



Woking Local Action 21

Response to:

Woking Local Development Framework Core Strategy Sustainability Appraisal Scoping Report July 2009

Woking Local Action 21 has been involved in promoting sustainability in Woking for over 10 years, following on from the Local Agenda 21 initiative spawned at the Rio Earth Summit in 1992. At our recent review of our core principles, we adopted the concept of One Planet living, where we would encourage and support Woking in moving towards having a one planet footprint and living within our fair share of the earth's resources.

A procedural comment: the timing of the publication of the scoping report, to coincide with summer holidays, will have inevitably limited the range of responses received.

We find the scoping document limited in its outlook, relying too much on existing conventional planning issues and conforming to current government 'planning' policy, without embracing the wider potential impacts of climate change and unsustainable living. We believe that the development of a new LDF at this time presents the opportunity to institute a framework which will actively promote and support the Borough moving towards 'one-planet living'.

Using the guiding principles of the UK Sustainable Development Strategy/Framework as a yardstick, i.e.:

- living within environmental limits
- ensuring a strong, healthy and just society
- achieving a sustainable economy
- promoting good governance
- using sound science responsibly

the scoping assessment is lacking particularly in the areas of living within environmental limits and using sound science responsibly.

In our view the scoping document should be looking at those issues that are widely expected to become more prominent in the next 15 to 20 years, specifically the need to adapt to and to mitigate the effects of climate change; to adapt to a significantly constrained availability of conventional energy and the resultant security issues that may arise from that; and to address the potential problems of food security.

It is very important that the LDF reflects that we are entering a period of significant change in the physical, social, economic and policy environments in which we find ourselves. Significant change also means greater uncertainty. Thus the basis of the LDF should reflect our need to transition at a more fundamental level, rather than simply implement small incremental changes to the current framework.

In particular, the opportunity should be grasped to build in flexibility in reframing the scope and targets for the LDF, as new information comes to hand. Specifically, it should be implicit that new indicators may need to be adopted and older ones discarded, before the lifetime of the LDF has elapsed.



Woking Local Action 21

Additionally, there needs to be scope to allow for positive planning for a sustainable future, rather than basing the framework on (negative) planning to limit impacts. So, for example, rather than planning to limit damage to ecologically important habitats, there should be an expectation to create better habitats, such as through biodiversity corridors and reinstatement of ecological habitats. Similarly, there is much emphasis (reflecting national policy guidance) on the energy standards for new building, but what about improving existing stock, which is the larger proportion?

We have set out further comments on the Scoping Report here, following the guiding principles of the UK Sustainable Development Strategy/Framework.

1. Living within environmental limits

There should be an expectation that existing buildings within Woking will be reducing their energy consumption year on year, whilst maintaining a comfortable environment. An appropriate indicator should be established to measure this.

The framework should seek to facilitate an increase in the amount of local food production, thus reducing food footprint, increasing health and well-being, and increasing food security. The recent Defra report on food security indicates that there is likely to be a need to address this aspect particularly in the near future, and local authorities are likely to have a role to play in this. Food footprint is not just related to food miles, it is also related to seasonality, production method and water consumption. The environmental / economic changes we face can also affect consumers food choice - re-localisation of food production can limit the impacts here.

Policies for procurement and resource utilisation within Woking Borough Council's own estate should reflect the drive to reduce consumption and resource usage.

2. Ensuring a strong, healthy and just society

The effects of climate change and unsustainable use of the earth's resources will increasingly affect future generations. No community or society can consider itself just unless these intergenerational issues are tackled with integrity. To continue to monitor society using indicators that are in conflict with ensuring a fair and reasonable quality of life for succeeding generations is failing to address these issues of justice. There needs to be provision for engaging the community on these challenging issues, and the responsibility for this lies, ultimately, with local government. See further comments under Promoting Good Governance.

Achieving a sustainable economy

The current indicators for economy use conventional measurements for the growth of Woking's economy. A recent report by the Sustainable Development Commission, 'Prosperity Without Growth', suggests alternative indicators already exist to measure prosperity (p105). There should be an option built into the scope of the LDF to transition from currently accepted economic indicators to ones that reflect a more sustainable balance of economic activity and well-being.

Additionally, the drive to develop economic activity should be limited by an overriding goal to achieve One Planet living and climate stability within globally agreed limits. If economic 'growth'



Woking Local Action 21

takes Woking above the required trajectory towards global equity then it should defer to the higher priority of earth carrying capacity and climate stability.

We expect the framework to propose a local economy where the primary focus is **prosperity** (as defined in Prosperity Without Growth) rather than growth in conventional monetary terms.

Promoting good governance

In the next 15 years difficult decisions will need to be made to balance desire for 'growth' with the realities of adaptation to climate change and converging on global equity in resource usage. The need for disseminating and involving the community in the implications of such decisions need to be built into the scoping assessment now to drive the process. Taking such an approach would minimise the sort of fallout that has occurred from recent high profile projects, whilst educating and engaging the public in the implications of some of the trade-offs that will need to be made.

Using sound science responsibly

There is no reference to the use of UKCIP forecasts to model the direction of adaptation.

The references to greenhouse gas emissions reductions targets are out of date and refer to the lower percentages that were being considered for the UK prior to the Climate Change Bill being enacted, with the subsequent creation of the first three UK carbon budgets.

Several observers (e.g. Tyndall Centre) believe it is more appropriate to define the pathway for greenhouse gas emissions reductions in terms of actual tonnages emitted cumulatively rather than as percentage in annual emissions at a long-distant future date.

In conclusion

If Woking wishes to continue in a position of excellence in the areas of climate change and sustainable communities, it will need to step out of the safe zone of just conforming to current government expectations for planning, and set new standards for local development in the way it originally did with renewable energy, and other authorities, such as Merton and Uttlesford have done subsequently. Resting on historical laurels is no way to maintain a reputation.

Detailed comments on specific sections in the Scoping Report follow.

Para	LA 21 comment / query
3.1.2	The main rail radial links are good, but orbital terrible. Try getting to, say, Bracknell or West London without a car!
3.1.3	This seems to betray the inherent pro-car bias in the analysis. Should people have to use cars to access services? (Moreover, even though daytime services may exist to link the centre with the rest of the town, evening public transport often does not exist to many places with substantial populations.)
3.2.1	Housing numbers per se are rather less important than the way in which they are implemented. If we have car-dependent housing that needs acres of land for roads and car parking (both at the dwelling and at all the places people drive to) then we will use a lot of land (with all the consequences of hard tarmac surfaces). If we can seriously reduce car use then we can have greener developments that use less land, whilst meeting the real housing needs. "High density" under this approach is not "town cramming".
3.2.4	If high density redevelopment of existing urban areas is likely to be a priority, why does it follow that 'considerable measures' are likely to be required to ensure traffic congestion does not increase. In urban areas, the alternatives to car use are better than in outlying areas, and developments in urban areas that promote increased car ownership / use should be strongly discouraged. Allowing more cars and then dealing with the problems they cause is not the right approach.
3.2.10:	This statement is surprising. There have been many studies of growth areas that have clearly identified the infrastructure needs of new developments. The whole point of the "delivery" requirement in LDFs is to do precisely this. The sustainability component will be to seek to get "more out of less" – e.g. more housing for less land than otherwise. The need to meet sustainability objectives should not be compromised at the outset by uncertainties on the specific measures to fund change.
3.2.12	<i>"The South East Plan advocates a sustainable programme of action to stabilise the region's ecological footprint by 2016 and reduce it by 2026."</i> We can find no further reference in the SA scoping report to indicate how this highly significant 'objective' is to be monitored, or how measures will be designed to ensure that there is adequate progress. More importantly: according to WWF / SEI data, in 2005, Woking had an ecological footprint of 3.6 planets, meaning we are already living considerable beyond our share of the planet's finite resources. <u>An objective to start reducing it by 2026 is therefore completely wrong.</u> It suggests that we think we are currently living within environmental limits and that we can allow another 16 years to pass before we have to even start reducing our planetary load. It is essential that we reduce our planetary impact with immediate effect.
3.2.15	Housing options should also take account of affordability, the changing demographic (eg older people, more single person households), the probable need to have locations that are not car-dependent.



Para	LA 21 comment / query
3.2.18	The answer may be not to reduce delays per se, but to reduce car traffic by modal shift. We may be approaching a development threshold where public transport and slow modes have to take precedence in road space (even before the likely consequences of future restrictions on hydrocarbons are considered).
3.2.20	We agree that provision for walking and cycling is improved by following a strategy of high-density housing and mixed-use development. What about public transport provision?
3.2.26	Can the key issues be re-framed so as to drive adoption of preferred transport modes, not just provision, e.g. 'Will the option support improved provision for walking / cycling and use of walking / cycling?', and will the option support improved access to and use of public transport?'
3.2.27	Access to good quality local food (i.e. fresher and less processed) is a significant factor in health and well-being and is not mentioned in this section at all. Obesity is still increasing in the UK population and measures to help address it should be part of the LDF. For example in making alternatives to car travel more attractive.
3.2.35	The decision aiding questions here don't consider the impact of any development on the health and well-being needs of older people, nor on school-age and younger children. Health and well-being issues are different for different age groups.
3.2.36	LA21 does not support the stated assertion here that "further sustainable growth at Woking should be maximised". There should be a balanced view of the economy - economic growth having a lower priority than living within environmental limits. In addition, the Woking economy should be developed in directions that improve resilience to the possibilities of resource depletion, significant increases in the prices of energy and transport fuel, and reduced availability of imported goods. Local employment, local food growing and local repair services are likely to be more in demand, and should be stimulated whenever possible.
3.2.44	Why then is there a constant approval for developments that have the inevitable effect of increasing car use, as they are out of centre, and why do major traffic generators (like those in the Chertsey corridor) not have to fund efficient and frequent public transport networks? The very poor public transport accessibility to St Peter's Hospital is a case in point.
3.2.46	Decision-aiding questions could be added for example: 'will the option increase the proportion of goods and services sourced locally?', and 'will the option reduce dependence on carbon-based energy?'
3.2.52	Here the five key areas of the Surrey SCS are stated as Children & young people; Health and well-being; Safer and stronger communities; Economic development; and Housing. We understand that the content of the SCS is determined elsewhere, but we feel it is important to ensure the Woking's LDF also gives due regard to the specific needs of older people, who will form a growing proportion of the Borough's population over the coming decades.



Para	LA 21 comment / query
3.2.53 (and elsewhere):	Mixed communities only work if the communities carry out most of their activities in them by sustainable modes of travel. If they live in one “mixed community” and work, go to school or shop in another, reached by car, the claims for mixed communities in sustainability terms are invalid.
3.2.55	How do you define and measure ‘self-sufficiency of communities’?
3.2.56	Biodiversity. There is no mention in this section of management of trees in the Borough. The Woking Borough Council Climate Change Action Plan now has an action to promote tree management practices on the Council’s estate that recognise trees’ contribution to mitigating and adapting to climate change. (A017.G.7)
3.2.69	Most of this is avoidance, rather than improvement. Should not a sustainability appraisal seek to maximise sustainability at the outset as a basis for appraisal? There will be plenty of discussion about trade-offs and compromises as the plan develops. If the appraisal does not have clear positive objectives, there will be nothing much to appraise against! Can the decision aiding questions be extended to include: ‘will the option increase the capacity of the habitat to act as a carbon sink?’; and ‘will the option increase the resilience of the habitat to changes in weather arising from climate change?’
3.2.71	This mentions ‘security of energy supplies’ in the opening sentence but the rest of the paragraph deals with water supply security. Although not directly related to Climate Change, the question of long term security of energy supplies ought to include consideration of the certainty that fossil-fuel reserves are finite and that these conventional energy sources will experience steady and maybe steep price rises in the period covered by the LDF.
3.2.73	We are surprised that there is not much at all on the issues of waste and recycling (and the possible answer that it is a county responsibility in the Waste and Minerals LDF does not mean it should be less covered in this SA).
3.2.74	The scope of the SA should include provision for (expanding) local food production and support for more resident to grow their own food in allotments and community gardening schemes.
3.2.75	Update to include references to NI185, NI186 and the UK Climate Change Act 2009 and associated carbon budgets with their interim target of a UK-wide 34% reduction in greenhouse gas emissions by 2020
3.2.76	It is stretching a point to suggest that the measures set out here in the various action plans and policy measures will put Woking Borough in a strong position to ‘fully address’ the causes and consequences of climate change. The references given have very little influence on emissions from surface transport, none on flying and none on food production.
3.2.77	We don’t understand the use of the word ‘accessibility’ in the second sentence.

Woking Local Action 21

Para	LA 21 comment / query
3.2.78	Add these decision aiding questions: – Will the option: - increase the use of local agricultural land for food production? - increase the amount of food growing households? - reduce food miles? - reduce energy consumption (not just improve energy efficiency)? - reduce the need to travel? - reduce car usage? - increase household occupancy levels? - reduce the number of empty houses? - make it more attractive / easier for individuals and businesses to take low carbon choices in energy and transport - make it more likely that businesses which will contribute to local resilience will be attracted to start up in Woking and will flourish in Woking
4.2.3:	We agree, but the evidence of this report is that the process has already become too involved in the detail and has very little creative thinking. What are the key sustainability issues looking 15 – 20 years ahead, and how do we manage uncertainty in getting from here to there?
Table 1 item 5	Decision-aiding question text is incomplete.
Table 1 item 12	Decision-aiding questions are very short in number.
Table 1 items 13 and 14	These are not in the report itself
Table 1 item 16	Add a question: 'will the option support the improvement of energy efficiency in existing buildings?'
Table 1 item 17	Question about implementation of BREEAM is not relevant to this item