



# York Civic Trust

**York Civic Trust**  
**Inquiry into York's draft Local Plan: Phase 4**  
**Written statement in connection with Matter 13 – Climate Change**  
**Final Version**

**30<sup>th</sup> August 2022**

This statement in relation to Matter 13 is submitted by York Civic Trust. The Civic Trust is a membership organisation representing some 1300 individuals. Our vision is 'promoting heritage, shaping tomorrow'. Our Mission is to: protect and contemporise York's unique heritage; champion our environment and its sustainability; encourage the city's economic development in line with its character, and engage with all sectors of the community.

This statement has been prepared by Professor Anthony May OBE FREng CEng FICE, who chairs our Environment Committee. It also draws on the analysis of the Council's draft Climate Change Strategy undertaken with Dr Johan Kuylenstierna, SEI Research Leader, University of York.

York Civic Trust is committed to helping to secure a Local Plan, based broadly on the current draft. We are concerned, however, that there are weaknesses in the way in which the Plan has been formulated, and aspects of its resulting content, which render it unsound. We have endeavoured throughout the process to work with the City of York Council to secure improvements which overcome these deficiencies. In June 2022 we prepared a Statement of Common Ground with the Council, which we understood had the Council's support, and which we expected to be signed and submitted in time for consideration in Phase 3. Two months later, and within two working days of the deadline for submitting statements for Phase 4, we finally received a suggested redraft, with no explanation. Regrettably, therefore, we have had to submit our draft of June 2022, as evidence of our good intent. We focus here on the areas which we suggest in that draft Statement still need to be resolved.

The Inspectors ask us to:

- explain which particular part of the Plan is unsound;
- explain why it is unsound, having regard to the Framework;

- explain how the Plan can be made sound; and
- explain the precise change/wording that is being sought.

We have endeavoured to do this, though where we have concerns over the process of plan-making, we are clearly unable to answer the last of these.

### **Matter 13: Climate Change**

We draw in this response on our submission on Matter 8 in Phase 2 of the Inquiry. During Phase 2 the Council committed to providing modifications to Policies CC1-3, and the Inspectors refer to this in their questions. However, as far as we are aware, the Council has as yet failed to provide any such modifications.

Our principal concern is that Section 11 of the draft Local Plan is inadequate in its coverage of measures needed to achieve carbon reduction targets. We address this in our answer to Question 14.1. Given this, we are concerned that the remaining questions are too limited in their scope. We have endeavoured to answer Questions 14.2 and 14.3 in that context. We are not expert in the development of district heating and CHP, and have thus not attempted to answer Question 14.4.

#### **Question 14.1 Is the suite of Policies CC1 to CC3 (as proposed for modification) a sufficiently comprehensive response to this issue?**

Section 11 of the draft Local Plan deals with climate change. At the time that it was written, the relevant legislation was the Climate Change Act, 2008, which specified that the UK should achieve an 80% reduction in carbon emissions by 2050. At a local level, the Council had outlined its commitment to achieving carbon reduction targets of 40% by 2020 and 80% by 2050, within the Climate Change Framework for York (2010). Policies CC1, CC2 and CC3 dealt with renewable and low carbon energy, sustainable development and district heating, and we were satisfied that these were appropriate in that context.

However, as the Inspectors indicate, the situation has changed markedly since the draft Local Plan was published in early 2018. In March 2019 the City of York Council declared a climate emergency with a commitment to York being a Net Zero city by 2030. Its definition of Net Zero includes Scope 1 and 2 emissions (those that result from within the city) but excludes Scope 3 emissions (for example from goods entering the city, manufacturing new vehicles or building new infrastructure). In June 2019, the government issued a statutory order amending the target in the Climate Change Act, which committed the UK government by law to reducing greenhouse gas emissions by at least 100 per cent of 1990 levels by 2050. These requirements are enshrined in law through the series of five year carbon budgets. It appears to us that the Council is now required to ensure that its Local Plan is compatible with these targets.

In our response on Matter 8 in Phase 2, we concluded that the draft Local Plan needed to be significantly updated to reflect these changes in government and Council policy, and the increased focus on carbon reduction which underpins them. We strongly recommended, specifically in connection with transport emissions, “that the Inspectors accept that, in this

regard, the draft Local Plan is as yet not justified, and ask the Council to carry out the necessary further analysis, so that it can be considered in Phase 4 of the Inquiry.” Council officers committed, during the hearing on Matter 8, to carrying out such an analysis, but have so far failed to do so.

We therefore recommend that any decisions on Policies CC1-3 are deferred until such an analysis is available.

In July 2022 the Council published its draft Climate Change Strategy for consultation, and York Civic Trust submitted a detailed critique of the draft in early August. We can make this available to the Inspectors if appropriate. We summarise below our concerns, and the implications for the draft Local Plan.

1. The draft Climate Change Strategy only considers Scope 1 and Scope 2 emissions. As a result, it ignores the impact on carbon emissions, and hence climate change, of several of the policies which it appears likely to introduce. Two of particular note are the policy to promote replacement of current vehicle stock with electric cars and the dualling of the northern outer ring road. Both will result in other substantial embedded carbon; the latter is also likely to generate additional travel and hence add to the Council’s Scope 2 emissions.
2. The draft Climate Change Strategy sets an overall target of a 77% reduction in carbon emissions from 2005 levels by 2030. It makes clear that this target does not achieve the net zero pathway for York (which implies an 88% reduction). The difference has to be provided by sequestration and offsetting, yet the draft only offers tree planting as a solution. The wider range of sequestration methods available, including restoration of grasslands and wetlands, will be essential, and need to be reflected in the Local Plan.
3. The draft Climate Change Strategy identifies domestic buildings (31.8%), non-domestic buildings (30.1%) and transport (27.9%) as the three dominant sources of carbon emissions, and we have focused on those in our response. Policies CC1-3 contribute to reducing emissions from the first two of these, but say nothing about the essential requirement to reduce carbon emissions from transport.
4. The draft Climate Change Strategy uses a top-down national model to set targets for reduction in carbon emissions for each sector. For transport the reduction is 71% between 2005 and 2030; for domestic buildings 56% and for non-domestic buildings 63%. We question whether the differences in targets represent the most cost-effective balance of sectoral responses, but note that the target for transport is broadly compatible with estimates for other urban areas.
5. For buildings, the draft Climate Change Strategy sets a number of objectives. Policies CC1 and CC2 relate directly to the objectives of reducing emissions from new buildings and making our (new) buildings climate resilient. Policy CC3 relates to the objective of moving away from gas heating systems. The draft Local Plan offers no policies to deal with the other two objectives of improving energy efficiency in existing buildings and switching to energy efficient appliances. The draft Climate Change Strategy sets a target of 3,600 homes having a “medium” retrofit and 29,100 a “deep” retrofit by 2030, but offers no definition of these terms or any action plan for achieving them.

6. For transport, the draft Climate Change Strategy sets objectives of travelling shorter distances, increasing active travel, switching to electric vehicles, reducing freight emissions and futureproofing infrastructure. As we note in our response to Matter 7, the draft Local Plan offers little in the way of policies to achieve the first four of these. As far as we can judge, it says nothing about the final objective.
7. The key transport target is that 89% of cars should be electric or hybrid electric by 2030. Unfortunately the draft Strategy fails to make clear whether this represents 89% of the fleet – which all the evidence suggests is infeasible – or of sales in that year – which would place a far greater reliance on behavioural change to reduce carbon emissions. As we note in our response on Matter 7, the Council produced a strategy for an electric vehicle charging network in 2021 which, while in our view incomplete, provides the basis for a new Policy T10.
8. Any carbon reduction from transport not achieved by a switch to electric vehicles will require behavioural change. This split is not made clear in the draft Climate Change Strategy, but evidence elsewhere suggests that at least half of the reduction by 2030 will need to come from behavioural change. Recent studies estimate that car mileage will need to be reduced by between 20% and 50% to achieve this. The draft Climate Change Strategy sets a target of a 3% reduction in road traffic which, in our view, is an order of magnitude too low.
9. The remaining targets for transport include a 25% reduction in average passenger-miles per person, a 25% increase in bus use and a 33% increase in active travel. These appear to us to be more consistent with the overall target of a 71% reduction in transport emissions, and wholly incompatible with that for the reduction in road use. However, as we note in our response on Matter 7, the Council’s transport policies T1-9 offer no realistic possibility of such changes, and the Council has as yet failed to demonstrate that they are in any way feasible.

The Council’s report CYC/91 is directly relevant to points 7 to 9 above. It predicts, without setting out its assumptions, that CO<sub>2</sub> emissions from the road network would fall by 29% between 2019 and 2033. The transport sector has been much less successful than others in reducing carbon emissions, so realistically this implies a fall of around 35% from 2005 levels. This is only half of the Council’s target for carbon reduction from transport by 2030. Thus half of the required carbon reduction has to come from behavioural change, for which no realistic proposals or estimates are provided in the draft Local Plan.

Given the above, it is clear to us that Policies CC1-3 are wholly inadequate on their own to respond to the critical issue of climate change. We recommend that Inspectors ask the Council to revise the whole of Section 11 of the draft Local Plan to reflect the ambitions of its draft Climate Change Strategy. In terms of achieving net zero, new policies are needed on Scope 3 emissions, sequestration and offsetting. For buildings there needs to be a new policy on retrofitting of existing buildings. For transport there needs to be a much closer and clearer link with the transport policies and with Policies C1, DP2 and SS1, which will be the main drivers of any reduction in overall travel.

**Question 14.2** Does the approach of Policy CC1 to renewable and low-carbon energy generation and storage appropriately reflect national policy?

It appears to us, given the above, that this question is too narrow in scope. The key question, we suggest, should be whether the Policy is sufficient to achieve the objectives in the Council's draft Climate Change Strategy. The policy starts by saying that "new buildings must achieve a reasonable reduction in carbon emissions of at least 28% ...". Since the Policy does not specify the benchmark against which this reduction is to be estimated the statement appears to us to be worthless. But the remainder of the Policy then appears to focus on purpose-built renewable energy plants (which would presumably include wind turbines and solar farms) rather than achieving reductions within the buildings themselves. Moreover, the Council's draft Climate Change Strategy says very little about such free-standing facilities as being part of its approach.

We are not convinced that Policy CC1 has a place in the draft Local Plan. If the Council still considers that free-standing renewable energy plants have a place in its draft Climate Change Strategy, we recommend that Inspectors ask the Council to redraft this Policy to reflect its strategy.

**Question 14.3      Is the approach of Policy CC2 to sustainable design and construction justified?**

This Policy focuses principally on sustainability in new development. The Council's draft Climate Change Strategy sets an objective of designing and building new developments that minimise energy use and (carbon) emissions. It is clear to us that the outdated targets in Policy CC2 are inappropriate to achieve such minimisation of energy use.

The Policy also includes a reference to conversions and changes of use achieving BREEAM ratings of "very good" or "excellent", but then qualifies this in relation to buildings of heritage and conservation value. We are concerned with this on two counts. Firstly we doubt that the BREEAM standards are compatible with the "deep retrofit" which the Council now seeks. Secondly, we question the Council's reluctance to encourage carbon efficiency in heritage buildings. We are working closely with the heritage community in York to develop new design approaches for heritage buildings.

Finally, the Policy considers "consequential improvement to existing dwellings". This part of the Policy only appears to apply to buildings which are being extended, though paras 11.20-21 also refer to support for carbon efficiency improvements. As noted above, the Council now estimates that 32,700 dwellings need retrofitting by 2030. This will not be achieved by this part of Policy CC2 as it stands.

We recommend that Policy CC2 is split into three separate elements. The first should focus on new development, and set standards which are compatible with the Council's draft Climate Change Strategy. The second should set out a clear policy on retrofitting of existing residential and non-residential buildings, so that such improvements can be accelerated through the planning process. The third should focus specifically on heritage and conservation buildings, and specify ways in which improvements such as double glazing and wall insulation can be applied to such buildings.