CPRE West Oxfordshire - Objectives, WOLP Consultation - Oct 2023 - FINAL

Tackling the Climate and Ecological Emergency

For all objectives:

What policies/policy topics are anticipated to help deliver this objective?

Objective 1 To minimise the impact we are having on our changing climate by reducing carbon emissions across all sources, with a particular focus on transport, housing, industry and energy.

Agree, we need stronger policies to mandate reductions, such as reducing land take with increased density, making the most of the housing stock we have, reducing energy use for streetlighting (sensor approach) and solar power and heat source pumps on all new buildings moving forward.

Objective 2 To facilitate the roll out of clean, renewable energy at a range of different scales in suitable, appropriate locations across the District.

Highlighted in the previous consultation as very important was the need to build in "subject to there being no harmful impact on the countryside" and CPRE West Oxfordshire would like to see this wording built into this objective. Renewable energy is desirable in principle, but not at unacceptable cost to the countryside, our rural communities, or to the economy.

Investment in "rooftop renewables" needs to be the priority. All new build should include this as mandatory. Car park canopies and warehouse roofs should be actively encouraged. Any new development must generate energy in its own right and use the energy at source for minimum losses and maximum efficiency.

There needs to be a strategic plan which identifies a renewables strategy driven by the wishes of local communities, rather than the developer led initiatives we are seeing currently throughout the district.

Objective 3 To respond and effectively adapt to the consequences of climate change that are already happening, building resilience and wherever possible, reversing harmful impacts, including nature's decline.

CPRE can find no reference to the protection of Hedgerows within this report and this section may be the right place for a Hedgerow policy. We would like to see a policy to support the Climate Change Commissions target of increasing hedgerow by 40% by 2050.

Objective 4 To make the most efficient use of land, buildings and natural capital and ensure that waste is minimised whilst being seen as a valuable resource.

We would advocate for a brownfield sites first development policy, with 1 and 2 bedroom homes being the priority. All future housing development should be compact units at high density in order to adjust the balance of housing stock in the district and favour the lower cost, easier to maintain and more climate friendly units which are desperately needed. **Target density should be 70-100 dwellings per hectare**, a density level historically found in both rural and urban communities respectively.

Healthy, Safe, Strong and Inclusive Communities

Objective 5 To help achieve thriving communities where people can lead healthy, happy and sustainable lives, going about their daily activities in well-designed, safe, crime-free, inclusive and accessible environments.

Agree, but this must include improving **existing** communities , for example the redevelopment of the focus on filling in the wasted space in the centre of Carterton.

Objective 6 To create environments that support and encourage healthy lifestyles through promoting physical activity for people of all ages and abilities, including maximising safe and convenient opportunities for walking, cycling and the use of public transport and the provision of sport, recreation and play facilities and high quality green space. Agree. For example, the centre of Carterton should be linked to the Country Park via a road and cycle path from REEMA North to the back of Shilton Park, so it's accessible to all.

Objective 7 To deliver integrated and inclusive environments that promote good mental health and wellbeing for those living, working and visiting West Oxfordshire and help tackle mental health issues.

Agree, so new homes should link to accessible green spaces which are of vital importance to mental and physical well-being. The plan should state that schemes should meet the Natural England accessible natural green space – ANGST-standards (https://publications.naturalengland.org.uk/publication/65021)

Objective 8 To create a healthier food environment, with the opportunity for people to make better food choices, including growing and consuming healthy food locally.

Within this objective we would wish to protect land currently used for food production from development such as housing or solar farms. New communities could include facilities for growing vegetables and fruit on a collective basis.

Objective 9 To identify and secure the timely investment in infrastructure needed for health and wellbeing and the care system, including measures for the prevention of health related problems.

Unfortunately, excessive growth needs more infrastructure than in funds, so a high growth strategy leads to ongoing issues and infrastructure coming after development. There should be a focus on making what we have work. In particular, there needs to be an emphasis on getting those of working age in jobs, to increase economic activity per home and therefore improve affordability of homes. This will reduce the 'need'. It will also mean less reliance on inmigration. The District needs to be self-sufficient.

Objective 10 To conserve and enhance the intrinsic character and beauty of West Oxfordshire's countryside, at both a strategic level (e.g., the Cotswolds) and a local level, recognising its contribution to people's quality of life and the area's social and economic wellbeing.

CPRE welcome this objective. We would like to see policy in this section which at least mirrors or goes further and strengthens the NPPF policy that protects the Green Belt except "under exceptional circumstances". The definition of genuinely exceptional circumstances being only where the development is widely accepted as in the public interest and when it could ONLY achieve its purpose if it were located on Green Belt land.

Objective 11 To conserve and enhance biodiversity, supporting resilient habitats for species and robust and valued environments for people, where natural capital and the benefits of ecosystem services are recognised, valued and invested in over the long term and measurable net gains in biodiversity are achieved locally.

This is critical in new development. New developers must maintain what is there and mitigation strategies are not realistic or effective. Development on protected land or land of landscape value should be avoided.

"The <u>State Of Nature</u> report, released on 27th September, shows that nature in England is on the brink. With 59% of farmland birds lost, 44% of moth species have been lost since 1970 and nearly 1500 species at risk of extinction. The UK is one of the most nature-depleted countries in the world, with <u>more than one in seven</u> native wildlife species facing extinction and more than 40% in decline. Against a Government target of protecting 30% of the land and sea for nature by 2030, just <u>3% of land and 4% of sea</u> is effectively protected for nature in the UK. As the most rural county in the South-East of England we clearly have a responsibility to protect and nurture our countryside."

CPRE strongly supports the emerging Oxfordshire Nature Recovery Network which should be embedded into development planning.

We also support the Oxfordshire Local Nature Partnership in calling for a clear requirement on all forms of development to deliver a 20% net gain in biodiversity.

Objective 12 To achieve a healthy water environment, where better water management and multiple benefits for people and wildlife are provided, through the use of an integrated water management approach that brings together sustainable water supply, usage and recycling, wastewater disposal, improvement of water quality and flood risk management.

Developments that rely on draining into rivers and watercourses should not be permitted. The public sewers should be upgraded to take any new development and any calculations on capacity should take account of surface water getting into the sewers. The necessary water infrastructure measures must be in place before any new build. Monitor and hold the water companies to account for failures.

Objective 13 Protect and enhance the quality of environmental assets by avoiding harmful impacts of all forms of pollution, especially on local amenity, health, landscape character and biodiversity.

CPRE would like to see a proactive policy to protect dark skies in this section. We are encouraged to see there is "the potential" to identify dark sky areas within the district and we strongly support this mapping and identification exercise, with policy to protect these identified areas.

CPRE can find no reference to the protection of Hedgerows within this report and this section may be the right place for a Hedgerow policy. We would like to see a policy to support the Climate Change Commissions target of increasing hedgerow by 40% by 2050.

Hedgerows and dry-stone walls that date back to the 'Inclosure Act' should be protected. The Oxford Green Belt Way, D'Arcy Dalton Way and the Oxfordshire Way, all long distance footpaths that provide a vital amenity to local residents should all also be protected.

Objective 14 Conserve and enhance the character and significance of the historic and cultural environment, recognising and promoting the wider contribution to people's quality of life and social and economic wellbeing and enabling sensitive adaptation in light of climate change.

CPRE welcome this objective. There is already an emphasis in planning of sensitively restoring and protecting historic buildings and assets, but sometimes the setting is affected by inappropriate development nearby.

Attractive, Accessible and Thriving Places

Objective 15 To provide a framework within which West Oxfordshire's resident communities and businesses are able to thrive across a network of attractive, safe and inclusive, vibrant and well-connected market towns and villages. Agreed. This needs infrastructure before houses.

Objective 16 To ensure that all new development in West Oxfordshire is underpinned by a high quality, innovative and inclusive approach to design.

All future housing development in the district should be compact units at high density in order to adjust the balance of housing stock in favour of lower cost, easier to maintain and more climate friendly units. **Target density should be 70-100 dwellings per hectare**, a density level historically found in both rural and urban communities respectively.

This will ensure the homes we need at more affordable prices, preserve land for its other benefits and services, and make a significant contribution to meeting climate change targets.

Objective 17 To create a safe, welcoming and accessible environment in which West Oxfordshire's town and village centres can adapt and prosper, taking advantage of changing trends and shopping habitats to ensure they remain a destination of choice.

With internet shopping, town centres need to change. The hub of a town should be more of a social space and should include housing.

Objective 18 To achieve equality and inclusivity within our local communities by ensuring that everyone is able to access the core services and facilities that they need to meet their daily needs.

New development must provide in advance any facility improvements needed to support the growing community, such as schools and surgeries. Also, homes should be accessible or made easy to adapt if needed e.g.) wider doors etc.

Objective 19 To empower and enable local communities to positively shape and influence the future of their area from the 'grass roots' up.

Meeting the Housing Needs of All

Objective 20 To enable the delivery of a continual supply of high quality, well-designed and sustainable new homes to meet identified housing needs in the period 2021 – 2041.

We agree housing numbers should be based on "need" and this should be based on the ONS (Office for National Statistics) latest housing projections uplifted in line with the Government's current standard method requirements to produce the minimum realistic housing trajectory. West Oxfordshire should strongly resist additional housing numbers because of Oxford City overspill, and the numbers identified in the much criticised Oxford city Reg 18 part 2, HENA report. Oxford City should prioritise homes over jobs in city brownfield locations, allowing people who currently work in the city and are waiting for affordable homes to live in it if they choose, rather than offload these homes to neighbouring districts. West Oxfordshire should focus on providing homes for the needs of people in West Oxfordshire.

We consider the priority need in the area to be smaller 1 and 2 bedroom homes, sensitively designed and in keeping with the surrounding area.

Redevelopment of brownfield sites first. For example, Carterton is now a doughnut, with a dead centre now surrounded by new development. This town centre is ripe for redevelopment including smaller 1 and 2 bedroom homes.

A positive policy on extensions and annexes which provide homes for adult children to be independent and elderly parents to be supported. These should then be counted within the numbers of new homes.

A positive policy to allow larger houses/ buildings to be split into smaller homes or supported living /care home facilities, allowing more to be homed. These, again, should be included within the numbers.

Green space in new developments, which is maintained as an obligation by the developer for at least 5 years.

Brownfield land such as the REEMA sites must be used first as Carterton is now a doughnut, with a dead centre, which ripe for redevelopment including high density well-designed homes.

Objective 21 To ensure that new homes in West Oxfordshire are genuinely affordable over the short and longer-term to a broad range of people, including those who are not able to afford market priced housing to buy or rent.

Agree – priority should be social rent/purchase as Government definition of 'affordable' is nonsensical. Including energy and water efficiencies (such as solar, air pumps and water storage) being mandatory requirements of new builds.

Objective 22 To make sure everyone is able to access the home that they need

Agree, but the current system is not working with developers building too many larger houses that attract inmigrators with good income but does not address the actual need for affordable homes in the District.

Objective 23 To ensure that the type, size and tenure of new homes coming forward helps to create a balanced and sustainable mix of opportunities and encourages community cohesion and well-being.

CPRE welcome this objective.

Objective 24 To make the most efficient use of the District's current housing stock and maximise the opportunities presented by existing and previously developed land and buildings.

Agree- there should be a develop brownfield sites first policy We have enough larger houses, and the priority must be small properties. This will free up the larger houses which can be 'recycled' to more smaller homes.

A Vibrant, Resilient and Diverse Local Economy

Objective 25 To provide the framework within which the West Oxfordshire economy can thrive and diversify, building on its inherent strengths and capitalising on future growth potential to increase economic productivity, well-being and resilience.

Objective 26 To enable the delivery of a balanced portfolio of high quality employment land to provide flexibility, meet identified needs and cater for a broad range of user requirements over the plan period.

Objective 27 To support West Oxfordshire's existing and future economic assets by providing the right infrastructure, land and premises, enabling them to improve, expand and adapt as appropriate and ensuring they are not lost to other uses where they have an important economic, social and environmental role to play.

Objective 28 To provide flexibility to be able to respond to future trends and technological changes to support working practices such as increases in remote, hybrid and co-working.

Objective 29 To ensure that all residents of West Oxfordshire are able to benefit from improved education, training and skills opportunities to enhance their economic and social well-being to strengthen the local economy and benefit small and start-up businesses.

Objective 30 To celebrate the rurality of our District, enabling the sustainable growth, expansion and diversification of the rural economy and providing support for farmers and other rural businesses including those linked to the visitor economy.

CPRE WO welcome this objective.