

AVGP Submission to Consultation on the Preferred spatial strategy for housing and economic growth and draft policies

Proposed Housing Growth Sites Policy

We are concerned that only four of the proposed sites were assessed by the Sustainability Appraisal as having no significant negative effects. We request that the new Local Plan includes policies to mitigate or remove negative effects.

Accessibility and Sustainable Travel

It is particularly concerning that five of the sites are assessed as having significant negative effects relating to both Accessibility and Sustainable Travel objectives, and two more have significant negative effects when assessed against one of these objectives. This suggests that these sites are in the wrong location, leading to increased private vehicle use (and associated greenhouse gases) unless measures are introduced to mitigate these effects.

Whilst we acknowledge that Building Regulations now require the provision of Electric Vehicle (EV) charging points, this will have little effect on Sustainable Travel until EVs are much more affordable.

We therefore request that the new Local Plan should include a policy which promotes sustainable travel use and ensures that residents of all housing development sites (and Economic Growth sites) are able to use Sustainable Travel options, such as cycle paths, footpaths and improved access to bus stops and a frequent, reliable public transport system. This policy should also include a requirement that developments should use layouts with short blocks and many street interconnections such that walking times within the development and to shops and community facilities are minimised. (See below for excerpt from Friends of the earth Briefing Paper: “Planning for less car use”, Feb 2019)

Excerpt from Friends of the Earth Briefing Paper: “Planning for less car use”, Feb 2019

<http://www.transportforqualityoflife.com/u/files/3%20Planning%20for%20less%20car%20use%20briefing.pdf>

The way we travel and the amount of time we spend travelling are strongly influenced by land-use planning and its impact on the location, mix and character of development. Evidence from many studies across the world shows that concentrating developments in urban areas, and planning compact, dense, diverse settlements with good access by walking, cycling and public transport are the key to reducing the distance travelled by car. A number of built environment factors, many of them interrelated, have been shown to contribute to this.

The most important of these is **location**, with developments in central locations likely to generate less car travel than even the best designed development in a remote location. Transport carbon dioxide (CO₂) emissions from households in the suburbs have been found to be 2-3 times greater than those of households in central neighbourhoods.

Transport CO₂ emissions also tend to decline with increasing residential **density**, which enables better public transport and makes more destinations accessible by foot or bike. Increasing the housing density from less than 10 dwellings per hectare (dph) to more than 40 dph has been found to cut the likelihood of driving by a factor of three. There’s evidence that minimum housing densities should be around 100 dph to support a high-quality mass transit service such as a tram. Such densities do not require ‘high rise’ buildings. They can be achieved with low- or medium-rise buildings (3-6 storeys) in attractively designed developments with a mix of homes and large amounts of green space.

Both **diversity**, with a mix of uses such as housing, work opportunities, schools, shops and services in an area, and design of the street network, with short blocks and **many street interconnections**, reduce the distances people need to travel and encourage more walking. Living within a short distance of public transport also increases the mode share and likelihood of public transport trips.

To complement these approaches, demand management measures such as reducing levels of car parking in new developments and removing parking from urban centres (provided there is good public transport) discourage car travel. These and other traffic restrictions in urban areas can help prevent congestion associated with densification.

In combination, the effect of all these factors on carbon emissions can be very significant. **To significantly reduce the amount of car travel from new developments over the next decade we therefore need a model of ‘smart growth’ which concentrates high-density, diverse development in existing built-up areas (mainly on brownfield land), centred around high quality public transport, with good walking and cycling infrastructure. We should be building up rather than sprawling out into the surrounding countryside. By building up, and reducing the space for cars, more homes and more open space can be delivered in a given area than with low density development.** By facilitating improvements to public transport, walking and cycling this will also help to cut car travel by existing urban residents.

Whilst we also acknowledge that the proposed Climate Change Policy includes a reference to sustainable travel, we feel that the required mitigation of the significant negative effects on Accessibility and Sustainable Travel would be more strongly enforced by the addition of a separate policy, as we suggest above.

Biodiversity

In addition, three sites were assessed by the Sustainability Appraisal as potentially significant negative for the Biodiversity objective due to being located on, or within proximity to greenfield land, potential wildlife sites, TPOs and/or SSSI's.

Therefore, we request that the new Local Plan should include a policy which requires all developments to preserve or enhance existing biodiversity on site, or, where this is not practicable, which requires that developers ensure that biodiversity net gain occurs off site.