

## South Oxfordshire Local Plan 2034

### Matter 8 - Climate Change

#### CPRE Oxfordshire Hearing Statement, June 2020

CPRE Oxfordshire broadly welcomes the increased emphasis on climate mitigation and adaptation in the recent revisions to the Local Plan. In particular, we welcome the introduction of a new policy, DES 11, although we have major reservations of the soundness of the Plan, as outlined below.

#### Background

The lack of consideration of climate change in the development of the original plan was a massive omission. Particularly considering the Climate Change Act of 2008, Planning and Compulsory Purchase Act 2004 (Section 19) and the Government's Guidance on Climate Change (2014) which states:

*'Addressing climate change is one of the core land use planning principles which the National Planning Policy Framework expects to underpin both plan-making and decision-taking. To be found sound, [Local Plans](#) will need to reflect this principle and enable the delivery of sustainable development in accordance with the policies in the [National Planning Policy Framework](#). These include the requirements for local authorities to [adopt proactive strategies to mitigate and adapt to climate change](#) in line with the provisions and objectives of the [Climate Change Act 2008](#), and co-operate to deliver strategic priorities which include climate change.'*

Indeed the NPPF says (para 149): *'Plans should take a proactive approach to mitigating and adapting to climate change'*.

Additionally in 2019 Parliament declared a Climate Emergency and raised the ambition for the UK to become zero carbon by 2050, thus increasing the urgency to tackle climate change through the planning process. In March 2019, SODC declared a Climate Emergency, this means mitigating and adapting to climate change should be at the core of all decision making and policies at the Council.

In South Oxfordshire 33% of CO2 emissions are from homes (2016 figure, <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-2016>).

The Committee on Climate Change identify that:

*‘New buildings are one of the most straightforward sectors of the stock to decarbonise. Our 2019 report on UK housing recommended that by 2025 at the latest, no new homes be connected to the gas grid. Instead these homes should be fitted with low-carbon heating systems (for both space and water heating) and ultra-high levels of energy efficiency. Research by Currie and Brown and Aecom also identified potential to cost-effectively tighten standards for new non-domestic buildings. These steps, alongside the decarbonisation of cooking, would eradicate direct emissions from new buildings.’*

The recent (Feb. 2020) consultation on the Future Homes Standard recommended all new houses ‘should produce 75-80% less CO2 emissions than ones built to current requirements’.

### CPRE Comments

The Government Planning Guidance, quoted above, states that addressing Climate Change should underpin plan making. This has clearly not been the case with this plan. As evidence we note that the word ‘Climate’ occurs only 13 times in the entire 2034 plan (a document of 249 pages) and then only in the context of adaptation and resilience and not mitigation (i.e. reduction of carbon emissions).

The Objectives of the Sustainability Assessment (e.g. table NTS1) make no reference to mitigation of Climate Change. Climate factors are discussed in section 3.10 - however we note this is only two and a half pages in a document of 1,107 pages and talks almost wholly about climate resilience not climate mitigation<sup>1</sup>.

When we come to the actual sustainability scores for ‘Climate Factors’, the criteria are contradictory. Thus on page 8, scoring the housing requirement, the document states:

*‘Significant negative effects are also anticipated in relation to SA objective 10 relating to climatic factors on the basis that new housing will result in greenhouse gas emissions associated with construction and operational phases.’*

Yet on page 190, scoring the strategic sites, is the statement:

*‘SA objective 10 relates to climatic factors. The potential for a minor positive effect against this SA objective has been identified for all sites on the basis that there would be potential for greenhouse gas emissions associated with built development to be reduced and for renewable energy to be incorporated in new developments.’*

The confusions and contradictions continue when we get to the actual scores. Most of the assessments uniformly give a single green tick (minor positive benefit), see for example tables 6.5, 7.6 and 7.8. This is an incredible and unbelievable result and suggests no analysis has been undertaken on the climatic impacts (and in particular the need to reduce CO<sub>2</sub> emissions) of the various options. An exception to the overall picture of no discrimination on climate factors is the analysis of the Spatial Options (table 5.2, page 143). Here the Dispersal option is given a strongly negative assessment - no explanation of this anomaly is given.

When we come to the assessment of strategic sites (table 7.8) it is not credible that every site has the same impact - the differing travel implications for each site alone would suggest that they should vary (remembering that transport contributes 40% to the CO<sub>2</sub> emissions of the District). It is also not credible that building houses on a greenfield site has a 'minor positive benefit' on climate change, considering, for example that a typical house causes an emission of 50 tons of CO<sub>2</sub> in its construction.

**The Sustainability Appraisal on which this Plan is based is contradictory, incomplete and superficial and therefore unsound.**

While the recent addition of DES11 and edits to DES9 are welcome, it is clear that addressing Climate Change does not underpin the plan making. The locations of developments and sustainable transport choices have clearly not been driven by the need to mitigate<sup>1</sup> and adapt to Climate Change, as required by Government Guidance and the NPPF. **This alone makes this plan unsound.**

A policy to build zero carbon housing is both cost effective (an analysis by the Committee on Climate Change suggests that the cost is less than £5,000 per house for a new build compared with £25,000 for a retrofit) and feasible. **We therefore suggest that the DES11 be modified to aim for at least an 80% reduction on current building regulations by 2025 (and truly zero carbon housing by 2030).**

The Climate Change Guidance for planning recommends: 'Promoting low carbon design approaches to reduce energy consumption in buildings, such as [passive solar design](#).' We suggest this is included in the policy DES9.

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<sup>1</sup> The IPCC definition of Mitigation is:

**Mitigation is a human intervention to reduce the sources or enhance the sinks of greenhouse gases. Mitigation, together with adaptation to climate change, contributes to the objective expressed in Article 2 of the United Nations Framework Convention on Climate Change (UNFCCC):**

'The ultimate objective of this Convention and any related legal instruments that the Conference of the Parties may adopt is to achieve, in accordance with the relevant provisions of the Convention, stabilization of greenhouse gas concentrations in the atmosphere at a level that would prevent dangerous anthropogenic interference with the climate system. Such a level should be achieved within a time frame sufficient to allow ecosystems to adapt naturally to climate change, to ensure that food production is not threatened and to enable economic development to proceed in a sustainable manner'

Building on greenfield sites will inevitably reduce capacity for food production and the viability of the rural economy. This aspect should clearly have been included in the Sustainability Assessment (which it is not) but if point vii in DES8 is to have weight it should be.

**We also request that an additional point is included in DES10 to ensure renewable energy projects do not adversely affect food production, biodiversity and the rural economy.**

The current draft plan still contains very few carbon emission targets and is very unclear on how and what will be monitored in the area of greenhouse gas emissions.

**We suggest a full carbon account is made of all proposals for major developments along with regular monitoring of all emissions from new developments.** This full carbon account should include the loss (or change) of soil and biomass carbon stores, the loss of the ability of land to sequester carbon and the carbon emissions due to the construction process as well as the future operational carbon emissions of the housing and transport. (It is worth stating that it is possible, and financially viable, to produce housing with zero, or even negative, carbon emissions -see for example <https://ssassyproperty.com/>). This would enable South Oxfordshire to set realistic targets to achieve its stated aim to be zero carbon by 2030.