

Charlbury Neighbourhood Plan 2031: Sustainable Charlbury's comments on the consultative draft

Sustainable Charlbury welcomes the consultation draft of the Charlbury Neighbourhood Plan 2031 and commends the many good proposals within it. We would, however, like to make a number of suggestions. Our comments and suggested amendments are arranged by section heading and relevant page number of the printed version of the consultation draft plan, dated 15.09.19

Charlbury 2031 – Our Vision (page 6)

This section should be updated with a specific reference to the Town Council's recent decision to declare a climate emergency. In addition, the meaning of line 8 of the current text would be made more clear by the addition of two words "*loss of*" so that it reads: "*.....challenges of climate change and **loss of** biodiversity....*".

Housing (page 6)

The plan identifies the need for low cost housing and acknowledges our ageing community. To protect our more vulnerable residents generally, we would wish to see that all new homes and buildings in Charlbury are built to the highest environmental standards – in part to avoid future summer over-heating and to reduce cooling and heating costs and carbon emissions.

Policies CH2 & CH3 – lower-cost housing should not be identified as '*cheap to build*' housing. The cost of housing to a tenant or shared owner is the cost of heating, lighting and ventilating. It is the lifetime of cost of housing that we should be considering and for this reason we would like to see all new housing built to the highest environmental standards. The plan should acknowledge the need to improve the energy and carbon emission performance of all buildings, new and existing, in Charlbury. West Oxfordshire District Council, with its partner councils, is now preparing advice on how to deliver to Passivhaus standards, and the neighbourhood plan should reflect this. It should also ask of the councils that it amend their planning policies to accommodate this new reality.

Economy, Community, Transport and Movement (page 6)

The local plan runs to 2031 – towards the end of this period it is likely that most if not all, new cars in Charlbury will be electric thus requiring charging infrastructure. Whilst Policy ECT12 is welcome for new developments, as a matter of urgency, the plan needs to address the demand for on-street charging for existing housing.

Whilst the plan supports speed limits within the town centre, the work of the Speedwatch group has identified that it is the roads circling the Town Centre that are most in need of traffic-calming and road design to reflect the new priorities that mean streets are for people and non-motorised transport. The plan needs to acknowledge the needs of the majority of the permanent, more elderly population, living outside the old town centre. Safe electric

transport routes from the large estates towards town centre destinations are essential. Calming the traffic at all points along these roads would negate the need for individual schemes at specific points.

Natural Environment and Green Space (page 6)

In view of the Town Council's recent declaration climate emergency, we believe there is a need for strengthened language in this section of the plan. Explicit reference to the decision should be part of an additional paragraph that draws attention to the need for the whole plan to take account of the climate emergency. More specifically, recommendations covering design standards for new and existing buildings + the facilitation of walking and cycling should be further strengthened.

The plan recognises the importance of the protection of wildlife, biodiversity and designated Local Green Spaces. Whilst we do not know what the impact of climate change will be on our location, we are already aware of the overall warming average annual temperatures, a reduction in moderate rainfall and an increase in storm weather and a significant reduction in numbers of wildlife populations and of biodiversity. We know that the Cotswold Conservation Board will also be considering the protection of the landscape which we welcome but believe that the local plan needs to prepare the population for these changes. Given that this work is still to be started we would welcome the proposal to initiate working with local land and garden owners to minimise flooding and maximise/safeguard local soil fertility, biodiversity habitats and pollination species in the face of a changing climate.

Historic Environment and Locally Appropriate Design (page 7)

Whilst the plan places a lot of emphasis on the historic nature of the town, the majority of housing in Charlbury is of mixed quality and design significance and, in the words of the Plan, of 'generally unpretentious architectural character'.

The emphasis on trying to retain the chocolate-box character of the town centre indicates a lack of inclusiveness, and an unhelpful intention to conserve for its own sake. Much of the housing needs significant improvement to bring it in line with modern demands and the need to respond to the environmental crises with which we are faced.

Line 5 of the current text would, in our view, be clarified by a wording change so that it reads: "*.....which include **an intention to categorise more than 100 buildings as listed.***" (The suggested additional words are in bold. They replace "*...over 100 listed buildings*"). Given the danger that such listing is likely to lead to controversial attempts to thwart those householders who, for example, may want to install double- or triple-glazing to improve the comfort and cost of running their homes, we suggest that this whole proposal be abandoned.

Section 1: Introduction and Context

1.2 Planning Framework

Page 9: Amend the second bullet point so that it starts: *“The imperative to tackle the climate emergency....”* This wording replaces *“The challenges of climate change.....”*

Add an additional sentence to line 10 so that *“.....of any development proposed.”* is followed by (new sentence): *“These may include energy and carbon performance.”*

Section 2: The Town of Charlbury

Page 15: Add a sentence to the paragraph that starts *“Work to conserve....”*. The additional sentence should mention Southill Solar farm, a community renewable energy project which produces enough electricity to cover three-quarters of the electricity needs of Charlbury, Finstock and Fawler. Charlbury residents were key instigators of the project. Most investors in the solar farm live locally and the solar farm has the potential to be an ongoing valuable community asset.

2.2 Charlbury in the Future

Page 17. In the paragraph which starts *“Under the NPPF.....”*, after the quotation *“meeting the needs of the presenttheir own needs”* a reference should be added which mentions the proposed Design Guide from the combined district councils.

Also on Page 17, we have a number of suggested amendments to bullet points towards the bottom of the page in the paragraph which starts: *“Key considerations.....”*

In the first bullet point, delete the word *“extensions”*, replace with *“building improvements”*

In the second bullet point, after *“.....neutral economy”* add *“by 2030.”*

Section 3: Aims & Objectives

Page 19: Box entitled *“Aim 2 - Objectives”*

In the first bullet point, delete *“with the support of the community”*. Replace with *“...and support local initiatives to reduce carbon emissions.”*

In the second bullet point, change text to read: *“To support new development that is designed to reduce carbon emissions further than Building Regulations.”*

In the fourth bullet point, change text to read: *“Ensure new development is designed to facilitate safer cycling and walking.”*

In the fifth bullet point, change text to read: *“Identify appropriate carbon-saving projects and ring-fence Community Infrastructure Levy Payments from new developments to fund these projects.”*

Page 19: Box entitled “Aim 3 - Objectives”

In the 2nd bullet point, change text to read: *“All new housing development should demonstrate sustainable design, be energy-efficient and incorporate on-site renewables”*

In the 6th bullet point, simplify text so it reads: *“To support Charlbury Primary School.”* This involves deleting existing text after the word *“...school”*.

In the 8th bullet point, change text to read: *“To ensure that all new development is designed and sited so as to take into account the local effects of climate change, including minimising overheating in the summer, and taking into account future flood risk.”*

5.3 Housing Policies

Page 26: Box entitled “Policy CH1”

Add a sentence after current last sentence which ends with *“.....Conservation Area”*. New sentence reads: *“Climate change considerations will be integrated into all aspects of the plan.”*

Section 6: Economy, Community, Transport and Movement

Page 35, section headed “Justification”

Section 6.2 1.2. In line 2, after the words *“.....footpaths and cycleways”* add: *“which should be increased in extent and capacity.”*

Page 37: 6.4 Parking

Add new sentence at the end of this section. New sentence reads:

“So we need policies that encourage more walking and cycling, and fewer cars to establish new cycle routes & paths through the centre and introduce an electric car club.”

Page 39: 6.5 Walking and Cycling

Add a sentence to the end of the paragraph which starts: *“Promoting cycling.....”*

Suggested new sentence reads: *“Cyclists are treated like cars and vans are required to follow the one way system, which adds to cycle journey times.”*

Page 39: Box entitled “Policy ECT9: Walking and Cycling”

Add new sentence to end of box. Suggested new sentence reads:

“Cycle contra-flows to be encouraged to allow two-way cycle traffic in one way systems in Market Street, Brown’s Lane and Sheep Street.”

6.8 Sturt Road, The Slade and Charlbury Primary School

Page 41: Add sentence to the end of the box entitled “Policy ECT13:....”

Suggested new sentence reads:

“Proposals will be supported that create a sense of a street designed for pedestrians and cycles, rather than simply a road for cars. This may involve narrowing car lanes and adding cycleways and trees.”

In addition to the above-mentioned specific text changes, we have some additional general points that could be worked into the section on transport: Electronic sign boards at all bus stops so people know whether a bus has already gone down to the Bell or not.
Community-run bus for the station (to encourage a modal shift to more journeys by train)
Cycle routes (lanes) on roads out of Charlbury not just within Charlbury.

Appendix C - The local Design Guidance doesn’t appear to have been written with many of the objectives within the main body of the report in mind and needs to be brought in line with these objectives. We would query the description of Charlbury as having a ‘unique character and identity’ as stated in the Vision. Charlbury has grown as a working pre-industrial town with a significant population able to support shops and businesses. It is the character of the population, and the advent of car ownership, that has been lost in the last 50 years through the process of gentrification and a failure to accept change.

E.g. – C.1.2 – the proposed retention of former shop fronts whilst accepting the need to change the use of the buildings. We should acknowledge that a changed use and climate change requires different needs, designs and materials. It is the future that we need to control not the past.

C.1.3 – internal alterations – housing must be able to adapt to the new requirements of zero-carbon housing without unnecessary additional cost or conservation demands.

C1.4 – extensions – to take into account the need for vehicle parking and charging and include flood attenuation features as a consequence of an increase to the built environment.

Appendix D – There are significant disadvantages to the owners in having their home listed in terms of cost of repair and maintenance. Careful consideration should be given to this

blanket identification that everything over 170 years old is worthy of listing. Many of the properties identified are not of any significant preservation value. A more appropriate approach would be to invite applications for listing from owners who believe their properties to be representative of a particular feature or design worthy of retention within the context of their built environment.

Appendices generally - There are two sets of Appendices within the local plan – Appendix A – D in the main body of the report and Appendices 1-5 supporting the report. This is confusing and needs clarifying.

The particular challenges of the 21st Century need to be addressed in a local plan that looks forward 12 years to 2031.