**CPRE Oxfordshire response to Oxford Local Plan 2040 Reg 19 Consultation, January 2024**

This document support the Form B submitted on Para 1.2.

*Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)*

| | | | |
|---|---|---|---|
| Paragraph | 1.20 | Policies Map | |
| Policy Number | | Sustainability Appraisal | |

*Q2. Do you consider that the document:*

| | |
|---|---|
| (a)is legally compliant? | |
| (b)is sound? | NO |
| (c)complies with the duty to co-operate? | |

*Q3. Do you consider that the document is unsound because it is not: (tick as appropriate)*

| | | | |
|---|---|---|---|
| (a)positively prepared? | ✓ | (c)effective? | ✓ |
| (b)justified? | ✓ | (d)consistent with national policy? | ✓ |

*Q4. Please tell us below why you consider the document to be unsound, not legally compliant or fails to comply with the duty to co-operate. If you do believe the document is sound, legally compliant, or complies with the duty to co-operate you may use the box to explain why.*

Para 1.20 states: "*the delivery of new large-scale renewable energy projects will realistically be delivered outside of the city's administrative boundaries and the city will focus on the smaller-scale renewables that can be accommodated within new developments across the city*."

CPRE Oxfordshire welcomes proposed Policy R1 which states that developments should be designed in accordance with the energy hierarchy – reducing energy use, increasing energy efficiency, and then meeting all needs through renewable sources, ideally onsite with offsetting as a last resort.

However, we contend that:

a) Figures for emissions and energy consumption over the Plan period should include the impacts of the construction proposed, as well as items produced outside of Oxford.
b) The focus on only small-scale renewables within new developments fails to address the NPPF requirements for policies to support community-led initiatives for renewable and low carbon energy and to identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.

**Without such policies, the Draft Plan looks to be seeking to offload its renewable energy generation requirements onto its surrounding Districts in much the same way as it is also**

**passing on its housing requirements, at potentially similar cost to green field / Green Belt locations.**

This shows a remarkable lack of ambition and ignores the vital importance of energy generation close to the point of use, to maximise efficiency and to protect our countryside.

**Energy reductions should be achieved through direct action within the boundaries of the city. The Local Plan needs a robust brownfield first approach to renewable energy that includes a spatial strategy maximising the potential for renewable energy within the city on industrial sites, shopping centres, car parks and even the city's road network.**

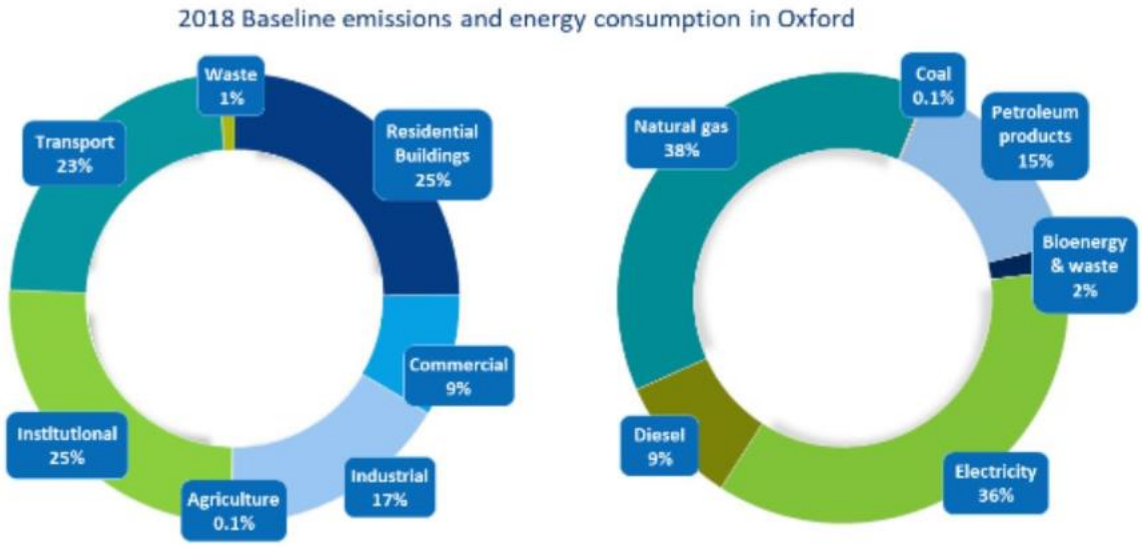
Additionally, research shows that Oxfordshires roof space is more than sufficient to accommodate the highest case for solar energy need across Oxfordshire in the Pathways to Net Zero report page 132 adopted by all Oxfordshire Councils. As the County's largest urban area the Plan should be identifying the maximum contribution available from its retail, commercial, educational, public service and domestic roofs, not just for its own needs but for the benefit of the wider County.

**Accurate energy and carbon accounting**

The NPPF states that "The purpose of the planning system is to contribute to the achievement of sustainable development … meeting the needs of the present without compromising the ability of future generations to meet their own needs" (Para 7)

According to the Local Plan (Para 5.2) Oxford's primary source of existing carbon emissions comes from the built environment, including buildings like homes and offices, as well as industrial and commercial uses.

The figures shown in the diagram below come from the Zero Carbon Oxford Partnership Roadmap & Action Plan (page 13).




These figures naturally do not include the emissions and energy consumption for the construction proposed throughout the plan period. Nor does it seem to account for items produced outside of Oxford. 0.1% for agriculture must represent the fact that much of what is eaten in Oxford is grown and manufactured elsewhere. *Using this as a baseline, every person in Oxford could buy a new 3-piece-suite with matching carpets and curtains every year, air-freighted from China, and the city of Oxford would still be carbon zero!*

**Proper measurement of the climate impact of cities is of vital importance for the future of carbon accounting, enabling cities to have much greater awareness of and therefore control of their activities. If it is not measured, you can't even begin to mitigate it.**

**Maximising renewable energy generation**

The NPPF says that Local Plans should aim to increase the use and supply of renewable and low carbon energy and heat.

NPPF (Para 155 2021 Version, Para 160 2023 Version):

a) provide a positive strategy for energy from (renewable/low carbon sources) sources, that maximises the potential for suitable development

b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development;

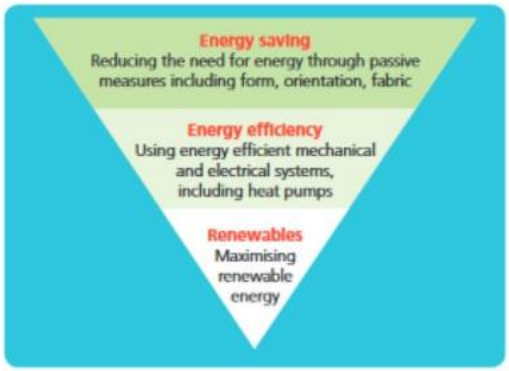
The measures outlined in the Local Plan focus on the smaller-scale renewables that can be accommodated within new developments across the city. Although the Plan mentions that exemplary design may actually be able to demonstrate a negative carbon balance (i.e.

installing renewable energy generation capacity that exceeds the needs of the development itself), maximising renewable energy generation is not a primary consideration.

Figure 5.1 shown below does not show the generation of renewable energy as integral to the design process, but an added extra.

**Figure 5.1 from Oxford Local Plan Submission Draft, p.95:**

*Figure 5.1: The energy hierarchy which should guide the design of all new development*




The approach is not seen as being able to cover Oxford's energy needs. It is anticipated that there will be developments where total energy need cannot be met onsite. The City Council also sees the considerable energy demands of the wholescale electrification of heat and transport operational energy needs as having to be met offsite. **Although it claims that energy offsetting is the least favourable approach to delivering net zero carbon development, the target is for the delivery of new large-scale renewable energy projects to be delivered outside of the city's administrative boundaries.**

The Zero Carbon Oxford Partnership Route Map & Action Plan (see above) says that the scope of the Local Plan baseline for carbon emissions is in keeping with the best-practice GHG Protocol for cities. But the GHG protocol specifies that offsets and avoided emissions should not count toward meeting any Science-Based-Targets. **Reductions should be achieved through direct action within the boundaries of the city.**

NPPF (Para 120 (e) Version 2021, Para 124 (e) Version 2023) supports opportunities to use the airspace above existing residential and commercial premises for new homes. This could equally be read to encourage use of airspace for electricity generation. For example, the BMW car plant in Cowley has 11,500 panels in an area the size of five football pitches which generates enough electricity to power 850 homes. But **the Local Plan makes no mention of the potential for renewable energy within the city on other industrial sites, shopping centres, carparks or even on the City's road network.**

To quote just one example, the Osney Mead area of Oxford has approximately 22 acres of available roof and car parking space that could be used for solar PV.

Oxford is also at the intersection of two rivers on which there are already two hydro-electric plants, but there is no mention of hydro-electric power.

**The NPPF states that local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in Local Plans or other strategic policies that are being taken forward through neighbourhood planning. (Para 156 / 161 – NPPF 2021/2023). It also requires the identification of opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers. (Para 155(c)/160c - NPPF 2021/2023). There is no mention of either of these strategies in the draft Oxford Local Plan.**

*Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) It would be helpful if you could suggest revised wording for the policy or text in question.*

Energy reductions should be achieved through direct action within the boundaries of the city.

The Local Plan needs a robust brownfield first policy approach to renewable energy that includes a spatial strategy maximising the potential for renewable energy within the city on industrial sites, shopping centres, car parks and even the city's road network.

This should include policies, as outlined within the NPPF, stating how the City Council will support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in Local Plans or other strategic policies that are being taken forward through neighbourhood planning and the identification of opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.