

## DRAFT QUESTIONNAIRE RESPONSE (NOT TO ALL QUESTIONS) FOLLOWS FOR NNGO

NNGO is ... our usual introduction... Nowhere to put this in the questionnaire!

### Multiple choice questions!

Many of the questions have multiple choices. As an example, these are generally:

- Strongly support
- Support
- Neither support nor oppose
- Oppose
- Strongly oppose
- I'm not sure

NNGO's response to the multiple-choice questions are highlighted in blue.

### Question 1 To what extent do you support or oppose our vision?

The Vision is:

*To realise sustainable growth opportunities and improve the quality of life and wellbeing for Heartland residents and businesses, by harnessing the region's globally renowned centres of innovation to unlock a world class, de-carbonised transport system.*

NNGO – Strongly Oppose

### Q2 To what extent do you support or oppose our principles? (There are 4 principles, 6 options each)

The four principles are:

- Achieving net-zero carbon emissions from transport no later than 2050
- Improving quality of life and wellbeing through an inclusive transport system accessible to all which emphasises sustainable and active travel
- Supporting the regional economy by connecting people and businesses to markets and opportunities
- Ensuring the Heartland works for the UK by enabling the efficient movement of people and goods through the region and to/from international gateways.

Net-zero carbon – Strongly support  
Improve quality of life etc – Strongly support  
Support the regional economy – Support  
Ensuring the Heartland works for the UK - Support

### Q3 Further comments?

NNGO supports improvements to quality of life and wellbeing for Heartland residents but is extremely concerned about the continuing strategy of unconstrained economic growth leading in turn to significant migration into the region. This is contrary to the government policy to level up the UK, adding huge pressure in Oxfordshire to underfunded public services and infrastructure with no democratic mandate. Whilst net-zero carbon emissions is laudable it will be more than offset by the environmental and biodiversity harm that will be done through the scale of population growth and house building proposed.

NNGO would prefer to see a vision that makes explicit and transparent to existing residents the scale of population growth planned and in order to help address the climate emergency believes this should reflect organic growth *only* (see our Q11 response). Housing must be truly affordable and the strategy should aim to address the house price bubble that exists in the region. Land take and natural resources should be seen as a constraining factor to economic growth, following the Doughnut Economics model, rather than incorrectly assuming it is an infinite resource.

NNGO therefore rejects the public consultation on this strategy as misleading and inadequate, in failing to be honest about the key issues.

1. Growth – this is key to the whole strategy. What level of growth is being planned for? What does it translate into in terms of jobs and housing, population increase and transport demands? How will that impact on the ability to deliver the climate goals you outline? What are the environmental and social impacts of such growth? How is ‘sustainable’ defined?

Buried on page 29, there is a different interpretation of the purpose of this strategy:

*‘the purpose of this strategy is to support the delivery of the region’s shared ambition with Government of: Enabling the region to realise its economic potential – with an ambition of a 70% increase in GVA by 2050’*

**Whose ambition and how has it been ‘shared’?**

**There has been no public debate on this issue and therefore there is as yet no public mandate for this level of growth.**

2. Climate change - Need Not Greed (NNGO) welcomes your dedication to achieving net-zero carbon emissions no later than 2050. We hope this will be achieved as early as possible! However, it is not clear how the levels of growth indicated above will impact on this, nor at what point growth must be constrained in order to achieve climate goals. What level of funding will be required to deliver this strategy and how realistic is this? We have concerns that you will need much support from central government to get to net-zero. We are not certain this will be forthcoming – many projects remain unfunded – rail electrification Didcot to Oxford and on to Cambridge for example. Funds to ‘level up every part of the UK’ seem, quite rightly, unlikely to be focused on Oxfordshire or much of the Heartland. Also, capital investment may be limited

due to the current extreme pressures on government borrowing - which is likely to be well over £300Bn this financial year due to the ongoing Corona virus crisis.

**Since the strategy is rightly positive about its intention to achieve net-zero, we are surprised that it is not accompanied by a model of the plan's carbon emissions. This should be provided and the Plan reviewed accordingly.**

3. The Strategy is pursuing a policy of creating a single housing and jobs market across the region, facilitated by longer distance commuting. The strategy pays lip service to reducing travel, but suggests no measures or monitoring indicators. In fact, the strategy is instead based on trying to develop the region as a single employment and housing market, supporting longer-distance commuting (rather than co-location of jobs and housing). See p.27 **'will fundamentally change socio-economic geography of the region.** *What was previously a series of individual economic and housing market areas will become one.*  
**The intention for such transformational change should at the very least be highlighted in any public consultation.**
4. We also note that solutions do not have to be 'innovative' or ground-breaking. There are tried and tested solutions which just need implementing eg cycle routes, more electric charging points. The vision, as worded, implies only innovative approaches are of interest.

**Q4 To what extent do you support or oppose investment in the following areas? (Digital, Existing and Repurposed infrastructure, Greening travel, New infrastructure, improve rural connectivity, 6 options each)**

Digital infrastructure – Strongly support  
Existing infrastructure – Strongly support  
Repurposed infrastructure – Support  
Greening travel – Strongly support  
New infrastructure – Neither support nor oppose  
Improve rural connectivity – Strongly support

**Q5 To what extent do you support or oppose policies set out in the four themes? (Decarbonise, transform journeys, Connectivity, Making it work for UK) (6 options each)**

Decarbonising – Strong support  
Transform journeys – Support  
Connectivity – No response  
Making it work for the UK – No response

'No response' is proposed when we have a mix of agreement and disagreement, or need more information to comment! See response to Q6...

**Q6 Any further comments about Draft Transport Strategy's policies?**

## **The Scale of our Ambition (page 29)**

This states that ‘the purpose of this strategy is to support the delivery of the region’s shared ambition with Government of: Enabling the region to realise its economic potential – with an ambition of a 70% increase in GVA by 2050’.

Whose ambition? Who has been consulted on it? What does that translate into in terms of jobs and housing? How will that impact on their ability to deliver their climate goals? **There has been no public debate on this level of growth and therefore there is no public mandate for this position.**

## **Decarbonise (pages 30-37)**

NNGO supports the plan to decarbonise by 2050. But we do not underestimate the difficulties. We wonder if hydrogen powered vehicles will be preferable to battery/electric ones, due to the problem in producing and recycling lithium batteries. The work done on this issue in the separate report ‘Pathways to Decarbonisation’ is welcome. The key role that improved internet connections can play in reducing travel demand is much clearer after the Corona crisis. But the decision to remove Huawei equipment, whilst it increases security, will cause delay. Policies 1 to 6 (p32 and 33) are accepted. The idea of an Oxford to Cambridge cycling and walking ‘green spine’ (page 34) is interesting!

## **Transform Journeys (pages 38-43)**

NNGO supports the East West Rail Mainline with interchanges where it crosses the existing mainlines (policies 7 to 11). This now includes an Eastern section to the East of Cambridge.

We also note the proposals for:

- A northern arc, that links north Oxfordshire, Northamptonshire and Peterborough (policy 12); and
- To strengthen connectivity between Swindon/Oxford and the South West and South Wales (policy 13).

It is difficult to comment on these without further details.

The Strategy says *that ‘Improving connectivity between Oxford and Milton Keynes is a strategic issue for the region’* (page 41). This appears to be an indirect reference to the Western section of the Expressway, which NNGO opposes.

Policy 14 refers to solving challenges on the Didcot – Oxford – Bicester / Banbury corridor. If this relates to the rail links, NNGO supports it. But we oppose road based ‘Expressway’ proposals.

We can’t comment on policies 15 to 18 inclusive, which are outside of Oxfordshire.

Page 42 mentions development of the Swindon/Didcot – Oxford – Bicester/Banbury ‘corridor’. The A34 is specifically mentioned as well as the rail corridor. Again,

NNGO opposes the 'Expressway' proposals, which currently refers to very broad possible routes through Oxfordshire.

NNGO is content with policies 19 and 20. However policy 21 concerns investment in the Strategic Road Network and the Major Road Network, in particular where this '*Enables ... additional housing growth*' which leaves open the question - Additional to what? As written, the policy implies that new roads will be supported if they facilitate more housing, not that more housing will be supported if it can be co-located with employment and services, or supported by a range of sustainable transport measures (not just roads). Without more clarity, NNGO therefore opposes this aspect of policy 21.

Policy 22 is a rather vague statement referring to '*hubs*' and two sorts of '*areas*', none of which are clear, so we can't accept that without more detail.

### **Connectivity (pages 44-47)**

NNGO is concerned that Policy 23 opens the door to the Expressway. We have concerns about the amount of growth planned and the inevitable environmental damage as mentioned in response to question 11 below. We accept that there is some need for more infrastructure for the many currently planned developments and for rail improvements.

Policy 24 is not currently relevant to Oxfordshire, so we have no comments.

Policy 25 – mobility hubs, we can accept this but only on a case by case basis. NNGO has concerns about some of the park and ride proposals for Oxfordshire.

Policy 26 to reduce problems due to changing from one mode of travel to another is accepted. Travel will never be '*frictionless*'.

Policy 27, tailoring solutions for small market towns and improving digital connectivity, is accepted.

### **Making it work for the UK (pages 48-53)**

Policy 28 is about improving access to Luton and Heathrow airport. Air travel uses untaxed fuel and is a carbon emitter on a very large scale. Its future is far from clear at the moment. In the long term, net zero carbon emissions may only be possible with high carbon taxes on fossil fuel and much reduced air travel.

Policy 29, whilst focusing on just two corridors, one of which might or might not be the A34, is an open door for the Expressway and so NNGO opposes this.

Policies 30 and 32 are rail focused and NNGO supports them.

Policy 33 mentions the A34 and M40 North of Oxford. This leaves unanswered pressures on other parts of the A34 and on other roads, notably the A40.

NNGO would support Policy 34, on seeking innovative solutions for the freight sector, but we need to see the detail.

Policy 35 on overnight lorry parking is also one where NNGO would need to see the detail.

Policy 36 is a general promise to work with various organisations to ensure the needs of the business community are met. NNGO thinks this is fine, but will you somewhere promise to inform and involve the public and other organisations about proposed decisions so they can understand them, get involved and comment?

**Q7 To what extent do you support or oppose the implementation and delivery approach? (6 options)**

NNGO - Neither support nor oppose

**Q8 To what extent do you agree or disagree that the investment pipeline reflects the region's connectivity priorities? (6 options)**

NNGO - Oppose

**Q9 Any further comments about the implementation and investment pipeline?**

**Page 56 to 63 – Investment pipeline**

NNGO is content with most proposals, many of which are outside Oxfordshire.

However, NNGO is opposed to the Western end of the Oxford to Cambridge 'Expressway' and 'Arc' and related excessive growth. This seems likely to be part of the Highways England Road Investment Strategy (ref Policy 29, page 48 of the Draft Transport Strategy and page 56). Also see page 5 of the 'Proposal to Establish...' which says '*... in support of the Arc initiative through its connectivity work stream.*'

Page 58 – NNGO expects the future role of airports to be reduced, given the scale of reduction in business and holiday traffic during Corona and the CO<sub>2</sub> target.

Page 58, 62 and 63 - Four of the nine proposed Area/Corridor/Connectivity studies affect Oxfordshire as follows:

- B. Peterborough – Northampton - Oxford
- D. Swindon – Didcot – Oxford
- E. Watford – Aylesbury – Bicester – M40
- G. Oxford – M40 junctions

It is difficult to comment on these proposals, which might hint at major developments, or might just mean upgrading pinch points on existing rail or road routes. NNGO would need to see the detail.

Page 59 – Targeted investment in the strategic or major roads network - None of the proposals affect Oxfordshire directly, though this is the box where proposals that do affect us may appear in future.

NNGO is slightly surprised to see that there is not more mention of either the A34 or the A40, or congestion in and around Oxford.

**Q10 Overall to what extent do you support or oppose the Draft Transport Strategy? (6 options)**

NNGO - Oppose

**Q11 Please provide any further comments you have about the Draft Transport Strategy?**

NNGO has a number of concerns and suggestions:

**Growth**

In the 'Pathways to Decarbonisation' report page 9 gives district total populations that can be added up to give Oxfordshire forecast totals as follows:

	EEH figure	ONS Figure <sup>1</sup>
2015	702,000	678,000
2020	762,000	696,000
2030	875,000	725,000
2040	980,000	745,000
2050	1,100,000	-

1. The 2015 figure is taken from the ONS 2014 projection, the rest from 2018 based projection, rounded to nearest 1000. Note ONS does not publish subregional figures beyond 2043.

The starting point in 2015 is overstated and by 2040 the EEH figure is a quarter of a million higher. The 2015 to 2040 growth assumed by EEH is 278,000 whereas that of the ONS growth is 67,000. The ONS projection is based on current fertility and death rates in 5 year cohorts plus an extrapolation of current migration rates into the county. The ONS 'natural' increase (births minus deaths) is probably quite sound. However ONS suggests that net migration is by far the largest component of growth (and is obviously difficult to project) but the EEH figure would require at least a *fivefold increase* on the current net migration into the County. So where would the extra quarter of a million people come from? They certainly cannot come from the rest of the heartland as this has similar exaggerated growth figures. If EEH is to use these very large growth figures they need to justify the methodology of calculation and make clear where they think these people will come from.

In addition the ONS make clear that the growth in population in Oxfordshire is entirely in the over 60 age range. This is also true of the projections for the whole of the UK, so there is no reservoir of younger people to populate Oxfordshire (or the EEH). The ONS estimate that the people over 60 will make up 30% of the population by 2040, compared with 23% on 2018. The transport patterns of this aging population needs to be taken into account on this strategy.

Within Oxfordshire, growth in Oxford City itself is comparatively low as might be expected – 15% over 30 years. But this pushes growth into the surrounding rural districts. Vale of White Horse has a forecast growth of 67% in 30 years – more than any other district in Oxfordshire. However, there is little room for additional growth in the Vale, which already has little room or infrastructure for additional large-scale development, without significant negative impacts on the environment and local communities.

These forecasts are rough - based on assuming that forecast growth in the number of households per year, during 2013-33 will continue for another 17 years up to 2050. This seems very unlikely. Many of the most obvious sites for development in Oxfordshire have been included in the existing contentious local plans (one of which was effectively imposed by the government). They have taken large chunks out of the Green Belt – ‘exceptional circumstances’ are apparently common in the Vale. Further expansion would be more damaging and much more difficult to accept.

So, NNGO is very concerned by the scale of these growth forecasts. We have commented on growth rates on many occasions and our arguments include that:

- About half of the growth in current Oxfordshire local plans is not due to local need, but to people moving in from other areas of England. This clearly conflicts with government plans to ‘level up’ depressed areas in England. This migration would remove young and skilled workers from other areas that need them more;
- Migrants were supposedly needed to fill high skill, high tech jobs. Whereas in fact most of the jobs created recently involve low pay, part time working, self-employment and/or zero hours;
- A rapidly aging population will have different transport patterns – probably less likely to drive cars, less likely to travel long distances and more likely to rely on public transport. This trend needs to be fully analysed and integrated into the strategy.
- Recent dramatic increases in working at home means that people who are employed in the Heartland may not need to live in Heartland or even in the UK;
- There are no clear plans to remedy infrastructure problems in Oxfordshire, notably the A34 and A40, but also water supply and shortage of suitable sites for major expansion;
- The world is uncertain and unexpected events are frequent and hard to predict. The financial crisis, President Trump, Brexit (where a final deal is not settled), climate change, technical change such as AI, possibly virtual abolition of the planning system and the Corona crisis have some unexpected and sometimes damaging consequences. This can slow down and even reverse employment and economic growth. The economy should be put on a greener and more resilient and sustainable path to recovery;



- The wildly over-optimistic forecasts lead to large amounts of land being zoned, much of which might not be needed until after 2050. This has the effect of removing the planning system's control of where development should go;
- More damage to the Oxfordshire key environments, in particular Green Belt, but also SSSIs, Nature reserves and AONB seem inevitable.

## **Other plans**

The relationships between this plan, Local Plans and in Oxfordshire the Oxfordshire 2050 JSSP Plan are not clear.

## **Monitoring Indicators**

Monitoring indicators reference biodiversity net gain and natural capital, but not landscape & visual impact or tranquillity. These must be included.

## **Economic change and Corona Virus**

The crisis has produced one favourable change – requiring more people to work at home and having more flexible working hours have illustrated the benefits of to employers and employees. This seems likely to continue in future. The need for childcare and home schooling have complicated this, and these pressures have been focused on women.

Conversely, as shops were closed, online shopping boomed but high streets have declined further. But online (as opposed to high street) shopping can drive an increase in poorly paid, unskilled and overworked jobs in warehouses and delivery. The warehouse 'Fulfilment centres' are increasingly automated, so one wonders who will be able to buy the goods they provide.

Artificial intelligence (AI) also seems likely to have impacts on the jobs market by 2050. It seems likely to further increase inequality, with a few very well-paid jobs, but many more menial and low paid ones.

Neither of these outcomes are good economic models for the future. Maybe we should try Kate Raworth's 'Doughnut economics'?

## **Aging Population**

The population is aging, and it is not clear how the plan picks up the consequences of this, despite it being an issue raised in the Sustainability Appraisal. People who are no longer young are generally less adaptable, less fit and often less well off. They may rely on free bus passes for travel, or cars and taxis.

## **First / Last mile for trips and deliveries**

NNGO is aware that:

- Geneva offers free public transport passes for visitors who stay in its hotels. Might some Oxford hotels be persuaded to offer this?
- DPD in London deliver parcels using a network of micro sites (rather than one large one) where vehicles are based. A range of small electric vehicles have been developed and are used, for example a pedal and electric assisted e-cargo bike, the P1, range 60 miles, payload 120Kg, 100 parcel stops a day. Charges from a 13amp socket. Electronic systems guide delivery drivers and ensure return journeys are minimised. They also have micro electric vehicles.  
<https://www.dpd.com/group/en/2019/11/04/dpd-uk-takes-delivery-of-another-electric-vehicle-first-with-launch-of-unique-cargo-bike/>

**Q12 To what extent do you agree or disagree that the independent Integrated Sustainability Appraisal is a robust assessment of the Draft Transport Strategy? (6 options)**

NNGO – Strongly disagree

**Q13 Please provide any further comments you have about Integrated Sustainability Appraisal?**

The document is frankly ludicrous, with the consultants clearly downplaying all the negatives and over-egging the positives. For example, new developments will inevitably increase light pollution but the ability to limit how much light pollution they emit is described as an ‘opportunity’ - in other words it will get worse, but it’s all good, because we can make sure it only gets a bit worse not a lot worse – wonderful!

The ISA does stress the ageing and rural population of the Arc – something that is not really addressed in the Strategy document itself.

Despite the spin, Table 5.3 clearly shows that whatever the economic benefits, the environment would come off very badly. Table 5.5 attempts to show the mitigation measures to address this, but they are pretty limited.

There is no mention of Green Belts.

Monitoring indicators fail to reference landscape & visual impact.

**Q14 To what extent do you support or oppose the approach set out in the Proposal to Establish a Statutory Sub-national Transport Body? (6 options)**

NNGO - Oppose

**Q15 Please provide any further comments you have about the Proposal to Establish a Statutory Sub-national Transport Body?**

NNGO welcomes the focus on decarbonisation in the Draft Strategy, but is concerned that it also anticipates considerable growth as well as ‘business as usual’ (whatever that means after Corona) continuing. Our specific concerns are that:

- Other environmental limits and concerns may not be addressed and respected.
- NNGO has some concerns that the new organisation will be a back-door way of imposing projects that are not acceptable locally - the 'Arc' and Expressway being a prime example.
- NNGO is concerned about the local accountability of the STB. The STB is rather remote and distant. Transport projects in one area can lead to increased traffic in another, for example it is likely that the opening of the Newbury bypass put more pressure on the A34. Local representation and links to existing democratic organisations for smaller areas are rather indirect, as some existing local councillors are involved but not others. The local councillors were elected for one set of purposes – but will now be involved in considering and deciding other key issues for areas far away from their constituencies. Who will control EEH? How far might you get with decisions just based on consensus?
- How will EEH be funded? Who pays for all the various investigations planned?
- NNGO notes that the *'Secretary of State would have to have regard to the proposals contained in the Transport Strategy and the advice of the Sub-national Transport Body'* (Page 7). So, the plan is only advisory and has no statutory force or presence in itself? However good it is, it could not prevent an 'Expressway' or similar, if the Minister disagreed. STBs are presented as the *'single voice for their region'* - but what about other voices or disagreements? Why do undemocratic Local Enterprise Partnerships play such a key role in this work? How are conservation groups, users of services or other local organisations heard? There don't seem to be any on your Forum.
- Finally, NNGO notes that regional structures are lacking for other activities, notably land use planning, leading to a lack of coordination. For example, it seems that unrestrained growth reliant on in-migration from elsewhere in the country is planned for every part of England – which is clearly not possible. If there are to be regions, should they be involved in more issues than transport?

Q16 I am responding to this as either - Individual resident; or Official representative of business, local authority or other organisation; or Elected member or MP

NNGO – Other