



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

8 September 2017

Paul Staines,
Oxfordshire Growth Board
c/o Oxfordshire County Council

By email:
growth.board@oxfordshire.gov.uk

Dear Paul Staines,

Re: Need Not Greed Oxfordshire response to the Oxfordshire Infrastructure Strategy (OxIS) Consultation, September 2017

Need not Greed Oxfordshire (NNGO) is a coalition of over 30 community organisations that is campaigning for sustainable, democratically-accountable planning across Oxfordshire.

NNGO is deeply concerned about what we view as the 'forced economic growth agenda' for Oxfordshire, as outlined in the revised SEP, and the apparent disconnect between the provision of housing and jobs and the infrastructure to support it. We therefore welcome the opportunity to contribute to this consultation.

NNGO welcomes the principle of an Oxfordshire Infrastructure Strategy as a necessary first step to a more strategic approach to development. We support the principle of OxIS as a vital stepping stone to a robust Joint Spatial Plan and we applaud this attempt at identifying the infrastructure needed to support the current and future residents of Oxfordshire.

We are however concerned by the underlying growth targets on which this strategy is based, which we do not believe have been subject to proper public consultation. We are also worried by the many serious flaws in much of the evidence provided – while we understand that this is a 'live' document, subject to change over time, the strategy is replete with errors and misprints, undermining confidence not just in the accuracy of the document, but in its overall scope and

ambition. Whilst accepting this is a first stage report, the document reads more like a 'wish-list' of possible projects, rather than as a real 'strategy' for the county.

We agree with the statement in the opening paragraphs of the Executive Summary that: "Growth in Oxfordshire over recent decades has created a deficit in existing infrastructure". However, we remain concerned about the 'considerable' funding gap outlined in this report – only £500million of the £9 billion of infrastructure funding deemed necessary to support the growth targets has so far been identified. This £8.5 billion funding gap seems unbridgeable. We would therefore like to know what steps might be taken to re-visit the growth targets, in light of the fact that only 1/18th of the infrastructure funding deemed necessary to support them has so far been identified?

Growth forecasts are excessive and may well never happen. The infrastructure needed for the over optimistic plan is massively underfunded. So, securing the total amount of infrastructure funding is vanishingly unlikely. We think that the growth targets should be revised downwards very significantly to a more reasonable level. We don't want a plan that allows even more massive amounts of building, but cannot provide enough infrastructure.

Population Growth

We dispute the basic premise of this document that the population of Oxfordshire will grow by 267,000 people by 2040, with the need for 123,500 additional homes.

The most recent DCLG household projections (published in 2016, 2014-based) suggest an increase for Oxfordshire from 274,000 in 2016 to 327,000 in 2039 (the last year of the projection). So 53,000 in 23 years. We understand that these take account of natural change and best estimates of migration and changes in household size.

The current population of Oxford City is 158,000, so this growth is equivalent to adding 1.7 Oxford cities to the County. 267,700 is 11,154 more people for every one of the next 24 years. That is 2.7 times more than the increase of 4,084 per year in the government's 2016 trend based forecast (made by the Office for National Statistics). We consider that growth on this scale is unjustified, unlikely to happen and that even if all the infrastructure was funded, it will damage the environment of Oxfordshire.

These figures are based on the extrapolation of the 2014 Strategic Housing Market Assessment (SHMA), which we believe is deeply flawed and exaggerated. The SHMA assumes very high growth rates, double the 'real' local need, and a decrease in the average household size (which hasn't happened).

Moreover, the OxIS report appears to extrapolate the SHMA figure to 2031 to 2040. This is wrong. The ONS projections clearly show population growth rates for England (and Oxfordshire) reducing from over 0.8% per annum in 2015 to 0.4% per annum by 2039. This is a direct result of an aging population.

NNGO considers that the plan should be based on a much lower growth scenario. If not, the very serious risks of not achieving the current very high predicted growth should be considered by the plan. These risks should be fully mitigated.

Timing and funding of Infrastructure

NNGO is very pleased to see a coordinated, coherent approach to infrastructural need in the County. There are serious issues about funding and timing which are referred to *“There is an increasing gap between the expected rate of growth up to 2031 and the ability to deliver key infrastructure”*.

The redevelopment of Oxfordshire cannot be done on the cheap. And there are continual references to constraints on spending that will deplete rather than increase resources. For example, *“The Oxfordshire Healthcare Transformation Programme estimates a potential £200m funding gap if the CCG does not evolve”*.

Successful development plans must have clear infrastructure funding available at the outset. The Oxfordshire plan does not have this. So, the development of Oxfordshire is happening back-to-front and failure is likely.

Over-reliance on developer contributions prevents infrastructure from being there, ready and waiting, to provide for homes when they come. Developer contributions are not equal to the task of big infrastructure projects, and the money is released retrospectively, leaving local people devoid of infrastructure for many years (if not ever).

NNGO thinks that there should be guarantees that infrastructure is planned, committed, properly funded and available BEFORE any land is zoned for building.

Roads

This document puts a high reliance on hard infrastructure, in particular roads. As history has shown, adding to and widening roads *always* leads to increased traffic, and necessarily creates new pinch-points at other places. It encourages new traffic and unnecessary person movements, swiftly catching up on the carbon and pollution savings that are made by reducing congestion and creating new routes.

NNGO would like to see a stronger commitment to reducing road traffic across the County and reducing the reliance on road building as an engine of growth.

Areas of Outstanding Natural Beauty

It is good to see the Oxfordshire AONBs recognised as an essential part of the Oxfordshire landscape. Many studies have shown the economic values of easily accessed green space, in terms of health and wellbeing of the population. Indeed, the green character of Oxfordshire is what will attract high quality business to the region.

However, many problems (and few solutions) are identified in this section.

At the landscape perspective for example, the Area of Outstanding Natural Beauty (AONB), the North Wessex Downs *“is already exhibiting some detrimental impacts on the character from development, which could be exacerbated by the significant planned growth around Didcot”*. This damage is not aided by our intent that *“the multi-functional nature of AONBs is promoted so that...economic development can take place”*. These are weasel words disguising plans to destroy our precious and irreplaceable environments and landscapes.

...‘the growing population across Oxfordshire is likely to increase pressure on the AONBs...additional measures will be needed to support the AONBs in accommodating additional visitors.’

The AONBs suffer “*damaging land management practices...habitat and species decline associated in part with habitat fragmentation...inappropriate extraction of natural materials...concentration of pollutants [in some water bodies].*”

Our rivers are at risk...“*significant pressure due to areas of growth*”.

NNGO demands a clear and comprehensive strategy to avoid, limit and mitigate these threats and risks.

Proposed Prioritisation Criteria

Whilst it is noted that a ranking system to prioritise investments will be used, the sole determinant for this is listed as “directly supporting sites that will deliver the required economic and housing growth”. We invite the Growth Board to consider other determinants, such as where funding could best deliver protection and enhancement of the environment in light of both existing and planned development.

In summary

The plan starts by setting ridiculously high growth targets. Growth on such a large scale would change the environment of Oxfordshire in many damaging ways. The plan then considers the infrastructure needed and finds that this is almost completely unfunded. So, a potential disastrous outcome of massive development without necessary infrastructure is clearly planned. Instead of considering the damaging stupidity of this outcome, the plan proceeds undaunted. Failure, crisis, damage and destruction seem almost inevitable. Please think again!