



## **NNGO Response to England's Economic Heartland's Outline Transport Strategy consultation – October 2019**

### What is NNGO?

Need Not Greed Oxfordshire (NNGO) is a coalition of over 40 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.

We are concerned that the proposed plans are predicated on very high and unlikely economic growth, driven by a tangled governance system that overrides local democracy. Proposals are imposed on this structure. The Expressway and related developments will irreversibly damage Oxfordshire's environment. The plan should instead increase sustainability and reverse the decline in biodiversity.

NNGO is opposed to the Ox-Cam Expressway proposals and suspect that the objective is to build an outer ring road for London, rather than improve local transport systems. We support plans to tackle the climate emergency and make transport more sustainable. And we think the plan should be clearer about this and make more effective suggestions.

### Our key concerns

Despite worthy statements about the need for a zero-carbon transport system, this is a 'business as usual' document, looking to facilitate excessive growth targets and funnel public cash for major infrastructure projects to EEH's private sector delivery partners (Atkins, Jacobs, Kier and the like). It says little to nothing about **reducing** transport requirements, prioritising sustainable modes of transport or meeting community needs.

## The Growth Agenda & Meeting Local Needs

- The starting point for the strategy appears to be to facilitate growth (p.13 ‘The Transport Strategy for the Heartland will set a framework for that investment and identify the pipeline of infrastructure capacity that is required to both support the delivery of current plans, and enable further growth to take place.’)
- Growth - especially on the scale proposed - must be justified in terms of the benefits it will bring, and how, and not as an end in itself. As you say on page 11 ‘*economic growth must not be at the expense of the environment*’. But this implies that the environment is a priority, whereas it is the last of your key principles - with ‘Enabling economic growth’ as your first one.
- We would suggest that this is the wrong starting point. We should be starting from considering how to a) address the needs of existing residents and b) tackle the climate emergency (see below).
- Even if planning for very high growth, it should be accepted that high growth might not happen. So, any plan should be flexible and allow for the possibility that the growth does not materialise. In planning terms, this means that huge areas of land for development should not be released immediately - as it may never be needed. There should be phasing, so if growth occurs, then more land is released. A ‘Big Bang plan’ that makes all the decisions in the near future is very unlikely to be relevant or successful by the time we get to 2050.
- There is reference to the changing needs of the population, especially younger and older people (p.89), and also to the needs of rural communities, but this is not developed into any strategic thinking or proposals.
- We disagree with the proposal to build a new road in Oxfordshire (the Expressway) to link with other existing or planned roads to Cambridge. It should be noted that three of our local authorities (Oxford City, South Oxfordshire and Vale of White Horse) have all passed motions opposing the Expressway. Given the scale of growth already in Local Plans, the *local* transport needs of Oxfordshire that result need to be given priority.
- NNGO is generally supportive of East-West rail and considers that it would provide many or indeed most of the benefits of the proposed Expressway. This does not obviate the need for co-location of housing and jobs. We note that proposed rail investments are intended to increase radial routes to London and that as much as a third of the housing proposed for the Arc is intended for long-distance commuting.

East-West rail should be built with the capacity to take freight and must be electrified (or possibly hydrogen-fuelled) as an essential means of reducing CO2 emissions and perhaps noise levels as well.

### The Climate Emergency

NNGO strongly supports the ambition of a zero carbon emissions transport system by 2050. However:

- The ambition should be to be zero carbon by *no later* than 2050. As it is currently written, the target could be met by remaining 99% carbon dependent for 20 years until 2040 say, but then rapidly reaching zero... This would meet the existing target, but it would not tackle disastrous climatic change.
- So, there should be steady progress towards that target, starting now. Ideally, the target should be changed so it is clearer about how quickly change is to occur. For example, perhaps 80% of the necessary change would be in the next five to ten years, leaving the more difficult 20% for the longer term but no later than 2050.
- To show what needs to be done, the plan should be much clearer about the scale of the current problem, what changes will be made when and the effect on emissions.
- It should also be clear how new transport proposals will be assessed against this eg what is the carbon footprint of the construction of the proposed Oxford-Cambridge Expressway and, were that to come forward within the lifetime of this strategy, what is the knock on impact in terms of carbon savings that would be required elsewhere in the system to accommodate it?
- Starting from this point would generate a clearer hierarchy of needs for investment:
  - Reducing need to travel
  - Cycling/walking
  - Public transport
  - Roads as last resort
- What is the approach to reducing the need to travel in the first instance? How will housing and jobs be co-located to minimise need?
- Where are the maps and analysis of cycle networks across the region? Or footpaths? How many people use these means of transport to get to work? What targets to increase this will be set for the future and therefore guide investment funds?

- Complete integration of bus and rail services is long overdue and will be essential. This may involve consideration of state ownership of bus services.
- The strategy should rule out any local airport expansion as currently incompatible with our national climate change commitments.

### Local Democracy

NNGO has serious concerns about the governance and accountability of this project. There is a very complex network of organisations, individuals and companies involved. It is not clear who will make the final decisions about which projects should go ahead. So, it is not clear how accountable the decisions are.

We notice that delivery partners are major infrastructure partners such as Kier and Atkins which are incentivised to bring forward large-scale projects. Where is the local community voice? Where do organisations such as the Campaign for Better Transport or Sustrans get involved? It is not sufficient to say they can comment on a consultation - involvement is needed at the early stages of policy-making, so that community and environment needs are centre stage.

### Additional concerns

- How will this Plan, which is predicated on getting large numbers of people to move here, fit in with plans and requirements for other parts of the UK? How is social equity being considered?
- Can Sustainability be more embedded as a core objective?
- How will the document be 'rural-proofed'? There is passing mention of lack of choice in rural areas (Page 89) but this is not expanded on and the strategy does not outline how it will look to address the issues.
- How will the complex timetabling of other documents, notably the Oxfordshire 2050 Plan, fit in to key decisions about the Expressway?
- Finally, we trust that the results of this consultation process will be made generally known. This should make clear what you will be changing as a result of the consultation.



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

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