

Planning

HEAD OF SERVICE: ADRIAN DUFFIELD



Sent by email:
TDP@dft.gov.uk

Contact officer: Juliet Evans

planning@southoxon.gov.uk

planning@whitehorsedc.gov.uk

Tel: 01235 422600

Textphone users add 18001 before you dial

28th August 2020

Dear Sir / Madam,

South Oxfordshire District Council and Vale of White Horse District Council's Joint Response to the 'Decarbonising Transport: Setting the Challenge' call for ideas consultation.

Thank you for providing South Oxfordshire and Vale of White Horse District Councils (South and Vale) the opportunity to comment on the 'Decarbonising Transport: Setting the Challenge' consultation.

Overall, the Councils are supportive of the Department for Transport's desire to tackle transport emissions in an effort to address climate change. We welcome the aim of the Transport Decarbonisation Plan to end the UK's transport emissions and agree that ambitious policies are required to ensure this aim is achieved, however the aim to achieve this by 2050 is not ambitious enough.

Both Councils have declared a Climate Change Emergency. At South Oxfordshire District Council we have set a date of 2030 by which we expect to reach carbon emissions of net zero or near to net zero. At Vale of White Horse District Council we are aiming for a 75% reduction in carbon emissions in the district by 2030, and aim to be Carbon Neutral by 2045 district wide. We are working hard to reduce carbon emissions in our districts, and whilst support the government aim to end the UK's contribution to climate change by 2050, we query if this target date of 2050 is ambitious enough.

We agree that in order to achieve net zero by 2050 UK wide, there will be the need for radical steps across the UK economy and wider society, and thus far reaching policies will be required in the Transport Decarbonisation Plan. Reflecting this, please see the Council's comments on the Decarbonising Transport Plan below.

1. We consider there needs to be a much greater focus on reducing the need for travel in the first instance, particularly regarding the strategic priority, 'Accelerating modal shift to public and active transport'. If paired with making

public and active transport the easy and obvious choice for short, and eventually longer journeys, creating a behavioural shift towards making fewer journeys overall will contribute significantly to reducing emissions from transport.

2. In order to reduce the need for travel and facilitate modal shift, we agree that investment in technology and infrastructure will be required. In particular, we consider that the Internet provides an important opportunity to reduce the need to travel. It allows businesses to be more flexible with their workplace arrangements, and thus allows greater numbers of employees to work from home. As a result, we consider that the Transport Decarbonisation Plan should recognise the importance of investing in broadband services and infrastructure, and the influence they have on reducing the need for travel. The consultation document makes no reference to 'broadband' or 'working from home', and we would recommend this is an omission that should be addressed going forward.
3. Additionally, we are concerned that Figure 9 shows a projected increase in distance driven by cars (in km) of more than 35% from 2018 to 2050. We acknowledge that despite this uptake in car use, GHG emissions are projected to fall by 52% in this same period, and this is encouraging. However, we consider that there needs to be a greater focus on not just reducing GHG emissions from cars, but also reducing dependency on the car. Therefore, we consider that there should be an aim to reduce overall car dependency.
4. An important way in which modal shift to public and active transport can be achieved, is to design communities that encourage the use of public and active transport, and make those transport methods the most attractive option, which is recognised in the National Planning Policy Framework. Through delivering high quality design, public and active modes of transport can be prioritised over motorised traffic, which increases safety and encourages the use of these modes of travel over unsustainable transport methods. For example, through the delivery of bus and cycle priority measures (i.e. bus lanes, queue-jumper lanes, priority traffic signals), cycling is made safer and bus services are made more efficient, which ultimately increases the attractiveness of these transportation options. Delivering housing at higher densities can result in an increased concentration of people in an area, creating higher demand for public transport services (and subsequently can improve the viability of such services), local services and commercial uses, which together reduce the need to travel longer distances and maximises options for walking or cycling. The co-location of employment and housing is also important, as also allows for travel distances to be reduced which in turn aids modal shift. The planning system plays an important role in creating communities that contribute towards modal shift, and therefore it should be considered within the Decarbonising Transport Plan going forward.
5. We welcome the ban on petrol, diesel and hybrid vehicles being brought forward to 2035 as identified in relation to the strategic priority, the 'Decarbonisation of Road Vehicles'. We also consider that the government

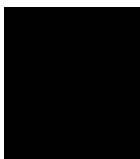
could be more ambitious, and potentially bring this target forward to 2030. Transport accounts for 40% of Oxfordshire's energy use, and therefore switching to electric or other ultra-low emission vehicles for private cars, commercial vehicle fleets and public transport, will not only be a key component in achieving carbon reduction targets but also in addressing air quality issues in our towns and villages.

6. We understand that the shift to zero emission vehicles will require appropriate charging infrastructure across the districts, in both domestic and public places. To address this, both districts have either emerging or adopted planning policy that supports low/zero emission vehicles and the expansion of charging infrastructure. The emerging South Oxfordshire Local Plan 2035, Policy TRANS5, requires proposals for all types of development to, where appropriate, be designed to enable charging of plug-in and other low-emission vehicles in safe, accessible and convenient locations. This will ensure that charging infrastructure is designed into new development, making it more accessible to all. The adopted Vale of the White Horse Local Plan 2031 Part 2 also requires in Policy 17, that Transport Assessments and Travel Plans consider opportunities to support the uptake of electric and/or low emission vehicles. This will help to support the transition to low/zero emission vehicles across the district. We also recognise that it is important to ensure that charging points provide appropriate charging speeds related to their location. In public places rapid chargers (50kW or above) are most suitable as consumers time is constrained, however at home where time is not as constrained, slower charging rates may be more acceptable (3kW or above). Both councils are also considering rolling out electric vehicle charging points across council car parks. The aim is to have these up and running by September 2021.
7. We support the aim of rail continuing to be an attractive sustainable transport option for all users, and consider government investment is crucial in achieving this goal and also in achieving a reduction in carbon emissions from the rail network. We support the improvement of rail infrastructure and rolling stock (including expanding the electrified rail network, and the development of the East-West Rail scheme), as well as the deployment of lower carbon technologies. We are also encouraged by the work undertaken by the 'Riding Sunbeams: First Light' project, and consider there to be an opportunity for East-West Rail to be powered by renewable energy.
8. We agree that emissions are not consistent across the country and a single solution for emissions reduction will not be appropriate for every location, as identified in the strategic priority 'Place-based solutions for emissions reduction'. In South Oxfordshire, Council GHG emissions fell by 32% between 2009/10 and 2018/19. In Vale of the White Horse, Council GHG emissions fell by 30% between the same period. We are committed to reducing this further across both districts, and therefore welcome the Department of Transport's plan to engage with stakeholders, including Local authorities, through workshops to consider place-based solutions for emissions reductions.

9. We consider the Science Vale, a world-renowned science, research and innovation hub that crosses the border of both districts, can play a key part in achieving the Plan's aim of the UK to be 'a hub for green transport technology and innovation'. The Oxfordshire Energy Strategy¹ sets out our shared ambition to become a low carbon county, and explains that we need to harness and use Oxfordshire's strengths in innovative vehicle and transportation technologies to deliver the 'future of mobility'. We consider that the work undertaken in the Science Vale will play an important part in ensuring the UK is a world leader in green transport technology and innovation. We welcome the reference in the consultation document to the partnership work with the Faraday Battery Challenge. The Faraday Institution are based on Harwell Campus, located within Science Vale. This work reflects the vital role the Science Vale already has in ensuring that the UK realises its commitment to the decarbonisation of transport. Thus, we consider it essential that the government continues to support the important science, research and innovation taking place at Science Vale - particularly the work that is contributing towards tackling climate change.
10. We also consider it important to note that it is not solely GHG emissions that are important in the decarbonisation of transport, but also overall energy consumption. As we transition towards full electrification, demand on the grid will naturally increase, and this should be limited so it does not exceed renewable energy generation. Therefore, we consider that it is important that all charts and figures in the Transport Decarbonisation Plan include total energy consumption.

In conclusion, the Councils are supportive of the Department for Transport's ambition to decarbonise transport. albeit we would urge to end the UK's transport emissions before your 2050 target. We hope our comments are helpful in taking the Transport Decarbonisation Plan forward.

Yours faithfully,



Juliet Evans
Senior Planning Officer
South Oxfordshire and Vale of White Horse District Councils

¹ <https://www.oxfordshirelep.com/sites/default/files/uploads/Oxfordshire%20Energy%20Strategy.pdf>