

To the Planning Policy Team St. Aldate's Chamber 109--113 St. Aldate's Oxford OX1 1DS

Attention of Richard Wyatt

We recognise that a response to the threats posed by climate change is a significant aspect of the submission plan, but the recent IPCC report makes it clear that the current draft Oxford Local Plan 2036 is significantly outdated in respect of the severity and urgency of the Climate Emergency which that report^[1] sets out. The report comments: "The challenge of avoiding catastrophic climate breakdown requires rapid, far-reaching and unprecedented changes in all aspects of society"

On that basis we challenge the soundness of the current draft. We submit that this fails under the 'positively prepared' and 'national policy' tests of soundness as applied specifically to the supporting Sustainability Appraisal ('SA'). Page 5 of the Draft Local Plan 2036 identifies the purpose of the SA as 'to ensure that all aspects of sustainability are properly considered', but we consider this purpose is no longer adequately served in light of the 2018 IPCC report

The IPCC report comments that to keep us to a 1.5 degree global temperature increase we need to reach Net Zero Carbon by 2050. This is a target that the UK Government is already working on through the UK Committee on Climate Change. In this context the existing City Council target of reaching zero carbon by 2100 is very outdated.

A Zero Carbon target needs to be set to reflect the latest research. We commend targets set by Bristol and London for Zero carbon by 2030, that that such a target should be an absolute priority for housing and transport. Oxford is a world--class city with a proven capacity to lead – we should adopt a target with this in mind. **That target needs to be explicit throughout this Plan and needs to be reflected in all relevant policies on housing, development, transport and the environment.**

We wish our representative to attend the inspection hearing and answer questions.

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We also wish to highlight some other omissions from the draft Oxford City Plan and areas which should be strengthened:

Lack of Carbon Accounting

The Council is bound by the legal duty set out in Section 19 of the 2004 Planning and Compulsory Purchase Act, as amended by the 2008 Planning Act, to ensure that, taken as whole, plan policy contributes to the mitigation of, and adaptation to, climate change. Paragraph 149 of the NPPF requires plans to take a proactive approach to mitigating and adapting to climate change and to ensure (footnote 48) that policies and decisions are in line with the objectives and provisions of the Climate Change Act 2008.

This means that local plans should be able to demonstrate how policies are in line with the legally binding carbon emission reduction targets set out in the Climate Change Act. This in turn means understanding both the baseline carbon dioxide emissions, the emissions inherent in future development and growth within the plan period, and the actions needed to reduce emissions over time. This in turn, means that annual monitoring reports should contain ongoing assessments of carbon performance against the Climate Change Act target.

Such carbon accounting can provide strong evidence to support climate change mitigation policies, such as strong policies requiring new development to be zero carbon. Carbon offset funds also have huge potential to stimulate the local low carbon economy, and deliver environment and social benefits (for example to residents in fuel poverty) alongside the carbon savings targeted.

Zero carbon requirements for new development - Policy RE1: Sustainable design and construction

We support the principle of including binding carbon reduction requirements for new development going beyond building regulations, however given the urgency with which emission reductions need to be made, the policy is insufficiently ambitious.

New development should be required to be zero carbon from the date of adoption of the plan, as has been successfully demonstrated within the London authorities, applying policies from the London City Plan.

Draft London Plan – policy S12 - Minimising greenhouse gas emissions^[2]

The emerging policy requires major development should be net zero-carbon, including a minimum on-site reduction of at least 35 per cent beyond Building Regulations required for major development through fabric efficiency and the on-site incorporation of renewable energy. Residential development should aim to achieve 10 per cent, and non-residential development should aim to achieve 15 per cent through energy efficiency measures. Where the zero-carbon target cannot be fully achieved on-site, a payment is made into a carbon offset fund to pay for the shortfall in carbon savings to be achieved off-site.

Policy 5.2 of the Adopted London Plan^[3] sets out very similar requirements.

We would add that the background paper on which your policy is based, Carbon-Related Issues (Climate Change and Fuel Poverty)^[4] and appendix 4 within it, is out of date. The consultation response^[5] that accompanied the revised National Planning Policy Framework (NPPF) published in July 2018 confirmed that whilst the government “intends to consult on further improving (national) energy requirements for new homes” and goes on.. **“the Framework does not prevent local authorities from using their existing powers under the Planning and Energy Act 2008 or other legislation where applicable to set higher ambition. In particular, local authorities are not restricted in their ability to require energy efficiency standards above Building Regulations.”**

Overheating –

Policy 5.9 Overheating and cooling

Major development proposals should reduce potential overheating and reliance on air conditioning systems and demonstrate this in accordance with the following cooling hierarchy:

1. *minimise internal heat generation through energy efficient design*
2. *reduce the amount of heat entering a building in summer through orientation, shading, albedo, fenestration, insulation and green roofs and walls*
3. *manage the heat within the building through exposed internal thermal mass and high ceilings*
4. *passive ventilation*
5. *mechanical ventilation*
6. *active cooling systems (ensuring they are the lowest carbon options).*

Major development proposals should demonstrate how the design, materials, construction and operation of the development would minimise overheating and also meet its cooling needs. New development in London should also be designed to avoid the need for energy intensive air conditioning systems as much as possible. Further details and guidance regarding overheating and cooling are outlined in the London Climate Change Adaptation Strategy.

Whilst the 'urban heat island effect' is mentioned in passing in the supporting text at paragraph 5.21 and in the introduction to chapter 4, the plan fails to include requirements for new development to be resilient to overheating. With climate change, average and extreme temperatures across the UK are expected to increase further in the coming decades. Heatwave events such as in 2003 are projected to become the norm in the UK by the 2040s. For a 2°C rise in global mean temperature, the increase in temperatures under heatwave conditions in Europe is projected to increase by between 1.4 - 7.5°C^[6].

We would therefore request that either Policy RE1 should be extended to require that new development be resilient to overheating, or that a new overheating policy be developed. Policy 5.9 from the Adopted London Plan^[7], shown above is a good example.

The areas where the urban heat island is most significant are the same central locations in Oxford in most need of more trees, fountains and pedestrianisation to make them more liveable spaces eg Broad Street, Cornmarket and the High Street. Fundamental changes need to take place to reduce vehicle movements in central Oxford to make it a better place to live, work, visit and study.

Chapter 6

Policy DH3: Designated heritage assets

We welcome paragraphs 4.5 and 4.6 (Sustainable retrofitting of existing buildings) which discuss the opportunity to retrofit the existing building stock (including historic and listed buildings) in order to improve their energy efficiency and reduce carbon emissions, and the guidance the city has already produced to promote sensitive retrofitting of historic buildings. However these paragraphs lack an implementation policy and sit in isolation from policy DH3: Designated heritage assets.

In a city like Oxford, with relatively low rates of new development and a very large stock of historic buildings, it seems unlikely that the targeted carbon emission reduction can be achieved without carbon reductions being secured from the historic building stock.

Therefore policy DH3 should be amended, or a new policy should be created to establish that proposals to sensitively retrofit heritage assets will be supported, and that climate change considerations are capable of being material considerations alongside the impact on the setting and fabric of the heritage asset in such cases. The Sustainable Use of Energy in Traditional Dwellings^[8], a research report for Historic England supports this approach and gives examples of policies developed in different parts of the country:

Bath and North East Somerset Council - CP1: Retrofitting Historic Buildings (part of policy)

The Council will seek to encourage and enable the sensitive retrofitting of energy efficiency measures and the appropriate use of micro-renewables in historic buildings (including listed buildings and buildings of solid wall or traditional construction) and in conservation areas, whilst safeguarding the special characteristics of these heritage assets for the future. Proposals will be considered against national planning policy

Brighton and Hove - CP15: Heritage (part of policy)

The council will work with partners to promote the city's heritage and to ensure that the historic environment plays an integral part in the wider social, cultural, economic and environmental future of the city... 2. Where proposals are promoted for their contribution to mitigating climate change, the public benefit of this will be weighed against any harm which may be caused to the significance of the heritage asset or its setting

Islington - DM3: Heritage (part of policy)

A. Protection of the historic environment: Islington's historic environment is an irreplaceable resource and the council will continue to ensure that the borough's heritage assets are conserved and enhanced in a manner appropriate to their significance.

G. Climate change: i) Proposals to mitigate, and adapt to, the effects of climate change should in the first instance explore all opportunities of enhancing energy efficiency and forms of providing renewable energy and improved adaptation to climate change without harming the significance of heritage assets. ii) Where conflict between climate change objectives and the conservation of heritage assets is unavoidable the public benefit of mitigating the effects of climate change will be weighed against any harm to the significance of heritage assets, in accordance with the development management principles in national, London and Islington planning policy.

[1] See the following. This link gives access to both the full report and a summary for policymakers: <http://ipcc.ch/report/sr15/>

[2] Draft London Plan showing minor suggested changes – July 2018

https://www.london.gov.uk/sites/default/files/draft_london_plan_-_showing_minor_suggested_changes_july_2018.pdf

[3] London Plan – Chapter 5 – London's response to climate change
- https://www.london.gov.uk/sites/default/files/the_london_plan_malp_march_2016_-_chapter_5_-_londons_response_to_climate_change.pdf

[4]https://www.oxford.gov.uk/downloads/file/5111/background_paper_-_carbon_climate_change_and_self-build_housing

[5] Government response to the draft revised National Planning Policy Framework consultation - A summary of consultation responses and the Government's view on the way forward (2018)
MHCLG https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728498/180724_NPPF_Gov_response.pdf

[6] UK Climate Change Risk Assessment 2017 Synthesis Report <https://www.theccc.org.uk/wp-content/uploads/2016/07/UK-CCRA-2017-Synthesis-Report-Committee-on-Climate-Change.pdf>

[7] Adopted London Plan

- https://www.london.gov.uk/sites/default/files/the_london_plan_malp_march_2016_-_chapter_5_-_londons_response_to_climate_change.pdf

[8] The Sustainable Use of Energy in Traditional Dwellings: Using legislation and policy to guide decision-making - Prepared for Historic England by the Centre for Sustainable Energy

- <https://www.cse.org.uk/downloads/file/historic-england-2017-sustainable-use-of-energy-in-traditional-dwellings.pdf>