

# CLIMATE CHANGE

## Joint Local Plan

Pre-submission Publication Version

(Regulation 19)



This topic paper supports the Joint Local Plan 2041.

We have prepared topic papers to present a coordinated view of the evidence that has been considered in drafting the Joint Local Plan 2041. We hope this will make it easier to understand how we have reached our current position.

The topic papers may be revised and published at the submission stage, timetabled for December 2024.

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# Section 1: Introduction

- 1.1. The growing impacts of climate change are evident, and it is clear that climate change is one of the greatest challenges facing the world today. South Oxfordshire and Vale of White Horse have both declared climate emergencies and are committed to tackling climate change and lowering greenhouse gas emissions.
- 1.2. The Joint Local Plan will play a vital role in responding to the climate emergency through the implementation of robust planning policies addressing issues associated with climate change. We aspire for the Joint Local Plan to be both ambitious and innovative in helping to address key issues such as climate change and nature recovery, in accordance with our corporate plans. Rising energy costs and the cost-of-living crisis are driving faster consumer demand for more efficient and renewable solutions.
- 1.3. We would like to build on the success of our South Oxfordshire Local Plan Policy DES10: Carbon Reduction, adopted in 2020, which put us among the leading authorities nationally in setting carbon reduction requirements that exceed the Building Regulations. We wish to be leading authorities in acting on climate change.
- 1.4. This topic paper has been prepared to illustrate how addressing the climate crisis has been a key consideration in the drafting of the Joint Local Plan 2041 to date and forms a golden thread throughout the document. To demonstrate this, the diagram set out in section 3 shows all the proposed policies in the Joint Local Plan that will have a direct impact on development and how it mitigates or adapts to issues around climate change. This topic paper also provides useful local and national policy context to provide clarity regarding why these policies are needed, and how we plan to achieve our aims of tackling climate change.
- 1.5. This topic paper aims to show how we have taken a holistic approach to addressing climate change through planning policy. Firstly, through actions that reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions, known as **climate mitigation**. For example, some ways in which planning policy can tackle climate mitigation is by including policies that require homes to be net zero in their emissions (Policy CE1), as well as policies that promote sustainable transport choices that are zero emission (Policy IN2).
- 1.6. Secondly, through making adjustments to natural or human systems in response to the actual or anticipated impacts of climate change, to mitigate harm or exploit beneficial opportunities, known as **climate adaptation**. For example, some ways in which planning policy can tackle climate adaptation

is by including policies that address flood risk (Policy CE6), water efficiency (Policy CE7), and designing homes so they avoid overheating (Policy CE4).

- 1.7. The Joint Local Plan contains many policies that will have a bearing on development and how it addresses issues around climate impact mitigation and adaptation. We've signposted to the main ones that have a direct impact on climate change mitigation or adaptation measures in the diagram in section 3. There are also many other policies, not shown on the diagram, which are important but have a more indirect influence.

# Section 2: Policy background

## Local Policy Context

- 2.1. This section provides an overview of the local policy context relating to climate change.

### Local targets

- 2.2. Both the Councils are committed to reducing carbon emissions and tackling the effects of climate change. In 2019 we declared climate emergencies and set ambitious climate action targets:

#### *South Oxfordshire District Council*

- To become carbon neutral within our own operations by 2025
- For South Oxfordshire to be a carbon neutral district by 2030

#### *Vale of White Horse District Council*

- To become carbon neutral within our own operations by 2030, with an aim for 75 per cent reduction in our emissions by 2025
- For the Vale of White Horse to be a carbon neutral district by 2045, with an aim for a 75 per cent reduction in emissions across the district by 2030

### The Corporate Plans

- 2.3. Alongside declaring climate emergencies, the Councils corporate plans (see [South/ Vale](#)) also identify tackling climate change and action on Climate Emergency as a corporate priority. The Joint Local Plan will play its part in fulfilling these corporate aims by ensuring that a golden thread exists throughout the Joint Local Plan through various policies that address climate change in different ways.

### Climate Action Plans

- 2.4. Alongside the corporate plans, the Councils have Climate Action Plans (see [South/ Vale](#)). The Climate Action Plans outline the steps both Councils will take towards the climate action targets set out in paragraph 2.2. These steps are presented in the plans in the form of actions that will be undertaken on carbon neutrality within the districts. These actions are important drivers for this evidence and will help us to meet these targets.
- 2.5. One relevant action is WOW15, which states that we must 'Include policies in the Joint Local Plan that will help deliver zero carbon development and encourage more sustainable choices'. This topic paper demonstrates how we are meeting this target by incorporating a variety of policies in the Joint Local Plan, most specifically Policy CE2: Net Zero Carbon Buildings and Policy IN2 - Sustainable transport and accessibility, which directly meet the WOW15 action.

## **National Policy Context**

- 2.6. This section provides an overview of the national policy context relating to climate change, including an overview of relevant legal context.

### **National targets and legal context**

- 2.7. In 2019 the UK Parliament declared an environment and climate emergency, subsequently amending the 2008 Climate Change Act to set a target for emissions in the UK to become net zero by 2050.
- 2.8. Section 19(1A) of the Planning and Compulsory Purchase Act (2004) also requires Local Plans to include 'policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change'. This legal requirement will be tested at the examination of the Local Plan.

### **National Planning Policy Framework and National Planning Policy Guidance**

- 2.9. National policy is set out in the Government's National Planning Policy Framework (NPPF), last updated in December 2023. It requires Local Plans to take a proactive approach to mitigating and adapting to climate change. It identifies four ways that the planning system should support the transition to a low carbon future:
- contribute to radical reductions in greenhouse gas emissions
  - minimise vulnerability and improve resilience
  - encourage the reuse of existing resources, including the conversion of existing buildings
  - support renewable and low carbon energy and associated infrastructure
- 2.10. Chapter 14 of the NPPF is also dedicated to 'Meeting the challenge of climate change, flooding and coastal change' and sets out a number of ways in which local plans should take a proactive approach to mitigating and adapting to climate change.
- 2.11. National Planning Policy Guidance (NPPG) also makes it clear that to be found sound, Local Plans will need to address climate change and enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

# Section 3: Joint Local Plan 2041

## Vision and Objectives

- 3.1. The emerging Joint Local Plan contains an ambitious vision and a series of objectives which set out how we'd like the districts to be, and what we want our local plan policies to achieve. They demonstrate the holistic approach we are taking to tackle climate change and take action on the climate emergency through planning policy.
- 3.2. There are three parts of the vision which relate to climate change:
  - Our vision is for carbon neutral districts, for current and future generations.
  - A place where residents can reach the facilities they need for everyday living on foot, bicycle, wheeling, public transport or by zero-emission and low carbon transport choices.
  - Where residents and visitors can live healthy lifestyles and access greenspace. Where people are safe from pollution, flooding, and the effects of climate change.
- 3.3. There are also two relevant plan objectives:
  - **Objective 2** - Help transition to net zero carbon districts by 2030 for South Oxfordshire and 2045 for Vale of White Horse, mindful of the districts' carbon budgets, by locating new housing and employment development in places which minimise the need to travel by private car, requiring buildings to be designed to the highest achievable standards for reducing energy and water use, encouraging suitable renewable energy generation, and supporting nature-based carbon and stormwater storage
  - **Objective 3** - Strengthen resilience to climate change by designing new buildings and infrastructure in our districts for extreme weather events, such as flash floods and heat waves, and implementing nature-based solutions like planting street trees.

## Net Zero Carbon Study

- 3.4. The Councils commissioned consultants Bioregional to undertake a Net Zero Carbon study to support preparation of the Joint Local Plan 2041. This study ensures that through planning policy, we do all we can to address the climate emergency and reach our net zero targets, whilst ensuring these policies are feasible and viable.



- 3.5. The study provides a suite of policy recommendations to us that will help us reach local and national net zero targets within the districts. It will also support the Councils in our commitments to become carbon neutral districts (by 2030 for South Oxfordshire and 2045 for Vale of White Horse) and meet the aims of the Corporate Plans and Climate Action Plans. This study will later support the local plan as a piece of evidence as it goes through examination.
- 3.6. The study is set out in six parts (tasks) including a scoping paper, viability and feasibility testing, and a paper on offsetting. To accompany the Preferred Options consultation, we published tasks 1 to 5 of the Net Zero Carbon study.
- 3.7. An additional element of this study has now been completed which establishes potentially suitable areas within the districts for renewable energy schemes and will map these out. This part (task 6) of the study accompanies the Regulation 19 consultation, alongside the republication of tasks 1 to 5 of the Net Zero Carbon study.

### **13 December 2023 Written Ministerial Statement - policy impact and response**

- 3.8. A Written Ministerial Statement (WMS) was published by the former Conservative government on 13 December 2023 entitled 'Planning – Local Energy Efficiency Standards Update'. This WMS restricts the ability of local authorities to set local energy efficiency standards in local plans, such as ours and therefore has an impact on emerging Joint Local Plan Policy CE2 – Net Zero Carbon Buildings.
  - 3.9. This is because the policy is based around calculating the energy efficiency of a building using the metrics of Space Heat Demand and Energy Use Intensity, whilst the WMS states that no other metrics should be used other than the approach of a Target Emissions Rate (TER), measured through the Standard Assessment Procedure (SAP).
  - 3.10. As TER does not cover unregulated energy uses, which can equate to up to 50% of the total operational energy use of a building, this leaves a significant amount of carbon emissions unaddressed. The use of SAP is also flawed as it does not accurately assess building energy performance, and therefore buildings typically use two or three times the amount of energy predicted by SAP.
  - 3.11. Despite the 2023 WMS, we consider the energy efficiency standards set out in Policy CE2 – Net Zero Carbon Buildings to be necessary to meet our local net zero targets. Therefore, we commissioned consultants Bioregional to explore this, and they have set out a report that demonstrates that our local

circumstances clearly justify a departure from the 2023 WMS. This report forms part of our evidence base supporting the Joint Local Plan.

### **How policies in the emerging Joint Local Plan have changed since the Regulation 18 (Part 2) consultation**

- 3.12. The key policy change that has been made since the previous consultation has been to Policy CE3 (Reducing embodied carbon). Following viability assessment, embodied carbon standards have been amended from mandatory to encouragement for Vale of White Horse residential developments and South Oxfordshire specialist older persons housing with care accommodation. Other residential developments of less than 50 homes and non-residential development less than 5000m<sup>2</sup> are also encouraged to meet the standards.
- 3.13. Policy CE5 (Renewable energy) has also been amended to reflect recent changes (July 2024) to the NPPF which previously required onshore wind schemes to demonstrate community support in order to gain permission.
- 3.14. Other minor amendments to policies have been made, including to Policies CE1 (Sustainable design and construction) and CE2 (Net Zero Carbon Buildings) where wording has been strengthened, changing requirements from 'should' to 'must'.

### **Policies in the emerging Joint Local Plan that address climate change**

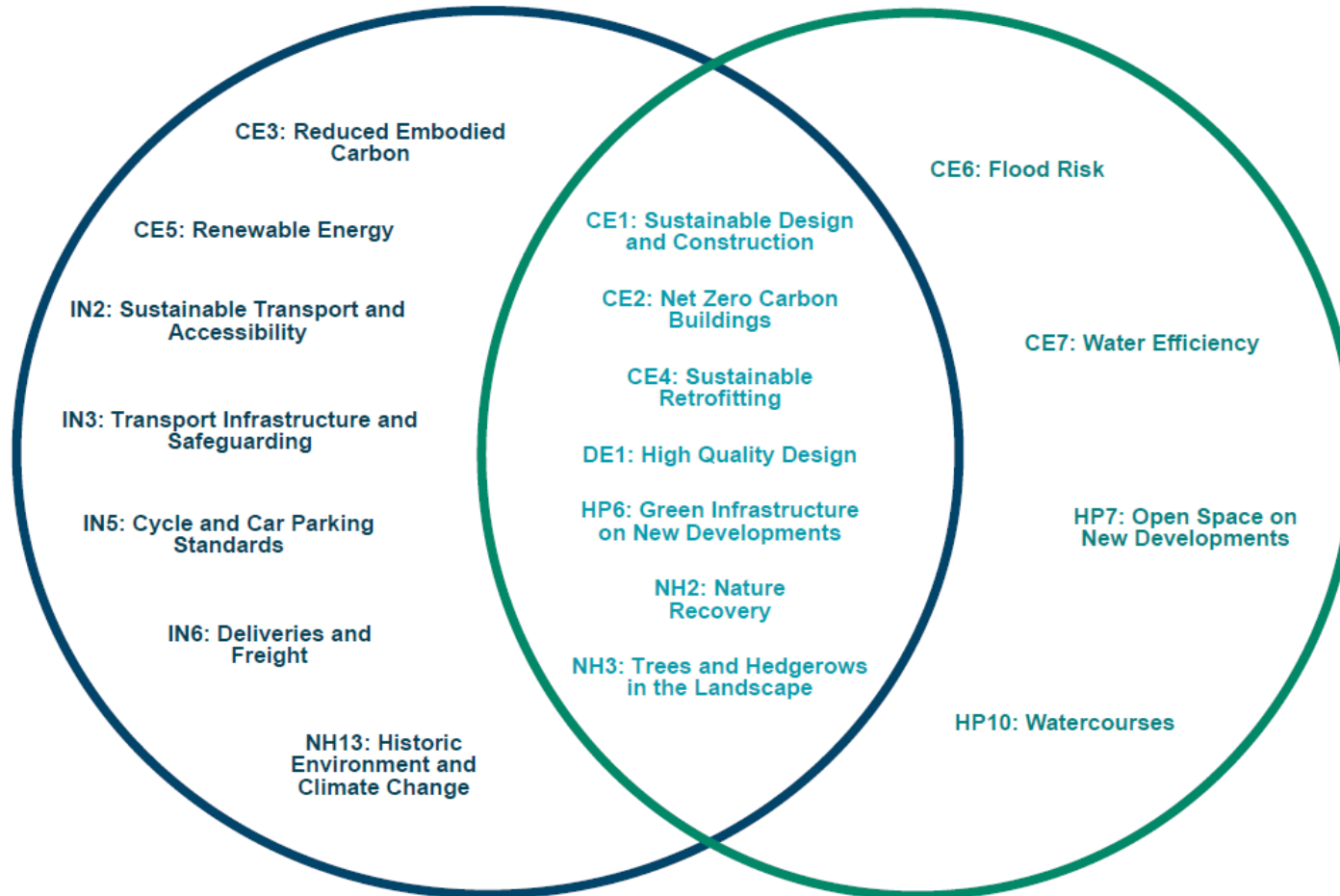
- 3.15. The diagram on the next page sets out which policies in the emerging Joint Local Plan directly address climate change, either through climate change mitigation, climate change adaptation, or both. There are around eighteen policies identified in this diagram, demonstrating how we are tackling climate change through a multitude of policies, and by various actions. This diagram helps to clearly set out the golden thread of climate action that exists throughout the emerging plan.

## Policies in the Joint Local Plan that address climate change

Climate Change Mitigation: Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.

Both: Policy proposes measures that will address both Climate Change Mitigation and Adaptation

Climate Change Adaptation: Adjustments made to natural or human systems in response to the actual or anticipated impacts of Climate change, to mitigate harm or exploit beneficial opportunities.



## **Section 4: Conclusion**

- 4.1. This topic paper has summarised the key drivers for our focus on climate change in the Joint Local Plan. Addressing the climate crisis has been a key consideration in the drafting of the Joint Local Plan 2041 to date and forms a golden thread throughout the document.
- 4.2. To demonstrate this, the diagram set out in section 3 shows the proposed policies in the Joint Local Plan Preferred Options which have a direct impact on development and how it mitigates or adapts to issues around climate change.
- 4.3. This topic paper may be revised if necessary and published at the submission stage, timetabled for December 2024.

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