

## **Consultation Response from Oxfordshire Green Party**

### **OXFORDSHIRE PLAN 2050 – vision, aspirations and draft objectives**

#### **General comments**

##### **Addressing the climate emergency and unsustainable growth**

The UN Intergovernmental Panel on Climate Change (IPCC) reported in 2018 that very severe cuts are needed in carbon emissions by 2030 if we are to have any chance of limiting temperature rise to 1.5%.

As it stands the Oxfordshire Plan 2050 makes some references to climate change, but it is wholly inadequate in its response to the climate emergency. The plan needs to have as a central goal a ‘route map’ towards a zero-carbon economy. Every aspect of the plan needs to be considered in the light of the need to radically reduce carbon emissions and to adapt to cope with the damaging effects of climate change.

The Local Plans for each of the 5 Districts similarly need to be reviewed urgently and revised in the light of the climate emergency.

Forward planning for the County must recognise sectors which have to contract in order for a carbon-neutral society and a genuinely sustainable economy to be created (e.g. fossil fuel industry and investment/petrol and diesel vehicle production/fossil fuel intensive agriculture/flying/shipping), and those which must be significantly increased (e.g. local food production/forestry and the production of wood/renewable energy/energy efficiency/repair rather than replacement of goods, etc). In addition there needs to be much greater commitment to safeguarding the natural environment. This means favouring sustainable development in a consistent way, not adhering to the outdated and actually dangerous idea of conventional economic growth. The Oxfordshire 2050 Plan does not do this and is therefore unfit for purpose.

The continuing focus on economic growth in the county is also exacerbating the problem of lack of genuinely affordable housing, as we outlined in previous responses e.g. to the Oxford Local Plan.

A key assumption within the Oxfordshire Plan 2050 is the building of 100,000 new homes by 2031, supported by the ‘Growth Deal’. Even more are proposed beyond that. We have a number of concerns about this. Few of the homes will be affordable by local people. The plans are based on estimates of housing need that are grossly inflated (see the updated Oxfordshire Strategic Housing Market Assessment), and the resulting developments will therefore unavoidably create carbon emissions during construction plus many other negative impacts.

Instead of continually expecting Oxfordshire’s economy and population to grow unsustainably, there would be advantages to providing Government support to areas with more available brownfield sites and less water stress.

##### **Ending austerity**

A presumption running through the development proposals in this Plan is that very poorly funded public spending will be sufficient to support infrastructure and facilities development around over-estimates of housing demand. Devices such as CIL do not deliver enough funding for essential infrastructure. In short, assumptions about infrastructure delivery are completely unrealistic and development on the scale and at the speed suggested would require a new tax base for the country

and exceptional increases to training bursary/grant support to address the shortages of specific construction and engineering skills. Until there is political will to do this, the draft Oxfordshire Plan to 2050 is impractical.

## More detailed comments

### p. 2 *Introduction*

Since Oxford and Oxfordshire home prices are amongst the highest in the country, there are no 'affordable' market homes available to most people in Oxfordshire, for sale now or in prospect at present rates of delivery. The use of the term 'affordable housing' in Oxfordshire has little meaning and the funds allocated to or otherwise obtained by local authorities are far below meeting actual housing demand needs given that County average incomes are no better than the average for the UK. Councils being funded to buy homes on sale for social and keyworker housing inside existing settlements makes sense economically and socially, whereas dormitory settlements in the countryside will lack facilities under the current levels of public spending and will generate large additions to local traffic if ever built. Councils should be directed to seek building above private and public car parks, where suitable, as part of intensifying housing within settlements, near to existing facilities, and be provided with more funds to do this. Brownfield sites remain under-utilised everywhere.

p.3 **In the vision**, 'Sustainable communities' by 2050 should mean less commuting, more jobs within communities, adequately funded public services (which implies reversing the public spending cuts since 2010 and adding greater spending on education and health care) and dealing with the climate emergency. The vision needs reference to an ambitious target for achieving zero carbon and a strong statement on increasing biodiversity.

It should be noted that 64,000 people are dying prematurely in the UK each year due to air pollution, according to the latest research.<sup>1</sup> For every person who dies, many others will suffer from respiratory and other conditions that place demands on the NHS. A vision for Oxfordshire must include a plan for clean air.

p.5 The designated areas of the County are welcome, but designation for environmental protection, ensuring food security and sovereignty and extending forested areas in order to cut wood/wood product imports require much larger designated areas for these reasons and others – such as for eco-tourism. Building on greenfield sites should generally be avoided - to force developers to compete for social housing projects in existing settlements, and for refurbishment contracts where local councils buy homes on sale or use existing buildings and neglected industrial estate sites for homes. Investment in reducing traffic to cut air pollution and congestion is a substantial county need, perhaps via electronic road pricing as well as a year by year expansion of social housing and keyworker housing inside existing settlements, and using the existing built environment as far as possible.

p. 6 **Housing costs** have not been shown to go down as a result of increasing home building. In general, housing projections offer the wrong homes, in the wrong places at the wrong prices. The primary need for housing in Oxfordshire is NOT at market prices. We need social and keyworker homes inside existing settlements, by purchase, by sustainable retrofitting and refurbishment, and by zero carbon construction on brownfield sites.

p.6 The Oxford and Swindon water catchments become unsustainable through over-use in 2020. Planning for population increase throughout the whole Cambridge–Oxford Arc presumes the

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<sup>1</sup> <https://www.independent.co.uk/news/health/air-pollution-smoking-deaths-compare-a8818851.html>

existence of hitherto unknown sources of water. In terms of sustainability, inflated housing proposals are ecologically impossible and implausible in human terms without water. In terms of national priority, using existing settlements and their brownfield sites in areas of highest rainfall in the UK and highest levels of water availability would make sense, and have a potentially sustainable regenerative effect.

p.7 References to the A34 and A420 as heavily used roads illustrate the need for reducing car movements, especially for access to Oxford. The Cowley Area Transport Group has produced a report, *Electronic Road Pricing for Oxford* as a proposal for an Oxford City Region electronic road pricing trial for the UK, based upon the Singapore experience of operating this technology since 1998. We should not be building more trunk roads or increasing road capacity.

p.8 We strongly oppose the Oxford–Cambridge Expressway. It is not a done deal, nor has any consultation been made on the principle of this motorway and associated massive corridor development. It has attracted the formation of the No Expressway Alliance which currently has a network of 58 groups. A first judicial review effort is underway and it is quite probable that more will follow. Since this infrastructure does not address any known transport need, unlike the completion of a re-opened Varsity line (East–West Railway) and the re-opening of other rail lines to help reduce traffic, it is not possible to see why public money should be wasted to increase traffic in the Oxford and environs road system. We need a Government commitment to a general railway renaissance to cut traffic in Oxfordshire and elsewhere on grounds of greenhouse gas emissions, air pollution, noise and congestion. There can be no sustainable additions to road capacity, given the problem of induced traffic.<sup>2</sup>

p.10 You cannot protect the historic built environment and the ‘distinctive landscape character’ of Oxfordshire with concrete and tarmac, with new settlements facilitating more traffic movement in the process of unsustainable development. This is unsustainable in every sense, unwanted by many communities and inherently damaging to human health and our environment. Since the Oxfordshire 2050 Plan envisages environmental damage on a massive scale (low grade housing/Expressway etc) it is unfit as a set of proposals, being entirely unsustainable.

p.11 Decreasing traffic movements is essential to a healthy environment, as it is to sustainable communities. Investment in reducing traffic is already essential in the County and realistic sums of money need to be devoted to it, as part of the process of ending austerity.

p.12 There is an over-emphasis on the urban and industrial economy and inadequate recognition of the importance of rural businesses. As noted elsewhere, we challenge the assumptions on economic growth.

p.13 Housing projections are not reliable or realistic. The 100,000 homes target has been widely criticised as noted above. You cannot have sustainability if each new home being built is adding substantially to carbon emissions in its construction and operation, including consequent transport emissions. The proposals also fail to take into account the skills shortages in the construction industry.

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<sup>2</sup> For an extensive explanation of how new road capacity increases the number of car journeys and the distances driven, see:  
<https://webarchive.nationalarchives.gov.uk/+http://www.dft.gov.uk/pgr/economics/rdg/nataarchivedocs/tru nkroadstraffic.pdf>

Government hostility to migrants is currently prejudicial to meeting skills needs in construction and elsewhere.

The continuing focus on economic growth in the county is driving the proposals for additional house building and we challenge that level of growth as unsustainable. We have identified a range of ways in which housing needs could be met more effectively and sustainably than creating huge new private sector developments. Many of these were identified in our response to the Oxford Local Plan.

The failure to improve housing policy can become a failure of the JSSP/Oxfordshire 2050 Plan if the misplaced growth assumptions of bodies such as the Oxfordshire Growth Board and LEP are not set aside.

p. 15 Reducing the need to travel is an important objective, but we must also invest much more in enabling people to walk, cycle and use public transport. Disused rail lines need to be re-opened to cut car use, air pollution and congestion. Bus subsidies in rural areas need to be restored to minimise car use and give people choices about their journeys. Redesigning road and pavement conditions for cyclists and walkers is essential to public health and must be completed without delay. These actions will not take place without ending austerity.

Transport improvements should include better provision for cargo bikes and freight consolidation centres, to facilitate cycle freight (to tackle congestion, pollution and carbon emissions).

p.16 and 17 These options need more in-depth consideration. We recognise that developers may be unwilling to use some brownfield sites but normally these can be refurbished and used. This will have less impact on communities of all sizes, especially if car-free developments are increased and become a feature of far more communities. One purpose of doing this is to make commuting less likely, but the creation of a better economic role for councils as part of ending austerity is needed to create more employment in more localities: eg to get people into work/training who are unemployed/under-employed/not currently in education/employment/training – to enhance spending in the local economy to the benefit of local enterprises and local job creation.

p.18 ‘Key regional projects’: there are proposals for a reservoir, to which there are objections. However the issue is not just storage, but low rainfall compared to demand. Climate change is predicted to make rainfall more unpredictable – ranging from longer droughts to more flooding. Given the leakages, a key task for the water industry should be to plug its leaks prior to re-nationalisation and new investment. The problem of a lack of water supply from 2020 has not been addressed and this certainty is another reason for the failure of the Oxfordshire Plan 2050 to be practical.

We are totally opposed to the Oxford–Cambridge Expressway.

p.18 – 20 Many of the observations already made above are relevant to plans for infrastructure. We would add that the provision of health services should not be considered in isolation. Creating and maintaining healthy environments in which to live are crucial, for both mental and physical wellbeing. Green space plays a vital role in this.

25<sup>th</sup> March 2019