

## Comment

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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Abingdon Carbon Cutters ( Sally Reynolds)
Comment ID	LPPub903
Response Date	18/12/14 18:23
Consultation Point	Local Plan 2031 Publication Version ( <a href="#">View</a> )
Status	Submitted
Submission Type	Web
Version	0.2
Files	Comments of Abingdon in Transition to the Vale of White Horse Draft Local Plan (?the Local Plan?)
Q1 Do you consider the Local Plan is Legally Compliant?	Yes
Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified)	No
If your comment(s) relate to a specific site within a core policy please select this from the drop down list.	N/A

**Q4 Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.**

In its current form the Plan should be found to be **unsound** as it does:

- **not adequately set out the criteria that would ensure that all new development would benefit from the NPPF presumption in favour of sustainable development,**
- **not include the criteria necessary for monitoring purposes,**

- not ensure that development carried out in accordance with the proposed policies would not make the area less sustainable for existing residents and businesses,
- not adequately address the unsustainable level of under-occupation by a careful analysis of the demand for downsizing and, as a result, the Plan would create more housing need than it would meet,
- does not include policies which complement its register of self-builders (that should also include co-housers),
- not identify Lifetime Neighbourhoods as a priority for meeting social care needs,
- not prioritise low carbon modes of transport and concentrates on works which would increase car dependency.

**Q5 Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

**In order for the Local Plan to pass the test of soundness it must include the policies necessary to secure development which would ?contribute to the achievement of sustainable development? and prevent unsustainable development:-**

- Policies enabling access to affordable land and housing for small-scale farming.
- Policies to protect the best and most versatile agricultural land and, where biodiversity loss is inevitable, this should be adequately replaced/offset.
- Policy requiring ?energy plans? from residential and commercial developments of any significant size. These plans should calculate the demand for energy and how this would be reduced (to zero carbon) by choice of building fabric, smart metering, low energy appliances, energy champions, inspections and evaluations, etc. The ?energy plan? would identify the on-site or off-site/local energy supplies.
- Policies to secure and support community workshops, business hubs and smallholdings through s106 developer contributions (or CIL).
- Policies to secure flood assessments that demonstrate no net increase to flooding through mitigation measures and possible offsetting (ie increasing flood water storage off-site or, possibly, through planting).
- The Local Plan should provide encouragement to those wanting to prepare Neighbourhood and Community Plans that set out a positive vision for their local area.
- The Local Plan should provide flexibility for the development of Abingdon Town centre where the Council should not be wedded to the idea of a large retail unit as smaller and more diverse developments including more residential would be more sustainable

#### **Comments of Abingdon in Transition to the Vale of White Horse**

#### **Draft Local Plan (?the Local Plan?)**

#### **1. Introduction**

Abingdon Carbon Cutters (ACC) was established in 2007 and submitted comments on the 2013 draft Strategic Local Plan. In October 2103 the group was officially recognized by the Transition Town movement. The main concern is that the policies in the Local Plan should be worded so as to ensure that only ?sustainable development? would accord with the plan.

There is nothing intrinsically unsustainable to building more houses in the District. However, there are few signs in the Plan that it is much more than a means of allocating sites without proper consideration of the economic, environmental and social impacts that are indispensable for the exercise to be in accordance with NPPF para 14 and benefit from the **presumption in favour of sustainable development**.

The scale of growth being proposed; the substantial number of houses predicted on substantial number of new jobs, would not appear to be sustainable. The Local Plan should not have adopted the figures from the Strategic Housing Market Assessment without providing clear evidence to show how this rate of building, infrastructure provision and implied traffic growth would be compatible with at least 6% annual reduction in carbon emissions from the combination of new and existing development.

**ACC/AiT object to the Local Plan that should be found to be unsound as it is not in a form that would both prevent unsustainable development and support development that would cut carbon in accordance with carbon budgets arising from the 2008 Climate Change Act and the National Planning Policy Framework.**

## **2. Housing**

Notwithstanding some surprise at the scale of job growth said by the (undemocratic) Local Enterprise Partnership to be desirable and achievable, there might be ways in which some but not all of this housing could be provided in sustainable ways. In fact, it is the scale of this housing that requires special attention be given to all aspects of sustainability for the impact of this extraordinary level of growth to be acceptable. New development must not be allowed to add to the challenge of reducing carbon emissions and should be aimed at assisting the transition of existing towns and villages into a more low carbon economy.

Carbon must be reduced in building materials, construction and use. Whilst it might no longer be appropriate to refer to the Code for Sustainable Homes (the BRE are working on a replacement), the presumption in the NPPF still applies to plan-making and decision-taking and new housing from 2016 must be zero-carbon. Based on the Brundtland definition included in the NPPF, all new development should at the very least 'consume its own smoke' [1] and Code for Sustainable Homes Level 4 (higher than the current Building Regulations [2]) has been considered at appeal to be insufficient to benefit from the presumption. Any 'smoke' left for future generations to consume is a sign that development cannot be said to be sustainable at a time when emissions must be reduced. There is the alternative of adopting Passivhaus standard as has been done elsewhere in the UK and abroad. There should be policies ensuring that the performance or implementation gap is effectively closed by proper monitoring and post occupation evaluations.

The Local Plan is an opportunity to set out in public policy terms the ways in which developments could contribute to off-site carbon reductions. [3]

The Local Plan could also refer to the carbon reductions that can be achieved in the occupation of the housing stock; the ways in which the high levels of under-occupancy [4] could be reduced through controlling the size of new housing and promoting forms of cooperative housing that allow for an efficient use of buildings through some sharing of space (eg laundry rooms, libraries, workshops, guest accommodation etc), already common abroad and being promoted in Wales. This represents the most sustainable form of housing in social, economic and environmental terms. To be sound, the Local

Plan would need to show an understanding of the potential for and benefits of downsizing, explaining the need to develop Lifetime Neighbourhoods as well as a proportion of Lifetime Homes, to start to meet the serious deficit in social care for the increasing proportion of elderly. [5]

There should be policies supporting mixed use developments, including working from home, possibly in live/work units and local business hubs.

The LPA is committed to keeping a register of self-builders and the Plan should include enabling policies so that opportunities can be created to meet the demand.

## **Recommendations**

- 1     1.            **New housing to be built to a genuinely sustainable standard (eg zero carbon, carbon negative or Passivhaus) with adequate inspection and post-occupancy evaluation to ensure that is being achieved.**
- 2     2.            **Levels of under-occupancy (and affordability) require a very large proportion of all new housing to be of one or two bedrooms ? any larger dwellings should be adaptable with the potential for subdivision or creating a self contained annex or bedsit. Most new dwellings should be terraced with a clear southern aspect.**
- 3     3.            **The Local Plan should require developers of any larger site (say 30+) to refer to registers kept by the LPA of those interested in cooperative housing and self-building/finishing (definitions of these housing sectors would be required and all or most should count as ?affordable housing?).**
- 4     4.            **Policies on permitted development rights should ensure retention of a good stock of small houses and high standards of energy efficiency.**
- 5     5.            **Support for mixed use areas including working from home or local business hubs.**
- 6     6.            **The Plan should explain and support Lifetime Neighbourhoods.**

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## **3. Transport**

Reductions of carbon emissions from transport are an essential part of the Climate Change Act. This can only be achieved by a substantial modal shift from car to walking, cycling and bus/train, as well as the electrification of the road system (ie electric cars and buses and ecarbonising of the grid). In this context the proposed road building at Lodge Hill and Chilton, and the safeguarding of a route to the south of Abingdon make no sense. Claims are made about the sustainability of the area when, in fact, there are very severe problems with the local highway network, including the A34 ? to the extent that development in many parts of the District should be severely limited until very strict demand management measures have been put in place. Allowing development without such measures would make the area less sustainable for both new and existing residents and businesses.

The Premium Bus Route between Oxford and Didcot has never been run as a premium bus service (a turn-up-and-go service), and has actually deteriorated over the last few years. Para 7.31 of the earlier Transport topic paper says of Science Vale UK that, "...the benefits of this growth would be undermined if the transport improvements were not secured. As a result, **all** development??, in this area will be required to contribute to the Science Vale UK Integrated Transport Package which requires a turn up and go frequency of around 15 minutes (para 6.64). In fact the Infrastructure Delivery Plan is almost all about changes to the road network that would do no more than encourage a growth of car traffic.

Car clubs have proved to be one of the few effective measures in reducing car ownership and use and should be low carbon, developer-funded on all "strategic developments", and available to new and existing residents.

Policies in the Local Plan are currently too weak to ensure adequate S106 funding from all strategic sites to establish a network of dedicated cycle paths concentrating on commuting routes up to about ten miles.

The A34 is almost entirely a matter for the Highways Agency. However, it is both a major source of noise and harm to air quality in many parts of the District, including a number of sites being proposed for housing. A lower speed limit would reduce both congestion and the frequency of RTAs (and consequent cause of disruption and congestion), reduce carbon emissions and reliance on fossil fuels (lower speeds are also more compatible with electric vehicles), as well as substantial reductions in noise from engines and tyres. A 50mph limit was negotiated between the HA and OCC at Botley and other lengths of the Oxford ring road.

The proposed site at Radley would, incidentally, take advantage of an existing rail station and turn-up-and-go bus route.

## **Recommendations**

1. **1. Travel Plans should be a requirement of all new development demonstrating how the development would contribute to the target of removing carbon from car transport by 2040 (financial contributions to bus services, car clubs and cycle path improvements).**
2. **2. The speed limit on the A34 (at least within the District boundaries) should be reduced to 55mph**

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## **4. Other policies**

**In order for the Local Plan to pass the test of soundness it must include the policies necessary to secure development which would "contribute to the achievement of sustainable development" and prevent unsustainable development:-**

- **Policies enabling access to affordable land and housing for small-scale farming.**
- **Policies to protect the best and most versatile agricultural land and, where biodiversity loss is inevitable, this should be adequately replaced/offset.**
- **Policy requiring "energy plans" from residential and commercial developments of any significant size. These plans should calculate the demand for energy and how this would be reduced (to zero carbon) by choice of building fabric, smart metering, low energy appliances, energy champions, inspections and evaluations, etc. The "energy plan" would identify the on-site or off-site/local energy supplies.**
- **Policies to secure and support community workshops, business hubs and smallholdings through s106 developer contributions (or CIL).**
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- **The Local Plan should provide encouragement to those wanting to prepare Neighbourhood and Community Plans that set out a positive vision for their local area.**

- The Local Plan should provide flexibility for the development of Abingdon Town centre where the Council should not be wedded to the idea of a large retail unit as smaller and more diverse developments including more residential would be more sustainable

## **5. Is the Plan sound?**

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[1] Appeal Ref: 2169598

[2] The Committee on Climate Change does not regard the Building Regulations as adequate (see *How local authorities can reduce emissions and manage climate risk* 2012).

[3] An example would be to buy shares in Abingdon Hydro (or its upgrading) that could be assigned to the purchasers of new developments.

[4] 80% of dwellings in the District have one and more often 2 or more spare bedrooms

[5] *The generation strain: Collective solutions to care in an ageing society* Clare McNeil , Jack Hunter IPPR 2014

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

**Q6 If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

Yes - I wish to participate at the oral examination

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

**Q7 If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

Some of our members wish to interrogate the planners and explain more fully our concerns.

**Please upload any supporting information**

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