

Vale of White Horse Draft Local Plan 2031 (“the Plan”)

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Hearing Statement

Matter 1

1.2 Does the Sustainability Appraisal test the Plan against all reasonable alternatives in terms of the overall requirement... and its broad spatial distribution (see also Matter 3)?

1. Serious questions have to be asked of a SA lying behind a strategy locating substantial developments in car dependent rural areas, with minimal specifications for energy efficiency, unconcerned about orientation, terracing or the ‘mix’ (ie to balance with size of households) and without sufficient measures to limit the congestion that is making the area progressively unsustainable for both new and existing residents and businesses.
2. The Foreword says that the Plan is - ‘...based on the very latest evidence.’ but not apparently the IPCC synthesis report published in October 2014 (or the UK 4th Carbon Budget, the 2011 Carbon Plan or RTPI Future Horizons 2014).
3. The Council appears to believe that a strategy based on locating substantial numbers of new dwellings in rural areas would be found to be ‘sound’; reflecting permissions and appeal decisions granted since 2010. This strategy is supported by references to sustainable modes of transport (eg SO8). However, in his ‘Summary: myths, values and challenges’ Steve Melia states, that, “UK governments, abandoned any serious attempt to restrain car traffic some time ago, although the belief that they are trying to ‘get people out of their cars’ seems to endure regardless.”¹ A realistic view of the need to reduce car dependency would suggest only two alternatives:
 - (i) concentrate most if not all new development within the larger urban areas (Abingdon, Wantage and Didcot), or

¹ Melia S 2015 Urban Transport Without the Hot Air Vol 1 p110 UiT Cambs

(ii) introduce radical measures of car restraint (eg Melia believes that a correlation between parking provision and car ownership/use can be proved²).

4. The Plan claims that it would “2.8 facilitate the right type of housing in the most sustainable locations... Meeting the needs of our rural areas... Supporting some development across the rural areas to retain and enhance services to help improve the vitality and sustainability of our rural communities.” Whilst the sustainability of rural communities is a laudable objective, there is no evidence in this Plan or the Sustainability Appraisal that the proposed level of development in rural areas would do anything other than locate residents in unsustainable locations and result in increased car traffic making the whole District less sustainable. For the strategy of dispersal to be sustainable it would be necessary to apply policies imposing radical restraint over the use of cars.

5. It is inaccurate and misleading to have the objective of, “Maintaining the very good bus services, particularly between the main settlements”. This could not have been written with reliable information about the current situation on the Premium Route between Oxford – Abingdon – Didcot. Thames Travel would confirm that this is currently proving almost impossible to operate to any reasonable standard, partly but not only, due to congestion in Abingdon and Oxford.³ This is a crucial route and fundamental to both the objective of the Plan to reduce car dependency and to preventing new development making the area even less sustainable for existing residents and businesses. But, as Steve Melia point out, more people will only use public buses if, firstly, the use of their private car is radically limited. Despite opposition in the Plan to development in Drayton due to congestion problems the LPA has supported an NDP allocating over 200 dwellings and a permission for the first 73 without a transport plan.

6. The objective of, “Ensuring that employment and housing growth is located to reduce the need to travel by car and encourage walking and cycling for short journeys”, is based on another myth exploded by Steve Melia regarding ‘co-location’⁴ and there are no policies in the current Plan that would suggest any modal shift would take place. This is particularly so given the significant number of allocations in car dependent rural areas.

² Melia op cit p98

³ This service has been more ‘frequent’ in the past, but was reduced as too many buses were stuck in the same traffic queue

⁴ Melia op cit p107

7. The purpose of Policy SO 8 is to: “Reduce the need to travel and promote sustainable modes of Transport.” However, there are no effective policies in the Plan that show how this important objective is to be achieved. The CIL and grants are being invested in road schemes to benefit car drivers and not to improve public transport. No reference is being made to parking restraint or developer funded ULEV car clubs through s106 obligations placed on developments that, with unmitigated transport demands, will make congestion and GHG emissions even worse.

8. A sound Plan would set out the measures that would achieve the remarkable modal shift implied by this policy. Developer funded car clubs and rigorously enforced travel plans for all new commercial developments, Park and Ride facilities on the A34 at Milton Heights and Abingdon to serve Oxford and Milton/Harwell, and a comprehensive cycle network all have the potential to make the transport system more sustainable and move towards meeting transport carbon reduction budgets, but have not even been considered in the production of this Plan.

9. The A34 itself is notoriously liable to congestion (and not only at peak hour) that could render the ambitious growth projections (the residential growth in the SHMA is predicated on the predicted job growth) unlikely to be achieved. There are substantial new developments planned at Begbroke (jobs), North Oxford (houses, jobs and mainline station), Botley (houses and retail/jobs), North Abingdon (houses), Milton and Harwell (jobs and houses) which will be largely dependent on a functioning A34. The LEP, SHMA and now this draft Plan all lack credibility by failing to address and quantify the problems with the A34 (proposed junction improvements would encourage its use) and the uncertainty this creates for the growth of both jobs and housing.

10. It should be an important part of the Plan to identify the measures that could mitigate this strategic challenge. For example a 50 mph speed limit should be negotiated and agreed by Highways Agency and with the relevant district/county councils (as on the Oxford Ring Road).

1.4(c) The question of compliance with s39(2) of the Planning and Compulsory Purchase Act 2004 – and the contribution that the Plan must/would make to the achievement of sustainable development?

11. The Plan appears to lack a ‘..proactive strategy to mitigate and adapt to climate change;’⁵ a strategy that could be relied upon to reduce carbon emissions by about 60% by 2031 while housing and jobs would grow by about 40%. There do not appear to be any or adequate measures which will contribute to annual carbon reductions of between 6% and 10%.

12. When asked about this omission, the Council’s response was,⁶

- 1 Neither the Plan nor the District Council are immune from having to deal with these targets,
- 2 It is doubtful that the UK will meet its EU obligations,
- 3 The locational strategy (eg larger villages and Green Belt sites) would reduce emissions.

This is not an adequate response to the requirement of s39(2) of the 2004 Act.

13. In contrast, the Environmental Change Institute has responded to the prospect of 100,000 new homes in the County by explaining how these could contribute and actually drive the process of change to a low carbon economy.⁷

14. Recent research into the attitudes of young people to climate change revealed the most popular Narrative was.

“Climate Change is here and now - Climate change isn’t a problem for the future, it’s happening now. Current generations are going to have to live with its consequences but are also the ones who can take the lead in getting to grips with it. We need to de-carbonise the economy, starting with

⁵ Para 94 of NPPF

⁶ Public meeting on deposit of the Plan

⁷ Oxfordshire’s low carbon economy [Environmental Change Institute](#) 2014

the power sector, and keep global temperatures within the '2 degrees' target to avoid the worst consequences of climate change."⁸

15. Those responsible for producing the Plan appear to be out of touch with what experts regard as feasible, what is necessary, what is statutorily required, and actually what people want.

16. The Brundtland definition included in the NPPF (para 5) and referred to in the Plan, has been interpreted by an inspector as the need for development to "consume its own smoke"⁹ if future generations are not to be disadvantaged.¹⁰ Carbon reductions must be made a short term priority given impacts that are already being felt at 0.5 degrees of warming, and the very limited window available to prevent GHG emissions causing more than 2 degrees of warming (and associated more frequent and extreme weather events). Reductions that the Plan should be securing in the short term are far more effective and important than those which might be achieved in the longer term. There is no convincing evidence that development in accordance with the Plan will reduce and not actually increase carbon emissions (eg new building, new roads, more congestion, high carbon food).

17. The purpose of policy SO 12 is to "Minimise greenhouse gas emissions and other pollution (such as water, air, noise and light) across the district and increase our resilience to likely impacts of climate change, especially flooding." While the objective to "minimise" is clearly desirable it is also unrealistic and problematic in both application and monitoring. It would be much better to find in the Plan an requirement that all applications for new developments include the information that demonstrates it will be carbon neutral (ie 'consume its own smoke' as per Brundtland and the NPPF) which could include 'allowable solutions', post occupation evaluations and criteria for monitoring purposes. The Government relaxation of Zero Carbon Homes and allowable solutions does not change and is possibly incompatible with the existing statutory scheme and on-going requirements of s39(2) of the PCPA 2004, the CCA 2008 and the presumption in the

⁸ *Young voices; How do 18 to 25 year olds engage with climate change?* 2014 Climate Outreach Information Network

⁹ APP/N2345/A/12/2169598

¹⁰ It should not have to be said that any 'smoke' that is not consumed will impact on and have to be treated by future generations, contrary to the NPPF definition of sustainable development. See also Rt Hon Greg Clark's Foreword to the NPPF - "Sustainable means ensuring that better lives for ourselves don't mean worse lives for future generations."

NPPF. There are measures (south facing terraces of mostly 2 bedroomed houses or apartments, that could be secured by the Plan and start to contribute to the achievement of sustainable development.

Soundness - Summary

The failure to adequately plan for sustainable development should result in the Plan being found **unsound** for the following reasons:

- The plan has not been **positively prepared** as sustainable development is more likely to occur in spite of the Plan rather than due to its policies.
- The Plan does not include a strategy which seeks to meet **objectively assessed requirements** of the Climate Change Act and the related carbon reduction budgets.
- The plan is not **justified** because it is not based on the logical implications of the Climate Change Act for the development of land and buildings over the next 15 years.
- The Plan is not based on **robust and credible evidence** that relates to the necessary reduction in carbon emissions from existing land and buildings as well as all new development.
- The document will not be **effective** due to the failure to understand the repercussions of the statutory and advisory carbon reduction targets.
- The development supported by the Plan will not be **deliverable** in accordance with the criteria in the Plan. Development would need to accord with other criteria in order to contribute to the achievement of sustainable development.
- The Plan is not **flexible** in the sense that it would need substantial change to be contributing to the achievement of sustainable development.¹¹
- It would not be possible to **monitor** the contribution it is making to the achievement of sustainable development as it lacks the necessary criteria (eg energy assessments, carbon reduction targets and rates) to carry out that fundamental exercise.
- The Plan is not consistent with **national policy** in respect of carbon reductions nor the **Climate Change Act** (see NPPF paras 14 and 94).

¹¹ S.39(2) Planning and Compulsory Purchase Act 2004

