



**Oxfordshire Infrastructure Strategy (OxIS), Stage 1 - 2021-2040**  
**Consultation, August 2021 - Need not Greed Oxfordshire response**

NNGO is broadly supportive of the OxIS themes, in particular the need to tackle both our climate and nature emergencies, although we feel that the report fails sufficiently to address how this will be achieved. We agree that this requires a refresh of the evidence base and a re-prioritisation of strategic infrastructure schemes to 2040. We note and support movement away from a past approach which was too heavily focused on road-building schemes.

The overall message from this document is that there is a substantial funding gap but no resolution of how this will be addressed. Moreover, the funding gap is worse than stated because it does not appear to include the funding that will be required to tackle the fundamental issues of the climate and nature emergencies. Neither does there appear to be any explanation as to what will happen if the necessary funding is not forthcoming.

We have the following detailed comments.

**1. Growth targets should not dictate policy but be set within environmental/social constraints**

For example: 1.3 *“OxIS seeks to..Support and champion the Oxfordshire Local Industrial Strategy and Investment Plan”*

We reject this objective entirely since the Local Industrial Strategy was signed off behind closed doors by the unelected and unaccountable Oxfordshire Local Enterprise Partnership and Government, without going through local authority scrutiny or public consultation.

We question whether the 108,000 new jobs by 2040 target (see p16) is desirable or achievable within the context of also meeting the other theme objectives such as health and environment.

*We therefore request that this objective be rewritten or removed.*

## 2. Decision-making is generally best driven at as a local level as possible.

Page 7 The diagrams ignore / omit both parish councils and neighbourhood plans, the latter being a formal part of the county's development framework.

## 3. We welcome the move away from a 'spokes to Oxford' approach to a broader place-based approach (Section 1.7)

## 4. We need to see much stronger due diligence on stakeholders' proposed infrastructure schemes

There is no evidence provided of any due diligence conducted on stakeholders' wishlist of infrastructure schemes (*see 4.1 Identification of Strategic Infrastructure Schemes*).

It would be naïve, indeed untrue, to think that the interests of private companies and the general public are always aligned.

In particular, we are concerned to note that the only 'external' stakeholders involved in considering water issues appear to have been Thames Water and the Environment Agency. Given that 4.2bn litres of sewage was dumped into the Thames and its tributaries in 2017 by Thames Water and that the majority of Oxfordshire's eight major rivers are classed as having moderate or poor cleanliness, these feel like somewhat unreliable witnesses!

For example, Page 13: "*As identified in the Thames Water Pollution Incident Reduction Plan (2020), a key need is to reduce sewage outfall incidents in Oxfordshire by 30% by 2025.*" **It cannot be acceptable to proceed with a scenario where 70% of the current level of sewage outfall can continue beyond 2025.**

We note that there is a stated intention to work in partnership with Thames Water to identify forthcoming waste water schemes (p24) but this is too vague and lacks the rigour that is required to deal with the fundamental issue of wastewater.

This report implies that there is a lack of internal capacity for robust assessment. What work has been done to engage with extremely well informed local campaign groups such as GARD (Abingdon Reservoir) and WASP (Windrush Against Sewage Pollution)?

**5. OxIS needs to be much clearer on how significant gaps in required infrastructure will be met and what happens if they are not. Will growth be constrained accordingly?**

The most significant gaps in schemes appear to be precisely in those areas where the need is greatest ie in tackling our climate and nature emergencies. It is useful to see that OxIS has identified these gaps and the schemes outlined to address them are welcome in principle. However, there is little detail on how these new schemes will be developed in practice beyond a vague instruction that these *'should be brought forward by key stakeholders'* (Section 5.2).

How will OxIS seek to support this process? What happens if stakeholders fail to develop such schemes? What encouragement can be offered or sanctions threatened? What contingency is in place if the schemes do not come forward? Would growth plans be restricted accordingly? How would this be measured/monitored to ensure that development does not outpace infrastructure to the detriment of our environment?

**6. Likewise, if funding is not available, how will development/growth plans be restricted to ensure that there is no undue harm to our environment or a worsening of quality of life for current Oxfordshire residents?**

The funding gap for identified schemes is given as £6bn (Section 7.1). This does not appear to include the additional funding that will be needed to support the further schemes stated as necessary to tackle our climate and nature emergencies. What contingency plans are in place should the necessary funding not emerge?

We hope these comments are helpful and would be happy to discuss further as required.

Yours sincerely

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On behalf of the coalition



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## About Need Not Greed Oxfordshire

Need Not Greed Oxfordshire (NNGO) is a coalition of 36 groups from across the county, 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
- Environmental and rural sustainability, ensuring that our landscape, natural world and rural communities are at the heart of decision-making.