



Planning for Real **NEED** not Speculator **GREED** in Oxfordshire
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17 January 2022

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Oxford's Economic Growth Strategy consultation - Need not Greed Oxfordshire response, Jan 2022

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.

This is the NNGO response to the consultation on the new Oxford Economic Growth Strategy.

Thank you for the opportunity to respond.

We welcome the consultation but note that potential respondents are directed to an extensive questionnaire which will deter many. We also think this form of questionnaire lends itself to analysis designed to achieve wider support than really exists.

Accordingly, we have chosen to respond with an overview.

General Comments

The timing of the publication of this strategy is no doubt to inform the development of the 2040 Local Plan and an attempt to sway the outcome of the strategic FOP (Future Oxfordshire Partnership) Oxfordshire Plan 2050 in the direction of going for very high further economic growth levels in and around Oxford or into the so-called 'knowledge spine'.

There are many fine words about the three major issues on which the strategy focuses - namely Enabling a More Inclusive Economy, Becoming a Stronger Global City, and Moving Towards a Zero Carbon Economy. Many of the comments on the first and last of these are to be welcomed. However, for the most part, NNGO believes that many of these will turn out to be only fine words. For instance, although the Delivery Plan sets out actions and outcomes desired, these are not quantified and success or otherwise is not able to be measured. NNGO believes that all such strategies should be measurable - preferably by 'backcasting' (quantifying the outcomes intended and measurements of the steps required to get there).

This is particularly important because the 'motherhood and apple pie' approach conceals major and irreconcilable tensions within and between the issues and objectives of the strategy. This is critical in relation to achieving zero carbon. It is impossible to see how this can be achieved against the scale of the growth scenarios contemplated - ie the strategy seems to be pursuing the fallacy that infinite housing and very high levels of economic growth are possible on a finite planet; there being no recognition that continuing or increasing recent high growth levels is simply not compatible with achieving zero carbon.

There is a duty on central and local government to ensure that the net UK carbon account for 2050 is at least 100% lower than the 1990 baseline. The Strategy does not address wider environmental objectives and is wholly unlikely to be compatible with these. Indeed, any Strategy should take as its starting point the 2021 Environment Act which includes requirements to clean up the Country's air, restore natural habitats, increase biodiversity, reduce waste and make better use of our resources. These duties should be the underlying basis for all developmental strategies in Oxfordshire. As an example of how the natural environment has been overlooked, the Strategy mentions biodiversity only once and green space only three times.

In this context NNGO considers it may be significant that the Plan is steered by a subgroup of the Oxford Strategic Partnership whose membership is almost entirely from the business and commercial sectors whose focus is economic growth. It follows from our comments in the previous paragraphs about climate change, and wider environmental imperatives that the balance of the strategy is wholly skewed - and unfit for this century.

Worryingly, the strategy also indicates an apparent unconditional acceptance of the Arc. Hopefully it now appears that the government is retreating from its

previous commitment; NNGO believes that all the Oxfordshire Councils should also be doing the same

Finally, local public services have been grossly underfinanced by central government, particularly over the last decade, and have been stretched to their limits by recent levels of growth. It is difficult to see how they can possibly cope with the funding required for the sort of growth levels envisaged in this Strategy.

The City Council needs to decide whether it is sensible to pursue an apparently freestanding economic strategy. If it does, NNGO believes that it must start from scratch. One way to do this would be to embody the principles of Doughnut Economics - which sees the economy as embedded in the social and ecological fabric; the objective being to bring about an economic system which can achieve a prosperous yet truly inclusive society whilst preserving the planet for future generations. And in any event, if the Council wishes to appoint a steering group, this needs to have a proper balance between environmental and economic interests which is totally absent in the present structure.

There are one or two more specific issues of particular concern to NNGO. They are related.

Imbalance of jobs and housing

The most concerning is that (although comments on affordable housing are noted) the Strategy hardly touches on the issue of where the extra people are going to live. It gives the employment figure for Oxford at 123,500 and population of 151,600 - a very high ratio of jobs to residents. Simply taking these figures, it is clear there is already a huge imbalance of jobs to people which accounts for the heavy daily commuting flows to and from jobs within the City boundary which the strategy quotes as producing 50 tons of carbon every rush hour. Far from reducing carbon (and pollution) the proposals in the Strategy threaten to worsen the picture.

There have been huge releases of land - unprecedented in scale - to meet alleged Oxford housing need in the recent tranche of Local Plans for the four surrounding Districts. These have been mainly (and in one case entirely) in the Oxford Green Belt. (They have interestingly mainly been on land owned by Oxford University and its Colleges -see below). It is significant in this respect that the Plan on page 9 shows the Green Belt within the City boundary; however, outwith the City the Green Belt is not shown, and there are several 'Areas for Growth or Development' shown to the N, E and S, covering areas wider than those recent allocations.

As mentioned earlier, it seems the City Council is clearly seeking to use the Strategy to make its case in relation to the FOP Oxfordshire Plan 2050 for the housing requirements of additional employment growth to be met in areas outside the City boundary; a thinly disguised land grab which NNGO believes is likely aimed largely at the Green Belt. NNGO (together with other civic groups) has responded

to the recent consultation draft of the 2050 Plan asking for a Peer Review of the reasoning behind the unnecessarily high growth forecasts, and a response is awaited.

Moreover, despite much platitudinous ‘greenwashing’, the thrust of the Economic Strategy is to continue to give precedence within the City to the reservation of brownfield and other adventitious opportunities for yet further employment generation. This appears to include the fall out effects of Covid - which would be better taken to provide opportunities to put housing back into the City and local centres - as well as already suitable land unnecessarily safeguarded for employment.

All this is of course a double whammy - stoking up economic activity at the expense of housing in the City - and runs counter to the 15 minute neighbourhood concept the Strategy suggests. Were the City Council really serious about the Climate Emergency, it should be pressing the case for housing within Oxford and backtracking on its pressure for developing land on its fringes within the Green Belt.

‘Connectivity’

The Plan says much about ‘Connectivity’ but stops well short of saying how this will be achieved without damage to zero carbon requirements or the biodiversity and natural environment of Oxfordshire. ‘Accessibility’ (to services and jobs) is a better concept and is much more compatible with zero carbon. Getting as much housing back into the City in line with the 15-minute neighbourhood concept is the best way to get towards zero carbon. At the same time, this would help inclusivity.

Green Belt

The National Planning Policy Framework cites five main purposes of the Green Belt. In summary the first four are to check sprawl, to prevent merging of towns, to help safeguard the countryside, and to preserve the setting and character of historic towns. The significance of the fifth, ‘to assist urban regeneration, by encouraging the recycling of derelict and other urban land’ is often overlooked. All apply to the Oxford Green Belt. NNGO believes that the City Council, instead of continually pressing to expand its urban area (often at lowish densities) into the Green Belt, should be seeking to preserve it to meet all those purposes - not least that quoted in full above.

Levelling Up - and the Universities

NNGO welcomes the City Council’s emphasis on inclusivity; the issue for Oxford is not simply to create more wealth by increasing the quantum of jobs and people, but to concentrate on a fairer distribution of that wealth.

There is an interesting parallel here. The Government nationally has made a commitment to a fairer distribution of resources and opportunity - ‘Levelling Up’.

Details of this are expected from the Secretary of State for Levelling up, Housing and Communities shortly.

Given the charitable status enjoyed by the Universities and Colleges, it would be reasonable to expect them to pull back from their continuous pressure on the Green Belt and engage with such a strategy - not least by relocating investment into the regions, possibly by partnering arrangements with provincial establishments. Given the acknowledged finite availability of commercial space within Oxford this has to happen eventually, so why not start planning for it now.

Prime Minister Johnson has on several occasions spoken of the undesirability of building houses on greenfield land in England's overheated South-East.

Conclusions

The 'elephant in the room' is unquestionably the City Council's long-standing wish to see Oxford itself dominate a high growth local economy with the surrounding areas providing the housing. This concept is simply not compatible with zero carbon - or indeed many of the 'green growth' or inclusivity policies suggested.

And they are not compatible with Green Belt policy. NNGO believes very strongly that the Oxford Green Belt should now remain as the permanent designation that Government policy intends. Enough is enough.

NNGO believes that a properly strategic and justified Oxon 2050 Plan is the best way to begin to reconcile the inherent conflicts between economic growth, inclusivity and zero carbon. Primary focus must be on the latter two issues and environmental protection.

Were the City to decide that they wish to have a separate Economic Strategy, it must from the outset embrace coherent environmental and societal principles - such as those for instance set out in Doughnut Economics. The Council should remember that active involvement of its elected Councillors is the only way to present democratic accountability; if it nonetheless wishes to have oversight with representatives from outside bodies, then it must involve representatives from the environmental sector.



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