated to the Executive Committee. On a day-to-day basis, Group-level sustainability risks are overseen and managed by the Group Sustainability Director and his team.

Environmental and quality risks are discussed at the quarterly Health, Safety, Environment and Quality Committee meeting. The Committee will develop risk management and improvement strategies as required and monitor progress.

A robust planning process helps us to identify risks and opportunities for each development early on. These are then fed into our masterplan and technical designs, as well as communicated to the construction teams using our pre-start processes and procedures. Any risks we identify are managed during project development and construction by trained employees and monitored by both our Health and Safety team and our sustainability team through inspections and audits.

During 2021, the sustainability team conducted 30 site audits. The majority of issues related to document control and management of externally provided products, processes and services. As a result, the sustainability team has concentrated on increasing site teams' awareness and role in managing these risks, as well as improving oversight of the internal environmental and quality audit process to ensure recommendations are actioned in a timely manner. To further support site teams, new training and support materials will be developed over the course of 2022, including a review and refinement of the Construction Phase Environmental Management Plan.

The CITB Site Environmental Awareness Training Scheme is mandatory for construction teams to help better equip them to identify and manage environmental risks on site. 120 people have been trained to date. We offer the CITB Director's Role for Health and Safety training course to our senior management. Since launching the course, 99 people have been trained.





We also have an online Environmental Awareness training module that is mandatory for all new starters to the business. In 2021, we had a 93% completion rate.

	HEALTH AND SAFETY	QUALITY	ENVIRONMENT
<b>Group</b>	Corporate risk register		
	Legislation register		Sustainability and climate change register Sustainability legal register
<b>Offices</b>	Office-based risk assessment		Office environmental and climate change risk register
	Contractor risk assessments, COSHH assessments and method statements		
	Fire risk assessments		
<b>Land acquisition</b>	Land acquisition pack and checklist		
	Soil surveys Flood risk assessments		
			Ecological surveys
<b>Pre-start</b>	Design risk assessment		
	Start on-site packs and checklists		
<b>Site</b>	Site assessment of risks		
	Fire risk assessment		Site-specific environmental and climate change risk register
	Site health and safety risk assessments		Construction Phase Environmental Plan
	Subcontractor health and safety, and environmental risk assessments, COSHH assessments and method statements		
<b>Post-completion</b>	Customer services health and safety risk assessments, COSHH assessments and method statements		
<b>CONTROLS</b>			
Internal audit, third-party audit, management review, checklists, meetings and surveys			





**Our principal sustainability risks**

In 2021, a new Group Sustainability and climate change risk register was developed. Where our previous Aspects and impacts register outlined every major activity we did that could affect the environment positively or negatively, the new register focuses on the principal sustainability risks to the organisation and the mitigating actions required. This enables better and more focused decision making by senior management as well as strong integration with the business strategy and the Group's risk management framework. The result has been for the Board to include climate change as a principal risk in the corporate risk register for the first time this year.





The Sustainability and climate change risk register is reviewed quarterly by the Risk Management Committee.

Risks and impacts	Monitoring and management of risks	Link to sustainability approach
<p><b>1. Failure to adequately recognise and prepare for the impacts of climate change on our operations and value chain</b></p>	<ul style="list-style-type: none"> <li>→ We have a net zero strategy in place with a comprehensive spread of actions covering operations and central support activities.</li> <li>→ Countryside has made significant investments and preparations to meet impending Building Regulation updates including the 2021 Part L uplifts and the Future Homes Standard.</li> <li>→ Group-level targets are cascaded down and addressed at monthly regional board meetings and business function forums (e.g. Group Technical forum).</li> <li>→ Senior Countryside employees sit on the HBF Future Homes Task Force.</li> </ul>	 <p><b>Risk change</b></p> 
<p><b>2. Failure to fully implement and achieve our sustainability targets leading to stakeholder and employee dissatisfaction, unsuccessful tender bids and reputational damage</b></p>	<ul style="list-style-type: none"> <li>→ Sustainability Committee, chaired by Non-Executive Board Director, monitors progress in attaining targets and embedding work programmes.</li> <li>→ Sustainability governance and risk management framework to ensure senior-level engagement and awareness of sustainability approach and progress.</li> <li>→ Use of pre-existing business function forums and new Task and Finish groups to develop and embed new sustainability initiatives.</li> <li>→ Regular reporting internally and externally, including monthly attendance of regional board meetings by senior members of the sustainability team.</li> <li>→ Group-wide sustainability training programme being developed to foster the skills and knowledge necessary.</li> </ul>	 <p><b>Risk change</b></p> 





Our principal sustainability risks continued

Risks and impacts	Monitoring and management of risks	Link to sustainability approach
<p><b>3. Failure to adequately implement and comply with environmental legislation and regulation, leading to environmental damage or fines and reputational damage</b></p>	<ul style="list-style-type: none"> <li>→ We have a certified environmental management system (ISO 14001:2015) and conduct internal audits to ensure control, compliance and continuous improvement.</li> <li>→ We maintain a legal register to ensure we are aware of, and prepare for, environmental legislative changes.</li> <li>→ We monitor the development of government policy and regulations and put in place responsive programmes and procedures.</li> <li>→ Pre-construction surveys are completed to highlight risks, and external consultants engaged to assess compliance obligations and mitigation activities.</li> <li>→ We work with the industry through the HBF, UKGBC and other forums to shape and share industry best practice.</li> </ul>	 <p><b>Risk change</b></p> 
<p><b>4. Perceived inability to meet partner and local authorities' evolving sustainability requirements and expectations, leading to dissatisfaction, loss of future business or fines</b></p>	<ul style="list-style-type: none"> <li>→ We use a variety of stakeholder engagement methods to foster open and productive communication with our partners, housing associations, local authorities and government.</li> <li>→ We work actively with our public relations and communications teams to talk about our sustainability efforts and progress, as well as participate in numerous benchmarks.</li> <li>→ We are improving our data capture and reporting to further enhance the transparency and measurement of our sustainability performance by our partners and stakeholders.</li> <li>→ We are developing role-specific sustainability training for our people to ensure they have the skills and knowledge needed to ensure our sustainability commitments are met.</li> </ul>	 <p><b>Risk change</b></p> 
<p><b>5. Failure to support customers in adapting to new heating (or other) technologies in their homes, resulting in customer dissatisfaction</b></p>	<ul style="list-style-type: none"> <li>→ We give home demonstrations to our customers to explain how to operate their homes in an efficient manner, as well as provide written documentation.</li> <li>→ Sales and marketing teams are briefed on the development-specific sustainability issues to ensure they communicate these clearly to customers and manage expectations.</li> <li>→ We will be developing a set of online videos for customers to support a more sustainable, and low-carbon, lifestyle. This will include information about how to best use new heating technology installed in the home.</li> </ul>	 <p><b>Risk change</b></p> 

Our principal sustainability risks continued

Risks and impacts	Monitoring and management of risks	Link to sustainability approach
<p><b>6. Failure to maximise the opportunities that modern methods of construction (“MMC”) and the factories create to address the industry’s skills shortage and our net zero ambitions</b></p>	<ul style="list-style-type: none"> <li>→ Our Partnerships model embraces MMC and the shift to using our own factories.</li> <li>→ A series of webinars and communication materials about our net zero strategy has been developed to enhance employees’ awareness and understanding of our route to net zero and the part that MMC will play.</li> <li>→ A follow-up embodied carbon assessment of our modular panel frames will take place to further understand and highlight the benefits of MMC.</li> <li>→ Attendance at manufacturing board meetings by senior members of the sustainability team ensures that sustainability remains on the agenda.</li> <li>→ In alignment with the Homes England pre-manufactured value (“PMV”) guidance, we intend to deliver more affordable homes delivered through our timber frame manufacturing facilities.</li> </ul>	 <p><b>Risk change</b></p> 
<p><b>7. Failure to effectively implement a Group-wide biodiversity strategy, leading to environmental damage and species loss, fines and local opposition to development</b></p>	<ul style="list-style-type: none"> <li>→ We work with ecologists and landscape architects to ensure that wildlife and nature are protected and enhanced. This includes conducting pre-construction surveys on all developments to highlight risks and to mitigate any impacts from construction, such as tree protection, translocation of species, etc.</li> <li>→ We are putting in place a cross-functional Task and Finish group to develop and implement a Group wide set of procedures to meet the Net Biodiversity Gain requirements within the Environment Act, as well as reporting mechanisms to respond to the Taskforce on Nature-related Financial Disclosures in the future.</li> <li>→ Training on biodiversity and ecology is available to employees and supply chain partners through the Supply Chain Sustainability School. A toolbox talk on biodiversity is delivered by site managers to staff and contractors as part of the yearly environmental training schedule.</li> </ul>	 <p><b>Risk change</b></p> 

Our principal sustainability risks *continued*

Risks and impacts	Monitoring and management of risks	Link to sustainability approach
<p><b>8. Failure of supply chain to provide materials, service and support to meet Countryside's sustainability ambitions and/or that adhere to our sustainability policy requirements, resulting in a negative environmental or social impact</b></p>	<ul style="list-style-type: none"> <li>→ We use a robust pre-qualification process to assess our supply chain's ability to adhere to our policies as well as their ability to support us to achieve our sustainability targets.</li> <li>→ We are a member of the Supply Chain Sustainability School, which offers free training to our supply chain in 17 critical areas of sustainability in the built environment. We have set a target for 85% of our supply chain being signed up to the School by 2025. This will help us to upskill our supply chain, improve their ability to respond to our requirements and increase their capability to innovate.</li> <li>→ We aim to provide advanced work plans for our supply chain to drive investment into innovation.</li> <li>→ We participate in the HBF Future Homes Task Force, which provides an additional forum to engage with supply chain partners in the industry's drive towards net zero.</li> </ul>	 <p><b>Risk change</b></p> 
<p><b>9. Inability to fulfil corporate requirements and expectations around environmental and social disclosure requests, leading to loss of investor confidence</b></p>	<ul style="list-style-type: none"> <li>→ We conduct an annual review of key sustainability benchmark requirements to ensure our data capture and reporting are aligned with investor expectations and to make our disclosures more transparent and accurate.</li> <li>→ We regularly engage with our investors through one-on-one meetings or presentations to understand their requirements and ambitions.</li> </ul>	 <p><b>Risk change</b></p> 

Our governance framework

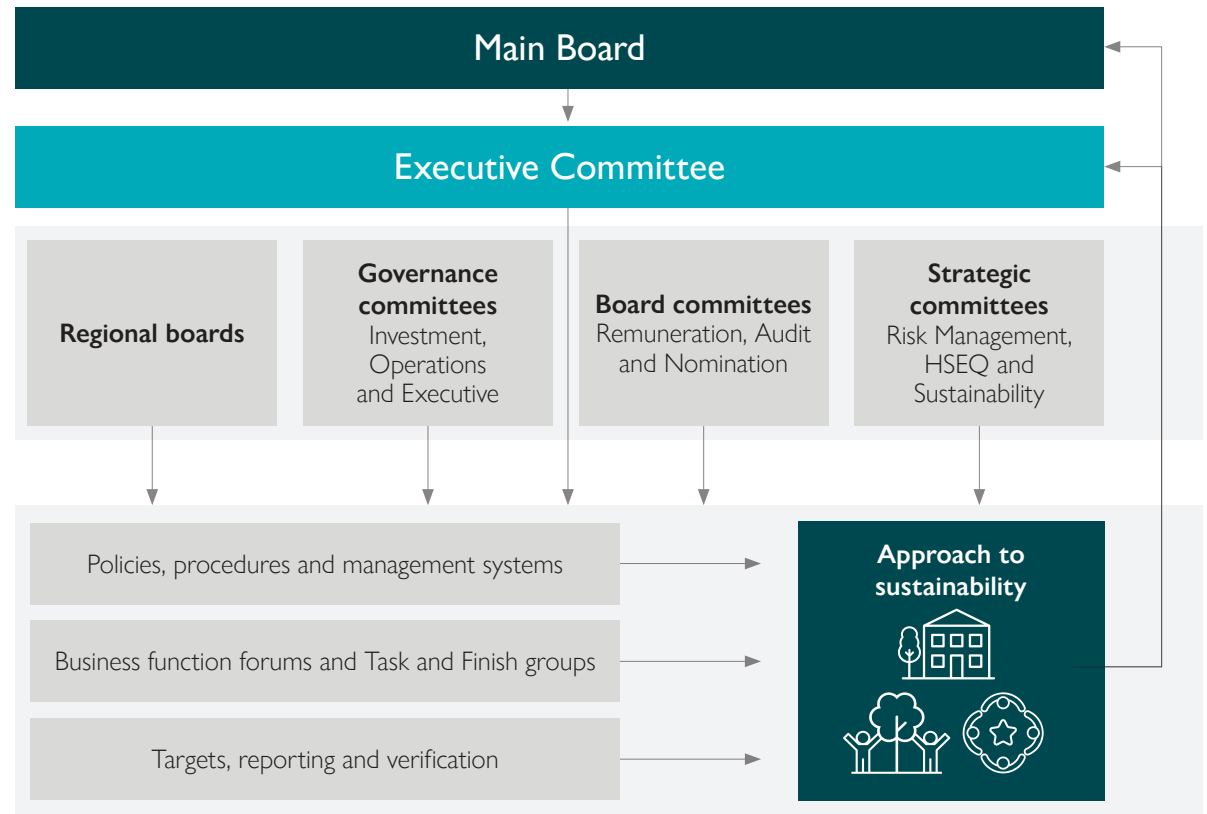
# A clear structure of roles and responsibilities

A robust and responsive governance framework is key to furthering our commitment to sustainability.

The Main Board is responsible for setting the overall direction and ambition of Countryside, as well as safeguarding the long-term success of the business, which extends to our approach to sustainability. Responsibility is delegated to the Executive Committee. For more information on the corporate governance framework, please see pages 76 to 78 in the 2021 Annual Report and Accounts.

Day-to-day responsibility of sustainability is led by the Group Sustainability Director, reporting to a member of the Executive Committee, and supported by the sustainability team. Dedicated committees and a collection of policies, procedures and management systems support good governance, while our sustainability targets, reporting and verification drive continuous improvement.

## Sustainability governance framework



## Our governance framework continued

### Sustainability Committee

Countryside formed the Sustainability Committee in 2021, replacing the Social Value and Sustainability Committee. The Sustainability Committee is responsible for ensuring that material sustainability issues are being addressed through our approach to sustainability and to monitor performance against our targets. Three meetings are held in the year, with each meeting addressing a different area of its responsibilities. It is led by a Non-Executive Director of the Board, and attended by senior representatives from across the organisation, including members of the Executive Committee. In his role as Chair of the Sustainability Committee, our Non-Executive Director acts as a direct link between the Committee and the Board in the delivery of the sustainability programme.

The Health, Safety, Environment and Quality Committee also plays a central role in sustainability governance, primarily supporting delivery of the Built to Last pillar of our sustainability approach through its focus on managing health and safety strategy and performance, including site-specific environmental and quality risks.

In 2022, as part of our continued drive to establish sustainability as business as usual, the terms of reference for other governance committees, such as Investment and Audit, are being revised to incorporate areas of responsibility for sustainability.

### Pillar sponsors

Each of the three pillars of our sustainability approach is sponsored by a member of the Executive Committee. The aim is to drive wider responsibility for sustainability across senior leadership and the business. In their role, sponsors advise and support the sustainability team and act as the advocate for their pillar in their committees. All three sponsors will join the Sustainability Committee from 2022.

### Our management systems

Our policies, procedures and management systems underpin our sustainability approach and performance. In 2021 we maintained our certification to international standards:

- ISO 14001:2015 Environmental Management;
- ISO 45001:2018 Occupational Health and Safety Management; and
- ISO 9001:2015 Quality Management.

In 2022 we will be extending our ISO 14001 and ISO 9001 certifications to new regional businesses, including Western, Southern and Northern Home Counties, the Chilterns and South West. ISO 45001 will be extended to Western Home Counties, Chilterns, South West and all three manufacturing facilities.

No enforcement undertakings or prosecutions have been received by Countryside for breaches of environmental legislation within the financial year.

### Embedding our approach to sustainability in the day-to-day

Our policies, procedures and management systems play an important role in helping the business to manage sustainability risks and opportunities. But for sustainability to truly be at the heart of our developments and day-to-day business activities, it needs to be threaded within the existing Countryside operating structure and decision-making, not something apart.

### Regional board meetings

To do this, we are taking a number of important steps. First, in 2021, the senior members of the sustainability team began attending monthly regional board meetings. The focus is on discussing the key risks, opportunities and impacts for sustainability, in addition to providing environmental and social data.

### Business function forums

Second, we are embedding responsibility for key aspects of our sustainability approach into the pre-existing business function forums. The forums will play an important role in helping to incorporate new programmes or procedures into the different functions' decision-making. From 2022, the sustainability team will attend each forum, bringing proposals, data analysis and challenges that need tackling.

### Task and Finish groups

There are some sustainability issues that impact more than one function in the business, such as waste reduction. No one team is responsible for minimising waste; it is an issue that can be affected by decisions made by many disciplines. Where such a sustainability issue exists, Task and Finish groups will be set up. These groups will include people from across Countryside, whose role will be to develop and test new initiatives, ultimately helping to embed the right solutions within their disciplines. In 2022, we will establish two Task and Finish groups, one to address Post-Occupancy Evaluation and one to address Future Homes and innovation.

Climate change

# Zeroing in on climate change



For more information about our net zero strategy, please see our report Pathfinder: Marking out the Route to Net Zero.

[bit.ly/36sDnwF](https://bit.ly/36sDnwF)

When the Intergovernmental Panel on Climate Change published its report in August 2021, there was no mistaking the stark warning. In the simplest terms, time is running out to minimise the catastrophic impacts of climate change and rising global temperatures. As the headlines read: it's code red for humanity and for the planet.

In November 2021, we published our net zero strategy. It sets out the principles that Countryside will follow to respond to the global call to action to tackle the climate emergency. Our target is to be net zero by 2030, which is consistent with the 2015 Paris Agreement that set reductions required to keep global warming to 1.5°C. It provides our people and partners with a clear pathway to achieving our goals. It also outlines, for the first time, our science-based targets, which have been verified by the Science-Based Targets initiative.

We have also joined the Race to Zero and committed to the Business Ambition for 1.5°C campaign.

## OUR SCIENCE-BASED TARGETS

Reduce our absolute Scope 1 and 2 GHG emissions by

# 42%

by 2030

Reduce our Scope 3 GHG emissions by

# 52%

per square metre of housing completed by 2030

## Our net zero strategy is knitted together by three tenets:

# 1

### The need to modernise construction

Solving the greatest challenge of our lifetime will require us to innovate for a brighter low-carbon future.

We need to transform the ways in which we conceive, plan and build our new homes and communities if we are going to make them and us truly net zero. This is no small task. It will require serious innovation and significant investment.

# 2

### The value of strong partnerships

Partnership and collaboration will support Countryside to create a shared sense of urgency and to embed the framework necessary to effectively transition to net zero.

Partnerships are the cornerstone of Countryside's business model; this is fundamentally different to others in our industry. We want to leverage this model to drive significant progress by finding the common challenges and mutually beneficial net zero opportunities and working together to address them.

# 3

### A fair and responsible approach that leaves no one behind

It is critical that we support a just transition to net zero.

Everyone will benefit from living in a low-carbon society, although the journey to net zero will impact us all socially and environmentally. Nearly 350,000 new roles are required in the construction sector to achieve net zero.

We must make sure disadvantaged householders are not adversely affected by rising energy prices and other potential by-products of the green transition.

As a business that works closely with housing associations and other key partners to create affordable homes, we are committed to ensuring that our pathway to net zero is fair for everyone.



**OUR ONLY FUTURE**

Climate change continued

# Our path to a net zero future



For more information about our net zero strategy, please see our report Pathfinder: Marking out the Route to Net Zero.

[bit.ly/36sDnwF](https://bit.ly/36sDnwF)


## Innovative, collaborative, fair and just


The work behind developing a trajectory which takes Countryside to net zero by 2030 has been thorough and intense, but this is only the start.

To achieve our science-based targets we will need to not only examine our construction and manufacturing operations, but also the design of our homes and developments to ensure they become part of the solution rather than the problem.


Working towards a just transition to net zero by 2030 underlines the strength of our ambitions to create places where people love to live, with sustainable communities built to last.


### Direction

 **31%** less CO<sub>2</sub> emissions through improved fabric efficiency, renewable energy and heat recovery systems by 2022

 **80%** less CO<sub>2</sub> emissions by switching from diesel to hydrotreated vegetable oil in directly hired plant and generators on site by 2023

### Delivery


 **75%** less CO<sub>2</sub> emissions through improved fabric efficiency, renewable heat and energy by 2025

 **60%** of suppliers to Countryside, based on spend, have also set science-based targets by 2025

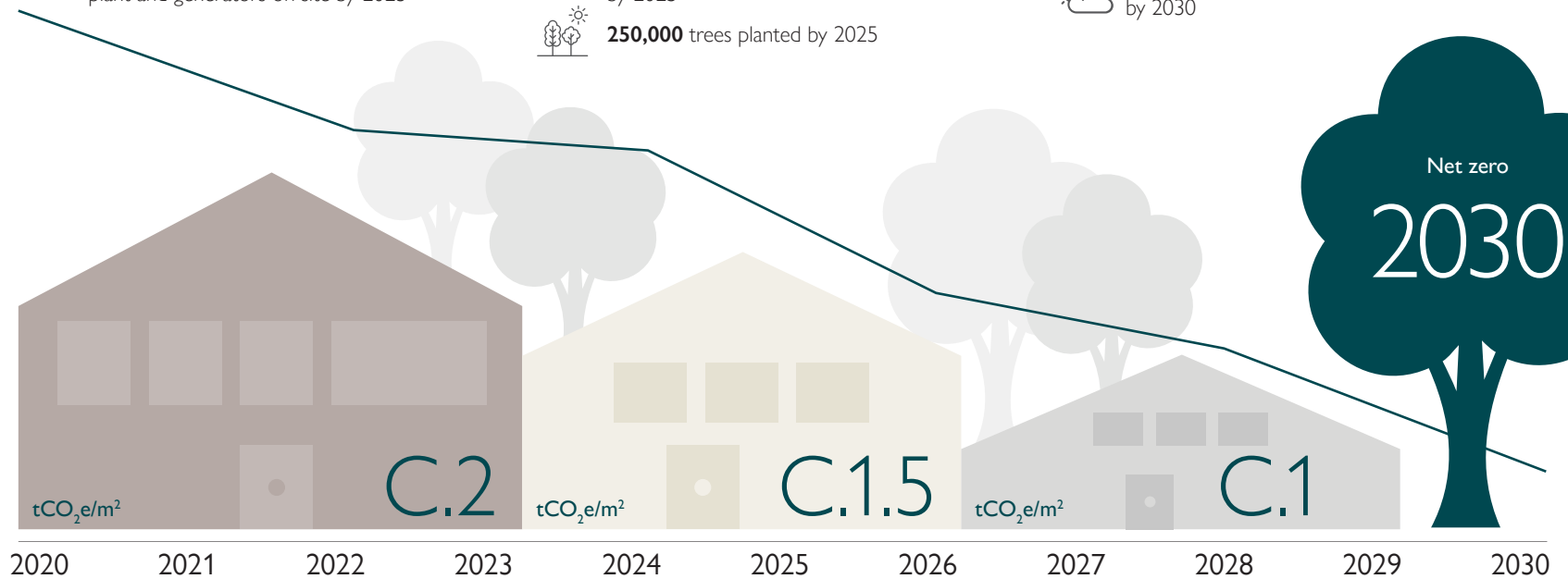
 **250,000** trees planted by 2025

### Determination

 **40%** less embodied carbon within our timber frame homes by 2025

 **42%** absolute reduction in Scope 1 and 2 GHG emissions by 2030

 **52%** per m<sup>2</sup> Scope 3 GHG emissions reduction by 2030



Climate change continued

“Addressing climate change is a key priority for Chelmsford City Council demonstrated by our declaration of an environmental and ecological emergency. It is critical that new homes are built to the highest environmental standards and we hope that this exciting and innovative project will allow us to demonstrate how net zero carbon ready homes can be considered the norm in all new developments.”

**Cllr Stephen Robinson**  
Leader of Chelmsford City Council

“The proposed garden communities supported by Homes England provide an ideal opportunity to showcase how net zero carbon ready developments can be implemented at scale. The proposals at Chelmsford Garden Community are particularly exciting as the focus is on a volume housebuilder on a large development zone and the learning from this project is hoped to be transferable to many similar developments across the country.”

**Fionnuala Lennon**  
Head of Garden Communities, Homes England

**Building our first net zero carbon ready homes at Beaulieu**

The vision for Beaulieu has always been to create a vibrant and integrated community in the city of Chelmsford that exemplifies excellence in design and sustainability. We are continuing that vision by delivering our first 80 net zero carbon ready homes at the development.

Chelmsford City Council and Homes England are working in partnership with Countryside to deliver these 80 homes by helping to fund some of the initial research required to deliver net zero carbon ready homes ahead of the Future Homes Standard in 2025. Countryside has committed to sharing the learning it takes from building these homes to help inform future zones at the Garden Community and other developments.

Beaulieu is among the first neighbourhoods being built as part of Chelmsford Garden Community with over 1,500 homes already completed. The Council's newly adopted local plan allocates further land to the Garden Community, meaning it will provide more than 10,000 new homes to the area when complete, along with a new mainline rail station and bypass, which is being funded by the Housing Infrastructure Fund.

Countryside has already started work to prepare a detailed planning application for the 80 net zero carbon ready homes at Beaulieu. We hope to submit it in late 2021 with construction completed in late 2023.

In 2018, Beaulieu won the National Planning Award for Infrastructure Planning and features as an exemplar scheme in both the National Design Guide and the Transportation Decarbonisation Plan.

**80**  
net zero carbon ready  
homes complete in late 2023



## Task Force on Climate-Related Financial Disclosures

# Much more than ticking boxes

We recognise the importance and value of better transparency, reporting and data on climate change. Not only will it help us to better understand how effectively our net zero strategy is working, it will allow us to respond more effectively to the increasing expectations from investors and other stakeholders around this issue.

The Task Force on Climate-Related Financial Disclosures (“TCFD”) provides a clear set of recommendations to improve companies’ climate-related disclosures, focusing on risks and opportunities and their potential financial impacts. We are committed to embedding the TCFD framework in our business, but it is an iterative journey. We want to ensure that we put in place the right mechanisms to effect change, not just tick a box.

We have worked hard this year to improve our public disclosures about climate change, particularly the Carbon Disclosure Project (“CDP”) and the TCFD. We held several workshops across the business with key disciplines to help better understand the operational and financial implications of our climate change risks and opportunities. In addition to this, we engaged PricewaterhouseCoopers (“PwC”) to lead a session with the Main Board about these same issues as well as the mandatory TCFD reporting requirements coming into force in 2022. We are proud to report that our CDP score increased to B in 2021 (D in 2020).



Task Force on Climate-Related Financial Disclosures continued

### Governance

**How we currently address recommendations**  
**Robust governance framework in place**

- Group Chief Executive is responsible for sustainability, including climate change.
- Other Executive Committee members sponsor thematic sustainability improvement programmes.
- Sustainability Committee has delegated authority to assess and monitor sustainability; chaired by a Non-Executive Director and attended by other senior leaders.
- Risk Management Committee elevated climate change to a principal risk.

**For more information on our sustainability governance, please see pages 24 and 25.**

**Planned future actions**  
**Enhancing governance**

- The terms of reference for all Governance Committees will be reviewed in 2022 to further embed sustainability and climate change considerations. For example, the Investment Committee will be required to consider climate change in capital allocation decisions.

**Training for Board Directors**

- Following on from the training delivered by PwC to the Board in 2021 about the TCFD, further training on climate change and associated business risks will be carried out early in 2022.

### Strategy

**How we currently address recommendations**  
**Net zero strategy**

- Countryside has published a detailed strategy and science-based targets to become net zero by 2030.

**For more information on this strategy, please see pages 26 and 27.**

**Sustainability approach**

- We launched a brand new approach to sustainability in May 2021 with 25 quantitative targets that align to our business strategy for growth and our partnership model.

**For more information on our approach, please see page 9.**

**Planned future actions**  
**Scenario analysis**

- Countryside will conduct climate-related scenario analysis in 2022.

**Learning pathways**

- Our net zero strategy sets out a series of high-level learning pathways for Countryside business functions.
- We will develop a suite of online training, e-learning and learning pathways around sustainability in the built environment over the next two years.

**Research and development**

- In 2022, we will conduct a second phase embodied carbon assessment of our timber frame construction and manufacturing.



### Risk management

**How we currently address recommendations**  
**Corporate risk management framework**

**For information on our corporate risk management framework, please see pages 36 to 39 in the 2021 Annual Report and Accounts.**

**Sustainability risk management framework**

- Environmental risks, including physical risks from climate change, are overseen and managed by the Health, Safety, Environment and Quality Committee. These are put into action on site by construction teams, with support from regional business functions.
- Specific transitional risks relating to the developments and homes are managed by regional businesses with support from consulting expertise as required.

**For full details on our sustainability risk management framework, please see pages 19 to 23.**

**Planned future actions**  
**Refining our Sustainability and climate change risk register**

- We will refine this risk register to better identify transitional and physical risks of climate change during 2022.
- We will continue to improve our methodology to quantify, in financial terms, the risks and opportunities of climate change.

**Partners' and local authorities' climate change requirements**

- We will engage with housing association partners and local authorities in 2022 to better understand their net zero ambitions and potential synergies with our strategy.

### Metrics and targets

**How we currently address recommendations**  
**Science-based targets**

- We have set science-based targets as part of our net zero strategy.
- Progress will be monitored through our Sustainability Committee and reported annually in our Annual Report and Accounts and the Sustainability Report.

**Embedding sustainability targets in the business**

- We are using pre-existing business function forums to operationalise our sustainability ambitions.
- New cross-functional Task and Finish groups are being established for sustainability issues that affect more than one business area.

**For full details on how we are embedding our targets in the business, please see page 25.**

**Planned future actions**  
**Implement a GHG Scope 3 emission reporting roadmap**

- 98% of Countryside's emissions are Scope 3 emissions. We need to improve data capture and veracity of this data. We will be launching a Scope 3 Value Chain Emission Reporting Roadmap in 2022 to guide us in this work.

**Remuneration and targets**

- In 2022, we will review executive remuneration to introduce targets relating to material sustainability risks, including climate change. Introduction of these is planned for 2023.

Task Force on Climate-Related Financial Disclosures continued

The tables below summarise our top three risks and opportunities related to climate change, including their estimated financial impact to our business. These figures were developed with key departmental leads within the business. For full details on how these estimates were determined, please see our 2021 CDP response.

Transitional risk	Transitional opportunity	Transitional risk	Transitional opportunity	Physical risk	Physical opportunity
<p><b>Emerging building regulations</b></p> <p>In response to the Government's commitment to achieve net zero by 2050, significant changes to the Building Regulation and are coming. These may lead to capital cost increases as well as require internal training for staff in the use of the new renewable heating technologies.</p>	<p><b>Resource efficiency</b></p> <p>In 2020, we spent £4,528,456 on waste disposal from our operations. We have set a Group-wide target to reduce our construction waste by 20% per 100 m<sup>2</sup> built by 2025, which we estimate will also reduce the cost of waste disposal by 5%.</p>	<p><b>Red diesel tax exemption</b></p> <p>Red diesel is responsible for the production of nearly 14 million tCO<sub>2</sub>e a year. The Government will revoke the tax relief for red diesel on 1 April 2022. In FY20 we purchased 1,537,614 litres of red diesel. Once the tax exemption is withdrawn, we would see significant cost increases per year.</p>	<p><b>Use of lower-emission sources of energy</b></p> <p>To help us become net zero by 2030, we must find alternative sources of energy for our construction activities. We have set a target reduction of 80% in CO<sub>2</sub> emissions for our directly hired on-site plant machinery and generators by switching from diesel to hydrotreated vegetable oil by 2023.</p>	<p><b>Changes in weather patterns, precipitation and extreme weather events</b></p> <p>Increasing periods of wet weather will impact our delivery programmes where traditional construction methods are used, while also increasing health and safety risks. Warmer weather is also expected, which could create a serious risk to thermal comfort and health in homes.</p>	<p><b>Modern methods of construction</b></p> <p>Adopting modern methods of construction helps us to build homes at the scale, pace and quality we need, whilst also delivering more sustainable outcomes for the business.</p> <p>Working in a factory setting also helps us to significantly mitigate potential future inclement weather caused by climate change, as well as delivering homes more quickly. The homes are also made watertight more quickly than using a traditional build method, which reduces material damage and waste.</p>
<p><b>Time horizon</b></p> <p>Short term (1–2 years)</p>	<p><b>Time horizon</b></p> <p>Medium term (3–5 years)</p>	<p><b>Time horizon</b></p> <p>Short term (1–2 years)</p>	<p><b>Time horizon</b></p> <p>Short term (1–2 years)</p>	<p><b>Time horizon</b></p> <p>Medium term (3–5 years)</p>	<p><b>Time horizon</b></p> <p>Short term (1–2 years)</p>
<p><b>Estimated financial impact</b></p> <p>£14,336,889</p>	<p><b>Estimated financial impact</b></p> <p>£45,285</p>	<p><b>Estimated financial impact</b></p> <p>£753,430</p>	<p><b>Estimated financial impact</b></p> <p>£645,797</p>	<p><b>Estimated financial impact</b></p> <p>£5,501,200</p>	<p><b>Estimated financial impact</b></p> <p>£14,365,000</p>



# 4 STAKEHOLDER ENGAGEMENT

Stakeholder engagement

# Building sustainable relationships

At Countryside, we strive to forge productive and lasting relationships with our stakeholders to drive our long-term business success.

Engagement with our stakeholders has allowed us to examine where we have most impact as a business and to make sure we focus our efforts in the right areas. The new approach to sustainability is our response to what our stakeholders tell us matters most to them.



Stakeholder engagement continued



Our Built to Last pillar focuses on our operations, so engagement with our supply chain, as well as government, regulatory and industry bodies is critical to help ensure that we build responsibly, efficiently and with pride.

	How we engage	Outcomes
<p><b>Supply chain</b></p> <p>Maintaining a positive relationship with our supply chain is critical to delivering our approach to sustainability, and also fosters a space for innovation. As the requirements for sustainable construction and zero carbon homes intensify, we will need to draw on their expertise to design and build communities built to last.</p>	<ul style="list-style-type: none"> <li>→ We have partnered with the Supply Chain Sustainability School to provide free training to our supply chain in 17 different areas of sustainability</li> <li>→ Subcontractors working on site are included in our toolbox talks and training session</li> <li>→ Our regional buying teams engage with local supply networks to identify opportunities for local material and labour sourcing where possible</li> </ul>	<ul style="list-style-type: none"> <li>→ To date, 71.7% of our supply chain have signed up to the School. It has delivered 517 training hours to our priority suppliers and 94 hours of e-learning have been completed</li> <li>→ We have refined our pre-qualification questionnaires for our supply chain to enhance alignment to our sustainability targets, while simplifying the number of questions to make it a less onerous process for all</li> </ul>
<p><b>Government, regulators and industry bodies</b></p> <p>To ensure our places are built to last, we actively engage with government, regulators and industry bodies. Not only does this ensure we remain legally compliant and prepared for changes to policy, it also provides us with opportunities to participate in important debates and decisions.</p>	<ul style="list-style-type: none"> <li>→ We are an active member of the Home Builders Federation and we have joined its recently launched taskforce to help effectively respond to the Future Homes Standard across the industry</li> <li>→ We became a member of the UKGBC and joined its mission to radically improve the sustainability of the built environment through industry-wide collaboration</li> </ul>	<ul style="list-style-type: none"> <li>→ To help meet the UK Government's target for 300,000 homes a year we are making significant investments into modern methods of construction and we now have three operating timber factories</li> <li>→ To support the UK's 2050 target to be net zero, we have developed our own net zero strategy, which will see our value chain become net zero by 2030</li> </ul>

Stakeholder engagement continued

# Sustainable Communities

At Countryside, we don't just want to build houses; we want to create vibrant and resilient communities. To do that, we must listen to our customers and local communities to understand their needs and aspirations.

	How we engage	Outcomes
<p><b>Customers and communities</b></p> <p>At Countryside, we don't just want to build houses; we want to create vibrant and resilient communities. To do that, we must listen to our customers and local communities to understand their needs and aspirations.</p>	<ul style="list-style-type: none"> <li>→ We engage regularly with local communities and authorities throughout the planning process to ensure our masterplan addresses local needs, including town hall meetings and drop-in sessions</li> <li>→ We create a range of communication media to ensure we reach as many local community members and customers as possible, including development-specific websites, community boards, newsletters and social media</li> <li>→ We offer home buyer demonstrations and "Meet the Builder" on-site sessions for customers</li> </ul>	<ul style="list-style-type: none"> <li>→ We established the £1m Communities Fund to provide support for local community groups and charities</li> <li>→ We launched a detailed internal guide for employees to ensure a consistently high standard for public engagement</li> <li>→ We monitor the social value generated through our work in local communities and have set a target for 30% social value per year from 2021</li> </ul>
<p><b>Partners</b></p> <p>Our reputation for creating places people love means we are a preferred delivery partner for local authorities, housing associations and Private Rented Sector providers. Our business model centres on partnerships and building lasting relationships that will help us to deliver high-quality homes and communities.</p>	<ul style="list-style-type: none"> <li>→ We engage with our partners through one-on-one meetings throughout project development, as well as in developing group-wide initiatives that may impact on them. We seek partners' opinions in our detailed materiality assessment every three to four years</li> <li>→ We use different media, such as webinars, to engage with our partners and wider stakeholders around specific joint initiatives, such as our net zero strategy focus on the just transition</li> </ul>	<ul style="list-style-type: none"> <li>→ Our approach to sustainability includes 31 targets that address the material issues identified by our partners, including build quality, affordable homes provision and biodiversity</li> <li>→ Our net zero strategy is predicated on working collaboratively with our partners to transition to a low-carbon economy</li> <li>→ We are enhancing our data capture on key environmental and social issues to enable better reporting to partners over the next few years</li> </ul>

Stakeholder engagement continued



Our Thriving Together pillar focuses on how best to support our people to deliver on the ambitions and targets of our approach, while also ensuring that we continue to provide a caring work environment where we can grow together, take pride in our efforts and deliver excellence.

	How we engage	Outcomes
<p><b>Investors</b></p> <p>The rise of sustainability in the corporate and political agenda is consistent with the growing interest of our investors. Setting clear targets, presenting transparent data and creating accountability are important for demonstrating to our investors how we identify and manage sustainability risks and opportunities so that we can deliver real and lasting positive impacts.</p>	<ul style="list-style-type: none"> <li>→ A comprehensive investor relations programme facilitates regular engagement throughout the financial year including Quarterly Trading Update</li> <li>→ Active engagement with our investors helped us to understand our material issues and create our sustainability approach</li> <li>→ We ensure our website is updated with clear and accessible information for our investors</li> </ul>	<ul style="list-style-type: none"> <li>→ To help our investors interpret our sustainability performance we participate in several key investor benchmarks, such as FTSE4Good and the Carbon Disclosure Project</li> <li>→ We are undertaking a detailed review of the sustainability data we capture to improve transparency, coverage and robustness</li> <li>→ We published a detailed net zero strategy with science-based targets in response to growing expectations from stakeholders, including investors</li> </ul>
<p><b>Employees</b></p> <p>Our employees are the backbone of our organisation. Without their dedication and passion, we will not achieve the stretching targets we've set for sustainability. We focus on fostering a work environment where people feel included and supported.</p>	<ul style="list-style-type: none"> <li>→ Regional staff engagement groups are in place. These groups act as a voice for employees to the Executive Committee</li> <li>→ We provide regular updates to employees through our intranet site, monthly newsletter and quarterly regional presentation</li> <li>→ We conduct employee engagement surveys and an employee suggestion scheme to provide easy opportunities for employees to voice their opinions</li> </ul>	<ul style="list-style-type: none"> <li>→ Our employees value a good work-life balance, so we have introduced a new flexible working approach across the business</li> <li>→ Our employees told us how health and wellbeing are increasingly important, so we have recruited 59 new Mental Health First Aiders and are rolling out Suicide First Aid training across the business</li> <li>→ To celebrate the hard work of our people we will be launching the Employee Recognition Awards in 2021</li> </ul>



# 5 PERFORMANCE

Our performance



By 2025, our ambition is to efficiently and responsibly build 40,000 new sustainable homes, and to deliver those homes in the right way, the Countryside way.

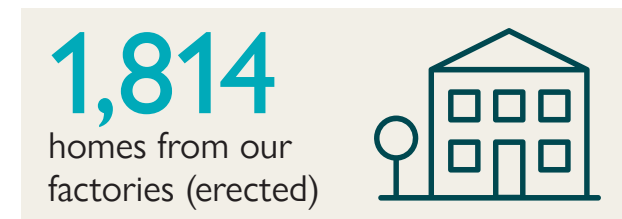
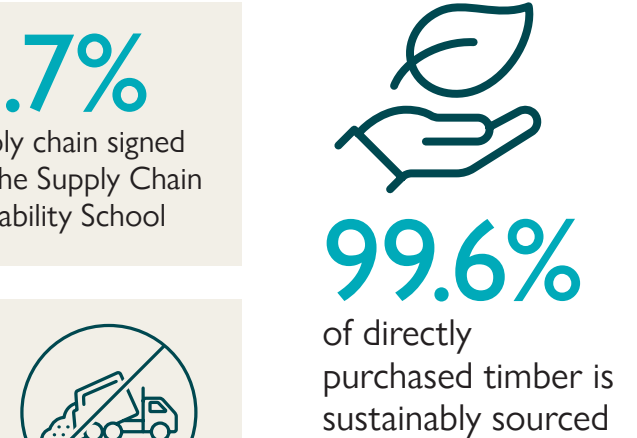
At Countryside, we take pride in everything we do to make places and communities that people love. For us, this means making sure that we plan, design and build spaces and places that are built to last: places that are beautiful, functional, connected and resilient.

Health and safety

Setting high standards for health and safety is a high priority to our business. We continued to implement our stringent Covid-19 plans, which allowed for our workforce to work safely. This included delegated Covid-19 Compliance Officers, temperature checking and additional hygiene and social distancing controls.

Our approach to sustainability sets out a clear intention to continually improve safety performance. Overall, our Annual Injury Incidence Rate ("AIIR") was 163 this year, compared to 224 in 2020. This is 56% better than the Health and Safety Executive national average of 372 (2020: 416). We maintained full accreditation to the international occupational health and safety standard ISO 45001:2018. This standard drives us to continually improve safety performance through an iterative process of risk assessment, inspection, auditing and review.

We are now a registered signatory of the Building a Safer Future Charter. This is an important step in our work to drive a culture of building safety. The charter signifies our commitment to protecting life by putting safety ahead of all other building priorities.



Our performance continued

BRINGING LOW-CARBON FUELS TO SITE



As part of our net zero strategy, we have committed to achieving an 80% reduction in the emissions collectively generated by our on-site plant and machinery. In 2021, we trialled the use of hydrotreated vegetable oil (“HVO”) in our telehandlers, monitoring its performance and carbon emissions. Over a working week, the emissions from the HVO-fuelled telehandler were 21.54 kgCO<sub>2</sub>e, compared to 398.9 kgCO<sub>2</sub>e emitted by the same machine running on diesel. This represents almost a 95% reduction in CO<sub>2</sub>e emissions. Countryside will be rolling out a programme of transition to HVO use across its sites over 2022 and 2023.

**104** tCO<sub>2</sub>e saved from switch to HVO

Innovating for a safer future

Countryside embraces innovation, constantly looking for new ways to make sure our staff, contractors and people visiting our sites remain safe at all times. We were proud to be the first UK developer to roll out artificial intelligence (“AI”) proximity sensors on all telehandlers across our construction sites and factories. The interaction of construction workers and plant is one of the biggest construction sector hazards and this AI system is designed to help to prevent accidental collisions between plant and people.

In addition to the AI sensors, we have invested in biometric technology, which is being rolled out across construction sites, factories and offices. This access control technology uses fingerprint scanning technology to capture a wide range of data, allowing for individual traceability. This technology will contribute to the prevention of unauthorised workers and modern slavery issues in the construction industry.

Upskilling our supply chain

In 2021 we became a partner of the Supply Chain Sustainability School to provide free training and development to our supply chain. Becoming a Partner member of the School demonstrates our commitment for employees and supply chain partners to have the right skills and knowledge to meet the environmental and social challenges ahead. 71.7% of our supply chain have successfully joined the School. We are targeting 85% of supply chain to sign up by 2025.



Procuring sustainable timber

We have seen a steep rise in global demand for building materials, particularly timber. This has been exacerbated by a significant increase globally in the use of timber as a low-carbon alternative for construction. Therefore, it is more important than ever to ensure that the timber we purchase is sustainably sourced and to make sure that we use the timber we purchase efficiently and wisely.

In 2021, 99.6% of the timber we purchased directly from our suppliers was sustainably sourced. Our Sustainable Timber Policy sets out our expectations for supply chain partners to purchase timber through internationally recognised certification schemes.

Our performance continued

Our operations

We have significantly improved the scope and quality of our carbon footprint reporting this year. Going forward, we plan to fully embed our Pathway to Net Zero to ensure that there is a comprehensive “big picture” strategy that addresses decarbonisation across the business, with a specific focus on our Scope 3 emissions.

In 2021, our overall total CO<sub>2</sub>e emissions for Scope 1, 2 and 3 were 13,657 tonnes compared to 9,467 tonnes in 2020. Please see pages 53 to 57 for a detailed breakdown of our emissions.

Our offices

This year we opened two new offices in Bristol and Milton Keynes. We also included our factory at Bardon as an office for the purposes of our footprint calculations as it had not begun production during the year. Our process for capturing and reporting office data has also improved significantly this year, with our online environmental reporting tool, SmartWaste, used to capture data for the first time. This year's data is set against a backdrop of our offices all being closed for a proportion of 2020 as a result of Covid-19. These factors have resulted in a 63% rise in the total tCO<sub>2</sub>e per employee (from 1.16 tCO<sub>2</sub>e in 2020 to 1.89 tCO<sub>2</sub>e in 2021).

Our planned office refurbishments were postponed due to the Covid-19 pandemic: however, we are pleased to say they are now underway, with a number fully completed. We expect to see a decrease in our emissions in the future, notably at Countryside House, where we have taken significant action to enhance our water and energy efficiency measures.

The total amount of office waste has decreased by 19.6% compared to previous years (439 tonnes in 2020 to 353 tonnes in 2021). Reconfiguration of our office spaces has improved our capacity to segregate waste, so we have been successful in increasing our recycling rate to 88.3%. Our office staff have also engaged with training materials focusing on “Ways to Zero Waste” and have applied this knowledge in their local offices.

Our footprint in 2021



Offices

3,855  
tCO<sub>2</sub>e

1.89  
tCO<sub>2</sub>e/employee



Sites

9,561  
tCO<sub>2</sub>e

1.97  
tCO<sub>2</sub>e/100m<sup>2</sup>



Factories

241  
tCO<sub>2</sub>e

0.15  
tCO<sub>2</sub>e/100Lmtrs  
produced



Water

27,641  
m<sup>3</sup>

Waste

47,637  
tonnes

Our performance continued

Business travel

Following the relaxation of Covid-19 restrictions, we have seen a phased return to "business as usual" and a subsequent increase in business travel emissions of 23.3% compared to last year (from 1,791 tCO<sub>2</sub>e in 2020 to 2,210 tCO<sub>2</sub>e in 2021). Following the relaunch of our company car policy, we have seen an increase of the number of employees selecting fully electric and plug-in hybrid vehicles. Business travel in EVs has so far equated to savings of 4 tCO<sub>2</sub>e and we expect this to increase next year as more employees take up our incentive offering.

Our sites

Reducing the environmental impact of our site operations is key to achieving ambitions set out within our sustainability approach and net zero strategy.

We have seen an increase of 39.7% in our normalised site carbon footprint this year, from 1.41 tCO<sub>2</sub>e/100m<sup>2</sup> last year to 1.97 tCO<sub>2</sub>e/100m<sup>2</sup> this year, which is mainly attributed to the significant expansion in our Scope 3 reporting. We have also agreed a 100% renewable tariff with our energy suppliers for our Temporary Builder's Supply, show homes and plots (prior to handover), which will start in January 2022.

There was a small 2.8% increase in our site water use this year from 3.18m<sup>3</sup>/100m<sup>2</sup> in 2020 to 3.27m<sup>3</sup>/100m<sup>2</sup> in 2021. We are committed to reducing the amount of water we use in our operations such as welfare facilities, dust suppression, cleaning and wheel wash systems. We are also committed to ensuring that the homes we build use less water and are installing water saving fixtures and fixings, including using aerated technology and dual low-flush toilets.

Our normalised site waste intensity increased by 8.7% this year from 8.8t/100m<sup>2</sup> in 2020 to 9.6t/100m<sup>2</sup> in 2021; however, our efforts to divert waste from landfill have resulted in an increased diversion rate of 99.5% (2020: 98.5%). Reducing the volume of waste created from our site, manufacturing and office operations is a focus for our business and is a key topic for discussion at monthly Board meetings. In FY22, we are looking to roll out Site Waste Management Plans for all new development sites.

Our factories

Despite our productivity being impacted last year due to the Covid-19 pandemic, we have returned to normal operations and our linear metres produced have increased by 15.1% (from 1,402 LMtrs in 2020 to 1,614 LMtrs in 2021). It is expected our new factory in Bardon will begin manufacturing in the next few months, which will help us to deliver a greater number of homes that have the environmental benefits associated with MMC construction.

Last year was the first time we were able to provide normalised data for our factories and our emissions increased by 7.1% this year (from 0.14 tCO<sub>2</sub>e/100 LMtrs in 2020 to 0.15 tCO<sub>2</sub>e/100 LMtrs in 2021). Our Scope 2 emissions decreased by 14.9% and we have invested in cutting edge renewable energy to power the factories and efficient production machinery so that emissions continue to decrease. Our new timber frame factory in Bardon has 250kW of solar array.

The total waste from manufacturing decreased by 19.3% this year (from 891 tonnes in 2020 to 719 tonnes in 2021) and we were successful in diverting 99.4% from landfill (2020: 99.0%). We are currently reviewing how to embed circular economy principles into our manufacturing processes.



Our performance continued



factory is approximately 360,000 ft<sup>2</sup> and houses the latest modern technology. We believe that adopting modern methods of construction, like open and closed panel timber frame homes, is key to delivering homes at the scale, pace and quality we need, while also delivering more sustainable outcomes. We have set a target for 50% of the homes we build by 2025 to come from our factories. Our ethos for off-site manufacturing is SIMPLE and we are proud to be leading the way.

Working in a factory setting reduces delays on site caused by poor weather and makes it easier to adopt opportunities for waste reduction and material re-use. It also provides a working environment that may be attractive to people who may not have necessarily considered a career in construction.

Delivering quality to our customers

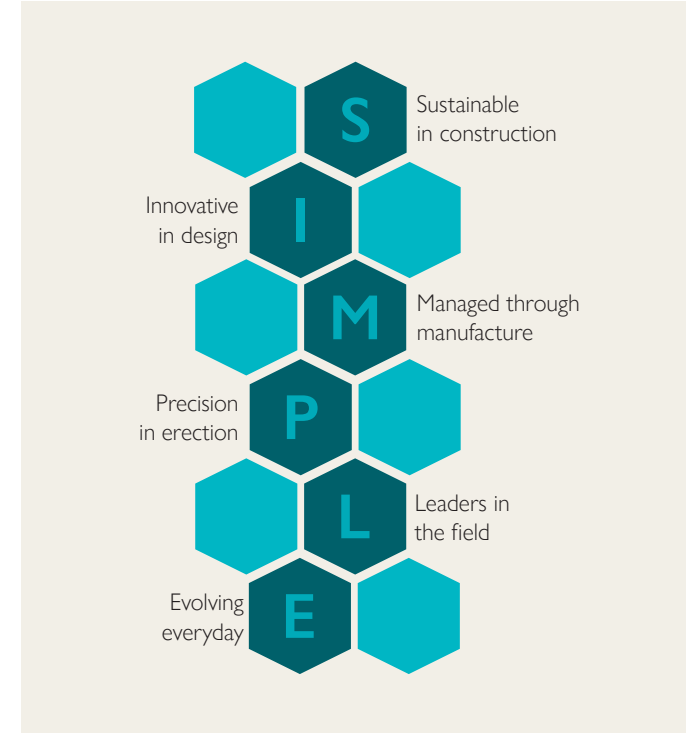
During 2021, we continued to focus on our customers' experience across all levels of the business and are proud to have, again, been awarded five-star status from the Home Builders Federation. Overall, 91.6% of customers said they would recommend us to a friend.

In March 2021, we were awarded both the Gold Award and the Outstanding Achievement Award for customer satisfaction by In-House, an independent research firm. The Outstanding Achievement Award is only given to companies with a yearly Net Promoter Score of 65% or over.

At Countryside, we instil an exceptional focus on quality whether it be in building our homes or supporting customers on their buying journey. Our Quality Management System ("QMS") is certified to ISO 9001, ensuring that quality is upheld from the design of our homes through to construction, sales and customer support.

Modern and efficient

In 2016, a report commissioned by the Construction Leadership Council gave an unmitigated prognosis to the housebuilding sector in the UK: modernise or die. It highlighted significant challenges our industry faces, including the skills gap and a lack of investment in innovation, among other issues. More recently, Homes England has established a research study in modern methods of construction ("MMC") and has told Strategic Partners they must commit to increasing their use of MMC if they want to continue to work with the Government body. Countryside has invested heavily in manufacturing, with two operational timber frame factories in Warrington and Narborough, as well as a brand new £20m factory in Bardon, which will produce modular timber panels. The new



We continually seek to improve our QMS. We are investing in the development of a digital tool for inspecting build quality. The tool will facilitate closer collaboration with our supply chain, enabling more efficient resolution and closure of identified quality problems. In addition, we are developing our building information modelling ("BIM") capability. One of our goals is to sufficiently mature our approach to achieve ISO 19650 certification, an international standard for managing information of a built asset using BIM.

Our performance continued

# Sustainable Communities

We will work with our partners to deliver sustainable communities that enhance the quality of life for over one million people by 2030.

Where we live has a powerful impact on our lives, from the lifestyles we lead, to the type of transport we use, the schools our children attend, and even the air we breathe. At Countryside, we know that central to everyone's experience of where they live is the community they feel a part of.

We work to create places that make life better for people. This means taking a placemaking approach that goes beyond building houses to also thinking critically about the social and digital infrastructure, transport and green spaces needed to nurture vibrant, connected and healthy communities. We think about the next generation, not just the next year, so whether we are working with existing communities to expand local opportunities for education and job creation, or fostering the diversity of new communities, we focus on helping them thrive, now and into the future.

Our exemplar schemes have been referenced in the Living with Beauty report by the Building Better, Building Beautiful Commission and in the National Design Guide and National Model Design Code.



**16%**  
social value added

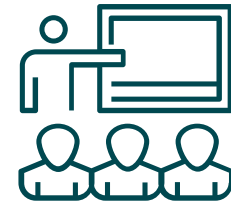


Through our sites we provided  
**2,919**  
weeks of apprenticeships



**2,107**  
affordable homes provided during 2021

**429,582**  
days of work for local people



**35%**  
local labour

**£47.6m**  
spent with local MSMEs

**£73.7m**  
spent in the local economy



Our performance continued

How we calculate social value

Areas of social value we measure

Employment	Work experience	Skills and training	Mentoring	Local economy and schools
Safety and inclusion	Supply chain	Affordable homes	Section 106 agreements	Environment

The concept of social value is becoming increasingly important as local authorities, investors and partners recognise its strength as a tool to measure the positive social and environmental impacts we make to local communities. Calculating the social value we create through our work helps us to better understand where our decisions and actions give us the biggest returns in terms of impact for our stakeholders.

This is why we set a target to generate 30% social value across our operations every year from 2022.

To determine the social value we create, we monitor ten areas that contribute positively to society. Within these ten areas, we measure over 80 metrics. Together, these measures are used to calculate the social value we add to society using the best practice valuation methodology, as deployed in the HM Treasury Green Book and OECD guidelines.

For the first time this year, we are proud to be able to report the social value we created. We generated £243.3m in social value through our operations in the year. This equates to 16% of our adjusted revenue. In 2022, we are moving to a new system to capture our social value data, which we believe will significantly improve the capacity for our regional businesses to acquire the data and evidence we need to measure our social value. Over the longer term, we will be implementing Group-wide processes to enhance the way in which we develop social value strategies for the developments we deliver. This will ensure that the initiatives we put in place respond to the local community's needs and help us to provide a consistently high-quality social value offering to local authorities and our partners.

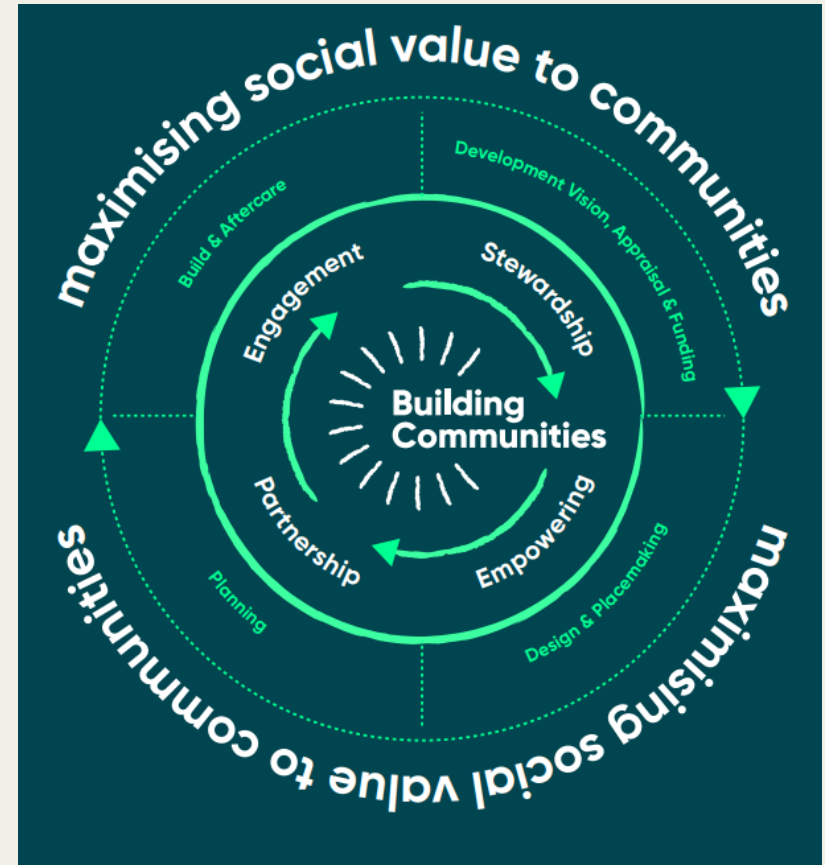
BUILDING COMMUNITIES

In 2021, Countryside launched the Building Communities approach. It provides a set of principles that can be applied on every project to ensure we support and engage communities at every stage. The four principles are: engagement, empowerment, partnership and stewardship.

They help us to:

- build a stronger sense of community by tailoring solutions to the local area;
- increase local economic growth and maximise social value;
- improve community prosperity and resilience;
- foster better public and community relations, based on trust; and
- facilitate the management and nurturing of the communities over the long term.

Andrew Taylor, Group Planning Director, said: "To truly build communities we need to consider holistic, integrated solutions which put people at the heart of our thinking. Applying the four principles of engagement, empowerment, partnership and stewardship consistently in our thinking and actions will mean we stay true to our values and deliver our purpose."



To find out more about Building Communities, please visit [www.countrysideproperties.com/sustainable-business/building-communities](http://www.countrysideproperties.com/sustainable-business/building-communities).

Our performance continued

JOHN WEST HOUSE



As part of our £1m Communities Fund, Countryside donated £2,500 to John West House. Owned by the Royal Borough of Windsor and Maidenhead, John West House is a homeless support service that helps vulnerable rough sleepers into long-term, sustainable accommodation.

This donation allowed John West House to appoint an arboriculture consultant to cut back and remove overgrown trees and vegetation, with Countryside volunteers providing the labour. Residents can now benefit from the growing plants and vegetables for use in meal preparations at the house, while also enjoying nature in the summer months.

Councillor Ross McWilliams, Cabinet Member for Housing, Sport & Leisure and Community Engagement, said: "It's great to see the Royal Borough of Windsor and Maidenhead and Countryside working together to improve outdoor facilities for the guests at John West House. The new garden area will create new opportunities for our former rough sleepers to learn green skills and use the space for quiet reflection."

The Communities Fund

In response to the devastating impact of the global pandemic in 2020, Countryside launched its £1m Communities Fund to support the most vulnerable people in our communities. In 2021, another £1m was allocated to the Fund so that we could continue our efforts.

We've supported numerous local charities and food banks during the year, including the London Borough of Barking and Dagenham, to which we gave much needed personal protective equipment and supplies for over 270 volunteers at the vaccination centre. We also funded three new defibrillator units within Watford Rural Parish Council and supported the Munch Club with its holiday hunger programme for families in need, amongst many others.

Community Chests

In addition to the Communities Fund, we have created community chests across a number of our developments. These chests set aside a funding pot for initiatives like health, wellbeing, skills development and community cohesion. One example is a pop-up cinema we funded through the Acton Arts Project, whose mission it is to enhance community spirit. Another is supporting Waltham Forest New Leadership Fund to support local communities to learn skills and enhance leadership.

Post-occupancy evaluations

When we launched our approach to sustainability, we set a challenging ambition for ourselves: to enhance the quality of life for over one million by 2030. One of the key mechanisms we will use to measure the impact we make on people's quality of life is Post-Occupancy Evaluation ("POE"). This is a process that allows for a structured mechanism to gather feedback from residents that helps us to understand how they really feel about the place they live. We have set a target to conduct at least three POEs annually across the business. We are establishing a POE Task and Finish group with leaders from across the organisation to develop our approach and to oversee the delivery of three POEs in 2022.

OUR POE AT BEAULIEU, ESSEX



Working with the Quality of Life Foundation, we undertook a POE at Beaulieu over the course of five months in 2021. Beaulieu is a vibrant new district for Chelmsford. We wanted to find out how residents felt about their surroundings, whether they felt connected to people and the local area, and how being part of the Beaulieu community has affected their wellbeing. Using the Quality of Life Foundation's framework, we examined six themes that contribute to quality of life: control, health, nature, wonder, movement and belonging. Over 150 people took part in the survey through online questionnaires and face-to-face interviews. We are excited to see what the results are in the new year.

Our performance continued

Creating nature-rich and healthy spaces

Nature has long been known for its benefits to our health, but never more so than during the pandemic when wellbeing became a priority for everyone. However, there is an increasing awareness of the fragility of the natural habitats that surround us and the threats they are facing.

Biodiversity

TINY FORESTS



At St James' Park in Bishop's Stortford, we are working with Earthwatch Europe to plant our first Tiny Forest next year. Tiny Forests allow us to plant dense and fast-growing native woodland with 600 trees planted in a space the size of a tennis court. Children from nearby schools and a local charity will be helping us with the planting. Earthwatch created the Tiny Forest initiative to reconnect people with nature, raise awareness about climate change and provide nature-rich patches that can support urban wildlife. These native forests can attract over 500 animal and plant species within their first three years, providing critical refuge for biodiversity to flourish.

Countryside is committed to ensuring that we create places where nature can thrive and we take great care during construction to protect the existing biodiversity from harm.

100% of our sites undergo an ecological assessment. We make sure that all necessary measures are taken to protect and, in some cases, enhance those habitats, to encourage biodiversity to prosper.

44% of our developments have a Biodiversity Action Plan in place. We work with ecologists and landscape architects to create as many spaces for nature as possible.

This could be green open spaces in a playpark, tree-lined streets, green or brown roofs, or even small corridors between homes planted with shrubs that provide birds and bats with food or shelter.

Biodiversity net gain

With the Environment Bill Act 2021 in place, achieving a net gain of at least 10% in biodiversity will become mandatory. In simple terms, this means that developers and other construction companies must leave the natural environment in a measurably better state than when they took possession.

Countryside is committed to achieving at least a 10% net biodiversity gain on its developments by 2025. We have also committed to planting 250,000 trees by 2025.

While we have a good framework in place to ensure we protect biodiversity, there is work to do to ensure we always achieve a net gain. We will be pulling together a Task and Finish group with people from across the business to identify the best way forward.

BAT BARNS IN BATH



At our development near Sulis Down, Bath, we are working to ensure that we protect nature from the very start – even before we've broken ground. Working with wildlife consultants, Bath and North East Somerset Council and Natural England, we are putting in place measures to protect the rare lesser and greater horseshoe bats that use our site as a foraging ground. Like all bats in the UK, they are declining in number.

We have employed Kestrel Wildlife Consultants to undertake survey work and oversee the building of a bat barn, which has been sensitively designed. Just like us, bats are looking for clean, comfortable and secure shelter. The bat barns provide the bats with a stable micro-climate, suited to their species-specific temperature and roosting requirements.

Our performance continued

Delivering affordable and thriving places

In creating new communities, we use a tenure-blind approach to our masterplanning, ensuring a good mix of homes for people. In 2021, we built 2,107 affordable homes, and have targeted to deliver 15,000 by 2025. We also delivered 884 Private Rented Sector units, providing high-quality rental accommodation as an alternative for people.

We do not just want to create affordable housing, though – we want to create places where community can thrive. High-quality masterplanning is key. It helps us to deliver the right kind of infrastructure, like footpaths, open green spaces, sports pitches and more, for the local area.

Sustainable transport is also an important consideration when working to develop healthy and future-proofed communities. In 2021, 35% of our developments had access to electric charging points for electric vehicles. With the rise in electric vehicle popularity and the end of petrol and diesel vehicle sales in 2030, we have set a target to provide 10,000 homes with electric vehicle charging points by 2025. In 2021, 96% of our developments were within 1km of public transport, such as a bus stop or train station, and 75% provided secure cycle storage for residents.

We assess our developments against the Building for a Healthy Life standard, which outlines 12 key conditions for creating healthy, connected and distinct new developments.

Supporting local economies

Supporting and empowering local communities is important to building healthy and resilient neighbourhoods. Throughout 2021, 35% of people working for Countryside, either as direct employees or as subcontracted labour on our sites, were from the local area. We spent over £73.5m with our local supply chain and provided more than 2,900 weeks of apprenticeships. But we want to do more for our communities. This is why we have set a target to establish local job training and employment support plans for each regional business by 2025. This will allow us to target our efforts in the right way for the local areas where we work.



NEW BROUGHTON'S THRIVING LOCAL ECONOMY



New Broughton is a major regeneration project that will bring 3,500 new homes to Salford. The development provides a new primary school to the Salford area as well as green open spaces for the community.

Working with Salford City Council, we created a local employment and skills plan to help boost the community's skills, confidence and capacity for employment in the future. Through the plan, we partnered with the Salford Training and Employment Programme to create a dedicated construction skills training programme for the long-term unemployed and advertised all job and training opportunities at the local community centre and through the partnership newsletter.

Getting to the heart of the local area

A big part of what we do is responding to local community needs. But what is local?

To truly direct our efforts to the local community we have development-specific local definitions, based on the population density of local authorities we work in. We know that one size does not actually fit all, so our local radius ranges from 2 to 20 miles from our developments.

Our performance continued

# Thriving Together

Not only do we want to create places that people love to live, we are committed to creating a place that people love to work. We want to do everything we can to help our people thrive. This means training and supporting our people to grow and develop and building a culture that is diverse, inclusive, creative and grounded in fairness.

We will create an inclusive, rewarding and caring workplace where all our people feel they can thrive and create places people love by 2025.

### Empowering through training

Everyone at Countryside, no matter their role, has a part to play in helping us to deliver our approach to sustainability and targets. But we recognise that our people need the right training and development to continue to build their knowledge, skills and confidence to embed sustainability into our day-to-day decisions. We have set a target to provide one day of training per employee across the Group from 2022.

To achieve our goal, we have already taken several steps, including becoming a member of the Supply Chain Sustainability School and the UK Green Building Council. Both these platforms offer extensive resources on sustainability topics, such as the circular economy, net zero, modern slavery, social value and more. Internally, we have created a sustainability training page on the online learning portal<sup>5</sup> for our employees, with a variety of videos, presentations, toolbox talks and recorded webinars. The sustainability page on our intranet was also updated this year to provide better guidance and access to policy and procedures relating to our approach to sustainability.

All employees are required to complete an online Environmental Awareness training module when they join Countryside. Our compliance rate in 2021 was 93%.

Over the next year, we will be creating new training videos for Countryside employees, including a brand new induction video for employees about our approach to sustainability. We are also developing a detailed training matrix for each function in the business, which will provide employees with clear learning pathways to develop the sustainability knowledge and skills they need in their roles.

### Mental health and wellbeing

Construction can be a rewarding and varied industry to work in, but it can also be a highly pressured environment. A report by the Chartered Institute of Building found that 70% of respondents experienced depression and 87% experienced anxiety<sup>6</sup>. Furthermore, stress, anxiety and depression account for one-fifth of work-related illnesses, resulting in 70 million days off sick per year at an estimated annual cost of £70bn-£100bn<sup>7</sup>.

Working with Lighthouse Construction Industry Charity, we now have 112 Mental Health First Aiders in the business working across our offices and sites. This includes 59 new Mental Health First Aiders trained in 2021. SID has a dedicated wellbeing area with courses and videos designed to help people build resilience, manage stress and more. We also offer an Employee Assistance Programme to employees that provides 24-hour online and telephone support across 11 areas of physical and mental health as well as financial and legal wellbeing.

5. Our online learning portal is called Share. Inform. Develop., known in Countryside simply as SID.  
6. Chartered Institute of Building, Understanding Mental Health in the Built Environment (2020), pp 16.  
7. Davies SC. Annual Report of the Chief Medical Officer 2013, Public Mental Health Priorities: Investing in the Evidence. Department of Health. 2014, p.158.

Our performance continued

Smart Working – The Countryside Way

In the summer of 2021, we introduced a new approach to work at Countryside called Smart Working – The Countryside Way. The ethos is to empower individual and team decisions about how we work, balancing the Group’s needs with people’s wellbeing. To support teams in this transition, we created a four-prong framework that makes clear what we mean by “smart working”, giving practical suggestions to support the one-on-one conversations between line managers and team members.

Our framework

Our framework consists of 4 key principles that will allow us to be at our best and deliver for our customers.



Diversity and inclusion

In a recent survey of Countryside employees, one-third of respondents said that caring about each other is the most important value to them. Creating a culture of diversity and inclusion not only helps to tackle the increasing industry skills gap, it fosters a positive work environment of respect and kindness where people can be themselves. In March 2021, we appointed a Head of Culture and Inclusion. In addition to continuing to support the integration of Countryside’s values into day-to-day activities, a key focus for this new role is to develop a Group-wide strategy for diversity, equity and inclusion at Countryside. 8% of Countryside employees self-identify as being from an ethnic minority.

While the strategy is not set to be released until later in 2022, several important successes have already taken place. This includes becoming a member of BPIC, a charity working in the built environment to improve ethnic minority representation in construction.

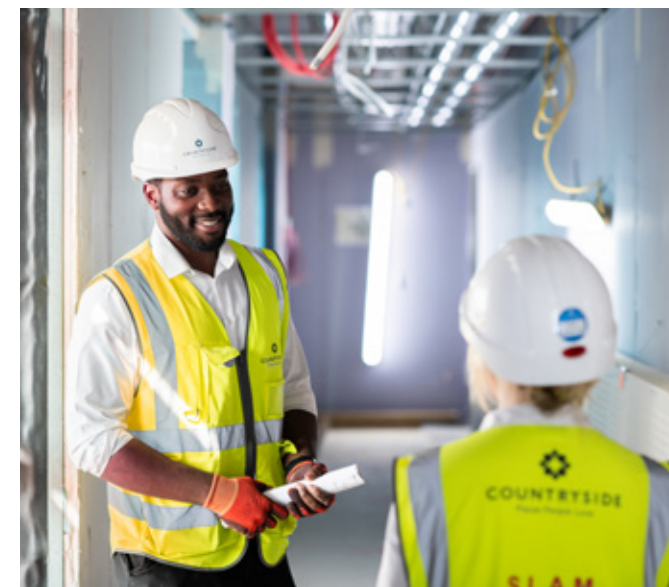
Supporting the next generation

A recent publication by the Institute for Public Policy Research called Skills for a Green Recovery reaffirmed concerns that the construction industry faces a staggering and persistent skills gap with up to 750,000 of the current workforce due to retire in the next 15 years. We strongly believe that we must invest heavily in attracting young people to the industry, showing off the best of what working in the built environment can offer. To support this, we have created an early careers team, which will lead our approach, including increasing work experience, intern, graduate and trainee opportunities both on site and in our offices.

In 2021, Countryside supported approximately 100 apprentices, two-thirds of whom work directly for us and one-third of whom work with contractors. Our graduate programme continues to attract high-calibre candidates and has grown this year from 24 spots in 2020 to 32 this year. We also partnered with the London Progression Collaboration, pledging £70,000 of apprenticeship levy funds towards its Reskilling the Recovery campaign. The campaign brings together large levy-paying businesses with smaller employers to provide much needed funding to the companies, trades and occupations which need it most.

“Countryside has shown a real desire to be more inclusive with tangible outcomes in place moving beyond it being a tick box exercise. We thoroughly look forward to this partnership, executing all the plans we have, and working stronger together.”

Amos Simbo  
BPIC Chair



## Our performance data

# Measuring our performance

### Financial performance

	2021	2020	2019	2018
Revenue (£m)	1,526.2	988.8	1,422.8	1,229.5
Adjusted operating profit (£m)	173.5	54.2	234.4	211.4
Adjusted operating margin (%)	11.4	5.5	16.5	17.2
Return on capital employed (%)	19.3	7.1	37.8	37.4
Land bank (number)	56,856	53,118	49,000	43,523

### Our people

	2021	2020	2019	2018
<b>Employment</b>				
Total number of employees (average)	2,045	1,947	1,851	1,557
Total full-term employees (at year end)	1,914	—	—	—
Total part-time employees (at year end)	101	—	—	—
Employee turnover rate	19.8%	17.9%	21.1%	19.1%
Total male employees	67.0%	69.0%	70.0%	71.0%
Total female employees	33.0%	31.0%	30.0%	29.0%
Male Board members	60.0%	71.0%	71.0%	58.0%
Female Board members	40.0%	29.0%	29.0%	42.0%
Males in senior management	80.0%	84.0%	83.0%	83.0%
Females in senior management	20.0%	16.0%	17.0%	17.0%

	2021	2020	2019	2018
<b>Employment continued</b>				
BAME Board members	0.0%	—	—	—
BAME in senior management	3.0%	—	—	—
Total BAME employees	9.0%	—	—	—
Total number of apprentices (at year end)	117	44	40	38
Total number of graduates (at year end)	32	24	27	14
Total number of new employees recruited (at year end)	536	—	—	—
Total number of internal promotions (at year end)	226	145	117	99
Number of absences per employee (average number of days)	4	4	4	5
Total number of volunteer days taken	7	—	—	—
Employees paid at least the Living Wage Foundation pay rate	—	—	—	—
<b>Training</b>				
Sustainability training per employee (average number of days)	0.034	—	—	—
Total number of health and safety training days	2,629	1,764	—	—

Our performance data continued

Our people continued

	2021	2020	2019	2018
<b>Health, safety and wellbeing</b>				
Annual Injury Incidence Rate	163	224	227	162
Total number of mental health first aiders (at year end)	112	56	—	—
Total of newly trained mental health first aiders (at year end)	59	70	—	—
Total number of offices and factories with mental health first aiders (at year end)	12	9	—	—
Total number of site-based mental health first aiders (at year end)	52	25	—	—

Our supply chain

	2021	2020	2019	2018
Total local supply chain working on site (number of working days)	186,061	—	—	—
Directed purchased sustainably sourced timber	99.6%	100.0%	100.0%	—
Supply chain partners signed up with the Supply Chain Sustainability School	71.7%	—	—	—
Supply chain partners' Sustainability School level	Gold = 4.5% Silver = 5.2% Bronze = 0.9%	—	—	—

Our customers and homes

	2021	2020	2019	2018
<b>New homes</b>				
Private units	2,394	1,454	2,177	1,995
Affordable units	2,107	1,691	2,179	1,491
Private rented sector units	884	908	1,377	816
<b>Quality and customer satisfaction</b>				
NHBC reportable items per inspection	0.28	0.22	0.21	0.22
NHBC Recommend a Friend score (customer satisfaction)	91.6%	90.6%	92.5%	84.5%
NHBC Construction Quality Review score (average)	4.23	4.13	3.95	—
Developments that underwent a Post-Occupancy Evaluation	1	—	1	—
<b>Modern methods of construction</b>				
Total number of homes built by our factories that were erected	1,814	—	—	—
<b>Energy efficiency</b>				
Developments with homes that feature renewable technology	32.0%	26.0%	30.0%	25.0%
Standard Assessment Procedure score	84.2	83.8	84.6	92.3

## Our performance data continued

### Our communities

	2021	2020	2019	2018
<b>Placemaking</b>				
Total area built (100m <sup>2</sup> )	<b>4,847</b>	4,997	6,031	3,977
Developments with community spaces/buildings provided	<b>37.0%</b>	34.0%	24.0%	—
Developments located within 1km of public transport	<b>96.0%</b>	97.0%	97.0%	96.0%
Developments with electric charging points	<b>35.0%</b>	21.0%	16.0%	25.0%
Developments with cycle storage	<b>75.0%</b>	69.0%	66.0%	72.0%
Developments with access to car clubs	<b>7.0%</b>	3.0%	2.0%	—
Developments with public green spaces created	<b>68.0%</b>	67.0%	64.0%	—
<b>Biodiversity</b>				
Total number of trees planted	<b>5,718</b>	2,806	6,162	7,320
Developments that feature green roofs	<b>13.0%</b>	12.0%	13.0%	23.0%
Developments with ecological surveys conducted	<b>100.0%</b>	100.0%	100.0%	92.0%
Developments with Biodiversity Action Plans in place	<b>44.0%</b>	42.0%	39.0%	37.0%
Developments with Sustainable Urban Drainage in place	<b>90.0%</b>	87.0%	75.0%	89.0%
Developments built on brownfield land	<b>53.0%</b>	58.0%	67.0%	64.0%

	2021	2020	2019	2018
<b>Social value and charitable giving</b>				
Total social value generated through Countryside activities (percentage of adjusted revenue)	<b>15.9%</b>	—	—	—
Total social value generated through Countryside activities (£)	<b>243,319,453</b>	—	—	—
Total donations spent with local charities, including the Community Fund (£)	<b>697,834</b>	760,000	1,000,000	163,414

## Our performance data continued

### Our operational impact

In 2021, we are reporting in full our emissions from energy, water, waste, business travel, Well to Tank (“WTT”), transmission and distribution losses (“T&D”) and refrigerant gas losses. We use the Building Research Establishment’s (“BRE”) SmartWaste system to record site, office and manufacturing energy use, water use, waste production and disposal volumes. Energy and water data is collated from supplier invoices that are agreed and paid within the reporting year. Office energy and water only includes consumption which we are directly invoiced for, either by the supplier or the landlord. Waste data is collated directly from supplier reports. Business travel mileage is recovered from staff expense claims and does not include staff commuting.

	2021	2020	2019	2018
Group total CO <sub>2</sub> e emissions (tonnes) (Scope 1, 2 and 3)	<b>13,657</b>	9,467	9,081	8,198
Group total CO <sub>2</sub> e emissions (tonnes) by £m revenue	<b>8.95</b>	9.57	6.38	6.67
Group total CO <sub>2</sub> e emissions (tonnes) per employee	<b>6.68</b>	4.86	4.91	5.27

This year we calculated our carbon footprint in partnership with Verco, an award-winning external consultancy practice. Calculations were carried out following the GHG Protocol Corporate Accounting and Reporting Standard and ISO 14064. Carbon emissions have been calculated using activity data collated in SmartWaste and carbon emission factors provided by DEFRA for 2021.

Our footprint was calculated on an operational control basis. The operational boundary covers emissions arising from Countryside’s direct operations and includes Scope 1, 2 and 3 emissions from our construction sites, offices and manufacturing facilities (factories).

Partnering with Verco this year highlighted opportunities to improve our reporting in line with evolving best practice. In previous years, T&D were included with our Scope 2 electricity emissions, but for 2021 they have been separated and reported under Scope 3. We also applied this methodology to our 2019 and 2020 figures to enable a more accurate year-on-year comparison.

Previously all business travel was disclosed under Scope 3, but we have updated our methodology to reflect where we have operational control and are now reporting under Scope 1 and 2. For consistency in our reporting, we have re-allocated our previous years’ business travel from Scope 3 to Scope 1 in line with this change. For the first time in 2021 we are also reporting Scope 3 business travel in vehicles owned or operated by third parties such as aeroplanes, trains and taxis.

Carbon emissions arising from refrigerant gas losses, WTT, waste and water are also reported for the first time this year as we continue to improve our methods for data collection, calculation and reporting.

### Our offices

Our office intensity measure is based on our average full-time employee number, which was 2,045 this year (2020: 1,947).

	2021	2020	2019	2018
Total CO <sub>2</sub> e (tonnes)	<b>3,855</b>	2,261	2,371	2,262
Total CO <sub>2</sub> e per employee (tonnes)	<b>1.89</b>	1.16	1.28	1.45
Total energy consumed (MWh)	<b>3,865</b>	2,190	2,278	2,523

### Scope 1

Natural gas CO <sub>2</sub> e (tonnes)	<b>256</b>	150	99	203
Natural gas (MWh)	<b>1,390</b>	818	537	1,103
Refrigerant gas losses CO <sub>2</sub> e (tonnes)	<b>24</b>	n/a	n/a	n/a
Refrigerant gas losses (kg)	<b>12</b>	n/a	n/a	n/a
LPG CO <sub>2</sub> e (tonnes)	<b>1</b>	n/a	n/a	n/a
LPG (MWh)	<b>6</b>	n/a	n/a	n/a
Business travel CO <sub>2</sub> e (tonnes)	<b>2,208</b>	1,791	1,827	1,656
Total Scope 1 CO <sub>2</sub> e (tonnes)	<b>2,490</b>	1,941	1,926	1,859
Total Scope 1 CO <sub>2</sub> e per employee (tonnes)	<b>1.22</b>	1.00	1.04	1.19

## Our performance data continued

### Our offices continued

	2021	2020	2019	2018
<b>Scope 2</b>				
Electricity CO <sub>2</sub> e (tonnes)	524	295	410	371
Electricity (MWh)	2,469	1,372	1,741	1,420
Business travel CO <sub>2</sub> e (tonnes)	2	n/a	n/a	n/a
Total Scope 2 CO <sub>2</sub> e (tonnes)	526	295	410	371
Total Scope 2 CO <sub>2</sub> e per employee (tonnes)	0.26	0.15	0.22	0.24
<b>Scope 3</b>				
Business travel CO <sub>2</sub> e (tonnes)	0.1	n/a	n/a	n/a
WTT from business travel CO <sub>2</sub> e (tonnes)	573	n/a	n/a	n/a
T&D CO <sub>2</sub> e (tonnes)	46	25	35	32
WTT CO <sub>2</sub> e (tonnes)	192	n/a	n/a	n/a
Emissions from waste and water CO <sub>2</sub> e (tonnes)	27	n/a	n/a	n/a
Total Scope 3 CO <sub>2</sub> e (tonnes)	839	25	35	32
Total Scope 3 CO <sub>2</sub> e per employee (tonnes)	0.41	0.01	0.02	0.02

	2021	2020	2019	2018
<b>Office water use</b>				
Water use (m <sup>3</sup> )	10,239	5,975	9,361	10,555
Water use (m <sup>3</sup> ) per employee	5.01	3.07	5.06	2.65

### Our sites

Our improved verification process has highlighted that this year some of our sites have been impacted by historical billing, particularly in relation to natural gas. It is important for us to maintain transparency in our reporting, so this data has been added to this year's disclosures. We are looking to improve the efficiency of our invoicing process going forward.

Our site intensity measure (tonnes/100m<sup>2</sup>) is based on our developed area of 484,724m<sup>2</sup> this year (2020: 603,173m<sup>2</sup>).

	2021	2020	2019	2018
<b>Total CO<sub>2</sub>e (tonnes)</b>	9,561	7,015	6,609	5,936
Total CO <sub>2</sub> e (tonnes) per 100m <sup>2</sup> completed	1.97	1.41	1.12	1.49
Total energy consumed (MWh)	33,830	29,705	26,332	23,694

## Our performance data continued

### Our sites continued

	2021	2020	2019	2018
<b>Scope 1</b>				
Natural gas CO <sub>2</sub> e (tonnes)	2,092	1,343	889	1,276
Natural gas (MWh)	11,348	7,302	4,837	6,936
Gas oil CO <sub>2</sub> e (tonnes)	4,125	4,231	4,389	3,536
Gas oil (MWh)	16,279	16,481	16,582	12,786
Total Scope 1 CO <sub>2</sub> e (tonnes)	6,217	5,574	5,278	4,812
Total Scope 1 CO <sub>2</sub> e per 100m <sup>2</sup> completed (tonnes)	1.28	1.12	0.88	1.21
<b>Scope 2</b>				
Electricity CO <sub>2</sub> e (tonnes)	1,317	1,327	1,227	1,036
Electricity (MWh)	6,202	5,922	4,913	3,971
Total electricity CO <sub>2</sub> e per 100m <sup>2</sup> completed (tonnes)	0.27	0.27	0.20	0.26

	2021	2020	2019	2018
<b>Scope 3</b>				
T&D CO <sub>2</sub> e (tonnes)	117	114	104	88
WTT CO <sub>2</sub> e (tonnes)	1,688	n/a	n/a	n/a
Emissions from waste and water CO <sub>2</sub> e (tonnes)	223	n/a	n/a	n/a
Total Scope 3 CO <sub>2</sub> e (tonnes)	2,027	114	104	88
Total Scope 3 CO <sub>2</sub> e per 100m <sup>2</sup> completed (tonnes)	0.42	0.02	0.02	0.02
<b>Total outside of scope</b>				
Biodiesel CO <sub>2</sub> e (tonnes)	104	n/a	n/a	n/a
Biodiesel (MWh)	427	n/a	n/a	n/a
	2021	2020	2019	2018
<b>Site water use</b>				
Water in (m <sup>3</sup> )	15,863	15,891	22,816	33,414
Total water in per 100m <sup>2</sup> completed (m <sup>3</sup> )	3.27	3.18	3.78	8.40
Water out (m <sup>3</sup> )	8,255	11,167	14,447	n/a
Total water out per 100m <sup>2</sup> completed (m <sup>3</sup> )	1.70	2.23	2.39	n/a

## Our performance data continued

### Our factories

Our manufacturing intensity measure (tonnes/100 linear metres ("LMtrs") produced) is based on the 161,365 LMtrs produced in 2021 (2020:140,196 LMtrs).

	2021	2020	2019	2018
<b>Total CO<sub>2</sub>e (tonnes)</b>	<b>241</b>	191	101	n/a
Total CO <sub>2</sub> e per 100 LMtrs produced (tonnes)	<b>0.15</b>	0.14	n/a	n/a
Total energy consumed (MWh)	<b>831</b>	796	383	n/a
<b>Scope 1</b>				
Natural gas CO <sub>2</sub> e (tonnes)	<b>5</b>	—	2	n/a
Natural gas (MWh)	<b>27</b>	—	12	n/a
Gas oil CO <sub>2</sub> e (tonnes)	<b>7</b>	10	12	n/a
Gas oil (MWh)	<b>29</b>	38	45	n/a
LPG CO <sub>2</sub> e (tonnes)	<b>51</b>	36	—	n/a
LPG (MWh)	<b>235</b>	169	—	n/a
Total Scope 1 CO <sub>2</sub> e (tonnes)	<b>63</b>	46	14	n/a
Total Scope 1 CO <sub>2</sub> e per 100 LMtrs produced (tonnes)	<b>0.04</b>	0.03	n/a	n/a

	2021	2020	2019	2018
<b>Scope 2</b>				
Electricity CO <sub>2</sub> e (tonnes)	<b>114</b>	134	80	n/a
Electricity (MWh)	<b>539</b>	589	326	n/a
Electricity CO <sub>2</sub> per 100 LMtrs produced (tonnes)	<b>0.07</b>	0.10	n/a	n/a
<b>Scope 3</b>				
T&D CO <sub>2</sub> e (tonnes)	<b>10</b>	12	7	n/a
WTT CO <sub>2</sub> e (tonnes)	<b>41</b>	n/a	n/a	n/a
Emissions from waste and water CO <sub>2</sub> e (tonnes)	<b>13</b>	n/a	n/a	n/a
Total Scope 3 CO <sub>2</sub> e (tonnes)	<b>64</b>	12	7	n/a
Total CO <sub>2</sub> e per 100 LMtrs produced (tonnes)	<b>0.04</b>	0.01	n/a	n/a

Our performance data continued

Our factories continued

	2021	2020	2019	2018
<b>Manufacturing water use</b>				
Water in (m <sup>3</sup> )	1,539	1,060	1,036	n/a
Water in per 100 LMtrs produced (m <sup>3</sup> )	0.95	0.76	n/a	n/a
Water out (m <sup>3</sup> )	1,966	1,422	1,036	n/a
Water out per 100 LMtrs produced (m <sup>3</sup> )	1.22	1.01	n/a	n/a

Waste

	2021	2020	2019	2018
<b>Total waste</b>				
Total waste (tonnes)	47,637	45,492	42,353	31,042
<b>Office waste</b>				
Total waste (tonnes)	353	439	179	318
Total waste recycled (%)	88.3%	77.0%	84.0%	83.0%
Total waste per employee (tonnes)	0.17	0.23	0.01	0.20

	2021	2020	2019	2018
<b>Site waste</b>				
Total waste (tonnes)	46,565	44,162	41,728	30,724
Total waste reused/recycled/recovered (%)	91.3%	94.4%	85.2%	81.3%
Total energy from waste (%)	8.2%	4.1%	12.3%	18.1%
Total to landfill (%)	0.5%	1.5%	2.5%	0.6%
Total waste diverted from landfill (%)	99.5%	98.5%	97.5%	99.4%
Total waste per 100m <sup>2</sup> completed	9.61	8.84	6.92	7.73
<b>Factory waste</b>				
Total waste (tonnes)	719	891	446	n/a
Total waste reused/recycled/recovered (%)	96.6%	97.0%	79.0%	n/a
Total energy from waste (%)	2.8%	2.0%	18.0%	n/a
Total to landfill (%)	0.6%	1.0%	2.0%	n/a
Total waste diverted from landfill (%)	99.4%	99.0%	98.0%	n/a
Total waste per 100 LMtrs (tonnes)	0.45	0.64	n/a	n/a

## Verification statement

### Scope

RPS conducted an independent verification of Countryside Properties PLC's (CPPLC) Sustainability Report (covering the period October 2020 – September 2021). The boundaries of the report cover CPPLC operations in its offices, sites and factories.

The purpose of the verification statement is to provide assurance to stakeholders of the relevance, completeness, consistency, transparency and accuracy of the stated environmental and social information; and ensure that the disclosures are adequate for the purposes of stakeholders' decision making. The scope for RPS's verification was to:

- Conduct high-level data verification of performance measures identified in the report, including specific data points.
- Review the validity and accuracy of statements made in the report as applied to the implementation of the company's sustainability strategy.
- Undertake limited verification of greenhouse gas (GHG) emissions process of the following, in accordance with the requirements of the ISO 14064 – part 3 standard:
  - Scope 1 (natural gas, gas oil, LPG, and business travel for company cars);
  - Scope 2 (electricity, including EV company cars);
  - Scope 3 (business travel, well to tank, transmission and distribution losses, and emissions from waste and water).
- Undertake limited verification of operational waste and water usage performance data.
- Undertake limited verification of social value metrics with the caveat that underlying financial performance metrics are covered within the financial audit undertaken by PwC.

### Methodology

CPPLC's GHG inventory has been completed in accordance with the World Resources Institute (WRI)/World Business Council for Sustainable Development (WBCSD) Greenhouse Gas Protocol, Corporate Accounting and Reporting Standard, Revised Edition, and adheres to the best practice reporting principles of relevance, completeness, consistency, transparency and accuracy.

In conducting the verification, RPS used the appropriate verification planning, validation, GHG assessment and evaluation steps in accordance with the requirements of ISO 14064:3, and in adherence to the standard's principles of independence, ethical conduct, fair presentation and due professional care.

At the commencement of the project the levels of verification, objectives, criteria, organisational scope and materiality thresholds were all agreed with CPPLC. RPS verified data through online interviews with key individuals at Group level and desktop study of sample data streams and evidence to confirm accuracy of source data into calculations and document review.

### Conclusions

During 2021, CPPLC has undergone a strategic review of its business to focus on a partnerships approach. Allied with this has been the launch of a new approach to sustainability, including more than 30 targets. This included setting Science Based Targets Initiative (SBTi) approved science-based carbon targets and defining a 2030 pathway to net zero. The published report has been structured to reflect the result of this process within the overarching company's vision – 'Places People Love', which also informs a summary section included within the Annual Report and Accounts.

Systematic management of CPPLC's sustainability issues is maintained, with the use of management systems for quality, health and safety and the environment applied to all operating divisions. Smartwaste continues to be used as the principal data collection tool within the business. Overall data collection processes have improved and are now more consistent and transparent.

During the reporting year progress has continued with embedding social value within the business including moving to a new system to capture social value data in FY21. To date use has been made of the Social Value Portal and associated proxy measures following the National Themes, Outcomes and Measures (TOMs) Social Value Measurement Framework.

Based on the agreed scope of work and the approach outlined above, nothing has come to our attention that causes us not to believe that the CPPLC Sustainability Report 2021:

- Is materially correct and a fair representation of CPPLC's sustainability performance within the established scope of reporting;
- Prepared in adherence to the best practice reporting principles of relevance, completeness, consistency, transparency and accuracy;
- Worthy of the award of limited verification.

With respect to the GHG emissions we declare that CPPLC have received limited verification for the reporting year 1st October 2020 – 30th September 2021 for the following:

- Scope 1 and 2 and selected Scope 3 emissions;
- Year on year change in emissions (scope 1, 2 and 3) compared to 2019-2020;
- Intensity metrics;
- Total energy consumption for 2020-21.

We can confirm that we are independently appointed by CPPLC and no member of the verification team has a business relationship or reason for bias regarding CPPLC.

## Verification statement continued

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### Areas for improvement

RPS recommends that to further improve its reporting, Countryside should:

- Continue to embed its recently developed internal GHG Accounting Protocol detailing process and assumptions to ensure the same process is employed year-on-year.
- Monitor and report its progress against the SBTi approved science-based targets.
- Continue to progress its risk management and reporting processes to align with the Task Force for Climate-Related Financial Disclosures.
- Improve the collection of raw data and its input into data collection tools such as Smartwaste.
- Continue to embed social value measuring policies across the Group and deliver auditable data minimising the reliance on manual input of information.
- Continue to expand the number of Scope 3 GHG categories for which emissions are reported. In particular, emissions from the processing of sold products (embodied carbon in buildings) and use of sold products (operational fuel and electricity consumption in buildings).
- Undertake embodied carbon/whole life carbon assessments for a wide range of CPPLC development types, in order to establish an embodied carbon benchmark for CPPLC developments.

**MA (Oxon), MSc, MIEMA, CEnv**

**Director – Sustainability**

**RPS Consulting UK and Ireland**

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**COUNTRYSIDE**

Places People Love

# PATH FINDER

Marking out  
the route to  
net zero



Direction		Delivery		Determination		Review
A sense of urgency	The guiding framework	Communicating change	Empowering action	Lasting culture change	Sustained delivery	

# 1 DIRECTION



Direction		Delivery		Determination		Review
A sense of urgency	The guiding framework	Communicating change	Empowering action	Lasting culture change	Sustained delivery	

# A foreword from our Group CEO

## Establishing a sense of urgency

When the Intergovernmental Panel on Climate Change (“IPCC”) published its report in August 2021, there was no mistaking the stark warning. In the simplest terms, time is running out to minimise the catastrophic impacts of climate change and rising global temperatures. As the headlines read: it’s code red for humanity and for the planet.

According to the UK Green Building Council (“UKGBC”) the built environment contributes around 40% of the UK’s total carbon footprint. Almost half of this is from energy used in buildings (e.g. plug loads and cooking). It has never felt more imperative for developers like Countryside to commit to, and be accountable for, becoming net zero in their operations, and for us to play a bigger part in creating a low-carbon, sustainable society quickly.

Today, I am proud to launch our Pathfinder report introducing our net zero strategy. The report sets out the principles that Countryside will follow to respond to the global call to action to tackle the climate emergency. Our target is to be net zero by 2030, which is consistent with the 2015 Paris Agreement that set reductions required to keep global warming to 1.5°C. It provides our people and partners with a clear pathway to achieving our goals. It also outlines, for the first time, our science-based targets, which have been verified by the Science-Based Targets initiative. This Pathfinder report follows our recently published [approach to sustainability](#), which introduced Countryside’s high-level ambitions for our contribution to a sustainable built environment, driven by 25 stretching targets.

Our pathway is interwoven and knitted together by three tenets:

### 1 The need to modernise construction

**Solving the greatest challenge of our lifetime will require us to innovate for a brighter low-carbon future.**

We need to transform the ways in which we conceive, plan and build our new homes and communities if we are going to make them and us truly net zero. This is no small task. It will require serious innovation and significant investment.

### 2 The value of strong partnerships

**Partnership and collaboration will support Countryside to create a shared sense of urgency and to embed the guiding framework that is necessary to effectively transition to net zero.**

Partnerships are the cornerstone of Countryside’s business model; this is fundamentally different to others in our industry. We want to leverage this model to drive significant progress by finding the common challenges and mutually beneficial net zero opportunities and working together to address them.

### 3 A fair and responsible approach that leaves no one behind

**It is critical that we support a Just Transition to net zero, so that we can all share fairly in the benefits and burdens of the transition, and avoid deepening existing inequalities.**

Everyone will benefit from living in a low-carbon society, although the journey to net zero will impact us all socially and environmentally. Nearly 350,000 new roles are required in the construction to achieve net zero. With our sights set squarely on becoming a low-carbon society, we must make sure disadvantaged householders are not adversely affected by rising energy prices and other potential by-products of the green transition. As a business that works closely with housing associations and other key partners to create affordable homes, we are committed to ensuring that our pathway to net zero is fair for everyone.



“

This report sets out the principles that Countryside will follow to respond to the global call to action to tackle the climate emergency.”

**Iain McPherson**  
Group Chief Executive

 More detail on our website:  
[bit.ly/36sDnwF](https://bit.ly/36sDnwF)

Direction		Delivery		Determination		Review
A sense of urgency	The guiding framework	Communicating change	Empowering action	Lasting culture change	Sustained delivery	

# A foreword from our Group CEO continued

## Establishing a sense of urgency continued

The launch of this report does not mark the very start of our journey to net zero. A lot of work, decisions and organisational changes have already happened to ensure that Countryside is putting in place the right systems to fundamentally integrate sustainability and positive climate action into our day to day. This has included:

- reconfiguring our governance structure to launch a Sustainability Committee, which will oversee and interrogate our progress in achieving our science-based targets;
- reviewing the terms of reference of other committees, such as our Investment Committee, to ensure they are empowered to consider climate change and sustainability within their mandates;
- improving our financial forecasting to develop consistent climate-related financial risk disclosures in line with the expectation of the Task Force on Climate-related Financial Disclosures, as well as improving our corporate ESG risk management process and non-financial data collection;
- joining the Home Builders Federation Future Homes Task Force and Delivery Hub, working with industry colleagues to ensure an efficient transition to meeting the UK's new building regulations and other Government-led net zero commitments;
- enhancing our employees' and supply chain partners' training and skills development through our membership of the Supply Chain Sustainability School and UKGBC; and
- reviewing potential reward and recognition mechanisms to encourage our people to make positive decisions around sustainability.

With these measures and others soon to be introduced, we are working to make Countryside as agile and responsive as possible to the rapidly evolving requirements of our partners, stakeholders and communities when transitioning to a sustainable built environment. At the same time, we remain true to our purpose of creating places that people love, with a long-term sustainable business model.

This Pathfinder report does not have all the answers for our route to net zero. Tackling the impacts of climate change on our business, and on the people who live in the communities where we build, is not going to be easy, but we are committed to the ambitions and targets we have set and to the role we want to play in a more sustainable future. We believe that the principles we have established to drive our work will make sure we are ready to respond to this urgent and important challenge.

**Iain McPherson**  
Group Chief Executive



We have joined the Race to Zero Business Ambition for 1.5°C.”

More detail on: [Page 9](#)



<b>Direction</b>	
A foreword from our Group CEO	2
Becoming net zero	4
Measuring the carbon footprint of our value chain	5
Our science-based targets to become net zero by 2030	6
<b>Delivery</b>	
Communicating change	8
Our path to a net zero future	9
Empowering action	10
Innovating for a brighter, low-carbon future	14
Ensuring a just transition to net zero	17
Creating a net zero supply chain	20
<b>Determination</b>	
Governance and transformational change	24
Thriving together	25
<b>Review</b>	
Measuring and reviewing progress	28
Glossary and document references	29

Direction		Delivery		Determination		Review
A sense of urgency	The guiding framework	Communicating change	Empowering action	Lasting culture change	Sustained delivery	

# Becoming net zero

## Our framework for change

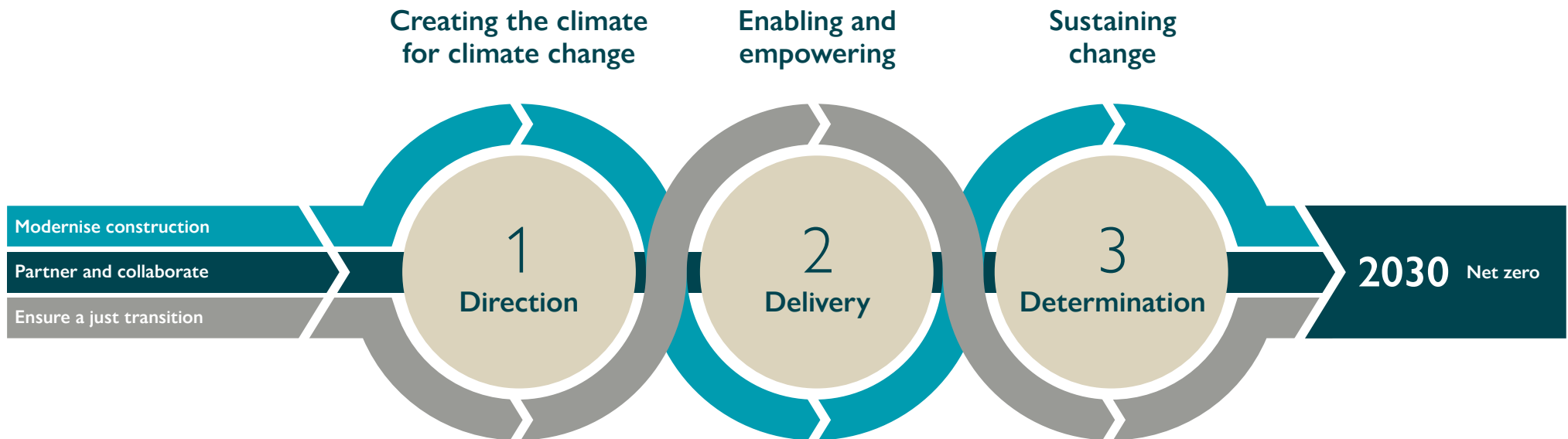
The UK Government has made a commitment to becoming carbon net zero by 2050, requiring us to balance the amount of greenhouse gas we emit into the atmosphere with the amount that is removed by trees and through other measures. When we add no more than we take away, net zero will be achieved.

Countryside's purpose is to create places where people love to live, with sustainable communities built to last. Climate change is society's

greatest challenge and one of the most significant risks to the future of the construction industry. Solving this challenge will require everyone to act with a much greater sense of urgency.

In May 2021 we launched our new approach to sustainability, which set out a focused, ambitious and impact-driven strategy for Countryside to play its part to respond to the big environmental and social challenges it faces, like climate change, with 25 stretching targets guiding it.

Four months on from launching our new approach to sustainability, we remain focused and ambitious with this Pathfinder. We are proud to be marking out the route we will take towards becoming a net zero business. This will require not just a series of actions, but a holistic framework for organisational and cultural change.



Direction		Delivery		Determination		Review
A sense of urgency	The guiding framework	Communicating change	Empowering action	Lasting culture change	Sustained delivery	

# Measuring the carbon footprint of our value chain

You can only manage what you can measure

We have taken a “whole lifecycle” approach to determining the carbon footprint of our value chain. We calculated this baseline and defined our footprint in partnership with Verco, an award-winning external consultancy practice that advises Government and the private sector on zero carbon policy creation and implementation.



## Suppliers to Countryside

## Countryside operations

## Customers and end of life

	Raw material extraction	Material production	Delivery	Manufacturing	Construction	Homeowners and tenants	End of life
	Sourcing, extracting and processing construction materials		Storing and delivering materials	Manufacturing timber frame houses and constructing residential developments		Living in the homes (60 years)	End of life demolition
1,000 tonnes of CO <sub>2</sub> e in 2020	161		48	14		642	21
% of total emissions (99.6% of total emissions)	18%		5%	2%		72%	2%
Emissions scopes	Scope 3			Scope 1 and 2			Scope 3

Direction		Delivery		Determination		Review
A sense of urgency	The guiding framework	Communicating change	Empowering action	Lasting culture change	Sustained delivery	

# Our science-based targets to become net zero by 2030

## Decoupling emissions from business growth

Progress towards net zero will be measured against our 2020 greenhouse gas emissions. In setting our targets, we have followed the Science-Based Targets initiative's ("SBTi") criteria. The SBTi drives ambitious climate action in the private sector by enabling companies to set science-based emissions reduction targets. It provides a clearly defined pathway for decoupling our projected business growth from our corresponding emissions growth.

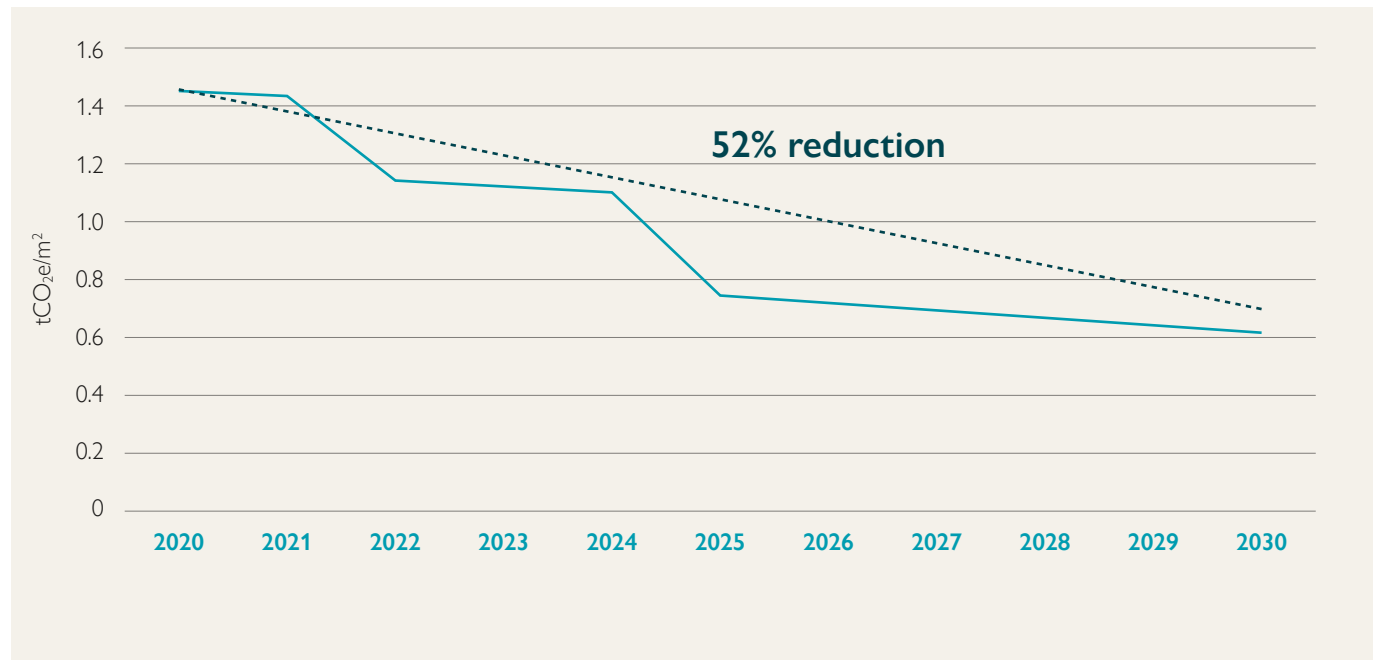
Our scope 3 emissions make up approximately 98% of our footprint, and we are addressing approximately 68% of these. The SBTi approved our targets in September 2021. We are clear that this baseline data is just our starting point. As we enhance our ability to measure emissions, our monitoring will improve and will better inform our actions.

The Scope 3 pathway chart highlights the impact building regulation changes will play in 2022 and 2025 reducing our GHG emissions.



### Scope 3 emissions pathway to 2030

Tonnes of CO<sub>2</sub>e per m<sup>2</sup>



### Emissions excluded from our science-based targets

Our scope 3 emissions make up approximately 98% of our footprint. In setting our science-based targets, we adhered to the SBTi guidelines, excluding the scope 3 unregulated emissions. Unregulated emissions relate to our homeowners use of electrical appliances, computers and all other electrical loads. Our control over homeowners use of electricity and our ability to reduce emissions in this area is limited. However, though unregulated emissions are not within the scope of our SBTs, page 12 does outline the steps we will take to encourage homeowners and tenants to become more energy-efficient.

— Countryside's projected 2030 emissions  
 - - - - - Scope 3 emissions reduction target of 52% per m<sup>2</sup> by 2030

Direction		Delivery		Determination		Review
A sense of urgency	The guiding framework	Communicating change	Empowering action	Lasting culture change	Sustained delivery	



# 2 DELIVERY

Direction		Delivery		Determination		Review
A sense of urgency	The guiding framework	Communicating change	Empowering action	Lasting culture change	Sustained delivery	

# Communicating change

## The challenge (and opportunity) of our lifetime



Direction		Delivery		Determination		Review
A sense of urgency	The guiding framework	Communicating change	Empowering action	Lasting culture change	Sustained delivery	

# Our path to a net zero future


Innovative, collaborative, fair and just

The work behind developing a trajectory which takes Countryside to net zero by 2030 has been thorough and intense, but this is only the start.

To achieve our science-based targets we will need to not only examine our construction and manufacturing operations, but also the design of our homes and developments to ensure they become part of the solution rather than the problem.


Working towards a just transition to net zero by 2030 underlines the strength of our ambitions to create places where people love to live, with sustainable communities built to last.


## Direction

 **31%** less CO<sub>2</sub> emissions through improved fabric efficiency, renewable energy and heat recovery systems by 2022

 **80%** less CO<sub>2</sub> emissions by switching from diesel to hydrotreated vegetable oil for on-site plant machinery by 2023

## Delivery

 **75%** less CO<sub>2</sub> emissions through improved fabric efficiency, renewable heat and energy by 2025

 **60%** of suppliers to Countryside, based on spend have also set science based targets by 2025

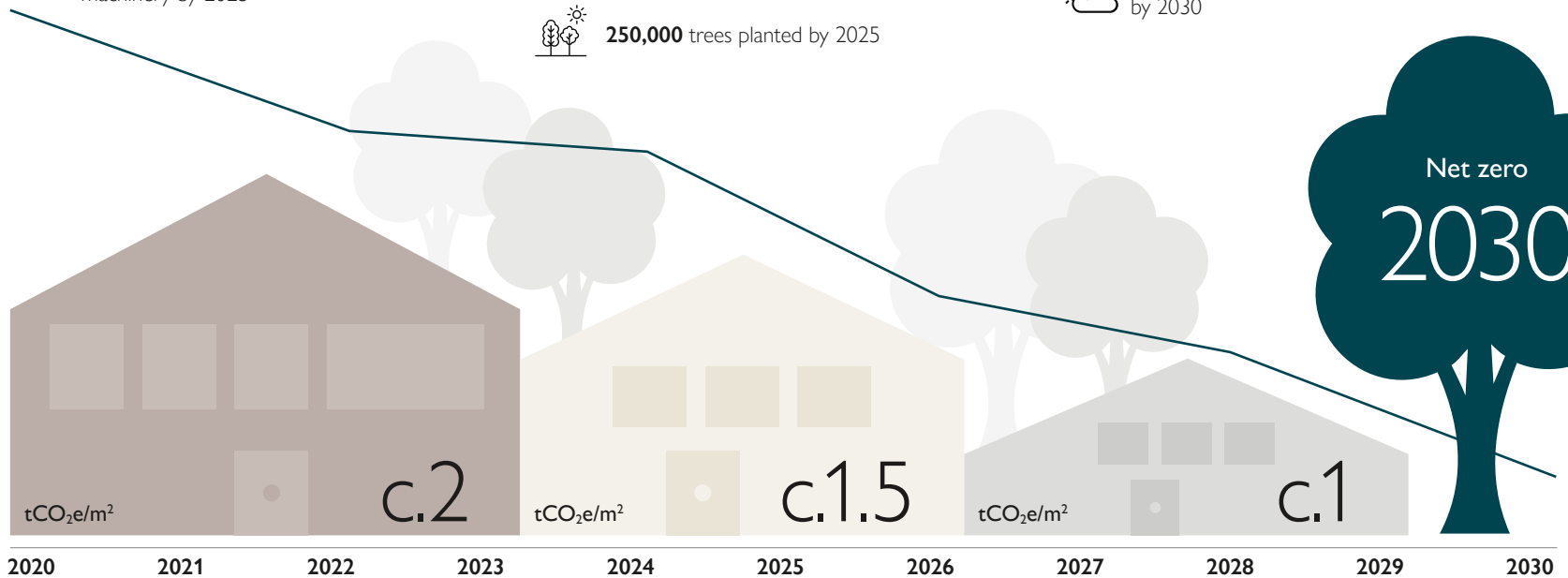
 **250,000** trees planted by 2025

## Determination

 **140%** less embodied carbon using our timber frame homes by 2025

 **42%** absolute reduction in scope 1 and 2 GHG emissions by 2030

 **52%** per m<sup>2</sup> scope 3 GHG emissions reduction by 2030



<sup>1</sup> We plan to incorporate further modern construction solutions into our factories to deliver homes that have 40% less embodied carbon than a traditional brick and block home by 2025.

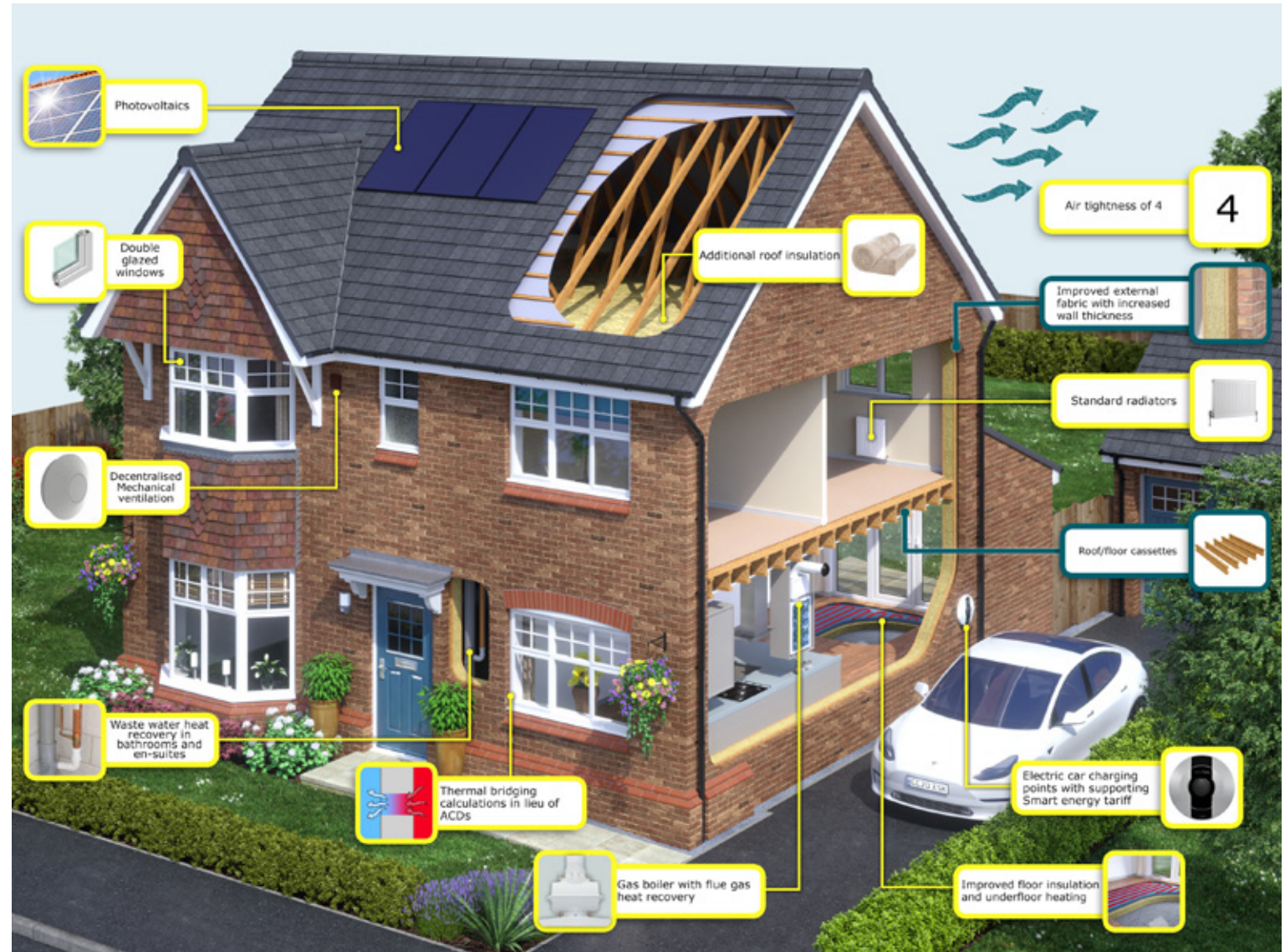
Direction		Delivery		Determination		Review
A sense of urgency	The guiding framework	Communicating change	Empowering action	Lasting culture change	Sustained delivery	

# Empowering action

## Designing homes fit for a net zero future

### The Building Regulations, Part L, 2021

The Government's aim is to build net zero carbon ready homes by 2025. The first step towards this comes after June 2022 when all new homes will be expected to produce 31% less CO<sub>2</sub> emissions. To achieve the carbon savings of 31%, dwelling designs will need to meet or exceed the combined element approach as defined within the National Building Specification model.



Annotated 3D picture of a CPPLC home with cut out and annotation showing examples of the changes necessary to meet the interim uplift of Part L

Direction		Delivery		Determination		Review
A sense of urgency	The guiding framework	Communicating change	Empowering action	Lasting culture change	Sustained delivery	

# Empowering action continued

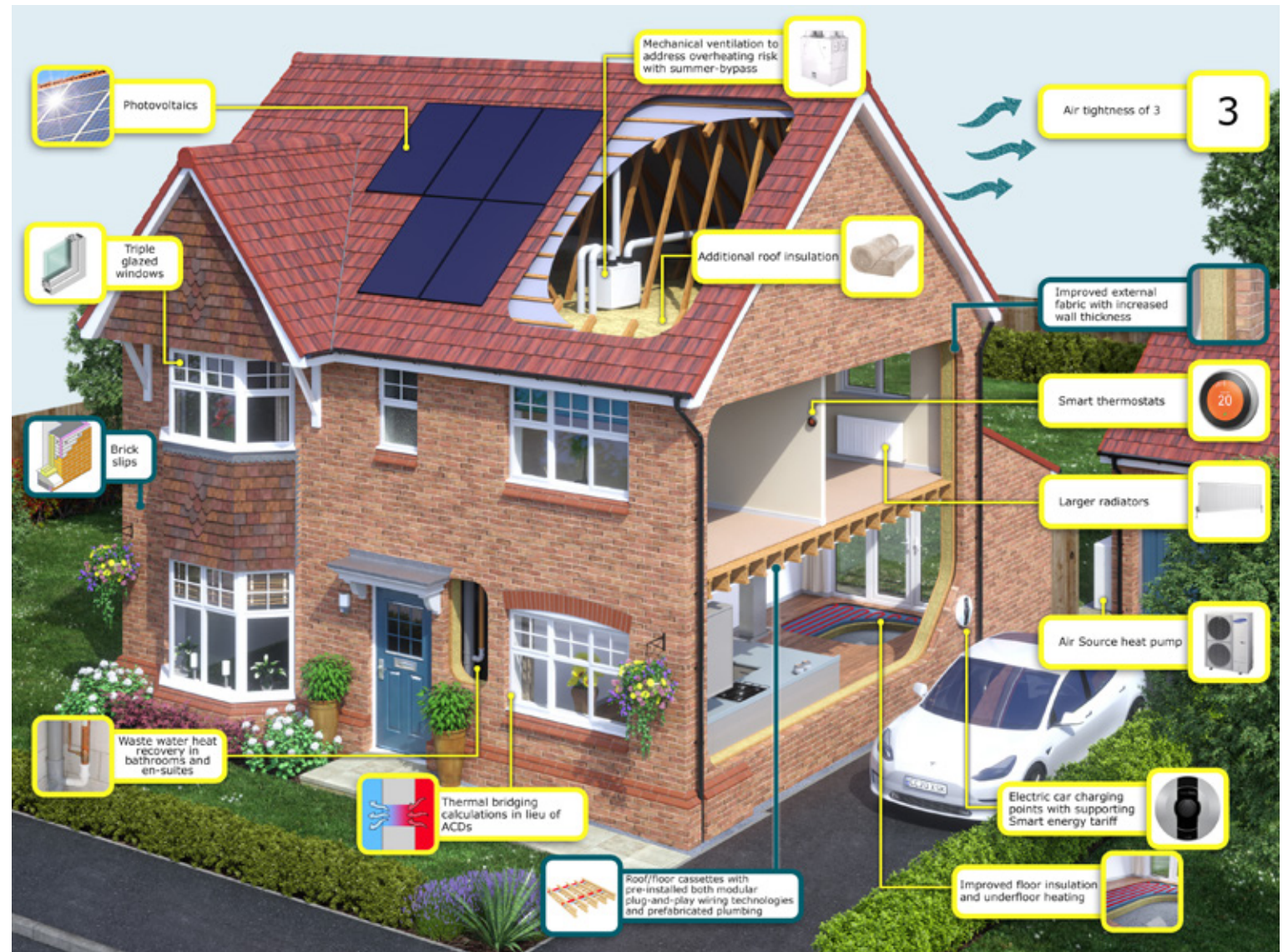
Designing homes fit for a net zero future continued

## The Future Homes Standard

A public consultation for the Future Homes Standard is planned in 2023. The new regulations are expected to be confirmed during 2024 and to go live in 2025.

Homes built to the Future Homes Standard in 2025 will be responsible for c.80% less carbon emissions than a house built today. The Government's draft 2025 Model Design relies on low-carbon heating, triple glazing and a very low wall U-value. We are expecting to see the end of gas boilers and an increase to minimum wall cavities of 150mm.

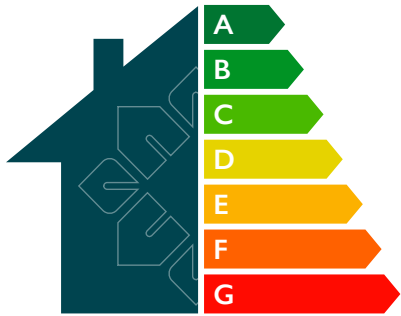
Annotated 3D picture of a CPPLC home with cut out and annotation showing modern methods of construction and examples of the changes necessary to meet the Future Homes Standard



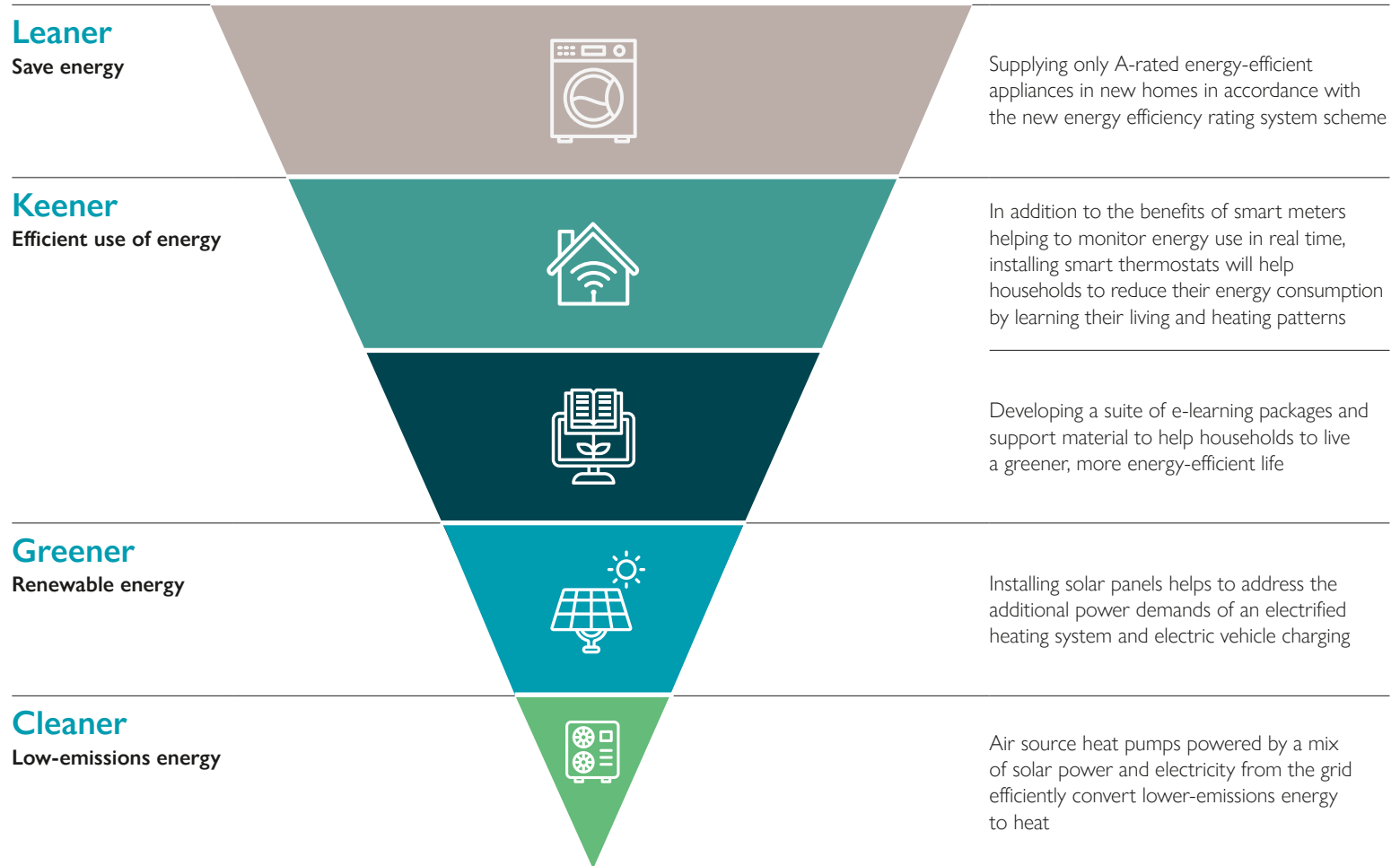
Direction		Delivery		Determination		Review
A sense of urgency	The guiding framework	Communicating change	Empowering action	Lasting culture change	Sustained delivery	

# Empowering action continued

## Designing homes fit for a net zero future continued



In addition to adopting a fabric first approach to reduce the heating demand of new homes, we are also applying the principles of Countryside's energy hierarchy to help reduce both regulated and unregulated energy usage.



Direction		Delivery		Determination		Review
A sense of urgency	The guiding framework	Communicating change	Empowering action	Lasting culture change	Sustained delivery	

# Empowering action continued

Designing homes fit for a net zero future continued



## Building our first Net Zero Carbon Ready Homes at Beaulieu

The vision for Beaulieu has always been to create a vibrant and integrated community in the city of Chelmsford that exemplifies excellence in design and sustainability. We are continuing that vision by delivering our first 80 Net Zero Carbon Ready homes at the development.

Chelmsford City Council and Homes England are working in partnership with Countryside to deliver these 80 homes by helping to fund some of the initial research required to deliver net zero carbon ready homes ahead of the Future Homes Standard in 2025. Countryside has committed to sharing the learning it takes from building these homes to help inform future zones at the Garden Community and other developments.

Beaulieu is among the first neighbourhoods being built as part of Chelmsford Garden Community with over 1,500 homes already completed. The Council's newly adopted local plan allocates further land to the Garden Community, meaning it will provide more than 10,000 new homes to the area when complete, along with a new mainline rail station and bypass, which is being funded by the Housing Infrastructure Fund.

Countryside has already started work to prepare a detailed planning application for the 80 net zero carbon ready homes at Beaulieu. We hope to submit it in late 2021 with construction complete in late 2023.

In 2018, Beaulieu won the national Planning Award for Infrastructure Planning and features as an exemplar scheme in both the National Design Guide and the Transportation Decarbonisation Plan.

Direction		Delivery		Determination		Review
A sense of urgency	The guiding framework	Communicating change	Empowering action	Lasting culture change	Sustained delivery	

# Innovating for a brighter, low-carbon future

## Energising innovation and modern methods of construction

Transitioning towards a net zero world will not only require energy-efficient homes to live in, it will also mean thinking about the embodied carbon within the home. The term “embodied carbon” refers to the carbon emissions created over the course of a building’s entire lifecycle from the extraction of the raw materials, through to the construction and use of the home to the demolition and disposal of materials at the end.

Embodied carbon is becoming an increasingly important consideration in the mitigation of climate change. The World Green Building Council recently highlighted that, of the cumulative carbon emissions associated with new global development between now and 2050, roughly 50% will be associated with the emissions before a building is ever used.

### Construction Playbook – supporting MMC

In the Construction Playbook, a guidance document about sourcing and contracting public works projects, the UK Government has reaffirmed its commitment to modern methods of construction (“MMC”). Departments and arm’s length bodies are expected to set targets for the use of MMC in delivering projects and programmes. This expectation has been reflected within Homes England’s £11.5bn Affordable Housing Programme. Any strategic partner working with Homes England to build affordable homes through this programme must commit to using MMC to build at least 25% of the homes it delivers.

### Our commitment to MMC

We firmly believe that adopting MMC, such as modular timber frames, is key to delivering homes at scale, pace and quality, while ensuring more sustainable outcomes. Countryside has invested c.£6m in a manufacturing facility at Warrington which produces fully formed, closed panel timber frames, and a new c.£20m factory in Bardon, Leicestershire, opened in June 21.

**c.24%**

of Countryside’s GHG emissions are attributed to construction materials and the transportation of those materials to site

### Countryside’s MMC targets

**≥50%**

of all homes to be built using modern methods of construction by 2025

**≥20,000**

of homes to be built by our factories by 2025



### Carbon lifecycle assessment study

In 2020, we commissioned a carbon lifecycle assessment to understand and compare the embodied carbon levels of our modular timber frame home against traditional brick and block construction. The assessment was carried out by an external sustainability consultant and concluded that Countryside’s traditional brick and block home has significantly higher levels of embodied carbon attributed to its materials than our modular timber frame home, with approximately 14,500kg more CO<sub>2</sub>e in embodied carbon.

**30% less**

embodied carbon in a modular timber frame homes than traditional brick and block build

Direction		Delivery		Determination		Review
A sense of urgency	The guiding framework	Communicating change	Empowering action	Lasting culture change	Sustained delivery	

# Innovating for a brighter, low-carbon future continued

Energising innovation and modern methods of construction continued



## Countryside's timber frame factory in Bardon

- 360,000 sq.ft purpose-built manufacturing facility
- EPC A rating
- BREEAM excellent rating
- 250kW of solar array
- 118kW of Tesla battery storage
- 100% of regulated energy met through the solar array

## Researching MMC, a study by Homes England

In May 2020, Homes England commissioned a research study into modern methods of construction to drive innovation in the construction industry. Spencer's Park is the largest of eight sites included in Homes England's Modern Methods of Construction (MMC) Research Commission. The purpose of this Commission is to collect a body of verifiable data from a range of MMC typologies throughout the lifecycle of a development from construction to post occupation.

This Commission is being supported by the Building Research Establishment and is aligned with work already undertaken by the Construction Leadership Council and the Advanced Industrialised Methods for Construction of Home initiative.

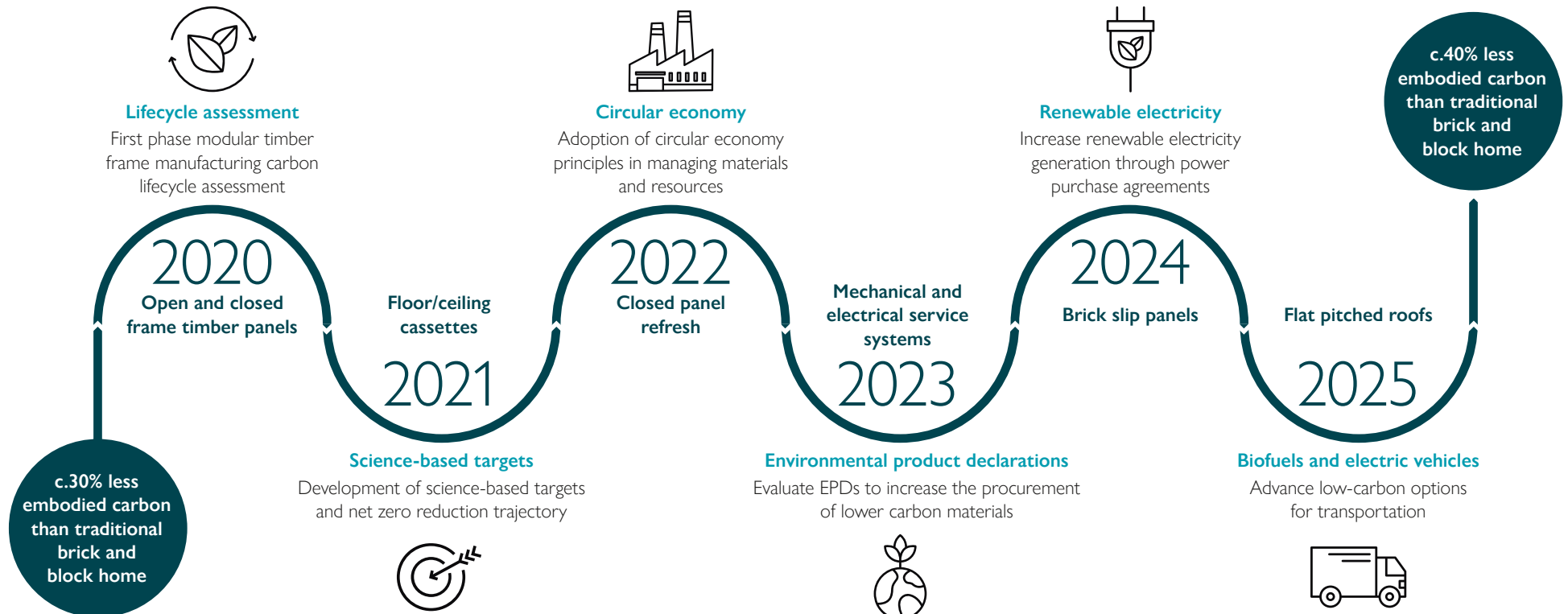
100% of all new homes at Spencer's Park will be constructed using MMC. Data collected at these eight sites will be made available to developers and the wider industry to promote understanding of these new technologies and benefits of MMC.

Direction		Delivery		Determination		Review
A sense of urgency	The guiding framework	Communicating change	Empowering action	Lasting culture change	Sustained delivery	

# Innovating for a brighter, low-carbon future continued

## Energising innovation and modern methods of construction continued

Countryside is committed to modernising construction. It's critical that we move from the traditional model of "design and construct" to a more high quality product-led and volume delivery model. To support this transformation, we are fundamentally restructuring the way our business operates to drive increasing levels of pre-manufactured and modern elements being introduced into our homes. Not only will this new model help Countryside to build homes at the pace and quality it needs to help meet the Government's ambition of building 300,000 a year in the UK, it will help to reduce the embodied carbon levels within the homes we built. Our 2020 Carbon life cycle assessment showed that our modular timber frame homes had 30% less embodied carbon than our traditional brick and block home. The adoption of more rigorous design processes, better quality control, reduced waste and fewer transport loads will further help to reduce the embodied carbon level of our new homes. The timeline below shows when we plan to incorporate new modern construction solutions into our factory-built homes as well as the other measures we will be introducing at our factories to deliver homes that have 40% less embodied carbon than a traditional brick and block home by 2025.



Direction		Delivery		Determination		Review
A sense of urgency	The guiding framework	Communicating change	Empowering action	Lasting culture change	Sustained delivery	

# Ensuring a just transition to net zero

## Partner and collaborate

With Countryside's business model centred around partnerships, we remain the UK's only major housebuilder for which private "for sale" homes make up less than half of our annual total completions. This means that the majority of the homes we build are for housing providers and the private rented sector. This mixed tenure model is strongly aligned to Government policy and supports the UK's vision to build back better.

Because of the significant proportion of affordable homes that we build, we believe it is critical for us to ensure that the decisions we make as an organisation to transition ourselves and our future development schemes to be net-zero must consider and support a just and fair transition for everyone.

To ensure that the principles of a just transition to net zero are embedded within our business and our partnerships we have taken two important actions.

The first was to join the UKGBC, who are leading the just transition charge in the built environment, and will be looking to work closely with them to identify opportunities to lobby for a just transition across the sector.



The transition to a net zero built environment will unavoidably impact us all socially and economically. It is critical that we play our part to help avoid deepening existing inequalities and support a just transition – one which improves lives and livelihoods, "levels up" communities, and leaves no one behind."

**Building a just transition to net zero  
(Jan 2021)**

UK Green Building Council



For our future housing market to be successful, we need to create sustainable mixed-tenure communities that provide more housing choice, improve quality and increase efficiency. We will be working closely with Countryside to consider and plan how the new residential developments we build together can be inclusive for all, and how best they can incorporate sustainable design and construction technology to become net zero carbon ready."

**Scott Black**

Executive Development Director – Places for People



Working with Countryside we have the capability to deliver thousands of new high-quality family homes throughout England, that will help us to play our role in building low-carbon homes and communities, as well as supporting the levelling up of the economy."

**Graham Barnett**

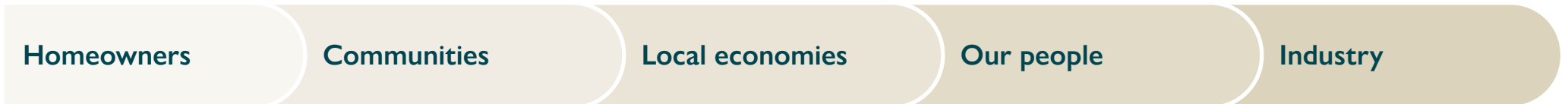
Chief Executive Officer / Founder Sigma Capital Group

Direction		Delivery		Determination		Review
A sense of urgency	The guiding framework	Communicating change	Empowering action	Lasting culture change	Sustained delivery	

# Ensuring a just transition to net zero continued

## Action plan

In addition to joining the UKGBC, we have created an action plan for our business that focuses on the key interventions we can make with our stakeholders to support and drive a just transition to net zero.



### Homeowners

**Minimising lifecycle maintenance and heating costs**  
We will work closely with key stakeholders, including housing associations, to build homes that are fit for a net zero future. We will also seek to ensure that households are not adversely affected by potential increases in energy prices that may occur as the Government looks to tax fuels high in carbon emissions, like gas. Our work will include coming up with new designs and configurations that seek to minimise the lifecycle maintenance and heating costs of our homes.

### Communities

**Supporting low-carbon initiatives in communities**  
We will work with residents and local communities to support low-carbon initiatives. This could include, for example, training residents to become “energy efficiency champions” so that they can help and advise others on ways to reduce energy costs and save money.

### Local economies

**Supporting local economies**  
As part of our procurement strategy, we will seek to support the local economies around our developments. We have set a group-wide target of generation 30% social value across our business every year. Social value is an important and useful way to measure the positive social and environmental impact created by our work, putting it into financial terms. In our [approach to sustainability](#), launched in May 2021, we set out a commitment to develop local job creation, training and employment support plans across the whole of Countryside by 2025.

### Our people

#### Sharing our knowledge and expertise

We intend to work closely with our housing association partners, supply chain, local community and industry colleagues to tackle the far-reaching and complex issue of transitioning to a low-carbon economy. Countryside has joined the Home Builders Federation’s cross-sector Future Homes Task Force. The Task Force brings together representatives from across government, construction, suppliers, and environmental groups.

### Industry

#### Investing in training and skills

We will create a bespoke training programme to empower each Countryside employee with the skills and expertise they need to effectively support the transition to net zero. We have also become a partner of the Supply Chain Sustainability School, offering free e-learning and training in construction-specific sustainability and climate change issues to supply chain partners. We are targeting 85% of our supply chain to be signed up to the Supply Chain Sustainability School by 2025.

Direction		Delivery		Determination		Review
A sense of urgency	The guiding framework	Communicating change	Empowering action	Lasting culture change	Sustained delivery	

# Ensuring a just transition to net zero continued

## Action plan continued



### Beam Park

Countryside is partnering with L&Q and Greater London Authority, one of the UK's leading housing associations, to regenerate Beam Park in East London. We are building 3,000 homes, 50% of which will be affordable. When the masterplan is complete in 2030, Beam Park will also provide two schools, retail spaces, a gym, a nursery, community facilities and a multi-faith space. 44% of the development has been allocated for publicly accessible green space, including a three-hectare central park in the heart of the area, with the River Beam running through it.

The energy strategy for the development will reduce CO<sub>2</sub> emissions by 35% beyond the current building regulations. This will be achieved using the London Plan Energy Hierarchy: use less energy ("be lean"), supply energy efficiently ("be clean") and use renewable energy ("be green"). A range of passive design features and demand-reduction measures will be used, including roof mounted solar PV and two state-of-the-art energy centres, delivering savings for residents. The latter will include combined heat and power units, supported by heat pumps that create low-carbon renewable heat for the commercial units.

### Heat Trust – just, fair and high-quality sustainable heat



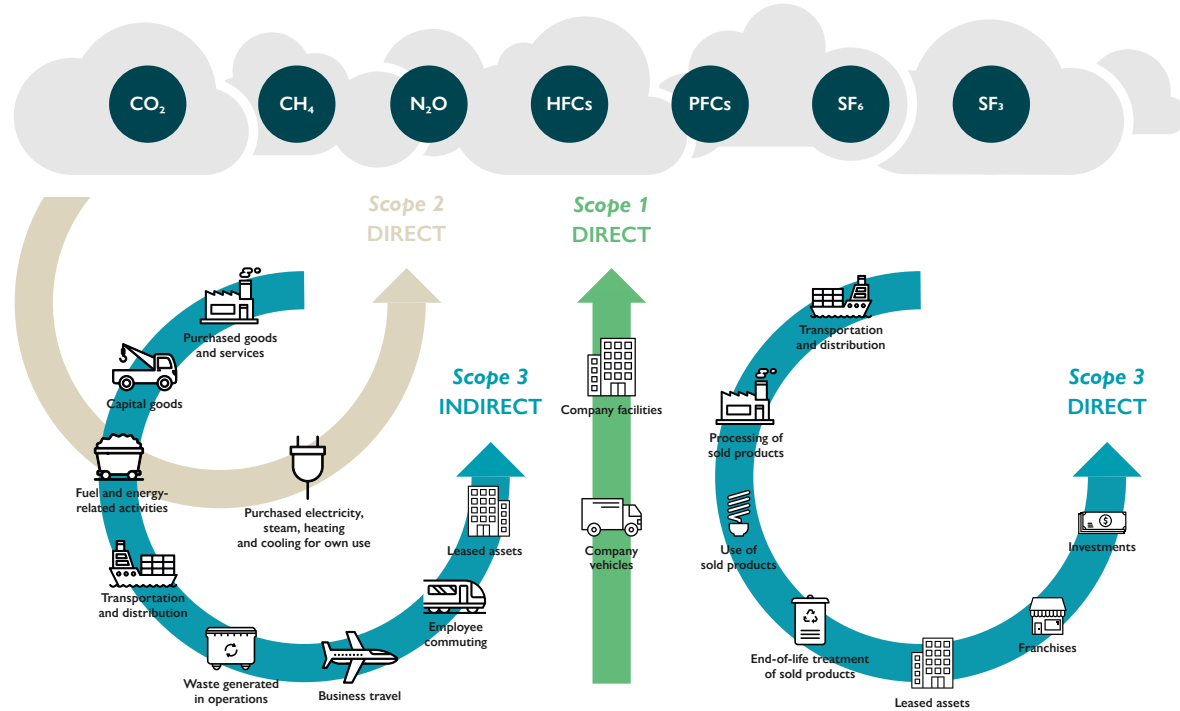
Heat networks are playing a key role in meeting carbon reduction targets and helping to create a sustainable energy future. Beam Park has signed up to the Heat Trust scheme, which is a voluntary, stakeholder-led customer protection scheme. Signing up to Heat Trust will ensure the residents at Beam Park enjoy the benefits of heating systems fit for the future by setting the standards they should expect and making sure they are treated fairly.

Direction		Delivery		Determination		Review
A sense of urgency	The guiding framework	Communicating change	Empowering action	Lasting culture change	Sustained delivery	

# Creating a net zero supply chain

## Working with the supply chain to accelerate climate action

To achieve our science-based targets, we are examining our construction and manufacturing operations to ensure they become part of the solution rather than the problem. To accelerate climate action, we are also engaging with our suppliers and sub-contractors. We have set out a plan of action below, detailing how we will work closely with our supply chain to utilise low-embodied carbon products in our designs, and seek opportunities to reduce operational and transport-related emissions. The actions in the table have been grouped under 5 of the 15 categories of scope 3 emissions in the GHG Protocol. The Protocol is intended to provide companies with a systematic framework to measure, manage and reduce emissions across a corporate value chain.



Overview of GHG Protocol Scope and emissions across the value chain

Action	Measurement	Target and review
<b>Scope 1 – Energy, direct emissions</b>		
Use hydrotreated vegetable oil (“HVO”) in directly hired plant and generators. HVO has 80–90% less CO <sub>2</sub> e than petroleum diesel.	→ Percentage of spend on HVO vs petroleum diesel → GHG reporting (scope 1)	→ 100% usage by 2023 → 80% reduction in scope 1 GHG emissions
Reduce hire periods of generators by optimising the use of temporary building supplies on site.	→ Average on-site generator hire periods → Percentage of hybrid generators used vs non-hybrid	→ Reduce absolute scope 1 GHG emissions by 42% by 2030
Reduce fuel consumption by adopting hybrid generators which utilise partial battery power.	→ GHG reporting (scope 1)	

continued overleaf →



# Creating a net zero supply chain continued

## Working with the supply chain to accelerate climate action continued

Action	Measurement	Target and review
<b>Scope 2 – Energy, indirect emissions</b>		
Procure renewable green energy for office and construction site usage.	→ Percentage of our energy procured that is renewable	→ 100% of our energy procured is renewable by 2023
<b>Scope 3 – Indirect (upstream activities)</b>		
<b>Capital goods</b>		
Undertake supply chain survey to determine the specification and usage of cement replacement like granulated blast furnace slag.	→ Percentage of cement replacement across volume of usage and total spend	→ Survey output analysis and quarterly internal buyer forums
Establish a process to gather environmental product declaration information for high-spend volumes of carbon-intensive building materials. Use improved understanding gained to inform procurement decision making and reduce embodied carbon levels.	→ GHG reporting – CO <sub>2</sub> e/m <sup>2</sup> → Case studies on low embodied carbon building materials in use	→ 25% reduction in embodied carbon levels of top five most carbon-intensive building materials
Reconfigure supplier assessment process to measure and promote the adoption of science-based targets across the supply chain.	→ Percentage of suppliers by emissions that have set a science-based target	→ 60% of suppliers have set science-based targets by 2025
Promote the use of the Supply Chain Sustainability School to improve knowledge and understanding around climate change mitigation.	→ Percentage of our supply chain that have signed up to the Supply Chain Sustainability School based on spend	→ 85% of our supply chain signed up to the Supply Chain Sustainability School by 2025
<b>Waste generated in operations</b>		
Work with the supply chain to stimulate greater adoption of circular economy principles in managing materials resources and to reduce reliance on single use plastic packaging.	→ Percentage of waste diverted from landfill → Construction waste intensity (tonnes/m <sup>2</sup> )	→ Reduce construction waste intensity by 20% by 2025 → Maintain 98% of waste diverted from landfill

continued →  
overleaf →

# Creating a net zero supply chain continued

## Working with the supply chain to accelerate climate action continued

Action	Measurement	Target and review
<b>Scope 3 – Indirect (downstream activities)</b>		
<b>Use of sold product</b>		
Arrange supply agreement and roll-out use of smart programmable thermostats to pilot projects.	<ul style="list-style-type: none"> <li>→ Percentage of homes with smart thermostat installed</li> <li>→ Post-completion building performance measurement programme</li> <li>→ GHG reporting – scope 3 emissions</li> </ul>	→ 80% reduction in regulated energy by 2026
Negotiate a partnering supply agreement to provide electric vehicle (“EV”) charging stations to our properties. These will be a minimum dedicated 7kW supply.	→ Percentage of homes that have an EV charging station installed	→ 10,000 homes to have accessible EV charging facilities by 2025
Develop preferred supply agreements to design and equip our homes so that they save energy and create renewable heat (waste water heat recovery, flue gas heat recovery, photovoltaics and air source heat pumps).	<ul style="list-style-type: none"> <li>→ Percentage of homes that have energy saving and renewable heat generation</li> <li>→ EPC rating of homes</li> </ul>	→ 80% reduction in regulated energy by 2026
Develop preferred supply agreements to build homes with lower heat demand by adopting enhanced, thermally efficient products (thermal lintels, insulants, enhanced glazing specifications, ground floor systems, etc.).	→ EPC rating of homes	→ 80% reduction in regulated energy by 2026

Direction		Delivery		Determination		Review
A sense of urgency	The guiding framework	Communicating change	Empowering action	Lasting culture change	Sustained delivery	



# 3 DETERMINATION



Direction		Delivery		Determination		Review
A sense of urgency	The guiding framework	Communicating change	Empowering action	Lasting culture change	Sustained delivery	

# Governance and transformational change

## Leadership and accountability

To create a sense of urgency, we launched a new **approach to sustainability** in May 2021 which is focused, ambitious and, most importantly, impact-driven.

Our new approach is guided by our values and purpose of creating places people love, with sustainable communities built to last. The path we are taking to net zero requires a strong and guiding coalition of the most senior people in our business with the power and influence to lead Countryside to a net zero future. The journey we have embarked on will require transformational change across the entire organisation.

### Delivering change and empowering action

Since launching our new approach to sustainability, our work has continued to gather momentum, empowering action across all levels of the organisation. We have established a Sustainability Committee chaired by a Non-Executive Board Director at Countryside, which is attended by senior representatives from across the organisation, including the Executive Committee. The Committee has oversight of the sustainability strategy, holding the organisation to account. This includes evaluating the interventionary measures necessary to achieve our net zero targets. The Chair of the Sustainability Committee also acts as a liaison between the Main Board and the organisation in the delivery of the sustainability programme. For example, during a Main Board session early in the summer of 2021, the Chair of the Sustainability Committee led discussions on the proposed science-based targets being set, which led to their full ratification.

In addition to the Committee, significant progress is being made to embed sustainability within other key governance channels. The MD of Corporate Affairs, who is part of the Executive Committee, ensures sustainability is considered alongside other important business issues. In addition, other leaders on the Executive Committee have sponsored thematic sustainability improvement programmes.

Following discussions held at the most recent Sustainability Committee, the terms of reference for other governance committees, such as Investment and Audit, are being enhanced. An example of this is ensuring the Investment Committee considers climate change in capital allocation decisions. Discussions have also been held at the Remuneration Committee to incorporate ESG-linked incentives, including carbon mitigation, into the Company bonus scheme for application in FY23.

We have assigned the delivery of sustainability targets across all key functions to further empower action and sustain progress. Quarterly meetings are held and attended by regional Directors for all key business areas, such as planning, commercial, technical, construction and sales. These meetings not only facilitate the communication of proposed changes to operating practices, controls and measurement, but also provide an opportunity for leaders across the Company to play a significant role in continuing to shape our evolving net zero strategy.

### Future Homes Working Group

To specifically address the challenge of designing, manufacturing and constructing homes to become zero carbon ready, we are establishing a Future Homes Working Group. This multi-disciplinary group will have representation from across the Company. The Future Homes Working Group will take on many challenging topics, ranging from technical questions related to improving the fabric efficiency of homes, to the installation of renewable heating technology and the implication of homeowners using and maintaining these systems. We expect that the Group will work in parallel with the Home Builders Federation ("HBF") Future Homes Hub, and the cross-industry solutions being proposed by the HBF will be factored into the Countryside Future Homes Working Group's decision-making and proposals.

### Sustainability governance



Direction		Delivery		Determination		Review
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# Thriving together

## The net zero generation

The UK's commitment to becoming net zero by 2050 is leading to the squeezing of regulations affecting new home design and construction, particularly building fabric efficiency, airtightness and renewable energy systems. The increased concentration of greenhouse gases in the planet's atmosphere is a problem over 150 years in the making. The solutions to this challenge must look to the future, embracing modern methods of construction, new ways of working and increased adoption of smart digital construction.

**Moving to a low-carbon future needs the right people in Countryside, with the right skills, knowledge, passion and motivation to deliver.**

A recent publication by the Institute for Public Policy Research, entitled Skills for a Green Recovery, reiterated concerns that the construction industry faces large and persistent skills gaps and shortages, with up to

750,000 of the current workforce due to retire in the next 15 years, giving rise to questions about how effectively we can transition to net zero.

**The evolution required to modernise construction and achieve next zero could inspire the next generation of young workers to pursue a purpose-driven career in an industry they may have once not considered as attractive to them.**

**BPIC NETWORK** **Strengthened together**  
**Improving diversity**

The skills shortage in the construction industry is further exacerbated by a lack of gender diversity and under-representation of black and minority ethnic ("BAME") groups. In August, Countryside formed a new partnership with Black Professionals in Construction ("BPIC"). It is our firm belief that a diverse workforce in a supportive environment can bring different

perspectives, new ideas and greater creativity. This will help to address the skills gap and ensure the best and brightest minds are set to work on the net zero challenges ahead.

**SID** **Share, Inform, Develop ("SID")**  
Countryside has invested significantly in a dynamic learning platform powered by a knowledge intelligence engine. The SID platform will be utilised to bring together net zero-related guidance and information sources in a modern, engaging and accessible way. This platform will also enable the development of net zero learning pathways for specific roles and activities, and the creation of a Sustainability Academy where our people can learn, collaborate and inspire action together. All of this will help to ensure that our people have access to the skills and knowledge needed to deliver our net zero outcomes.

Modernise construction

Partner and Collaborate

Ensure a just transition

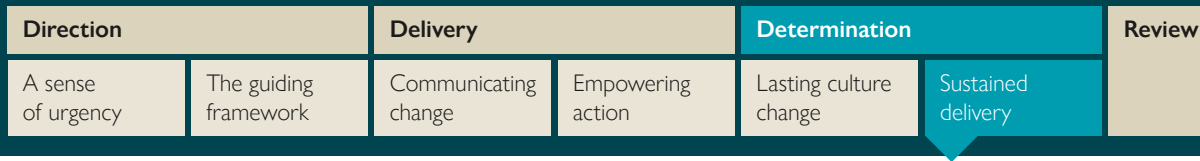
### Learning pathways

The three tenets of Countryside's path to net zero are: the need to modernise construction to achieve more sustainable, low-carbon outcomes; the value of strong partnerships to ensure a shared sense of urgency; and a responsible transition to a low-carbon economy that leaves no one behind. The following matrix summarises the learning pathways for Countryside business functions across the development lifecycle. This summary level matrix will inform the production of more detailed net zero learning plans that are specific to each business function.



**New intake of graduates in the 2021 scheme**





# Thriving together continued

## The net zero generation continued

### Learning pathways

Developing an understanding of the potential negative consequences of transitioning to a low-carbon society on disadvantaged householders who may become adversely affected by rising energy prices ("just transition").
Developing comprehension of the commercial viability implications of delivering enhanced energy performance levels. The adeptness to collaborate with partners to leverage mutually beneficial low-carbon outcomes on new developments and regeneration projects.
Developing the knowledge and understanding to factor costs into future site acquisition which facilitates the implementation of new net zero carbon ready designs, technologies and infrastructure.
Developing an enhanced appreciation of the infrastructure challenges associated with the mainstream transition to electric-based heating and electric vehicles on local energy networks.
Developing an understanding of the practical solutions that will support net zero carbon ready developments' interaction with wider energy systems, including demand-side management.
Developing the adeptness to engage key stakeholders and communities on the social value of sustainable, low-carbon developments.
Developing the knowledge and understanding to oversee the formulation of energy strategies that deliver zero carbon ready developments, including low temperature communal renewable heating systems.
Developing an understanding of the measures necessary to adapt to climate change, including overheating, flooding and water stress.
Developing transport strategies that seek to reduce the need to travel and encourage sustainable travel options including walking, cycling and public transport.
Developing in-depth knowledge and understanding of new standard assessment procedure ("SAP") models and the proficiency to develop appropriate technical solutions which reduce heat and power demand and utilise renewable energy generation.
Developing an understanding and appreciation of lifecycle analysis ("LCA") tools to quantify lifetime environmental and carbon impact. Using LCA to arrive at informed decisions on embodied carbon levels in material selection.
Developing increased familiarity and competence utilising digital design and information modelling platforms to maximise resource efficiency and minimise environmental impact.
Developing the knowledge and skills necessary to support the transition from traditional housebuilding to a product-led logic.
Developing carrying out building performance evaluation and the ability to develop post-occupancy energy performance monitoring and evaluation procedures.
Developing leading the organisational and cultural change necessary for Countryside to achieve progressively higher levels of pre-manufactured value (change management).

### Development lifecycle – business functions

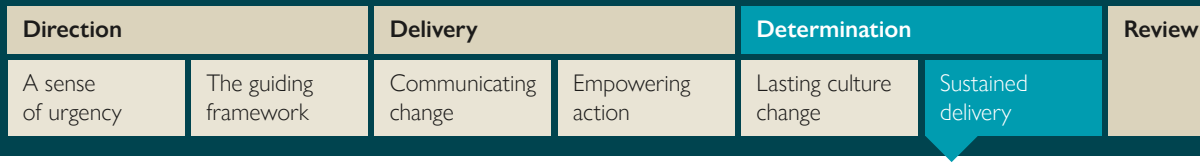
Strategic partnership development	Land acquisition, planning and regeneration	House design and technical support	Manufacturing	Construction	Commercial/procurement	Sales and customer service
2	1	1	1	1	1	1
3	3	3	2	1	3	1
2	3	2	1	2	3	1
1	3	3	2	2	3	2
1	3	3	2	2	2	1
2	3	1	1	1	1	2
1	3	3	3	3	3	2
1	3	3	3	2	2	1
2	3	2	1	2	2	2
1	2	3	2	2	3	1
1	1	3	3	3	3	1
1	2	3	3	2	2	1
1	2	3	3	3	3	1
1	1	3	3	2	2	1
2	2	3	3	3	3	1

### Proficiency level

Awareness and appreciation	1
Working knowledge	2
Practical knowledge	3

### Tenet

Modernise construction
Partner and collaborate
Ensure a just transition



# Thriving together continued

## The net zero generation continued

### Learning pathways

	Development lifecycle – business functions						
	Strategic partnership development	Land acquisition, planning and regeneration	House design and technical support	Manufacturing	Construction	Commercial/procurement	Sales and customer service
Developing the knowledge and ability to apply the principles of “lean construction” to create more value with fewer resources.	1	1	2	3	3	3	1
Developing reducing embodied carbon levels through the application of sustainable principles in procurement, design, manufacturing, logistics and transportation.	1	1	3	3	3	3	1
Developing in-depth knowledge and understanding of building to higher standards of energy efficiency and airtightness, including new building services technologies and potentially new construction methods for the next generation of homes.	1	2	3	3	3	2	1
Developing the knowledge and capability to oversee the installation of renewable energy generation technologies (e.g. air source heat pumps).	1	1	3	2	3	2	1
Developing in-depth knowledge and understanding of improving build methodologies and quality assurance processes to close the performance gap between design and operational emissions.	1	1	3	3	3	2	1
Developing the capability to implement circular economy principles to achieve stretching resource efficiency and waste reduction targets.	1	2	2	3	3	3	1
Developing the capability to manage multi-skilled modern methods of construction (“MMC”) assembly teams.	1	1	2	3	3	3	1
Developing the know-how to reduce scope 1 GHG emissions and the local air pollution impacts on site, associated with fossil fuel power machinery.	1	1	1	2	3	2	1
Developing an understanding of carbon footprints and the steps necessary to reduce emissions in the supply chain, including scope 3 reporting.	1	1	2	3	2	3	1
Developing the incorporation of carbon reduction targets, including science-based targets, and wider sustainability metrics into the tender process.	1	1	1	3	2	3	1
Developing the knowledge and understanding to interpret environmental product declarations and work with supply chains of construction products to reduce embodied carbon.	1	1	3	3	2	3	1
Developing the knowledge and understanding of technical skills and qualifications required for installers of renewable heating technology (e.g. heat pump installers).	1	1	2	1	3	3	1
Developing the knowledge and understanding to signpost supply chain partners to low-carbon learning pathways within the Supply Chain Sustainability School.	1	1	1	3	2	3	1
Developing the procurement processes that actively seek out local suppliers and sub-contractors in order to reduce travel emissions and generate social value.	1	1	1	3	2	3	1
Developing the support processes and technical guidance needed to help customers operate and maintain new technology like, heat pumps.	2	1	3	1	2	1	3

### Proficiency level

Awareness and appreciation	1
Working knowledge	2
Practical knowledge	3

### Tenet

Modernise construction	
Partner and collaborate	
Ensure a just transition	

Direction		Delivery		Determination		Review
A sense of urgency	The guiding framework	Communicating change	Empowering action	Lasting culture change	Sustained delivery	

# Measuring and reviewing progress

## Transparent and accountable

**Measuring performance and demonstrating progress will be very important on our pathway to becoming net zero. We are committed to being transparent and accountable, and sharing information and data with our stakeholders on the impact of the changes taking place in Countryside to reduce value chain carbon emissions.**

### Measuring our value chain

A key change in how we measure and report on climate change at Countryside is a shifting emphasis from focusing predominantly on our construction activity scope 1 and 2 emissions to advancing our understanding and reporting of emissions across the whole value chain. While reducing direct emissions derived from construction and manufacturing operations remains important, they only represent c.2% of our overall value chain emissions. The table to the right illustrates the key reporting metrics and methods we will employ to measure, evaluate and report on progress across the whole value chain.

### Additionality

We hold three Sustainability Committee meetings a year, with the third meeting focusing on additionality – evaluating the degree of progress being made by Countryside to achieve our stated commitments, targets and net zero outcomes.

### Data verification and reporting

We are committed to being transparent and accountable, reporting annually on the progress we are making on the route to net zero. This reporting will include the progress against our science-based

targets, which align with the Paris Agreement to ensure we contribute to limiting global temperatures to below 1.5°C.

To ensure that the data and information we present is accurate and consistent, we assign an independent third party to undertake an annual verification process. The results are shared in our Annual Report and Accounts, and on the Countryside website.

Countryside's value chain	Key reporting metrics and methods
<b>Reducing direct energy emissions (scope 1)</b>	→ tCO <sub>2</sub> e per year
<b>Reducing indirect energy emissions (scope 2)</b>	→ tCO <sub>2</sub> e per year
<b>Reducing other indirect emissions (scope 3)</b>	→ tCO <sub>2</sub> e/m <sup>2</sup> per year
<b>Supply chain</b>	→ % of the supply chain that have set science-based targets
<b>Delivering net zero carbon ready homes</b>	→ Energy Performance Certificate
<b>Renewable energy</b>	→ Capacity installed on new homes (MW) → Number of homes with renewable heating installed

Countryside's value chain	Key reporting metrics and methods
<b>Bringing down the embodied carbon levels in the homes we build</b>	→ tCO <sub>2</sub> e/m <sup>2</sup> GIA
<b>Data verification</b>	→ Independent third-party verification statement
<b>Progress reviews</b>	→ Sustainability Committee year-end "additionality" meeting
<b>Annual reporting to investors and stakeholders</b>	→ Annual Report and Accounts → Sustainability Report → Detailed GHG report → Annual CDP submission → Other investor benchmarks

Direction		Delivery		Determination		Review
A sense of urgency	The guiding framework	Communicating change	Empowering action	Lasting culture change	Sustained delivery	

# Glossary and document references

## Organisations and publications that have been referenced

### Intergovernmental Panel on Climate Change (“IPCC”)

The IPCC is a body of the United Nations, housed under the United Nations Environment Programme (“UNEP”). The IPCC produces an assessment of climate change science on an approximately six-year cycle. Each report is numbered, starting with the first assessment produced in 1990.

### 2015 Paris Agreement

A global agreement signed at the UN Climate Change Conference in Paris in December 2015 and ratified by 97 countries in November 2016. The Agreement “emphasises with serious concern” the need to hold the increase in the global average temperature to “well below 2°C” above pre-industrial levels, and “pursuing efforts to limit the temperature increase to 1.5°C”.

### Business Ambition with Race to Zero

The “Business Ambition for 1.5°C” is an urgent call to action from a global coalition of UN agencies and business and industry leaders, in partnership with Race to Zero. It is calling on companies to commit to ambitious science-based emissions reduction targets.

### UK Green Building Council (“UKGBC”)

Countryside is a member of the UKGBC, which is uniting the UK building industry using sustainability as a catalyst to positively transform the places people use every day. A charity with over 600 member organisations spanning the entire sector, it represents the voice of the industry’s current and future leaders who are striving for transformational change.

### Science-Based Targets initiative (“SBTi”)

The SBTi mobilises companies to set science-based targets. It is a partnership between CDP, the United Nations Global Compact, the World Resources Institute (“WRI”) and the Worldwide Fund for Nature (“WWF”). The initiative defines and promotes best practice in science-based target setting, offers resources and guidance to reduce barriers to adoption, and independently assesses and approves companies’ targets.

## Explaining the terms used

### Net zero

The UK Government has committed to becoming carbon net zero by 2050. Carbon net zero, or net zero as it is most commonly referred to, means finding a balance between the amount of greenhouse gas produced in the UK and the amount removed from the atmosphere through different means, like trees and carbon storage. Achieving net zero means the amount added is no more than the amount taken away.

### Net zero carbon ready homes

A net zero carbon ready home has been designed and constructed with the potential to be operationally net zero. Whilst a net zero carbon ready home will likely generate both renewable electricity and heat, it will still be reliant on some of its electricity needs being met by the National Grid. As the National Grid itself decarbonises and accelerates towards becoming net zero, the carbon emissions of the net zero carbon ready homes it supplies will also drop, thereby becoming net zero carbon homes.

### Just transition

A just transition seeks to ensure that the substantial benefits of a green economy transition are shared widely, while also supporting those who stand to lose economically – be they countries, regions, industries, communities, workers or consumers.

### Science-based target

Science-based targets are a set of goals developed by a business to provide it with a clear route to reduce greenhouse gas emissions. An emissions reduction target is defined as “science-based” if it is developed in line with the scale of reductions required to keep global warming below 2°C from pre-industrial levels.

### Climate emergency

The United Nations (“UN”) released a report in October 2018 on the impacts of global warming and warned that we may have just 12 years left from 2018 to limit a climate crisis. In Britain around 92% of the population lives in areas where the local authorities – over 500 councils all together – have declared a climate emergency.

Direction		Delivery		Determination		Review
A sense of urgency	The guiding framework	Communicating change	Empowering action	Lasting culture change	Sustained delivery	

# Glossary and document references continued

## Organisations and publications that have been referenced

### Future Homes Task Force

The Future Homes Task Force was established by the Homes Builders Federation (“HBF”) to bring together representatives from across the construction industry to develop a sector-wide climate and environment plan (called the Delivery Plan) to create high-quality homes and places that are net zero carbon by 2050. A Future Homes Hub is being created to support the implementation of the Delivery Plan.

### TCFD

The Task Force on Climate-Related Financial Disclosures (TCFD) provides a set of recommendations for voluntary and consistent climate-related financial risk disclosures in mainstream filings. The recommendations assist companies to provide better information to investors, lenders, insurers and other stakeholders on how they are managing to risks and opportunities of climate change on their business.

### Supply Chain Sustainability School

Launched in 2012, the Supply Chain Sustainability School is a free learning environment, upskilling those working within, or aspiring to work within, the built environment sector. It focuses on 17 key topics of sustainability, as well as addressing topics in offsite, digital, procurement, lean construction and management.

### GHG Protocol

The most widely used international accounting tool for Government and business leaders to understand, quantify and manage their greenhouse gas (“GHG”) emissions.

### The Construction Playbook

Sets out key policies and guidance for how public works projects and programmes are assessed, procured and delivered. The Playbook looks to drive innovation and Modern Methods of Construction, through standardisation and aggregation of demand, increased client capability and setting clear requirements of suppliers.

## Explaining the terms used

### Modern Methods of Construction (“MMC”)

MMC is a wide term, embracing a range of offsite manufacturing and onsite techniques that provide alternatives to traditional housebuilding. MMC ranges from whole homes being constructed from factory-built volumetric modules, through to the use of innovative techniques for laying concrete blockwork onsite.

### Pre-manufactured value

Pre-manufactured value (PMV %) is the financial proportion of a construction project’s gross construction cost derived through pre-manufacturing. Pre-manufactured value is a means of measuring industry improvement through a direct link to the physical way in which a building is constructed.

### Part L – Conservation of fuel and power

Approved building regulations in England setting standards for the energy performance of new and existing buildings.

### Future Homes Standard

The Future Homes Standard is a new Building Regulation in the UK that will require new build homes to be future-proofed with low-carbon heating and world-leading levels of energy efficiency; it will be introduced by 2025.

### Lifecycle assessment

A technique used to examine the environmental impact of a product through all stages of the product’s life, including design, raw material extraction, material production, part production and assembly, through to its use, and final disposal.

Direction		Delivery		Determination		Review
A sense of urgency	The guiding framework	Communicating change	Empowering action	Lasting culture change	Sustained delivery	

# Glossary and document references continued

## Organisations and publications that have been referenced

### Homes England

An executive non-departmental public body, sponsored by the Ministry of Housing, Communities and Local Government and the Department for Levelling Up, Housing and Communities.

### Heat Trust

Heat Trust launched in November 2015 as an independent, non-profit consumer champion for heat networks that works with suppliers to promote best practice, innovation and continuous improvement in customer service.

### Black People in Construction (“BPIC”)

BPIC is a built environment inclusion business network working with industry organisations to improve ethnic minority representation as well as retention.

### Construction Industry Training Board (“CITB”) – Building Skills for Net Zero

The CITB research report “Building Skills for Net Zero”: used the Climate Change Committee’s data to outline the skills implications for the workforce of the Government’s commitment to achieve net zero by 2050.

### Institute for Public Policy Research – Skills for a Green Recovery

The Institute for Public Policy Research’s (“IPPR”) report assesses the performance of current employment and skills programmes and promotes the notion that investment in a green recovery can create new construction jobs, and stimulate a revolution in the productivity of the construction sector.

### Partnerships

Our Partnerships division is aligned to Government policy delivering mixed tenure homes through estate regeneration and developing brownfield land in partnership with local authorities and housing associations.

## Explaining the terms used

### Environmental Product Declaration (“EPD”)

An Environmental Product Declaration is a document which transparently communicates the environmental performance or impact of any product or material over its lifetime. Within the construction industry, EPDs support carbon emissions reduction by making it possible to compare the impacts of different materials and products in order to select the most sustainable option.

### Circular economy

Promoting resource efficiency by replacing a linear “take, make, dispose” model of production with one where materials function at their highest utility at all time. The circular economy model aims to extract maximum value from resources while in use, and then recover and reuse these materials at the end of each service life.

### Levelling up

In its manifesto in 2019, the Conservative Party said it would be “levelling up every part of the UK”, the goal being to narrow the divergence seen across the country in areas such as health, education, living standards and economic growth.

### Social value

Social Value is a term used to describe the financial value attributed to any positive social impact made by an organisation or person. Different methodologies are used to calculate social value, but generally it will include activities or interventions that have made a positive impact to local economies, upskilling people, providing new community assets, and enhancing environments (to name a few).

### London Plan Energy Hierarchy

Development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:

1. Be lean: use less energy
2. Be clean: supply energy efficiently
3. Be green: use renewable energy
4. Be seen: monitor and report on their actual operational energy performance



WICKLESHAM LODGE FARM  
FARINGDON

PROMOTION DOCUMENT  
JULY 2021



COUNTRYSIDE  
Places People Love



WICKLESHAM LODGE FARM  
FARINGDON



COUNTRYSIDE  
Places People Love

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WICKLESHAM LODGE FARM  
FARINGDON

# CONTENTS

INTRODUCTION .....	5
COUNTRYSIDE .....	6
THE SITE.....	11
OPPORTUNITIES AND CONSTRAINTS.....	17
SUITABILITY, AVAILABILITY, DELIVERABILITY .....	28
NEXT STEPS .....	30





# Introduction

This Initial Vision document has been prepared by Countryside to inform the Council of the opportunity provided by Land at Wicklesham Lodge Farm, Faringdon to provide a sustainable urban extension and sustainable transport hub to the town that respects its character, enhances its facilities and is well integrated and connected to the existing settlement.

The purpose of this document is to introduce Countryside as the land promoter, and to demonstrate Countryside's distinctive vision for the site, characterised by its reputation for delivering high quality homes supported by community facilities and integrated new infrastructure, built around the existing landscape and historic features of the site.

The site comprises 152 hectares of land to the south of the existing settlement of Faringdon. This site provides the opportunity to deliver growth for Faringdon that is informed by the rich history and character of the settlement, whilst providing the required infrastructure and services for the existing and future communities. The

site would make a major contribution to addressing the housing need at a local and strategic level for the Vale of White Horse and the wider county of Oxfordshire. Countryside also envisage this site as a key element of the Oxford-Cambridge Arc, extending connectivity to the west of Oxford towards Swindon. The site lies on a key route to serve this function, with Faringdon being the largest town in this part of Oxfordshire and therefore in terms of settlement hierarchy is the most sustainable location.

The Government document on the Oxford – Cambridge Arc Spatial Framework places considerable emphasis on the natural environment, climate change and connectivity with reference to environmental improvements, habitat recovery and sustainable transport-led development. These are also important priorities for the Vale of White Horse

and for local communities. Countryside will respond positively in a vision for the site that will prioritise environmental enhancement, sustainable travel and a positive response to climate change.

The site is in a single ownership, meaning that it is genuinely available, deliverable and achievable for the site to provide much needed housing, including affordable homes, jobs, services, open space, green infrastructure as well as essential infrastructure to ensure connectivity to the existing settlement of Faringdon and beyond.

Countryside has a proven track record of promoting and delivering high quality and sustainable new communities. Countryside would be the master developer and would therefore deliver the entire site, ensuring consistency and high quality.

# Countryside

Countryside is a leading provider of new homes and widely recognised as being at the forefront of delivering sustainable new communities. Our achievements are exemplified by the receipt of more than 350 awards for our design and sustainability. We hold more housing design awards than any other housebuilder.



“Our focus on long-term stewardship ensures we create thriving and vibrant new communities.”

Countryside has a strong track record of delivering sustainable new communities. Our developments provide schools, roads, shops, community centres, greenspace, employment and villages squares – these are the very things which tie a development together and foster community.

At Countryside we are passionate about the places we create and the new communities we create. We use placemaking skills to create an environment where residents feel a true sense of belonging. We achieve this by carefully master planning developments to integrate new facilities, delivering necessary supporting infrastructure and placing an emphasis on landscape-led public spaces.

We believe that creating places the community loves is key to establishing a lasting legacy for the scheme. Our highly successful approach to place keeping and the long-term stewardship means that we create places which are highly valued by both residents as well as the wider community.

Countryside work with charitable bodies such as the Land Trust to take on the ownership and management of the open spaces and other community assets for the community benefit in perpetuity.

We use a collaborative approach to build relationships with all partners through the evolution of the development. We work closely with existing communities to ensure our developments enhance their facilities and deliver local benefits.



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“ We put the existing landscapes and historic features at the heart of our master planning.”

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Historic trees are retained in prominent locations or as part of open spaces. Hedgerows are incorporated and we create features out of existing landscape attributes.



Countryside create a variety of green spaces for residents to enjoy including formal spaces such as parks, local greens, play areas, sports pitches and allotments. Alongside formal spaces, we provide a combination of structural landscaping and ecological areas designed to support local wildlife and encourage biodiversity.

We incorporate SUDs into our green spaces. We create living spaces out of these areas. These spaces enhance well-being and add social vibrancy. A drainage strategy can create village life with more biodiversity and quality of place than possible without it.

Countryside reduce the embodied carbon of construction through careful selection of building materials. Homes will be designed to meet and be able to adapt to any changes to the Government’s Future Homes Standard.

Modern methods of construction are also likely to play a growing role in the delivery of new homes over the coming years and this is an area that Countryside has committed significant resource to. The benefits include the reduction of construction waste and an increase in the speed of delivery. Countryside will work to ensure that the latest in modern technologies and building methodologies are employed within the new community at Wicklesham Lodge Farm.

We will seek to improve the efficiency of the scheme by incorporating low carbon renewable energy technologies. This could include the use of Smart Grid technologies, sustainable travel options and use of electric vehicle charging points, green roofs, and water harvesting.

Countryside will use green and blue infrastructure to improve carbon sequestration, minimise heat island effects, increase biodiversity and be more resilient to climate change and flood risk.

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“ Countryside believe in creating sustainable communities which can mitigate and adapt to future effects of climate change.”

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## OUR ETHOS

Our business is built upon implementing a strong vision to provide the foundations for a successful, long-lasting community.

From the homes we build, to the resident associations we form, Wicklesham Lodge Farm will be given the opportunity to thrive with a strong community spirit.



## PLACES PEOPLE LOVE

Placemaking is much more than just geography – it is a practice and philosophy, as much about the feelings people experience as the physical buildings.





## MAXIMISING SOCIAL VALUE

Our Social Value Policy ensures that we maximise the social value and beneficial impact that we bring to communities. We have extracted the following three as being the more pertinent to this exciting opportunity at Wicklesham Lodge Farm. These are:

- To leave a positive legacy through our work with communities to ensure we deliver benefits for them and create more resilient and sustainable places.
- To monitor and measure the social value delivered through our activities, and continuously try to increase the value that we create.
- To support and embed sustainable development goals in accordance with the United Nation's Global Goals for Sustainable Development.

## CORPORATE SOCIAL RESPONSIBILITY

We carry out our work in an ethical, safe, environmentally responsible and in a sustainable manner. The desire to have positive impact on the people and communities who live in and around our developments is at the heart of our methodology. Our Sustainability Strategy focuses on the five areas that are most material to our business and include:

- Governance
- Ethical and Responsible Business
- Customers and Community
- Environment
- Supply Chain







WICKLESHAM LODGE FARM  
FARINGDON

# THE SITE



# Overview

The site comprises approximately 152 hectares of land immediately to the south of the A420, which runs to the south east of the settlement of Faringdon. It is located to the north east of Swindon and the south west of Oxford. Faringdon is the main settlement west of Oxford in the gap to Swindon. The site comprises predominantly agricultural land. In the centre there is a cluster of existing buildings, together with farm buildings as well as a series of small scale business premises/office buildings. Across the site there are areas of existing woodland and tree planting as well as tree and hedgerow planting along existing field boundaries.

To the south east and north east of the site lies further agricultural fields. Immediately to the west of the site, adjacent to the A420 is a sand and gravel extraction operation. Beyond this lies the hamlet of Little Coxwell and the village of Great Coxwell.

On the other side of the A420 from the site lies the settlement of Faringdon, which is well served by services and facilities.

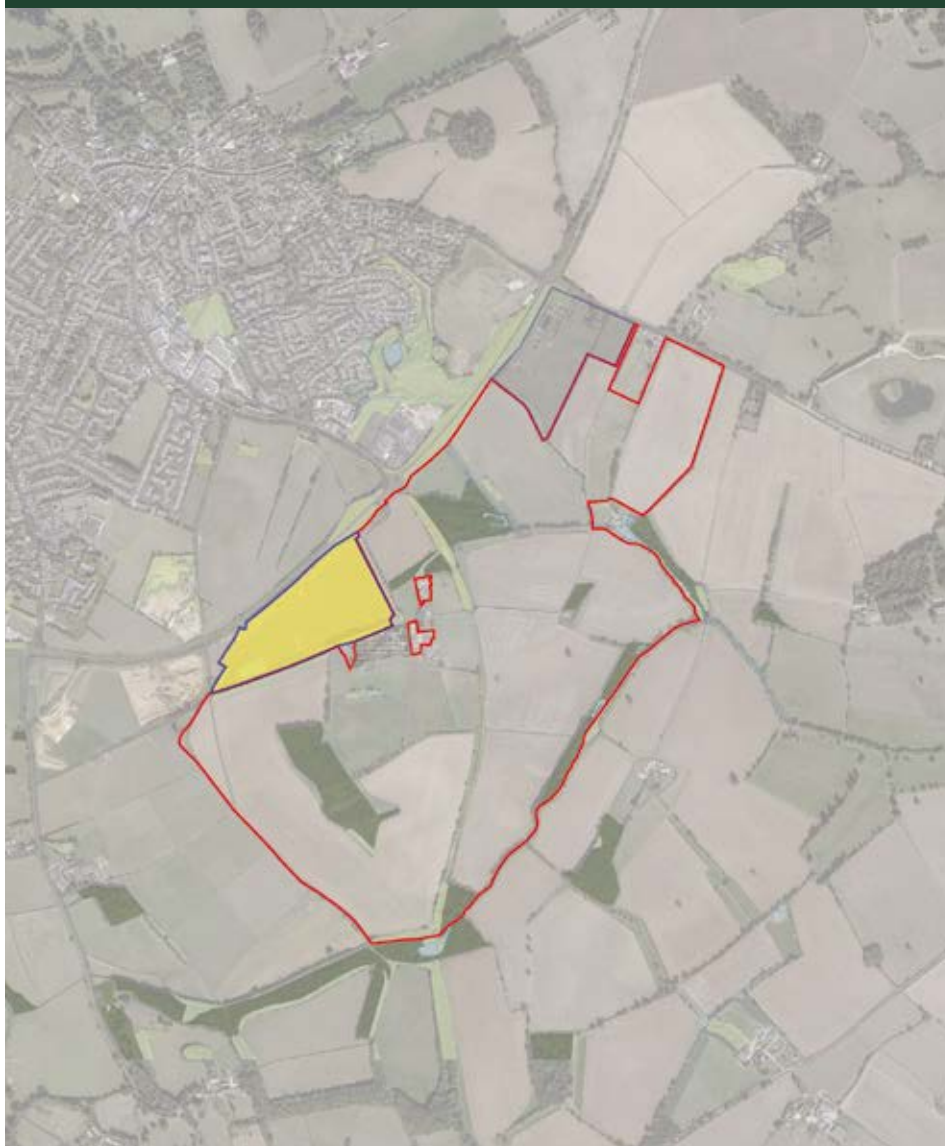
Part of the site comprises the Wicklesham and Coxwell Pits Site of Special Scientific Interest (SSSI).

There is a Grade II Listed Building (Barn and Granary associated with Wicklesham Lodge) within the centre of the site. The Little Coxwell Conservation Area lies to the west of the site. To the south of the site (approximately 600m away) lies the Scheduled Ancient Monument of 'Little Coxwell Camp'.



The site is within the Faringdon Neighbourhood Plan Area. There are 2 Neighbourhood Plan employment site allocations relevant to the site; one being Wicklesham Quarry which is to be safeguarded for B2 and B8 use and also Wicklesham Farm for limited B1 expansion.

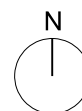
There is a swathe of the site located within Flood Zones 2 and 3. This area runs across the width of the site following the line of an existing watercourse running north of Wicklesham Copse (an existing area of woodland close to the A420). The remainder of the site is located within Flood Zone 1.

Figure 1. Site Boundary



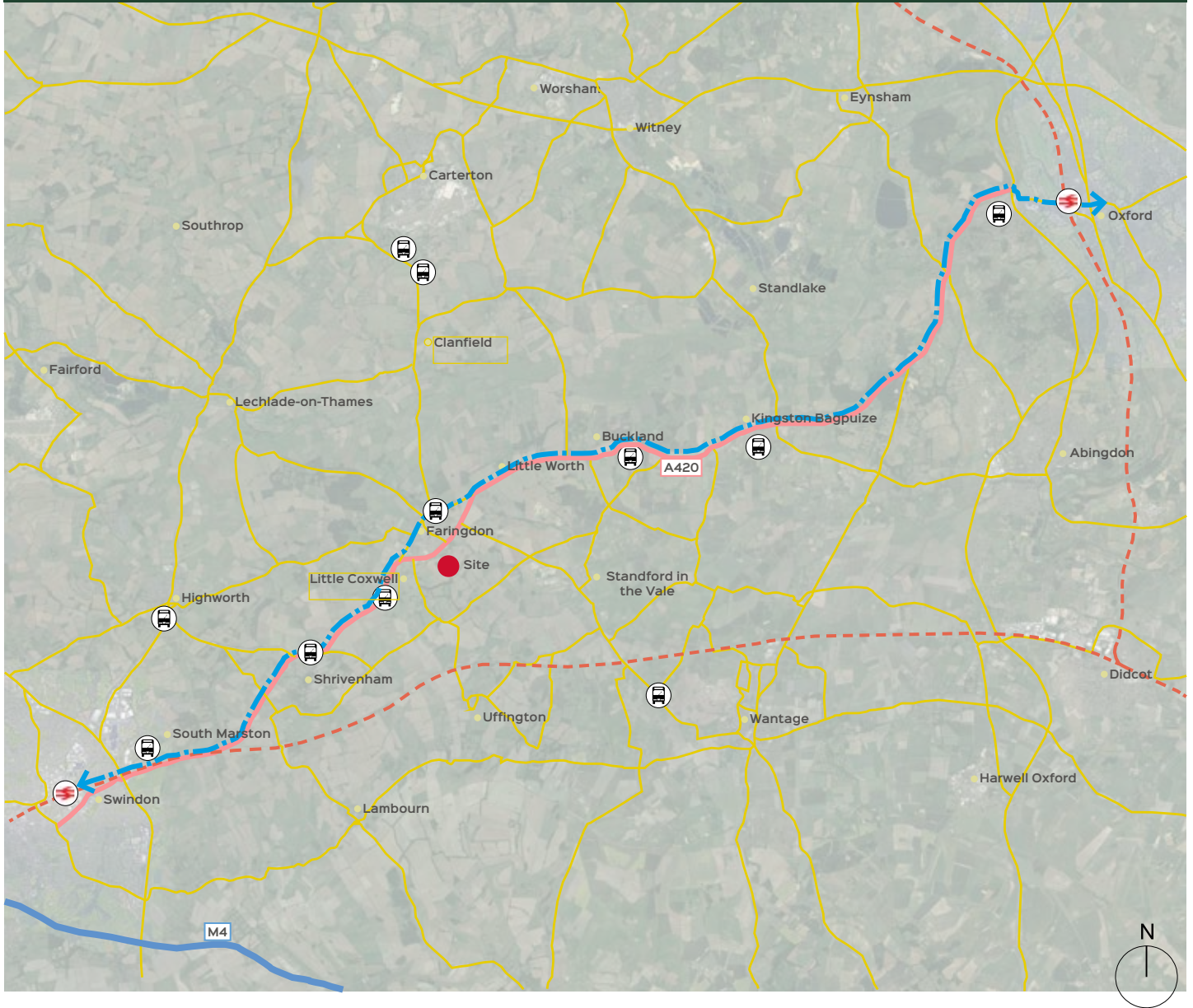
Key:



-  Site Boundary
-  Safeguarded Employment Zone



# Wider Context

Figure 2. Wider Site Context

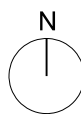
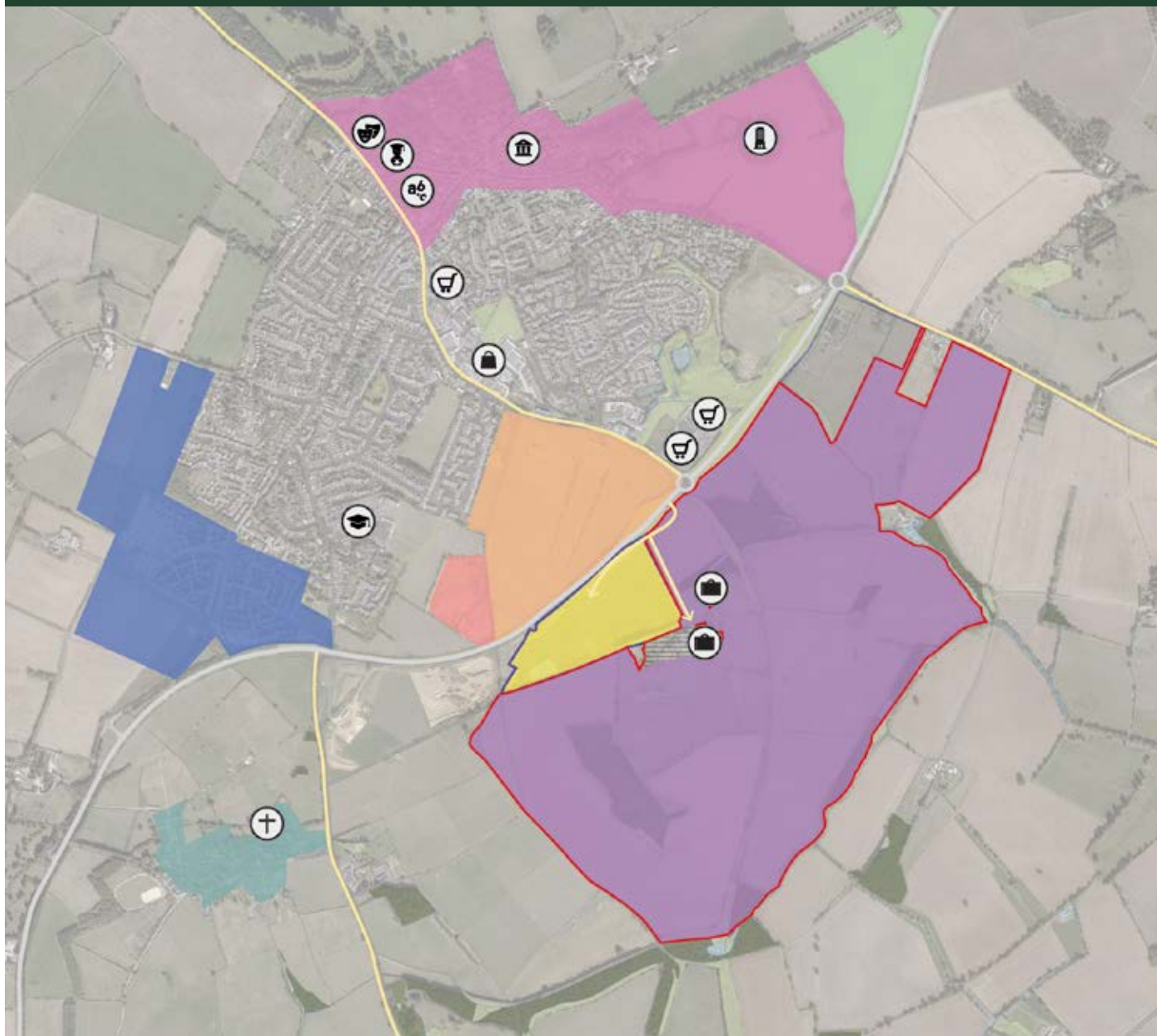


- Key:
- Site Location
  - Primary Routes
  - M4
  - A420
  - - - Railway
  - ↔ S6 Bus Route (Swindon to Oxford)
  -  Train Station
  -  Bus Stop























“Faringdon is the best location for growth to the west of Oxford. Significant development here would align with the vision for the Oxford-Cambridge Arc and would ensure balanced east west growth, both in terms of economic and social growth.”

# Context Analysis

Figure 3. Site Boundary



Key:

-  Site Boundary
-  Landowner Residence
-  Primary Road
-  Secondary Road
-  Safeguarded Employment Zone
-  Wicklesham Lodge Farm
-  Designated Development Zone
-  Bloor Development Scheme
-  Rogers Concrete Development Site
-  Conservation Area
-  Folly Park
-  Little Coxwell (Historic Village)
-  Faringdon Junior School
-  The Old Station Nursery
-  Stagecoach Performing Arts Faringdon and Highworth
-  Faringdon Town Council
-  Faringdon Folly Tower
-  Supermarket
-  Retail Park
-  Faringdon Community College
-  Little Coxwell St Mary's Church
-  Local Businesses

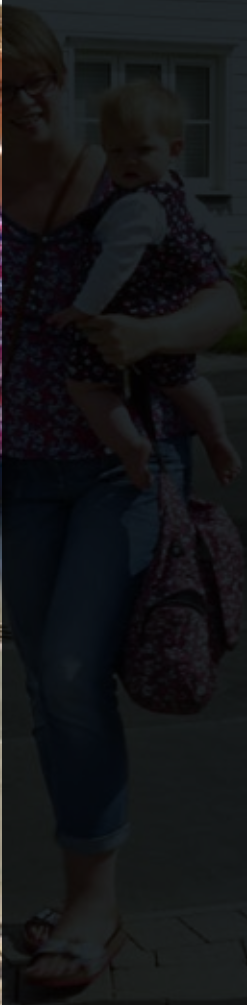






WICKLESHAM LODGE FARM  
FARINGDON

# OPPORTUNITIES AND CONSTRAINTS



# Site Constraints & Opportunities

The site provides an opportunity for a sustainable extension to Faringdon with its own distinct character and closely linked to Faringdon, enhancing employment and services provision.

## Constraints

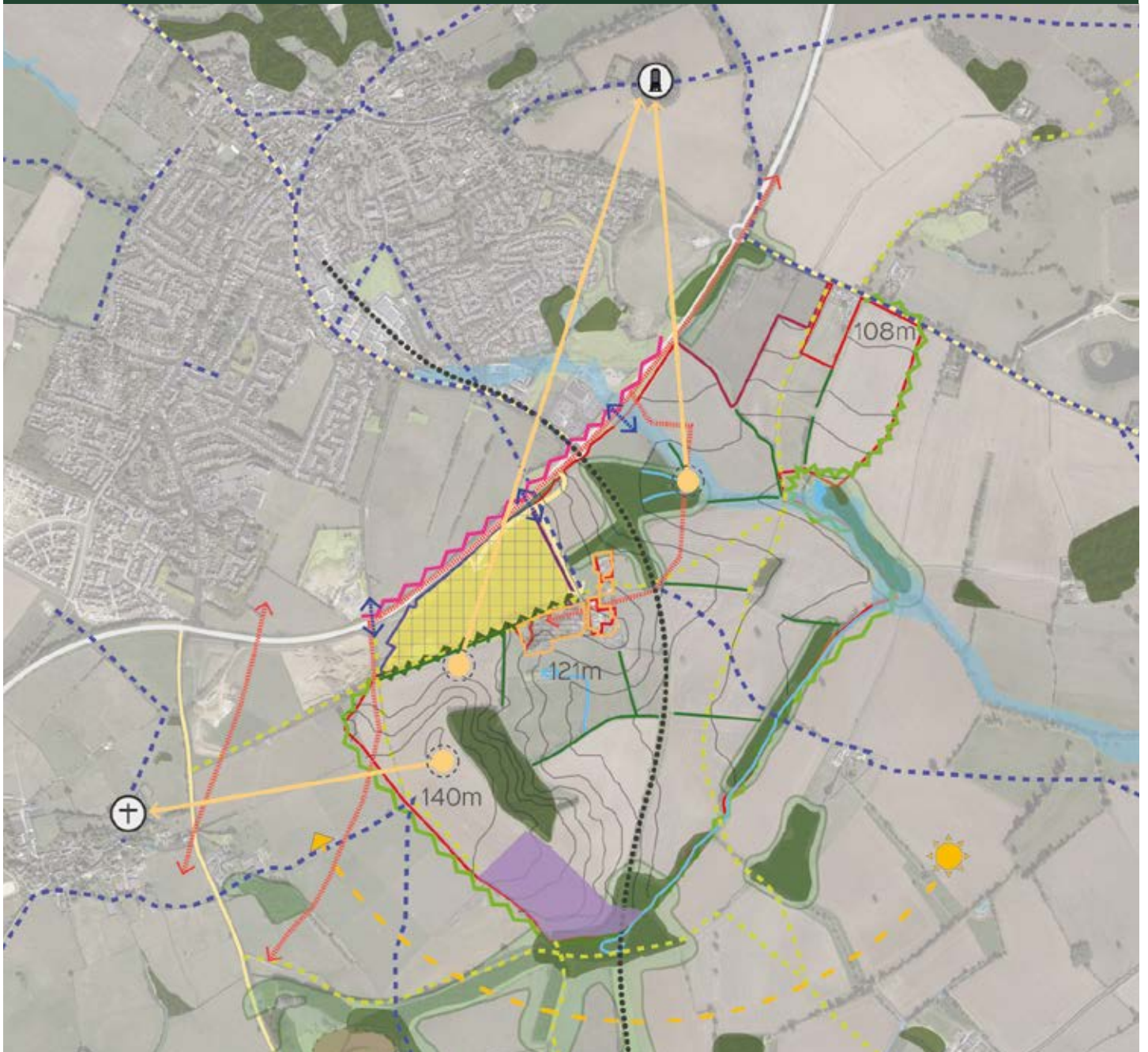
- Noise from the A420
- Need to ensure connection with Faringdon
- Views to heritage assets
- Existing public rights of way/bridleways across the site
- Small area of flood risk by existing watercourse
- Varying topography across the site
- Areas of woodland

## Opportunities

- Desirable location between Swindon and Oxford
- Located on a key transport route facilitating easy access
- Opportunity to create connections across A420 to Faringdon
- Existing landscape infrastructure creates character
- Undulating topography gives views across countryside
- Historic railway route provides green link for pedestrians and cyclists
- Opportunity for employment and retail provision to enhance and complement existing provision in Faringdon
- Limiting development to protect key views and monuments
- The site's location which benefits from being a public transport corridor between Oxford and Swindon
- Zero/low carbon opportunities
- Biodiversity Net Gain opportunities and habitat connectivity
- Existing services to be supported and supplemented.

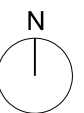


Figure 4. Site Constraints & Opportunities



Key:

	Site Boundary		Hedgerows		Topography
	Landowner Residence		Safeguarded Employment Zone		Historic Railway
	Primary Road		Designated Archaeology Site		Public Rights of Way/Footpaths
	Secondary Road		Flood Risk Zone 3		Bridleways
	Existing Development and Site Entrance		Protected Area/Woodlands		Green Buffer
	Existing Pylons		Heritage Site		Noise Pollution
	Existing Water		Site of Special Scientific Interest		Proposed Viewpoints
			Wildlife Protection Areas		Opportunity to provide future connections



# Landscape Infrastructure Plan

The site contains existing woodlands, hedgerows and water courses which provide a basis to inform the masterplan layout.

- Existing woodland and hedgerows to be retained
- Buffers around existing woodland to protect and enhance biodiversity
- Existing archaeological site protected
- Flood Risk Zone 3 has been highlighted and follows a historic river which is to be maintained
- No development will take place to the west of the western woodland to maintain uninterrupted views from the Vale of White Horse
- Utilise existing landscape features to provide a sense of place and local distinctiveness to the areas of open space

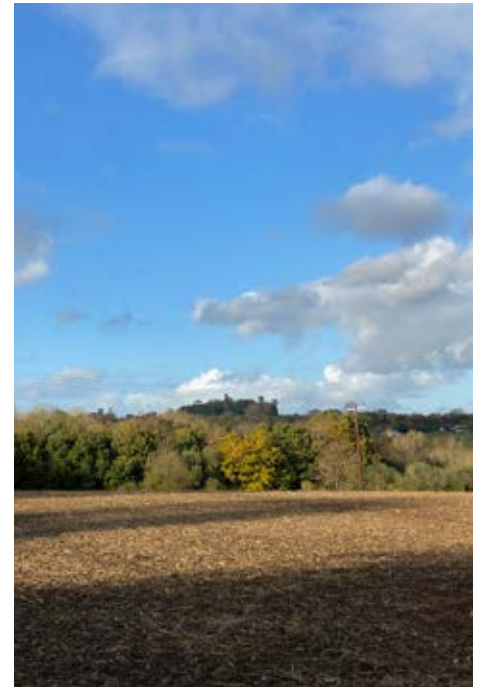
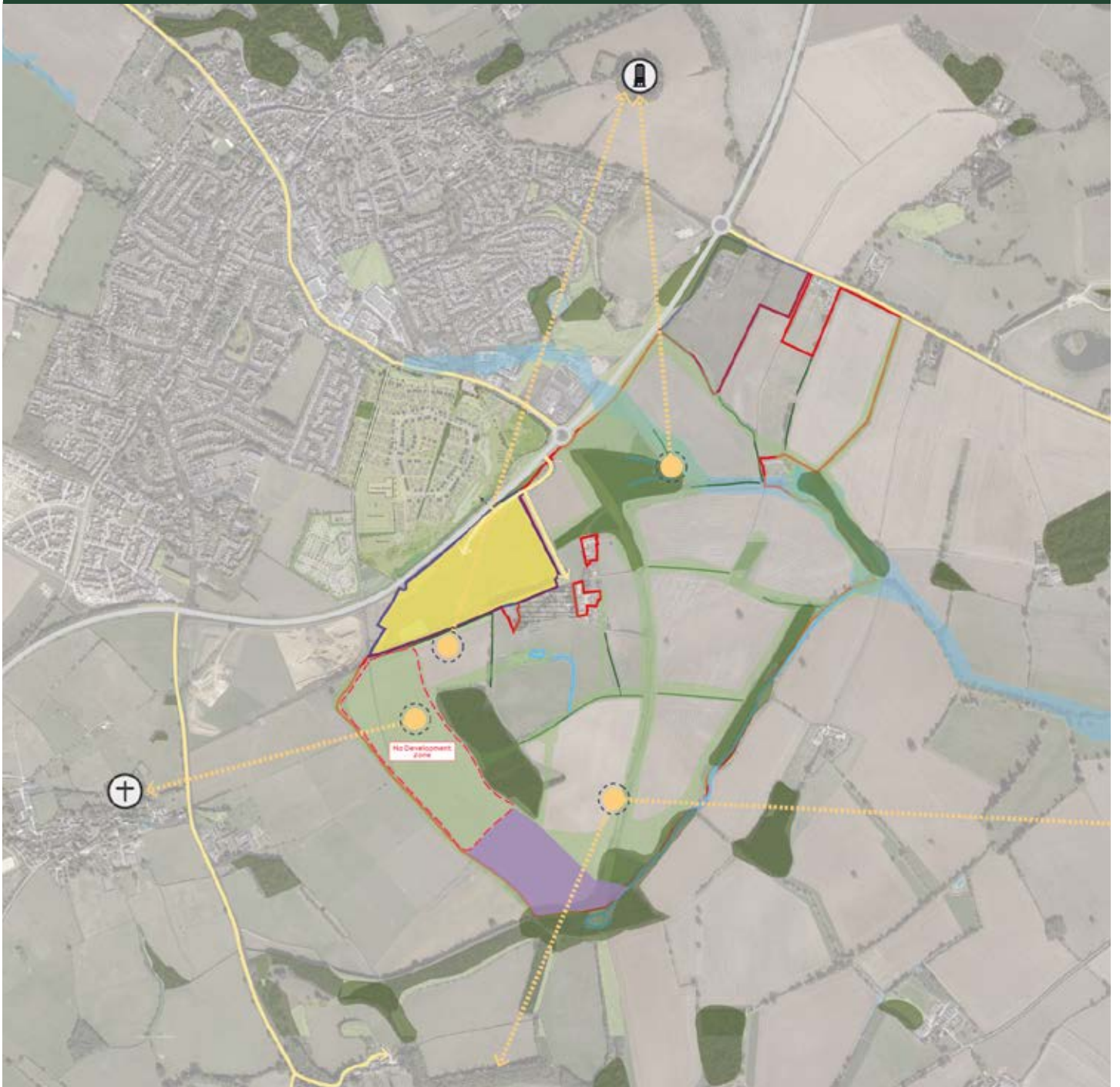













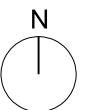


Figure 5. Green and Blue Infrastructure



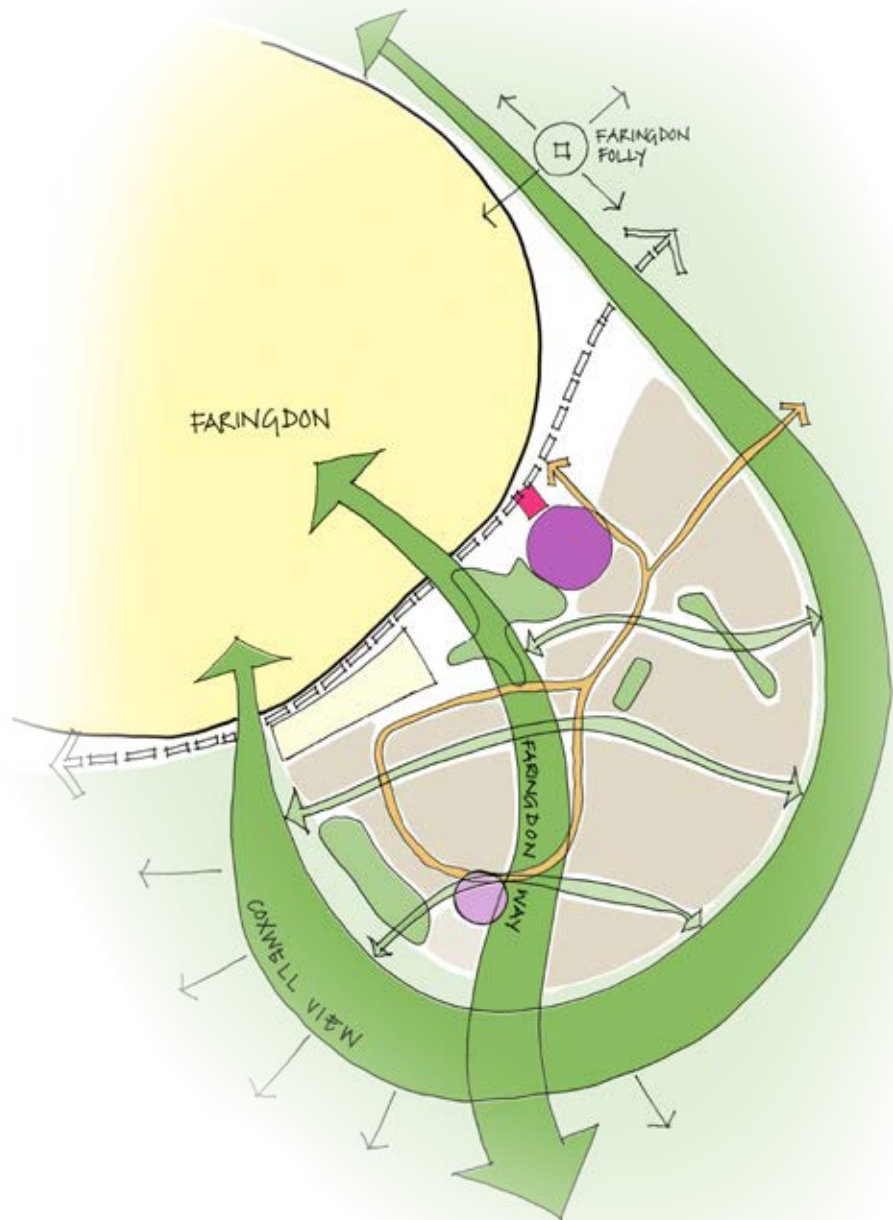
Key:

- |  |  |   |                             |
|--|--|---|-----------------------------|
|  | Site Boundary  |  | Designated Archaeology Site |
|  | Landowner Residence  |  | Flood Risk Zone 3           |
|  | Safeguarded Employment Zone                                  |  | Protected Area/Woodlands    |
|  | Primary Road   |  | Proposed Green Buffer/Links |
|  | Secondary Road   |  | Existing Water              |
|  | No Development Zone (Retention of key views out of the site) |  | Hedgerows                   |
|  |  |  | Proposed Viewpoints         |



# Concept

- A sustainable extension to Faringdon that will build on and enhance the existing town and facilities
- A sustainable transport hub connecting Swindon and Oxford
- A well connected scheme that embraces integration with Faringdon
- Focus on health and well-being to support the local community with green links and fitness trails
- Layout informed by topography to capture views out of the site
- Retention and enhancement of existing historic buildings and landscape features
- Emphasis on green links and active forms of travel
- A local centre providing employment, retail and leisure facilities to complement the existing provision in Faringdon
- A neighbourhood centre providing community amenities
- Opportunities for community growing - orchards, allotments and edible trails



### Location

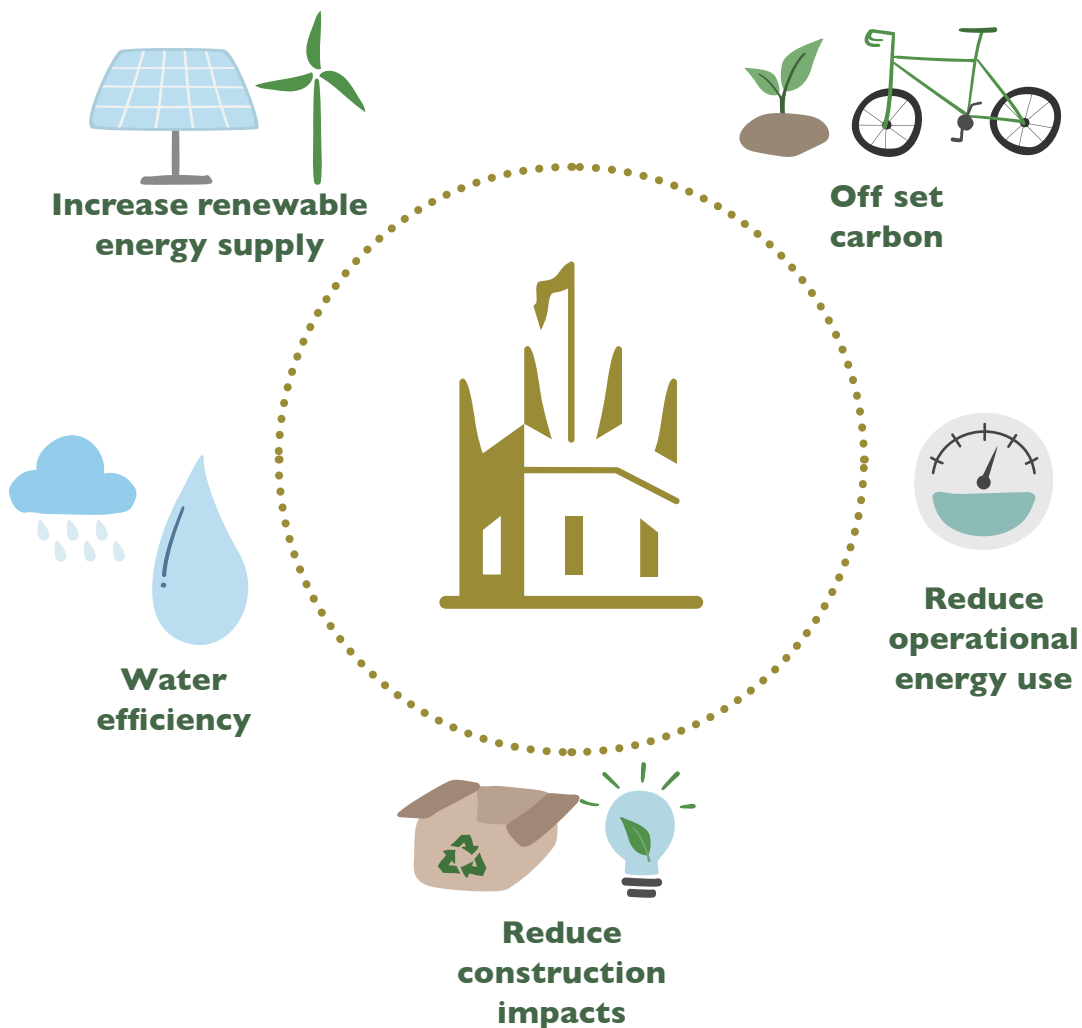
- A residential and employment extension to Faringdon
- An important east west sustainable transport connection hub

### Vision

- High Quality, highly sustainable and inclusive development
- Connected to the heart of existing Faringdon via safe walking and pedestrian routes
- A place to live, work, play, relax and socialise
- A sustainable transport hub providing a key stop for services connecting Swindon and Oxford
- Collaborating with existing residents to truly address local needs and aspirations
- A strong and healthy community

### Addressing Climate Emergency

- On site energy generation
- Use of sustainable technologies
- Sustainably conscious design - building orientation and materiality
- Low carbon development
- Encourage walking, cycling and the use of public transport
- Access to nature and green spaces



# Masterplan






















The proposed scheme aims to deliver the following:

- The preservation and enhancement of the historic Faringdon landscape
- Circa 2500 homes for an intergenerational community including circa 200 homes for retirement living, affordable housing, first homes and self build.
- Improved access to existing green spaces, including a north/south green way a long the historic railway route
- A local centre linked to the existing retail provision on Park Road and complementing existing employment and services in Faringdon and future employment uses within the quarry site.
- Two new primary schools and potential for a secondary school
- A neighbourhood centre providing community, leisure and sports facilities
- An integrated Mobility Hub that aims to bolster connectivity around Faringdon and provide opportunities for cycling, car charging ports and an increased bus service that provides a sustainable transport hub for services connecting Swindon and Oxford
- Pedestrian and cycle connections to existing routes in and around Faringdon
- A sustainable urban expansion to Faringdon including employment opportunities and future
- Open spaces both formal and informal and opportunity to delivery on Biodiversity Net Gain.

The proposed scheme aims to deliver the following approximate figures:

- **72ha** Developable Area
- **5.03ha** Additional Developable Area
- **6000m<sup>2</sup>** Employment & Retail Space
- **5ha** Primary School Education (Addition of secondary school: **+5.5ha**)
- **70ha** Open Space (which includes existing woodlands)

Key:

-  Site Boundary
-  Landowner Residence
-  Safeguarded Employment Zone
-  Flood Risk Zone 3
-  Protected Area/Woodlands
-  Proposed Green Buffer/Links
-  Proposed Mobility Hub
-  Proposed Parcel Zones
-  Proposed Neighbourhood Centre
-  Proposed Primary Schools
-  Proposed Secondary School
-  Existing Water
-  Hedgerows
-  Proposed Ped/Cycle Links Across A420
-  Proposed Primary Route
-  Primary Road
-  Secondary Road
-  Proposed Green Links
-  Proposed Roundabout
-  Proposed Viewpoints
-  Employment Area

- Design will respond to local distinctiveness
- Active travel at the heart of the masterplan
- Designed to incorporate EV charging infrastructure
- Digital infrastructure designed in.





Mobility Hub

Local Centre

Neighbourhood Centre

Figure 6. Concept Masterplan

# Masterplan - Character Areas

Figure 7. Concept Masterplan - Character Areas

The scale of the Wicklesham Lodge Farm site allows the scheme to be broken down into a series of character areas all leading off of the main spine road through the site. Each of these character areas will be able to provide a distinctive style and sense of place. Allowing residents and visitors alike to orientate themselves within the new development. These will be designed to capitalise of the existing attributes of the site and its connections to both Faringdon and the wider countryside beyond.



- Key:
- Character Area 1
  - Character Area 2
  - Character Area 3
  - Character Area 4
  - Character Area 5

Character Area 1



Character Area 2



Character Area 3



Character Area 4



Character Area 5



# Suitability, availability, deliverability

## Suitability

Land at Wicklesham Lodge Farm is suitable for allocation for development and represents a logical large scale comprehensive strategic development site that relates to the existing market town settlement of Faringdon.

The site is of a sufficient size to combine homes and employment opportunities to meet existing and future demand in the Vale of White Horse and Oxfordshire as well as within the wider Oxford-Cambridge Arc area. The Vale of White Horse and Oxfordshire are desirable places to live and work in the context of new travel choices and concepts that will assist towards the target to achieve

net zero carbon emissions. The site also provides an attractive setting with access to the countryside whilst being well placed in relation to an existing settlement of an appropriate scale within the settlement hierarchy (a market town). The site is also of a sufficient scale to be able to provide meaningful new open space and leisure facilities.

The site will be able to deliver integrated, forward looking and accessible transport options; it is well located on the strategic road network with good linkages to public transport (and potential future opportunities for mass rapid transit linkages between Swindon, Oxford and London) as well as walking and cycling opportunities.

## Availability

Countryside and the landowners confirm through the submission of this document that the site is available to come forward within the next plan period and beyond through a comprehensive strategic allocation to address the housing need of the Vale of White Horse, Oxfordshire and also to address the Oxford-Cambridge Arc aspirations.

The site extends to 152 hectares and is in a single landownership and Countryside have a promotion agreement in place.

There may be future potential to include an additional piece of land (shown in grey) on the Masterplan. However, this piece of land is not required to deliver the strategic site.





## Deliverability

There are no overriding physical or environmental constraints that would prevent the site from being delivered and there is, in fact, considerable potential to retain and enhance existing landscape and historic character.

Countryside have the experience, status and reputation to deliver high quality and sustainable strategic sites of this scale.

Countryside anticipate that (based on their extensive experience) this site could deliver between 250 – 300 homes per year for a 10 – 15 year period. They would anticipate submitting an outline application around the time of the adoption of the Vale of White Horse Local Plan. The proposed site is viable and deliverable with no barriers to development.

## Achievability

The masterplanning work undertaken to inform this document demonstrates that the number of units proposed for this site would be achievable. The emerging masterplan also makes provision for other requirements such as open space, as well as infrastructure such as the Mobility Hub and the Neighbourhood Centre and Local Centre.

The proposals make the most of the opportunities from the site such as the established landscape which provides a mature framework, around which the proposals can be based creating a sense of place for new residents.



---

“Countryside have the experience, status and reputation to deliver high quality and sustainable strategic sites of this scale.”

---

# NEXT STEPS

Countryside are keen to work with both Oxfordshire Council and the Vale of White Horse District Council to realise the potential offered by Land at Wicklesham Lodge Farm.

Countryside are committed to engaging with the relevant stakeholders on an on-going basis, and at the appropriate time, the community.

The team's proposed next steps over the coming months are as follows:

- Prepare a Detailed Concept Masterplanning and Vision Document which will be submitted to Oxfordshire Council and the Vale of White Horse
- Undertake technical assessments (including highways and drainage)
- Undertake surveys (including ecology and trees)
- Engage with the Oxford-Cambridge Arc and the Spatial Framework
- Engage with Oxfordshire Council and submit representations to the Oxfordshire Plan consultation in summer 2021
- Engage with Vale of White Horse

Countryside would be delighted to meet with Officers to discuss the site and the unique opportunity it provides.





Boyer

tatehindle



**COUNTRYSIDE**  
Places People Love

# Response 223

## Respondent Details

[REDACTED]

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. i) Are you responding as:

An agent, developer or landowner

[REDACTED]

[REDACTED]

## A little bit about you (continued...)

[REDACTED]

[REDACTED]

Q4. For further information about how we use your data below, please refer to our privacy policy, which also explains how to exercise your rights over your personal data. If relevant, please provide the details of the organisation, business or council you're representing. If relevant, please also give the details of the client your business is representing (EG if you're a planning agent responding on behalf of another organisation).

[REDACTED]	[REDACTED]
<b>First name</b>	Ziyad
<b>Last name</b>	Thomas
[REDACTED]	[REDACTED]
<b>Your business or organisation (if relevant)</b>	-
<b>Business or organisation you're representing (if relevant)</b>	Churchill retirement living
[REDACTED]	[REDACTED]

Q6. Please select which documents you wish to comment on:

Local Plan Issues Consultation

Q39. 32. Finally, do you have any other comments?

Please see attachment.

[REDACTED]

- [REDACTED]

If you are ready to submit your comments, please tick the box below, then select the 'Finish and submit' button. Note: once ticked you will not be able to return to your comments and they will be submitted. If not, please use the 'previous page' button to go back through the survey to amend or review your response. Alternatively you can use the 'save and continue later' so that you can save your progress, and return later to your comments. Simply provide your name and email address and you will automatically receive a link via email to return to your draft comments when you are ready.

Yes, I have finished and am ready to submit

South Oxfordshire & Vale of White Horse Councils  
Planning Policy Team  
135 Eastern Avenue,  
Milton Park,  
Milton,  
OX14 4SB

Churchill House, Parkside  
Christchurch Road, Ringwood  
Hampshire BH24 3SG  
Telephone 01425 462372  
Fax 01425 462101

23<sup>rd</sup> June 2022

Dear Sirs,

CHURCHILL RETIREMENT LIVING  
RESPONSE TO THE SOUTH OXFORDSHIRE & VALE OF WHITE HORSE COUNCIL  
JOINT LOCAL PLAN ISSUES AND OPTIONS CONSULTATION.

Thank you for the opportunity to comment on the consultation papers for the aforementioned document. Churchill Retirement Living is an independent developer of retirement housing for sale to the elderly. Please find below our comments on the Issues and Options consultation, which specifically address the need for specialist housing for the elderly.

National Policy Context

Government's policy, as set out in the revised NPPF, is to boost significantly, the supply of housing. Paragraph 60 reads:

*"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."*

The revised NPPF looks at delivering a sufficient supply of homes, Paragraph 62 identifies within this context, the size, and type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies including older people.

In June 2019 the PPG was updated to include a section on Housing for Older and Disabled People, recognising the need to provide housing for older people. Paragraph 001<sup>1</sup> states:

*"The need to provide housing for older people is **critical**. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; **by mid-2041 this is projected to double to 3.2 million**. Offering older people a better choice of accommodation to suit their changing needs can help **them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems**. Therefore, an understanding of how the ageing population affects housing needs is **something to be considered from the early stages of plan-making through to decision-taking**" (emphasis added)*

---

<sup>1</sup>Planning Practice Guidance, Paragraph: 001 Reference ID: 63-001-20190626. Available here: <https://www.gov.uk/guidance/housing-for-older-and-disabled-people>

Paragraph 003<sup>2</sup> recognises that

*“the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support.”*

Thus a range of provision needs to be planned for. Paragraph 006<sup>3</sup> sets out

*“plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require.”*

Therefore, recognising that housing for older people has its own requirements and cannot be successfully considered against criteria for general family housing.

### Need for Older Persons' Housing

It is well documented that the UK faces an ageing population. Life expectancy is greater than it used to be and as set out above by 2032 the number of people in the UK aged over 80 is set to increase from 3.2 million to five million (ONS mid 2018 population estimates).

The Homes for Later Living Report notes the need to deliver **30,000 retirement and extra care houses a year** in the UK to keep pace with demand (September 2019).

The age profile of both Councils can be drawn from the 2018 population projections from the Office for National Statistics. This advises that there were 56,086 persons aged 65 and over in 2018, accounting for 20.5% of the total population of both Authorities. This age range is projected to increase by 28,278 individuals, or 50.4%, to 84,364 between 2018 and 2043. The population aged 65 and over is expected to increase to account for 26.8% of the total population by 2043.

	Vale of White Horse		South Oxfordshire		Combined	
	2018	2043	2018	2043	2018	2043
65+	26,764	42,069	29,322	42,285	56,086	84,364
80+	7,634	15,323	8,289	15,777	15,923	31,100
All Ages	133,732	164,615	140,504	150,007	274,236	314,622

In 2018 there were 15,923 persons aged 80 and over, individuals who are more likely to be frail and in need of long-term assistance. The number of people in this age range is forecasted to increase by 15,177 individuals, or 95%, to 31,100 between 2018 and 2043. The population aged 80 and over is anticipated to represent a higher proportion of both Council's residents, accounting for 5.8% of the total population in 2018 and increasing to 9.8% by 2043.

It is therefore clear there will be a significant increase in older people over the Plan Period and the provision of suitable housing and care to meet the needs of this demographic should be a priority of the emerging Local Plan.

---

<sup>2</sup> Planning Practice Guidance, Paragraph: 001 Reference ID: 63-003-20190626. Available here: <https://www.gov.uk/guidance/housing-for-older-and-disabled-people>

<sup>3</sup> Planning Practice Guidance, Paragraph: 001 Reference ID: 63-006-20190626. Available here: <https://www.gov.uk/guidance/housing-for-older-and-disabled-people>

## Benefits of Older Persons' Housing

Older peoples housing produces a large number of significant benefits which can help to reduce the demands exerted on Health and Social Services and other care facilities – not only in terms of the fact that many of the residents remain in better health, both physically and mentally, but also doctors, physiotherapists, community nurses, hairdressers and other essential practitioners can all attend to visit several occupiers at once. This leads to a far more efficient and effective use of public resources.

### Economic

The report *'Healthier and Happier' An analysis of the fiscal and wellbeing benefits of building more homes for later living* by WPI Strategy for Homes for Later Living explored the significant savings that Government and individuals could expect to make if more older people in the UK could access this type of housing. The analysis showed that:

- 'Each person living in a home for later living enjoys a reduced risk of health challenges, contributing to fiscal savings to the NHS and social care services of approximately £3,500 per year.
- Building 30,000 more retirement housing dwellings every year for the next 10 years would generate fiscal savings across the NHS and social services of £2.1bn per year.
- On a selection of national well-being criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing to housing specially designed for later living.'

**Each person living in a home for later living enjoys a reduced risk of health challenges, contributing fiscal savings to the NHS and social care services of approximately £3,500 per year** (*Homes for Later Living September 2019*). More detail on these financial savings is set out within the report.

A recent report entitled *Silver Saviours for the High Street: How new retirement properties create more local economic value and more local jobs than any other type of residential housing* (February 2021) found that retirement properties create more local economic value and more local jobs than any other type of residential development. For an average 45 unit retirement scheme, the residents generate £550,000 of spending a year, £347,000 of which is spent on the high street, directly contributing to keeping local shops open.

As recognised by the PPG, Retirement housing releases under-occupied family housing and plays a very important role in recycling of housing stock in general. There is a 'knock-on' effect in terms of the whole housing chain enabling more effective use of existing housing. In the absence of choice, older people will stay put in properties that are often unsuitable for them until such a time as they need expensive residential care. A further Report *"Chain Reaction" The positive impact of specialist retirement housing on the generational divide and first-time buyers (Aug 2020)* reveals that about two in every three retirement properties built, releases a home suitable for a first-time buyer. A typical Homes for Later Living development which consists of 40 apartments therefore results in at least 27 first time buyer properties being released onto the market.

## Social

Retirement housing gives rise to many social benefits:

- Specifically designed housing for older people offers significant opportunities to enable residents to be as independent as possible in a safe and warm environment. Older homes are typically in a poorer state of repair, are often colder, damper, have more risk of fire and fall hazards. They lack in adaptations such as handrails, wider internal doors, stair lifts and walk in showers. Without these simple features everyday tasks can become harder and harder
- Retirement housing helps to reduce anxieties and worries experienced by many older people living in housing which does not best suit their needs by providing safety, security and reducing management and maintenance concerns.
- The Housing for Later Living Report (2019) shows that on a selection of wellbeing criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing into housing specifically designed for later living.

## Environmental

The proposal provides a number of key environmental benefits by:

- Making more efficient use of land thereby reducing the need to use limited land resources for housing.
- Providing housing in close proximity to services and shops which can be easily accessed on foot thereby reducing the need for travel by means which consume energy and create emissions.
- Providing shared facilities for a large number of residents in a single building which makes more efficient use of material and energy resources.
- The proposal includes renewable technology through the use of solar panels to assist in the reduction of CO<sub>2</sub> emissions.
- All areas of the building will be lit using low energy lighting and where applicable utilise daylight and movement sensor controls.

## Recommendations

Given all these factors and the guidance of the PPG, we consider that the best approach towards meeting the diverse housing needs of older people is **for the Local Plan to give the earliest consideration towards how best to meet these needs and to include a standalone policy in this respect**. Such policies should encourage the delivery of specialist forms of accommodation for older people and not be criteria led. Developers should not be required to demonstrate need given the many benefits that such developments bring and if a quantum is specified this should be regarded as a target and not a ceiling. Given also that such developments “*help reduce costs to the social care and health systems*” (PPG refers), requirements to assess impact on healthcare services and/or make contributions should be avoided.

While we appreciate that no one planning approach will be appropriate for all areas, an example policy is provided that, we hope, will provide a useful reference for the Council:

*“The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations.*

*The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances by providing appropriate housing choice, particularly retirement housing and Extra Care Housing/Housing with Care. The Council will, through the identification of sites, allowing for windfall developments, and / or granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities.”*

We would respectfully remind the Council of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that *“The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan”* (Paragraph: 002 Reference ID: 10-002-20190509).

The evidence underpinning the Council's planning obligations and building requirements should therefore be robust

We would also like to respectfully remind the Council that the viability of specialist older persons' housing is more finely balanced than 'general needs' housing and the respondents are strongly of the view that these housing typologies should be robustly assessed in the forthcoming Local Plan Viability Assessment. This would accord with the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG which states that. *“A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period.* If this is not done, the delivery of much needed specialised housing for older people may be significantly delayed with protracted arguments about failure to meet affordable housing policy requirements which are wholly inappropriate when considering such housing

Thank you for the opportunity for comment.

Yours faithfully



**Ziyad Thomas**  
BSc (Hons), MSc, MRTPI, MRICS  
Associate Director

# Response 224

## Respondent Details

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. i) Are you responding as:

An agent, developer or landowner

[REDACTED]

[REDACTED]

## A little bit about you (continued...)

[REDACTED]

[REDACTED]

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[REDACTED]	[REDACTED]
<b>First name</b>	Mark
<b>Last name</b>	Harris
<b>Your business or organisation (if relevant)</b>	-
<b>Business or organisation you're representing (if relevant)</b>	Dandara
[REDACTED]	[REDACTED]

Q6. Please select which documents you wish to comment on:

Local Plan Issues Consultation

Q39. 32. Finally, do you have any other comments?

Please see attachment.

[REDACTED]

- [REDACTED]

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Yes, I have finished and am ready to submit

**Joint Local Plan: Issues Consultation**  
**South Oxfordshire and Vale of White Horse**  
Dandara Ltd  
June 2022



**SOUTH OXFORDSHIRE AND VALE OF WHITE  
HORSE LOCAL PLAN – ISSUES  
CONSULTATION  
RESPONSE BY DANDARA LTD**

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## Table of Contents

1.0	Introduction	1
2.0	The Vision	2
3.0	Reducing Carbon Emissions	3
4.0	Nature Recovery and Landscape	6
5.0	Protecting and Enhancing Local Heritage	8
6.0	Thriving Inclusive Communities	9
7.0	Transport and Facilities	10
8.0	Healthy Lifestyles and Safe Communities	12

## 1.0 Introduction

- 1.1 Dandara are promoting land West of Wantage, also known as Woodhill Park and West Gate, as an ideal location for a strategic urban extension of the town, helping to meet the significant housing need of the area. As per previous representations, as well as delivering up to 1,000 homes as part of a highly sustainable development, the scheme will ensure delivery of the Wantage Western Relief Road (WWRR) which is identified as key piece of transport infrastructure which would help relieve pressure on the constrained highway in Wantage town centre as well as unlocking capacity to support the ongoing economic potential of the Science Vale – a key driver for growth in Oxfordshire.
  - 1.2 In support of a previous representation on the Oxfordshire Strategic Plan, Dandara submitted a Vision Document which sets out a conceptual framework for the development which Dandara are seeking to deliver. This document, which is resubmitted again alongside this representation, shows how the Vision for West Wantage is based around communities, healthy lifestyles and the environment – key themes running through the Local Plan Issues consultation document.
  - 1.3 Bidwells have prepared this representation on behalf of Dandara to respond to the consultation and to specifically demonstrate how and why the proposal for land West of Wantage would help realise the aspiration for a more sustainable future for Oxfordshire.
  - 1.4 This representation addresses the key themes set out in the consultation document and draws out specific examples of how development West of Wantage can deliver against the opportunities set out.
  - 1.5 We have not included an overview of the site or the proposal in this representation as this is included in the previous representation on the Strategic Plan and the accompanying Vision Document.
-

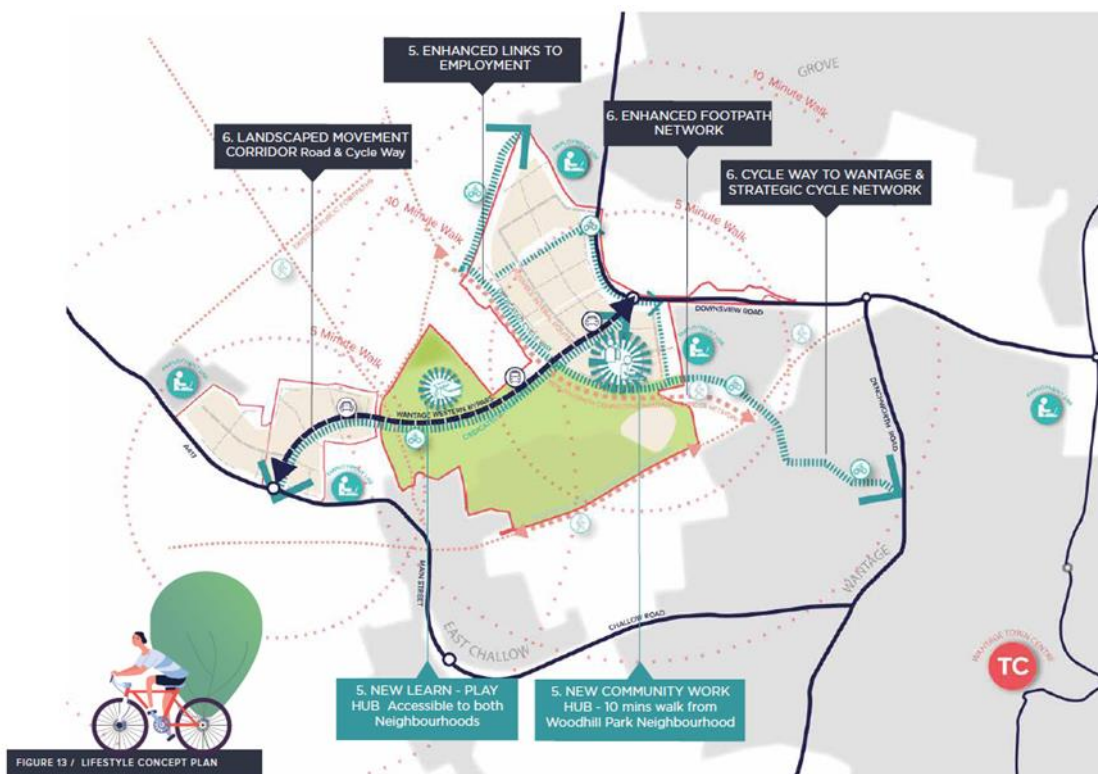
## 2.0 The Vision

- 2.1 The Vision for the Local Plan is clearly set around securing a more sustainable future for residents and the environment. Dandara are fully supportive of a vision which seeks to minimise carbon emissions and puts nature at the heart of new places. They are also firmly behind creating places for people with an emphasis not just of the quality of housing but on the quality of the environment in which people will move around in and integrate.
- 2.2 For this reason, Dandara strongly agree with the Vision which is set out in the consultation document which sets out clear, high-level aspirations for what development in the area will be expected to deliver.
- 2.3 As is set out in the rest of this representation, the allocation of West of Wantage would closely align with the Vision, with key aspects being:
- High quality, low energy homes, with a range of tenures and house types for all.
  - Significantly improved green infrastructure including new and enhanced green corridors, areas of biodiversity enhancement and public open space offering significant scope for community interaction.
  - On site services and facilities as part of a walkable neighbourhood.
  - A choice of transport opportunities with enhanced foot and cycle links to the town centre and throughout the site, alongside and access to the proposed Grove railway station
  - Support for growing the Science Vale by improving east/west transport links
  - Enhancement of the historic town centre through relieving the impacts of through traffic, benefitting new and existing residents.
-

## 3.0 Reducing Carbon Emissions

- 3.1 The diagram on page 27 of the consultation is telling in that it sets out that nearly 75% of all carbon emissions in the area are associated with either transport (48.7%) or domestic (e.g. housing) (26.4%). This makes it essential that the Local Plan targets these areas in seeking to reduce carbon emission as it is an area where there is opportunity to make a massive difference.
- 3.2 Whilst steps are being taken through Building Regulations to drive up the quality of the housing and make them more efficient, as evidenced by the recent change to require all homes to have electric charging facilities installed, the planning system can still make a massive difference by ensuring that homes are built in areas where they:
- a) maximise opportunities to make journeys on foot or by bicycle;
  - b) limit the distance people need to travel to work;
  - c) managing traffic to reduce congestion; and
  - d) making public transport more attractive
- 3.3 Given the role of Building Regulations in improving the quality of housing, it is through making appropriate choices around the allocation of land and affecting how people move, that Dandara believe the Local Plan can make the biggest steps in addressing carbon emissions.
- 3.4 Whilst all development and population increase will lead to a potential increase in carbon emissions, the proposal for West of Wantage is a prime example of where any impacts can be limited.
- 3.5 As set out in representations on the Strategic Plan, appropriate growth on the edge of a market towns like Wantage generally should be a priority in the Local Plan as it is these centres which provide the greatest opportunity to encourage sustainable lifestyles.
- 3.6 West of Wantage is ideally located to facilitate walking and cycling to the services and facilities of the town centre via existing links which can be enhanced and extended into the site. It is also of a scale where on site services, including shops and education facilities – key drivers for movement, can be located within 20 minutes of all homes, creating a walkable neighbourhood.
-

Figure 1: 20 Minute Neighbourhood – Lifestyle Concept Plan



- 3.7 In addition to this, the site is within 2.5km of the location of the proposed Grove railway station to the north which will provide opportunities to travel by non-car modes of transport. Whilst outside reasonable walking distance to the station, the travel distance would make the station easily accessible by bicycle and would also be readily accessible by public transport.
- 3.8 The Local Plan also needs to consider existing points of congestion on the local highway network, where these may worsen as a result of growth, and how congestion can be addressed through development.
- 3.9 In Wantage, the fact that the main east west route currently passes through the town centre is a major congestion issue. It needs to be recognised that people will continue to use the car, and the fact that ongoing economic growth in the Science Vale, without intervention, is likely to increase congestion in the area.
- 3.10 We consider that resolving this issue realistically can only be resolved by providing an alternative route to passing through the town centre. The delivery of the East of Wantage relief road opens up the possibility of a northern bypass, with the reserve route to the west of the town for the WWRR in the current Vale of White Horse Local Plan, which passes through the Dandara site, generally being the most appropriate location to deliver the final link. This plays heavily in favour of the allocation of the site.

- 3.11 In addition to transport, the development West of Wantage can also deliver on other opportunities set out in the consultation document. This includes increasing tree cover within the extensive areas of green infrastructure and ensuring the layout and design of the development to minimise the use of energy.
- 3.12 Whilst policies on the quality of development are important, Dandara believe that it is through Building Regulations that this is best managed to ensure a consistent and deliverable approach across areas and regions. The priority of the Local Plan should be the higher-level place shaping decisions which provide the best opportunity to make a real difference locally.
- 3.13 On all levels, development of the West of Wantage is ideally located to ensure the climate change aspirations for the area are realised.
-

## 4.0 Nature Recovery and Landscape

- 4.1 It is integral to the future environmental sustainability of the area that the Local Plan takes a proactive approach to the management of environmental assets at both a strategic and local level.
- 4.2 Strategically, it is essential that those areas designated for their landscape or ecological value are protected from development. This includes the AONB which runs through the south of the area and the various SSSIs and local wildlife sites.
- 4.3 There is sufficient suitable and deliverable sites outside of these areas to avoid the need for them to be compromised by the required growth and development in the area.
- 4.4 On a more local level, the document is correct in that it is important that individual environmental assets are identified and opportunities are taken to link them as part of a robust green infrastructure network.
- 4.5 This is exactly the approach taken to the proposal for West of Wantage where a strong green framework is proposed to draw together existing features, such as the Woodhill Brook wetland corridor, and plan for their enhancement and expansion, centred around a large, multifunctional open space.

Figure 2: Environmental Concept Plan



- 4.6 Within these areas, the site offers numerous opportunities to deliver a net gain in biodiversity through the enhancement and extension of existing assets. We consider this is how biodiversity net gain should be delivered – creating biodiversity value in locations where it is appropriate and can be part of a wider network, rather on an ad hoc, site by site basis purely to meet numbers.
- 4.7 For this reason, it is important that development is not prevented from taking place on sites where there may be some small-scale biodiverse areas as it is exactly these areas that are most suitable for enhancement and expansion. Whilst development which would lose these areas should be resisted, where sites are of a scale where they can build it in to the development, as is the case at West of Wantage, should be taken forward positively in the Local Plan.
-

## 5.0 Protecting and Enhancing Local Heritage

- 5.1 The options for protecting and enhancing local heritage in the local plan include '*planning for development at a scale that is appropriate for market towns and villages*'. Whilst the rationale behind this option is understood, Dandara's view is that appropriate development at a greater scale can actually in certain cases help to enhance those market towns which contain assets of historical value.
- 5.2 Wantage is one of the market towns with a Conservation Area which covers the town centre. It is through this town centre which all through traffic, and some local traffic, has to pass when moving east/west across the town. Owing to the volume of traffic and the tight nature of parts of the Conservation Area, this has a detrimental impact on the quality of the environment and the appreciation people can have of the Conservation Area and the numerous listed buildings it contains.
- 5.3 In Wantage, there is a perfect opportunity to consider what beneficial impact delivering a bypass to the north of the town centre would have on the conservation area and other local heritage assets. Dandara consider that removing traffic would not only make for a more pedestrian friendly environment through less conflict with pedestrians, it would significantly enhance the setting of the Conservation Area.
- 5.4 It is therefore essential that a one size fits all approach is not taken to the quantum of development in market towns but more bespoke approach which properly balances the scale of development against the full range of benefits it can help deliver.
-

## 6.0 Thriving Inclusive Communities

- 6.1 The status of the various market towns and service centres in the area is well established and is unlikely to change despite a new review of the services and facilities being undertaken. This will include the retention of the three market towns – Wantage, Didcot and Wallingford - running east west to the south of Oxford, partly within the Science Vale.
- 6.2 Whilst the opportunities and constraints in each of these settlements will need to be considered on an individual basis, with the two authorities working together, Dandara consider that emphasis should also be placed on ensuring that development in these three settlements is complimentary and maximises the benefits to the wider area.
- 6.3 As already stated, the delivery of the WWRR is an example of where development of a site would not only deliver a thriving new community, well linked to the existing town, but it would also help to support growth and development elsewhere in the Science Vale through improving connectivity and highway capacity in an area which will inevitably be challenged by an increase in local population.
- 6.4 The opportunities set out in the consultation document in respect on housing mix and quality are laudable, but care needs to be taken as to how the delivery of specialist homes, including affordable and self build homes is planned.
- 6.5 From Dandara's perspective, they would expect to deliver affordable homes on site. Whilst the delivery of affordable homes on individual sites should obviously be encouraged, the opportunity to deliver affordable homes on sites '*that we would normally protect from development*' raises the question as to if these sites can be made suitable for affordable housing, why are they not suitable for market housing?
- 6.6 The delivery of homes generally should protect those areas where development would be harmful, for example by prioritising those sites outside areas protected for their environmental quality, such as the land west of Wantage. To open-up potentially unsuitable sites for development, just to deliver affordable homes that could otherwise be part of larger, mixed communities, feels like an option which could undermine the delivery of a sound spatial strategy.
- 6.7 Self and custom build homes should be a key part of the overall development strategy for the area – but this should be in addition to the delivery of well-planned market housing and not part of. Meeting self build targets by requiring a proportion of plots within urban extensions to improve the rate of development across the area does not work – it slows it down and leads to a situation where more land is needed overall to deliver annualise housing targets.
- 6.8 Most people who want a self-build plot also do not want them as part of larger estates, they want individual plots or a plot on a small, dedicated self build site, probably in a more rural location. Therefore, whilst Dandara support the delivery of self build houses as part of the overall strategy, thought needs to be given to the detail of any policy and allocations to meet the need, with a preference for smaller, rural sites, rather than a percentage of self build plots in larger allocations.
-

## 7.0 Transport and Facilities

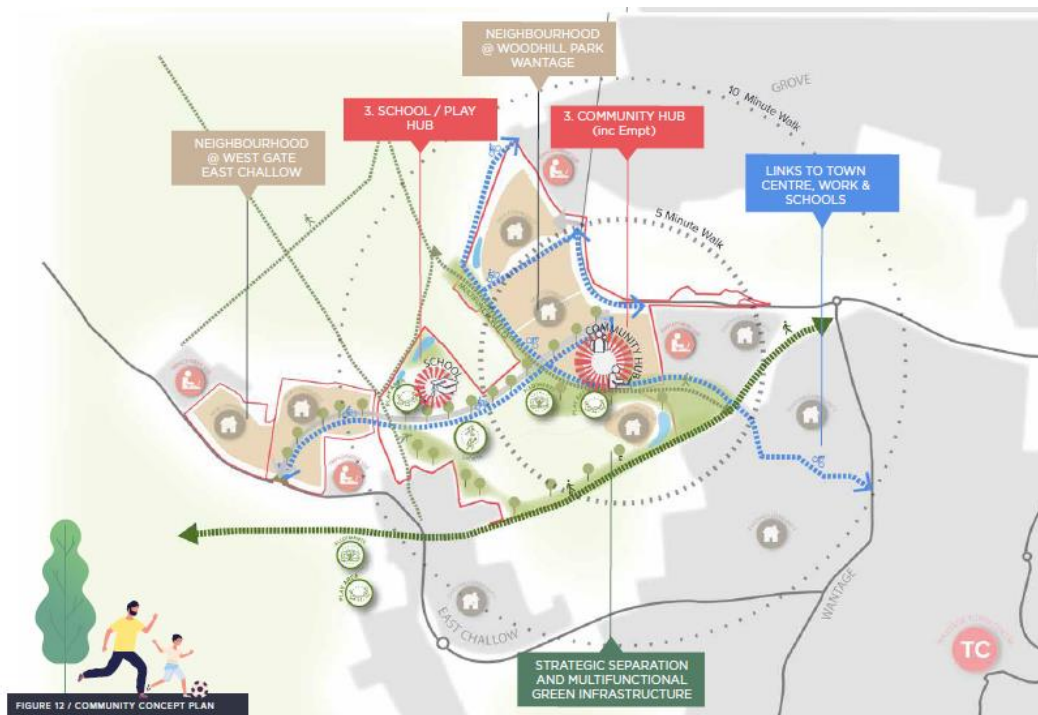
7.1 As has already been noted, Dandara support the concept of a 20 minutes neighbourhood, where residents have the option to walk or cycle to day to day facilities instead of travel by car. It is important that in considering 20-minute neighbourhoods, that:

- a) Consideration is given to facilities that can be provided on sites as part of major new urban extensions; and
- b) That an overly prescriptive approach to ensuring all key facilities are within 20 minutes is taken to assessing difference locations and development opportunities.

7.2 In cases where there is a reliance on access to existing services and facilities to make development acceptable, it is important that the actual 'on the ground' connections are taken into account as we have seen cases where developments are located on the edge of towns where they are effectively just a bolt on with no scope for proper integration and connectivity to the services and facilities they are supposed to be close to.

7.3 In this regard, West of Wantage, through a combination of on-site provision and direct access to the town centre via exiting foot and cycleway connections on Wasborough Avenue, from where the town centres is just a 1.25km walk, is ideally located to provide future residents with sustainable access to services and facilities.

**Figure 3: Community Concept Plan**



- 7.4 The provision generally of growth in larger sustainable urban extensions, rather than a greater range of smaller, piecemeal sites has the advantage of allowing appropriate integration of services and facilities. This approach was advocated in Dandara's representation on the Strategic Plan.
- 7.5 Dandara would welcome the delivery of a new rail station at Grove, which is in close proximity to their site at Wantage. A new station in this location would be of significant benefit to both the new and existing residents of Wantage and Grove, improving the sustainability of the location and increasing the justification for focusing a proportion of the area's growth needs on the area.
- 7.6 As well key strategic decisions on the location of growth and facilities, a successful transport network relies on the design of individual places, particularly the provision of appropriate transport links. This is something Dandara are acutely aware of and have ensured is built in to the development, as shown on Figure 2 earlier in this response with a strong movement network, including a segregated tree-lined cycle route alongside the WWRR, facilitating access to on and off-site services and facilities.
- 7.7 Further, the proposed layout of the development would facilitate provision of a centralised public transport route along the relief road, which the majority of residents would be within a 5-minute walk of, making it convenient for all residents.
- 7.8 In all regards, the scheme proposed by Dandara for West of Wantage, demonstrates the locational and design credential expected of sites suitable for development in the area. Its scale (and therefore scope to support other non-residential services and facilities), connectivity and design combine to make it an ideal location for growth.
-

## 8.0 Healthy Lifestyles and Safe Communities

- 8.1 The issue of healthy lifestyles and safe communities cuts across several aspects of the plan already addressed including movement, access to services and facilities, environmental protection and the provision of appropriate housing. However, the provision of open space more generally for community uses is a further aspect seen by Dandara as a key element of new developments, particularly post-COVID.
- 8.2 At West of Wantage, development would be focused around a large (up to 29ha) central open space. This would be a mix of formal and natural areas that would respond to both social and environmental policy requirements and be central to the high-quality development. The area would provide on-site opportunity for recreation, exercise and social interaction – all emerging aspirations of the Local Plan.
- 8.3 The space would also allow the management and integration of the small area of flood risk that runs through the centre of the site, providing not only the opportunity to improve the flood resilience of the area but to improve the biodiversity value of the site.
- 8.4 In allocating land for development, the provision of such areas of open space should be seen as a benefit of specific sites and weigh in their favour alongside other more standard consideration such as access to services and facilities.
-



BIDWELLS

# Response 225

## Respondent Details

[REDACTED]

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Q1. i) Are you responding as:

An agent, developer or landowner

[REDACTED]

[REDACTED]

## A little bit about you (continued...)

[REDACTED]

[REDACTED]

Q4. For further information about how we use your data below, please refer to our privacy policy, which also explains how to exercise your rights over your personal data. If relevant, please provide the details of the organisation, business or council you're representing. If relevant, please also give the details of the client your business is representing (EG if you're a planning agent responding on behalf of another organisation).

[REDACTED]	[REDACTED]
<b>First name</b>	Alan
<b>Last name</b>	Divall
[REDACTED]	[REDACTED]
<b>Your business or organisation (if relevant)</b>	-
<b>Business or organisation you're representing (if relevant)</b>	Elivia Homes
[REDACTED]	[REDACTED]

Q6. Please select which documents you wish to comment on:

Local Plan Issues Consultation

Draft Settlement Assessment Methodology

Q39. 32. Finally, do you have any other comments?

Please see attachment.

[REDACTED]

- [REDACTED]

## Draft Settlement Assessment Methodology

Q49. If you have any other comments on the Draft Settlement Assessment Methodology, please provide them below.

Please see attachment

If you are ready to submit your comments, please tick the box below, then select the 'Finish and submit' button. Note: once ticked you will not be able to return to your comments and they will be submitted. If not, please use the 'previous page' button to go back through the survey to amend or review your response. Alternatively you can use the 'save and continue later' so that you can save your progress, and return later to your comments. Simply provide your name and email address and you will automatically receive a link via email to return to your draft comments when you are ready.

Yes, I have finished and am ready to submit

Our ref: B0126/20

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23 June 2022

Vale of White Horse District Council &  
South Oxfordshire District Council  
135 Eastern Avenue  
Milton Park  
Abingdon  
OX14 4SB

By email

Dear Sir/Madam

## **Joint Local Plan Issues Consultation June 2022**

### **Representations on behalf of Elivia Homes**

#### **Land to the South of Watlington Road, Benson**

I write on behalf of Elivia Homes to formally respond to South and Vale's Joint Local Plan Issues Consultation.

Elivia Homes controls land to the south of Watlington Road, Benson on the eastern edge of the village within South Oxfordshire District.

This site was previously submitted to the joint South Oxfordshire and Vale of White Horse District Council call for sites in September 2021 in the name of Vanderbilt Homes. This was through the submission of a detailed Vision Document.

Vanderbilt Homes have now been amalgamated into Elivia Homes. Whilst the name of the promoter has changed, they are still the same organisation and the aspirations with regards to the site as set out in the September 2021 Vision Document submission remain the same.

These representations are made in the context of promoting this site for residential development including pre-application enquiries and planning applications.

The site can accommodate up to 180 new dwellings including a mix of sizes and tenures including affordable homes, and in doing so will contribute to the Council's housing supply targets.

The site provides an opportunity to deliver housing in the short term on a site with excellent sustainability credentials (on the edge of Benson adjoining the settlement boundary and surrounded on three sides by existing and committed development) and which has no overriding policy or technical constraints.



For information, enclosed with this letter is the site location plan and the previously submitted Vision Document.

Elivia Homes supports the draft Vision and the Themes set out by the Issues Consultation document and in particular the need to address the challenges associated with climate change.

The development of this site – which is available and achievable in the short to medium term – will contribute to the delivery of the identified themes as follows:

- Opportunity to create a carbon neutral development where there are sustainable modes of transport including walking/cycling distance to the town centre and bus services
- Opportunity to create a landscape-led development which will protect and enhance the surrounding area including an appropriate transition from the countryside to the settlement edge
- Opportunities for the development to provide biodiversity net gain
- Creating a thriving, inclusive, sustainable community; a development that provides a mix of dwelling sizes and tenure types including affordable homes, at appropriate densities
- Opportunity to create high quality, beautiful, and sustainable homes
- Opportunity to focus development in a settlement where facilities for everyday living are no more than a 20min walk or cycle ride away
- Ultimately, creating a sustainable, well-designed, inclusive development on the edge of an existing higher order settlement with no overriding policy constraints that will not require the release of Green Belt or AONB land with very limited impact on local heritage

Turning to the supporting documents, Elivia Homes supports the draft settlement hierarchy methodology. Benson is a Larger Village and is a highly sustainable location within South Oxfordshire District with regards to its ease to navigate on foot and by bicycle, and the availability of services and facilities. Benson should remain in the top order of settlements within any future settlement hierarchy.

The Issues Consultation document is at this stage a high-level introduction of a vision and themes, therefore it is not possible to comment on specific policy content or wording.

It will be important for future draft policies to have flexibility built into them and avoid an overly prescriptive approach to spatial planning and development control across the District, policies should have sufficient scope to allow the decision taker to have regard to potential of sites on an individual basis, both now and in the future over the course of the Plan period.

Policies need to be able to be agile and respond to changes in market conditions and/or situations where supply has been affected, for example sites not coming forward leaving the Council's housing delivery targets at risk.



## Summary

The new joint Local Plan is being developed with climate change as a leading priority and this is a common thread throughout the Vision and Themes. Development of land to the south of Watlington Road, Benson would accord with these themes and support the tone and objectives of the future plan.

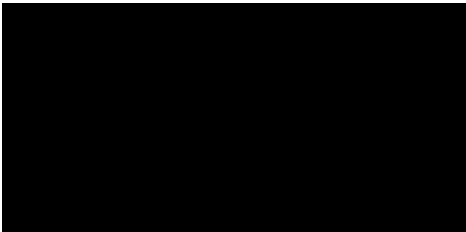
Policies must avoid being inflexible, overly restrictive, and which would undermine the objectives of the NPPF for development plans to support mixed and balanced communities, support economic development, and be responsive to changing trends and demands.

It is essential that Policies are flexible as the economy seeks to recover from the challenges presented by the COVID-19 crisis. The planning system should be a tool to unlock the potential of sites rather than restrict or hamper them.

We reserve the right to comment on any policy in any future consultation document (e.g. housing, parking standards, etc.) and if necessary, participate in the future Examination in Public of the Joint Local Plan.

We look forward to working with the Local Authorities collaboratively through the joint Local Plan review process.

Yours faithfully



**Alan Dival BA (Hons) MRTPI**  
**Director**

