



Oxfordshire Plan 2050 – Sustainability Appraisal Scoping Report Consultation, Spring 2019

Need not Greed Oxfordshire response

Need Not Greed Oxfordshire (NNGO) is a coalition of 36 groups from across the county, together representing thousands of community members. Our campaign is committed to:

- A restoration of planning principles, with a proper balancing of economic, environmental and social considerations;
- Local democracy, with planning control in the hands of locally elected and accountable representatives; and
- Environment and rural sustainability, ensuring that our landscape, nature and rural communities are at the heart of decision-making.

1. Is the scope of the SA appropriate as set out considering the role of the Oxfordshire Plan 2050 (JSSP) to help meet and manage Oxfordshire's growth needs and development ambition?

No.

a) The scale and likely impact of existing growth plans needs more open discussion.

In Need not Greed Oxfordshire's view, more clarity is required on whether the central tenet of the strategy – growth & development – is appropriate in the first place. The scale of influence by Government and other strategies, outside the scope of the Growth Board and Oxfordshire elected bodies, is acknowledged (para 2.5) but not defined.

The premise of the Oxford-Cambridge growth corridor and expressway appears to be accepted without question, despite the fact there has been no public consultation, parliamentary scrutiny or environmental assessment.

To what extent will these strategies inform, or indeed set the agenda for, the scale of growth and other factors in the OxPlan/JSSP? This does not seem to be clear, even in the emerging topic papers associated with the first of the Reg 18 consultations, and is a risk for the strategy, and for the integrity of the SA process. There is particularly a risk that the JSSP becomes self-justifying inasmuch as it needs to exist to mitigate its own effects.

b) There is little clarity on how emerging evidence will have influence on decision-making, especially about growth.

Any mitigation, spatial planning and infrastructure investment must not lose sight of the wider impacts and cumulative effects both within the county and to the wider UK. If modelling of long-term and cumulative effects in the SA prove the implications of particular plans or development to be unsustainable in some regard (for example on water quality or supply, or in terms of some social metric), then what mechanisms will there be for a fundamental reconsideration of the scale of growth and the objectives for the strategy? This is not clear in this document, nor in other information emerging from the Growth Board.

c) There needs to be greater clarity on whose needs take priority and what the wider social or environmental impacts of this are in the SA/SEA.

Many of the questions asked in the document are good ones, and the setting of a vision and objectives is welcome, but it is not clear yet as to how the vision and objectives will be used, how the objectives are to be assessed, and whose needs will take priority.

Is the Plan to be considered in the context of the county's existing role and contribution in the UK, or are the cost-benefits to be weighed for Oxfordshire's gain (without reference to possible impact or detriment to neighbouring or other areas of the country or wider)?

And who is making the judgement on *for whom* each objective is being optimised and therefore what the system boundaries for that objective are for consideration, and whether these are appropriate in each case? This does not appear to be part of the consultation and seems to be a fundamental question affecting the probity of social and environmental (and economic) equity and responsibility.

The document does note that the SA will consider impact across time and outside of the county (para 1.15) but this does not address the point being made here whereby we are asking for the *context* of the objectives being assessed to be made clear. The answers to these questions will have a significant impact on the effectiveness of any SA and SEA process and also on the final Plan. For example, what compromises will existing Oxfordshire residents be expected to see in order to attract additional future residents. Should Oxfordshire be

prepared to accept increased environmental pressure in order to meet the needs of the UK as a whole?

Who is making these judgements? These issues must be addressed and made explicit otherwise it is impossible to understand in what context the SA is being analysed, the objectives are being evaluated, and decisions made.

d) There needs to be clarity on how evidence will be analysed and objectives balanced against each other.

The section on “Relevant environmental protection objectives” (pges 7-8) raises the question as to how any of the objectives emerging from the consultation processes will be balanced against each other. Later in the document, it states (para 5.11) that “a clear set of decision-making criteria and assumptions for determining the significance of the effects will be set out”. How different impacts are assessed and balanced against each other, and prioritised against each other is critical to the delivery of the OxPlan objectives and thus must be both influenced and informed by the Reg 18 consultation responses and be transparent as to how this has happened in practice.

e) There is a risk the SA scope will not match the Plan

The document notes that SEA Regulations require “an outline of the contents and main objectives of the plan or programme and of its relationship with other relevant plans and programmes”. Yet in this case the vision and objectives are not yet fully developed and will be consulted on in Feb/March, and the scale of growth and broad locations for that growth will not be consulted on until the summer. The final scope of, and impact and influence of, other strategies such as the LIS and OxCam Arc have not yet been determined and yet will potentially significantly alter the scope of, or provide absolute parameters for, these objectives.

Given the tight timescales and the lack of opportunity for meaningful, iterative consultation discussion, there is a concern that either the outcome of any SA will not match the resultant strategy (and risk the Plan being considered unsound) and/or that the SA will be ineffective, leading to unsustainable practices.

f) Further concerns about scope and process

NNGO has repeatedly challenged key omissions and limitations in the scoping and statement of common ground documents for the JSSP and basing this SA consultation document on those perpetuates the problem. Omissions in these documents, such as an explicit understanding of the interface with the 25 year Environment Plan, or commitments to the rural and agri-economy, heritage and cultural capital, are reflected in their absence or minor role in this document,

Specific additional concerns include the fact that some more recent changes in rhetoric or discussions at Growth Board are not reflected in the consultation document. For example, healthy place-making is now an explicit commitment from the Growth Board and is being embedded in the development of the Plan.

We also note that Para 2.3 explains areas for which the JSSP will provide, but omits energy and natural environment, listed in the original Scoping Document.

The apparent lack of technical skillset on sustainability matters embedded in the OxPlan structure and processes (such as it is for Healthy Place-Shaping) is a further risk to the process.

g) The document as it stands fails to give sufficient priority to Oxfordshire's urgent need to reduce its carbon emissions in the coming decades.

The scope needs to consider the 25 year Environment Plan and latest Climate commitments and agreements.

Oxfordshire will need to drastically reduce its carbon emissions in the coming decades. Yet the Plan Appraisal completely fails to set any ambitious framework. In an 80 page document Climate Change gets just 389 words on page 27, along with a further 33 words in the section on 'key sustainability issues' (where climate change is number 11 in a list of 14 issues).

The scoping report talks generally about the need to 'Promote energy efficiency', 'encourage' the provision of renewable energy 'where possible' and 'minimise' greenhouse gas emissions from transport. Nowhere is there talk about the need for clear targets. There are sections on strategies for growth, infrastructure, place-making and more. Nowhere is there a strategy for carbon emission reduction.

For the sake of our future this Scoping Report needs to be drastically restructured. Tackling the threat of climate change should be a central goal for this Plan and the Sustainability Appraisal must lead work towards that goal.

h) Some specific comments on Table 2.2 Sustainable Development Messages

- Economy – 'facilitate building *competitive economy*' – Who are we in competition with? If with other parts of the country, that does not seem an appropriate goal. If the goal is for net gain to the UK, then this should be explicit and benefits (or detriment) to other areas – including indirect effects such as the re-focusing of investment away from them – needs to be in the scope of the appraisal.
- Transport – NNGO believed that the whole purpose of the JSSP was to ensure an integrated strategic spatial plan. We are disappointed that the

update of the Local Transport Plan has been separated out from this process and would urge that this decision is re-considered.

- Land – a clearly stated hierarchy of types of land appropriate for development is required. The whole ecosystem services value of the land needs to be considered, not just specific qualities.
- Biodiversity – this section is overly focused on designated habitats and assets and should be broadened out to reflect wider natural systems. The JSSP must identify where wildlife corridors should be enhanced in quality and extended in area. Wildlife areas shouldn't be corralled into islands amongst vast swathes of development, they will suffocate and die. Oxfordshire's ecosystems should be robust and enhanced connectivity is vital.
- Landscape – specific mention of the Green Belt is required.

2. Are there any additional plans, policies or programmes that are relevant to the SA policy context that should be included?

Yes.

- Wild Oxfordshire's Oxfordshire State of Nature report
- Landscape character assessments of the County, each District and each AONB and associated strategies and guidelines – incl. AONB management plans
- District design guidance
- Oxfordshire's historic landscape characterisation
- Oxford City Council's heritage plan
- 25 Year Environment Plan
- Glover Report on designated landscapes
- Healthy place shaping
- DEFRA biodiversity metrics
- Oxfordshire Strategic Environmental Economic Investment Plan

3. Does the existing and emerging baseline information provide a suitable baseline for the SA of the Oxfordshire Plan 2050 (JSSP)?

No.

Overall we are concerned that the document focuses on mapping a static picture of the current situation rather than detailing current trends and rates of change.

In this case, foreseeing the effects of the JSSP so far ahead is particularly challenging. To adequately fulfil the demands of a Strategic Environmental Assessment (predicting real-world environmental change likely to arise from the scale, character and broad location of proposed development), the emphasis should be on the iterative process, taking historical trends and the likely speed of their acceleration in the context of a step-change in the scale and extent of development, in order to start to define real objectives.

The information provided should therefore be reviewed to ensure it tracks recent change and rates of decline or improvement.

- a) **Para 3.8 states that “*improving the connectivity on this corridor, through East-West Rail and the Oxford to Cambridge Expressway projects, is a key ambition for Oxfordshire*”. However, the opinion of the people in Oxfordshire is not yet sought on this; the vision and benefits are not yet defined or proven.**

Making the assumption that this is the case is erroneous at this time unless the Plan has no alternative than to accommodate this ambition, in which case it is an imposed and fixed parameter that needs to be considered in that context, as an objective for the benefit of the UK, and this should be made explicit throughout the OxPlan process.

b) Population characteristics

Areas of deprivation in the county appear to be localised and although it is imperative that strategies to address these are developed, the assumption that growth of the county as a whole would address this is not necessarily a consistent argument. Para 3.19 notes that new development *near* to deprived neighbourhoods can stimulate regeneration. Careful spatial strategy, growth and investment may deliver improvements to these neighbourhoods and that would be most welcome, but the impact of focusing infrastructure and other investment away from other areas of the county, or a primary focus on “high quality” jobs or a knowledge-based economy, should be carefully considered such that new societal pressures are not created.

The Oxford centric nature of Para 3.20 is concerning and sets the tone for relegation of more rural parts of the county, and the rural economy, to second place in both the OxPlan and any sustainability assessment. The rural economy and its importance in the long term sustainability of local communities, and the environment in their care which has its own intrinsic as well as local, regional and global ecosystem and healthy placemaking services and values, should not be assumed to be secondary by decision makers by dint of population number differentials.

Specific comments on Table 3.3:

- It should perhaps be stated that the opportunities for economic growth and development might well “help to reduce the inequalities” but then they may also increase them if prices increase due to the attractiveness of an innovation hub with high wage jobs etc.
- The statement regarding reduced car travel fails to mention the impact of the JSSP and associated strategies on through traffic. This should be commented upon.

c) Housing

Specific comments on Table 3.6:

- The additional scale of demand arises from growth targets, on top of Objectively Assessed Need, and is being imposed through the Growth Deal – this is the only factor that is likely to prevent local authorities keeping pace with demand.
- The statement that house prices will continue to rise without the JSSP needs to have appropriate supporting commentary if it is to be considered seriously. If this is not able to be justified as a statement, then it should be excluded. Conversely, the statement implies that *with* the JSSP, house prices will fall. This is vanishingly unlikely given that developers are only incentivised to build at a rate that maintains their margins and that on any given day, the market is set by existing housing stock rather than new-builds.

d) Economy and Employment

Specific Comments on Table 3.7:

- The sustainability of the current job market in Oxon seems to be quite robust. The impact on other areas of the UK from investment in Oxon/the JSSP is not explored. Attracting people to the area is not going to help sustainability in other parts of the country and could provide a localised “brain drain”, further depressing some regions/making them less attractive for investment.
- High value sectors are again specifically mentioned. Other community investment is acknowledged, but specific opportunities for low and unskilled workers needs to be recognised. The role of the rural and agri-economy should also be highlighted, especially in the context of the 25 Year Environment Plan, new agri-environment schemes and post Brexit. Local food production, and reduction of food-miles is essential if Oxfordshire is to play its role in developing a sustainable national model. Given the recent report of the predicted great loss of insects¹, it may be that the SA should also give consideration to the need to support *organic* farming.
- The “*JSSP provides the opportunity to focus planning and investment on key economic sectors and strategic corridors and locations, supported by sufficient infrastructure to provide the conditions to make Oxfordshire’s economy competitive*”. Again – competitive with whom? Will sectors or areas that are less *key* or relevant to priority growth areas be omitted from investment, thereby increasing an economic and social gap between areas in Oxfordshire?

¹ <https://www.theguardian.com/environment/2019/feb/10/plummeting-insect-numbers-threaten-collapse-of-nature>

e) Transport

Specific comments on Table 3.9:

- The Local Transport Plan (LTP) and JSSP are de-coupled and therefore not reliant on one another. The capacity for *joined up thinking* is therefore at risk.
- Investment in infrastructure such as bus networks is welcome but long term modelling of the impact of the (likely) investment into priority areas versus across the county must be considered.
- Healthy Place Shaping should be included if it is now indeed embedded in the strategy.

f) Air Quality

Needs to consider 25 Year Environment Plan, yet currently doesn't in this report.

This issue also brings back into question the need to re-couple the LTP and JSSP and also the whole issue of the scale of and reason for growth. What are the key objectives? Are they to accommodate UK wide economy, and thus through traffic (especially freight), or are we optimising for localised economic growth through increasing housing and employment sectors that can accommodate alternative working patterns, shared workspaces, homeworking etc? The differences and balances in these will significantly affect the air quality questions and solutions that need to be asked (and the same goes for other, following, sections of the report).

g) Climate Change

In addition to our previous comments, some specific observations include:

- a move to increased use and embedding of renewables and clean energy in development and energy supply in the county is welcome, but impact on other issues, including biodiversity, air quality, long-term waste disposal, tranquillity, land use and landscape need to be carefully considered in the SA including how these considerations are aggregated and weighted, whether better to be in conjunction as opposed to their harms and benefits in isolation and *then* compared for example.
- Assessment of the economic costs associated with investments in renewable versus conventional energy systems and low-carbon footprint expenditure, the SA for such should identify if full lifecycle analyses have been undertaken such that the manufacture, maintenance/replacement and long term indirect costs, including health, have been considered. On the other side of the coin, the costs to the consumer, and opportunities to ensure that these are compensated for to ensure no social deprivation, must also be considered.

h) Water Resources and Water Quality

Again, the document needs to reference the 25 Year Environment Plan but doesn't.

The limited nature of this vital resource, and its capacity to accommodate more stress, is clearly highlighted in the text (para 3.62-3.65).

This one issue alone is significant in any appraisal of the long-term sustainability of large-scale growth ambitions for the county and brings into question why a focus on growth should be in this one highly stressed area.

A notable issue that has been omitted from the text that should also be included is specific reference to the regular discharges of untreated sewage into rivers that has been evident in recent legal action in the county, a consequence of lack of capacity of the systems in place for demands placed on them, surface water pressures on the systems and lack of infrastructure investment.

Specific comments on Table 3.14:

- The JSSP may well help locate development in less water stressed areas, but the basic premise that it is delivering growth over and above that which is currently organically needed means that it in itself is introducing a significant leap in additional stress to the system.
- Climate change and land use changes will add further stress to the system and must be factored into modelling/SA considerations.
- Infrastructure investment in SuDS etc should not be considered in isolation from longer term maintenance investment, sustainable mechanisms for such and also enforcement costs (without which the systems are not effective or sustainable over time).
- Modelling/assessment must look at cumulative effects over time and different system boundaries, and not consider developments, geographical areas or stages of the OxPlan in isolation.

i) Flood Risk

Again, the document omits the 25 Year Environment Plan and this should be an embedded consideration.

Para 3.67 suggests SuDS may help. These are only as good as the long-term structures in place to manage them, and so long term costs and enforcement needs to be factored into appraisals.

Specific comments on Table 3.15:

- Again, the same issue of scale of growth applies. Factors that can increase the risk of flooding are increased as a direct consequence of the escalated
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growth intrinsic to the JSSP (and associated strategies). Therefore, the JSSP is self-justifying inasmuch as it needs to exist to mitigate its own effects.

- Changed land use can have local and wider effects on climate, creating a feedback loop further affecting flood risk in the shorter, and longer, term.
- Modelling and assessment must take into account of cumulative effects, long term projections of different land use scenarios and offsite and wider region implications over time.

j) Soils

Again, the document needs to consider the 25 Year Environment Plan.

Specific comments on Table 3.16:

- The Growth Deal and effects of other strategies pushing/concentrating a growth strategy on Oxon does add stress to the system and increased demand for land that otherwise would not be there.
- The impact or requirements of the 25 Year environment plan and also any new agri-schemes are not yet known and will need to be integrated into the SA process and analysis.

k) Biodiversity and geodiversity

Again, there is no consideration of the 25 Year Environment Plan and there needs to be.

The strategy and SA needs to recognise statutory commitments to halt biodiversity loss and apply this across all development, cumulatively as well as in staged assessments, in the county. It would also be suitable to dovetail into the work DEFRA is doing regarding net biodiversity gain.

A point made earlier is also well illustrated here. The impact on biodiversity, and the value or weight attributed to this in decisions balancing other impacts and benefits, is affected by the observer and the objective being optimised. The wider question on whether the objective is for a net gain for a local development, for Oxfordshire, or for the wider UK is therefore relevant, as is the need for clarity on what priority biodiversity has, or has not, over and above, say, economic growth, and at what point does that balance in decision-making move?

Specific comments on Table 3.19:

- There is a concerning focus on designated biodiversity sites and providing corridors between them. The biodiversity in all natural habitats has an intrinsic value and also a vital role in the ecosystem services on which all our urban and rural communities and economy rely and which would rapidly deteriorate should that biodiversity be eroded. Green space in built environments can also be important for biodiversity and the presence of animals and plants have

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direct proven wellbeing and healthy place shaping benefits. Ignoring, or demoting, the priority for biodiversity that isn't in designated sites, or corridors protecting them, is not comprehending and ignoring the importance that it has.

- The cumulative effect of different parts of the strategy need to be considered, as well as the impacts of specific developments or projects.
- The proposal for a county wide green infrastructure strategy being proposed by OXIS would be a welcome additional consideration.

l) Heritage

Specific comments on Table 3.21:

- The context and setting of heritage assets are also important factors.
- Projections for the impact and effect of cumulative development, and the escalated scale of development and transport infrastructure that the JSSP and associated strategies are introducing to the county, should be modelled and part of the assessment.

m) Landscape and Townscape

Specific comments on Table 3.22:

- Again, needs to consider the 25 Year Environment Plan and also the Glover Review.
- The character of landscapes *and* settlements within it are important also.
- Modelling and assessment of impacts of development cumulatively, and at the enhanced scale, and the effects not only directly but in the setting need to be considered.
- Dark skies and tranquillity need to be explicit considerations.
- The proposal for a county wide green infrastructure strategy being proposed by OXIS would be a welcome additional consideration.

n) Future Challenges & Key Sustainability Issues

Para 4.11-4.13 refers to global talent, knowledge spine, high value science-related jobs and similar. It notes that OxLEP's Strategic Economic Plan identifies such as "the key driver for local economic growth in the future". There has been no consultation on this; the issues consultation with local communities is still to happen. This objective is not one arising from within the JSSP process, but from an associated initiative and the adoption of that particular objective has yet to be

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tested. If adopted for the strategy, the SA needs to ensure that there is clarity on what benefits the objective is going to deliver against which the impact can be assessed. Issues referred to earlier in this paper are relevant – will it simply transfer people from elsewhere in the country, putting greater stress on Oxfordshire’s resources and to the detriment of the human skillsbase, and thus investment and community benefits, elsewhere? Or will there be some potential net gain to the UK as a whole that counterbalances any localised harms? Further, it is unclear what the implications of a prioritisation on this sector are with regards to social equity and the ability to still deliver jobs and truly affordable housing for the lowest waged in our communities.

Section 4.17 notes the significant infrastructure funding gap with even currently anticipated needs. It is unclear from the report if sufficient funding will be made available and in a timely manner so that the desired growth can be sustainably supported. The SA should take the probability and practicality of such funding into account in its modelling and assessment and any risk should be considered a limiting factor to the scale of growth such that targets and projects are reassessed at an early stage.

Section 4.18 notes a number of costs in decreasing order. It is unclear if these are the costs needed or what has been allocated/anticipated. It would be reassuring if the amounts for each were revised to reflect the priorities emerging in the consultation exercise and – importantly - the outcomes in the SA report, however the quote from the OxIS report (para 4.20) suggests that no further monies, nor change in how the monies are prioritised is likely, suggesting instead that “their importance [to sustainable growth shall be considered] in other ways”. This suggests a risk that needs to be recognised early in the process and built into the SA assessment such that where impact is recognised on nonprioritized resources or issues, it should be assumed that mitigation measures that require investment will not be available and appropriate weight or significance should then be applied to the assessment. Again, in this instance, if the impact is significant or has long term consequences, the scale of growth needs to be re-evaluated and limited, or the priorities for investment need to be re-evaluated such that monies are diverted to appropriately mitigate the harm.

Section 4.24 lists a number of plans and programmes. 4.25 notes the JSSP has a “major role” in setting the spatial strategy and policy framework. It is perhaps notably that it admits it is not a “defining” role. The SA scope will need to evolve and reflect these other influencing programmes more or less as the OxPlan progresses as the degree to which some of them impact, influence – or dictate – the scope and parameters of the OxPlan is still unknown. This is a risk if targets or objectives are agreed to before the sustainability of such is properly assessed. There is a need for Oxfordshire to “cut its cloth to suit its purse”. The scale of growth must fit the money available to protect resources it relies on for the future, meet its national and international commitments, and provide sufficient

infrastructure investments in a timely manner to support communities and the local economy. If more is planned than there is money available to do this, then the implications for sustainability by that growth should be clearly and explicitly demonstrated in the SA report. 4.26 notes the £215million government funding for infrastructure (cf para 4.17 noting a gap of £7.14billion) and suggests “the JSSP should *help* to secure additional funding for the future”, but it is unclear in this document at least that there is any legal commitment for such.

4. Are there any additional SA issues relevant to the Oxfordshire Plan 2050 (JSSP) that should be included?

Yes. See discussion in previous section.

5. Is the SA Framework appropriate and does it include a suitable set of SA objectives and appraisal criteria for assessing the effects of the proposed Oxfordshire Plan 2050 (JSSP) and reasonable alternatives?

SEA regulations require a picture of actual change and what measures will be required to avoid, reduce, minimise or offset harmful effects or maximise benefits. To achieve this, the baseline information must record trends and rates of change, not just the static picture.

In addition, **there should be consideration of the cumulative and interactive impacts and it is not currently clear how this is being achieved.** For example, there are clear links between biodiversity, water, soil quality and archaeology.

Comments are listed below on a number of the proposed objectives:

SA Objective 2:

- Add healthy place shaping/making
- clarity is required on for what purpose the countryside is being optimised as this fundamentally affects the decisions being made, and sustainability assessments of such.

SA Objective 3:

- Ensure that new development is fully supported by appropriate **and timely** community, transport and utilities infrastructure and services
- There should be the addition of a commitment to encourage delivery of the right type and tenure of homes, reflecting the changing age profile of the county and the demography of specific economic sectors targeted for growth/additional jobs.

- There should be an explicit commitment to respect the rate and capacity of a community to grow without damaging social cohesion, and also for respect for the character, culture and ethos of a community

SA Objective 5:

- there is a need to commit explicitly to growing job opportunities that are not knowledge/high value and will generate opportunities for the lower skilled in the community.
- there is a need for a commitment to respect and enhance the rural, agri and tourism based economies and ensure a gap does not emerge between areas of high investment (City and Arc) and other parts of the county (rural) or neighbouring counties.

SA Objective 6:

- The whole issue of through traffic is not referred to here and should be.

SA Objective 7:

- The whole issue of some associated projects such as the Expressway are not referred to here and should be.

SA Objective 9:

- Given the specific sensitivity of this issue, the need to assess the cumulative impact of development and growth, and the long-term effects of any scale that is planned, must be explicitly committed to.

SA Objective 10:

- The promotion of use of SuDS must be coupled with assessment, policy and investment in long term maintenance and enforcement of such.

SA Objective 13:

- As described in previous section, ensure biodiversity outside of designated sites is also considered a priority and its intrinsic and other value is understood and protected in decision making at all levels.

SA Objective 15

- The character and distinctiveness of Oxfordshire's settlements needs to encompass not only the visual, but also the social/cultural.

6. Do you have any further comments you would like to add?

Yes

Whether the SA Framework is appropriate and includes a suitable set of objectives and appraisal criteria for *assessing the effects of the proposed JSSP and reasonable alternatives* is further affected by the phrasing used throughout the document looking at what would happen/the implications *without* the JSSP. This is concerning. The principle underlying the Terms of Reference for the Growth Board, the Growth Deal, the Statement of Common Ground and in the Scoping Document for the JSSP, is economic growth. Implicitly and explicitly in these documents, and in the interfaces with other strategies to which the Government has endorsed, this has the objective of providing growth over and above that which is organic and intrinsic to the county

as it stands. Any growth will by its nature put additional stress on certain resources and objectives addressed in the SA document. Therefore, the question used through this document, of what would happen *without the JSSP*, rather ignores the need for debate about whether growth over and above that required to continue current organic growth, high employment levels and net contribution to the treasury (as already enjoyed by Oxfordshire) is appropriate given *any* additional stress to resources.

Submitted on behalf of the Need not Greed Oxfordshire coalition

Planning for Real **NEED** not Speculator **GREED** in Oxfordshire

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