

9 September 2017

Paul Staines,
Oxfordshire Growth Board
c/o Oxfordshire County Council

By email:
growth.board@oxfordshire.gov.uk

working locally and nationally to
protect and enhance a beautiful,
thriving countryside for everyone to
value and enjoy

Dear Paul Staines,

RE: CPRE Oxfordshire response to the Oxfordshire Infrastructure Strategy (OxIS) Consultation, September 2017

The Oxfordshire Branch of the Campaign to Protect Rural England exists to protect and enhance the Oxfordshire landscape and its rural communities. We believe a thriving rural economy is vital to ensure these communities are sustainable for the future, places where people can live, work, shop, access services and enjoy the wonderful local landscape. Infrastructure is a vital element of building and protecting such communities, especially in the face of the significant growth planned for the county.

Summary

CPRE welcomes this attempt at identifying the infrastructure needed to support the current and future residents of Oxfordshire, especially as a first step towards a much-needed Joint Spatial Plan for the entire county.

We are however concerned by the growth assumptions on which the strategy is based, which have not been subject to public consultation, and the apparent serious flaws in much of the evidence provided. Whilst accepting this is a first stage report, the document is merely a wishlist of possible projects and cannot by any means be considered a 'strategy'.

The report acknowledges the deficit in existing infrastructure that has grown over recent years. Given the £8.5bn funding gap identified, it seems likely that this deficit will only worsen in the future. As most of the issues raised do not have any real plans for resolution or financing, the document is practically useless.

In these circumstances, our local authorities must make clear what steps they are planning to take to phase growth targets to ensure that infrastructure and services are not overwhelmed.

Overall comments

1. A full public consultation on the underlying growth targets is required as a matter of urgency. The growth targets on which this report is based have never been subject to public consultation and are therefore an inappropriate basis on which to be taking forward a strategic plan.

2. Evidence should be provided of how the information contained within the report has been assessed. As presented, this report is not a strategy but a wishlist of possible projects - in effect, a 'bidding document' to Government (as acknowledged by representatives at the public consultation event). There is no evidence of any robust examination or due diligence in relation to the information provided. This is particularly vital when data is being put forward by commercial businesses, which will not necessarily have the best interests of the Oxfordshire taxpayer at heart. Where issues are identified, there is currently little evidence about how the Growth Board will plan to overcome these. For example, it is recognised that the work to increase the capacity for the A34 / Junction 9 of the M40 has not worked and that this junction now has an increased number of accidents but there is nothing as to how to resolve this for the future.
3. A strategic environmental assessment is essential, to consider the cumulative impact of the proposed infrastructure. Whilst individual Local Plans may look at various elements of the strategy, this is not adequate in terms of the enormous development being proposed that could radically alter the character and landscape of the county and Local Plans do not cover issues such as allocation of health services. Serious impacts are suggested, for example in relation to our Areas of Outstanding Natural Beauty, and yet it is not clear how these impacts might be avoided or mitigated.
4. The report outlines a £9billion funding requirement, with only £0.5billion currently identified. However, the total figure appears to refer only to capital costs, not revenue and ongoing costs. When this is taken into account, the funding gap will clearly be even larger, with corresponding likely deterioration in levels of provision.
5. Many of the issues outlined in the report are related to national concerns such as the current stress on gas, electricity and waste water services. There should be a much clearer idea of how this "Oxfordshire Infrastructure Strategy" might fit in with any "national" infrastructure requirements.
6. The section on green infrastructure is very welcome but the needs and risks must be adequately assessed and addressed. Whilst there are many worthwhile projects contained in the Strategic Environmental Economic Investment Plan, this is merely a list of projects and not in fact a strategic look at the priorities for the Oxfordshire environment. The recent publication of Wild Oxfordshire's State of Nature report sets out a much clearer picture of the growing pressures and the overall priorities for action, in particular the need to create and maintain a cohesive, joined-up network of green space.
7. We are concerned that whilst the public is still being consulted on the contents of this first report, a second report has already been commissioned and appears to be well underway (with boards on show at the recent consultation event). How can the Growth Board reassure us that this consultation is therefore anything more than lip service?

Specific comments

We agree with the statement in the opening paragraphs of the Executive Summary that: "*Growth in Oxfordshire over recent decades has created a deficit in existing infrastructure*". With maintenance of existing services over-stretched, it is clear that substantial improvements will be required just to service the existing population, let alone the proposed growth (see below).

Population Growth

CPRE disputes the basic premise of this document that the population of Oxfordshire will grow by 267,000 people by 2040 with the need for 123,500 additional homes. We point out:

1. These figures are based on the extrapolation of the 2014 Strategic Housing Market Assessment. We believe the SHMA is flawed, assuming very high growth rates, elements of double accounting and a decrease in the average household size.
2. The SHMA report forecasts a growth rate of population between two and three times the Office of National Statistics projections (ONS) for south-east of England.
3. The OXIS report appears to extrapolate the SHMA figure to 2031 to 2040. However, the ONS projections clearly show population growth rates for England (and Oxfordshire) reducing from over 0.8% per annum in 2015 to 0.4% per annum by 2039. This is a direct result of aging population.
4. These figures (including the most recent ONS projections) make no account of continuing slow down of the UK economy and the effect of BREXIT. It is clear from recent figures that net emigration to the UK is dropping and surveys (and anecdotal evidence) suggest it is the young professionals who are planning to return to continental Europe. We may be facing a scenario of an increasingly aging population, but the report takes very little account of this possibility.

If Oxfordshire is to grow at 2 to 3 times the rate of the rest of the South-East it is at great risk of becoming a dormitory County to London. Network Rail anticipates a doubling of mainline passengers into Paddington by 2043, *and this is “without factoring in all of the potential growth in Oxfordshire”*. Again, we have the burden and the liabilities of such residents, without their working-economic input.

Whereas the public might hope that house prices would fall or stabilise due to extra supply, OCC-RIU anticipate that housing growth will greatly increase population, with a 3-fold increase in population relative to ONS figures. This means we are attracting in a large number of people (probably from London) to fill the homes, which would surely cause house prices to continue to rise.

Our population growth, now highly exacerbated by ambitious housing growth plans, is to be through *“a significant increase in the proportion of the population over the age of 70 years and...a decrease in the proportion of the population in working age”* (p.62)

These two factors coming together, a much higher population than expected due to building homes, and yet still an increased proportion of elderly versus working age people, indicates that we are building the wrong sort of homes, or that they are being bought by only the elderly who can afford them.

CPRE would like to see a thorough reappraisal of possible growth scenarios and the risks associated with the possible non achievement of these current projections.

Centralisation of services

A further general criticism of this document is the intended centralisation of services and facilities. There is a theme running through OXIS, that provisions should be centralised: for example, halving the number of Further and Higher education colleges, reducing local GP provision, closing local hospitals, closing police stations, reducing the number of waste recycling sites and bringing the elderly into purpose-built assisted living centres. These systems may reduce costs for the institutions but have a large social and environmental cost.

We should be aiming to use new communications technologies to disperse provision, so that citizens can travel less, rather than requiring them to travel more. It is easier to manage

traffic flows (in terms of people-movements) in a dispersed rather than a centralised form. We see this, for example, in health provision, recycling service etc. CPRE would like to see a strong rural economy supported by local and distributed services. This would reduce our current considerable over-reliance on car transport.

An overriding aim of new infrastructure must be to reduce vehicle movements - with associated congestion, air and noise pollution and parking problems.

Timing and funding of Infrastructure

CPRE is pleased to see a co-ordinated approach to infrastructure need in the County. There are serious issues about funding and timing which are referred to *“There is an increasing gap between the expected rate of growth up to 2031 and the ability to deliver key infrastructure”* (p.67).

Over-reliance on developer contributions is inappropriate. Developer contributions are not equal to the task of big infrastructure projects, and the money is generally released retrospectively leaving local people devoid of infrastructure in the interim.

We need to ensure that infrastructure funding is committed and available in advance of homes.

Roads

This document puts a high reliance on hard infrastructure, in particular roads. As history has shown us, adding to and widening roads leads to increased traffic, and frequently creates new pinch-points at other places. It encourages new traffic and unnecessary person-movements, swiftly catching up on the carbon and pollution savings that are made by reducing congestion and creating new routes (see for example: <https://www.cpre.org.uk/resources/transport/roads/item/4543-the-end-of-the-road-challenging-the-road-building-consensus>).

CPRE asks for a stronger commitment to reducing road traffic across the County and reducing the reliance on road building as an engine of growth.

Oxford-Cambridge Expressway (p.52)

CPRE is unconvinced of the need for, and is opposed to, an Expressway /Growth Corridor through the “Oxford/Cambridge Arc”.

CPRE Oxfordshire believes that if a case for extra capacity were to be proven, the East-West Rail project should clearly be put in place first, before any new roads are decided.

OXIS significantly downplays the impact that the Expressway would have on the Oxfordshire countryside, whichever route is chosen. For example, the potential routes cutting through the Vale of White Horse and South Oxfordshire’s open countryside and the Green Belt would be devastating and unacceptable.

OXIS also fails to acknowledge the vast associated development that would be required alongside the Expressway. The NIC has indicated that the scheme would be financed through the development of a million new houses, an average of approximately 10,000 houses a mile from Oxford to Cambridge, and associated employment.

OXIS should be revised to set out clearly the risks associated with the Expressway and associated development, and to prioritise East-West Rail.

Park & Rides (p.90)

CPRE Oxfordshire's position on Park & Rides is as follows:

- a) If communities are planned properly, with co-location of employment and housing, and adequate provision of high quality public transport, then Park & Rides should not be necessary.
- b) However, if P&Rs are required, CPRE advocates their location as close as possible to the home origin so that users can walk, cycle or 'kiss and ride' (acknowledging that this solution might potentially be described a 'local bus service'!).
- c) The next 'least worst' option would be to locate P&Rs as close as possible to the final destination, allowing speedy transfer across the 'last mile'.
- d) The worst option is a half-way house which sees P&Rs located in rural sites between major settlements. This would do nothing to reduce the number of car journeys but would shift congestion to rural roads and villages with inadequate supporting infrastructure, as well as impacting on the local landscape.

In Oxfordshire's case, the 'outer Park & Ride strategy' is based on a flawed policy of increasing employment growth within the constrained city of Oxford. Given virtually full employment levels in and around Oxford, there is no logical reason why land should continue to be allocated for employment creation in this area and reducing this pressure would reduce, or even remove, the need for outer Park & Rides.

Utilities

Electricity

There appears to be no long term strategy to upgrade the grid, with the quoted Scottish & South Energy's Long Term Development Statement only covering the period up to 2020. OXIS also reports (p134) the significant issues identified within Oxfordshire's Electricity Grid Market Failure Report (p134).

SSE's current plans (as outlined in OXIS) seem to be designed to deal with short-term issues with managing demand resulting from existing and new development. There is no strategic plan to produce a robust system of decentralised and renewable generation, and to cope with the anticipated increase in demand from the movement to electric-based transport and heating. Despite a desire and requirement (under the Climate Change Act and Paris Accord) substantially to reduce carbon emissions, no infrastructure investment is identified here to facilitate this.

Even the modest plans outlined here rely solely on developer contributions, despite the recognition that the cost is often too high for a single developer to bare, the likelihood of substantial co-ordination seems low, and the risks of insufficient funding for the network developments are high.

A full long-term costed strategy is required.

Gas

"There is an expected UK supply capacity surplus that is forecast to be sustained over the period of the LTDS (2016-2025)". (LTDS is SSE's Long Term Development Statement).

"Forecasted demand is projected to decline by approximately 10% between 2016 and

CPRE Oxfordshire response,
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2025". *"There is large potential and benefit from the development of alternative sources of gas, specifically bio-methane."*

To meet our climate change commitments, fossil fuel gas use should be being phased out, not in. New developments should not be incorporating gas as the means of heating.

"a full roll-out of smart meters, which are an effective means to reduce domestic energy demand, planned for the end of 2020."

The current performance of roll out of smart meters (for gas, electricity and water) has been woefully slow - a higher priority needs to be put to this.

Renewable Energy

We are deeply concerned to note that *"Oxfordshire will not meet its target of reducing greenhouse gas emissions to 50% by 2030"* in the Executive Summary, and that *"Oxfordshire needs to invest a minimum of £100 million / year until 2030 to achieve carbon reduction targets and meet the climate commitments set by national policy"* in this section.

As with Green Infrastructure, renewable energy here is presented as a means to producing its own growth and GDP, as opposed to a vital piece of infrastructure to support growth and to improve conditions for existing residents.

No strategy is presented for local production of green electricity, eg hydroelectricity projects on the Thames or widescale deployment of solar panels on 'dead' roof spaces, particularly on warehouses and other large commercial roofs. All new homes should be capable of significant solar generation.

De-centralisation of green electricity provision, with localised grids, often run by community groups, is a good model that has been used in other countries, notably Germany.

The report on Oxfordshire's Low Carbon Economy forecasts that with significant investment of £200 million/year, we could have 56% of electricity and 40% of heat provided from local renewables by 2030.

Even since this report, battery technology has progressed amazingly, and batteries are now being provided as part of household solar kits.

We need a costed Strategy for local green electricity generation.

Potable Water

Thames Water has added up all of the SHMAs and come up with a high level of water requirement that differs markedly from that which would result using conventional population predictions.

Note the primary driver for the proposed new Abingdon reservoir is not the needs of Oxfordshire but the needs of London and Southern Water. Oxfordshire's water needs could be tackled through other options such as improved sewerage treatment; or be achieved by a more aggressive leak reduction programme (including renewing mains pipes) and more stringent requirements for new-build to get down to 100 L/person/day.

We would particularly draw attention to, and endorse, the response to this consultation by GARD (Group Against Reservoir Development) which clearly sets out the flaws in Thames Water's approach and presents alternative options.

Broadband and Telecommunications (p160)

The proposed plan currently leaves over 20,000 people without broadband by 2019.

There is no plan beyond 2019, despite the recognition there will be continuing and increasing demand for broadband services into the future. What is the strategy to 2040 to ensure broadband for everyone? What is the cost? Who will bear the cost?

What is the strategy to bring at least existing best practice to Oxfordshire? It is astonishing that mobile coverage is still not available in many areas in Oxfordshire.

Broadband and modern telecommunications are crucial for the success of Oxfordshire's business and civil life. It is through efficient communication that we can enable rural businesses and the more remote communities to survive, whilst also reducing traffic and congestion.

Waste (p166)

This section paints a bleak picture for the future: with insufficient money to develop or run existing or new waste facilities; and existing HWRC facilities "*not fit for purpose*" in terms of reuse and repair.

The 2015 HWRC Strategy was generally regarded as inadequate. By closing sites, and centralising management to very few sites, would actually increase distances to be travelled and reduce convenience (and hence recycling rates). That strategy was driven by cost saving. The Key Findings do not address the chronic funding issues.

What is the strategy to 2040? What will it cost?

Flood Defences and Drainage (p172)

The report under-represents the importance of *pluvial* flooding: i.e. flash floods from rain. Recent events have shown many regions are now susceptible to flooding following heavy rain. It is very likely this has been exacerbated by increasing urbanisation.

On the 16th of September 2016, Didcot Station flooded and a line was closed. Didcot is a vitally important strategic point on the Great Western route and such a closure bears economic consequences. In 2014, an £8 million revamp and hard-surfacing of the forecourt and the carpark, with the carpark above the level of the station, was completed. Would lines have been closed and the station have flooded prior to these improvements? We cannot recall this having happened before.

The report ignores the vital importance of flood plain areas and the use of 'natural' flood prevention. There should be a strong commitment to preserving the natural flood plains of the Thames and its tributaries, and enhancing these where appropriate.

SUDS and Natural Flood Management

"It is often the case that the responsibility for maintaining Sustainable Drainage Infrastructure is not well defined and the maintenance regime itself is not quite as comprehensive as it should be. Therefore, a system to record and monitor such assets would be beneficial across the County to help ensure the level of protection they provide is maintained." (Page 181)

We need more than a system to '*record and monitor*', we need a robust mechanism to ensure maintenance is financed into the future.

What should we do in clay areas where SUDS may not be appropriate?

Natural flood management (recreating natural processes rather than SUDS) is given only a single paragraph and it is suggested that it *“its long-term cost should be relatively low”*. It may be true that the cost is relatively low compared to the £120 million Oxford Flood Alleviation Scheme but costs will be significant: there will be capital costs and there could be on-going costs (for example paying farmers to manage their land differently).

The ‘Key Findings’ in this section are inadequate.

- There is no reference to risk that new developments will increase surface runoff, with an absolute necessity for these development to include suitably designed SUDS to ensure flooding is not exacerbated.
- There is no reference to the serious issue of who maintains the SUDS.
- There is little recognition of the vital role played by the river flood plains and the absolute necessity (which also presents opportunities) that these are protected and enhanced.

Technology

Table 1.11 suggests that technological innovation will protect from flood, with *“more advance warning of flooding, more time to prepare appropriate response”*, and better catchment management.

Whereas technology can produce real advances in other areas (such as autonomous vehicles), there is no real technological ‘fix’ for flood risk. Flood risk requires working with the natural environment, and having respect to where development should be to work with the environment, not against it.

Areas of Outstanding Natural Beauty, the Green Belt and Green & Blue Infrastructure

The acceptance in the report that *‘Growth across Oxfordshire will place pressure on strategic green infrastructure assets and the broader natural environment, resulting from visual intrusion, increased recreation pressure, resource use as well as fragmentation and loss of habitat’* is of great concern. There seems to be an implicit acceptance that damage to these existing ‘assets’ can be mitigated, in order for ‘Oxfordshire to continue to enjoy the natural capital benefits these spaces provide.’ **Many of the natural assets at risk cannot easily be replaced and there should be a greater emphasis on working to avoid negative impacts.**

It is good to see the Oxfordshire AONBs, river corridors and the Oxford Green Belt recognised as an essential part of the Oxfordshire landscape. Many studies have shown the economic value of easily accessed green space, in terms of health and wellbeing of the population. Indeed the green character of Oxfordshire is what will attract high quality business to the region.

However many problems (and few solutions) are identified in this section.

At the landscape perspective for example, the Area of Outstanding Natural Beauty (AONB), the North Wessex Downs *“is already exhibiting some detrimental impacts on the character from development, which could be exacerbated by the significant planned growth around Didcot”*. This damage is not aided by our intent that *“the multi-functional nature of AONBs is promoted so that...economic development can take place”*.

‘the growing population across Oxfordshire is likely to increase pressure on the AONBs...additional measures will be needed to support the AONBs in accommodating additional visitors’

The AONBs suffer *“damaging land management practices...habitat and species decline associated in part with habitat fragmentation...inappropriate extraction of natural materials...concentration of pollutants [in some water bodies].*

Our rivers are at risk...*”significant pressure due to areas of growth”.*

CPRE would like to see a comprehensive strategy to assess and mitigate these risks.

CPRE welcomes the support for the Green Belt. It is misleading to state simply that *“A Green Belt has been designated to restrain development around the City of Oxford”*. The purpose of the Green Belt is clearly defined in law:

1. to check the unrestricted sprawl of large built-up areas;
2. to prevent neighbouring towns merging into one another;
3. to assist in safeguarding the countryside from encroachment;
4. to preserve the setting and special character of historic towns; and
5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

At least two recent studies in Oxfordshire have shown that all parts the Oxford Green Belt fulfil at least one of these purposes. It is a pity the report does not reference these studies fully. In addition, surveys show the majority of Oxfordshire residents support the preservation of the Green Belt.

It is true that parts of the Green Belt do not realise their full potential in terms of biodiversity and accessibility, and this could, and should, be improved but this not the primary function of the Green Belt designation. The Oxfordshire countryside and the rural setting to its historic towns are one of the main features which make Oxfordshire a desirable place to live and work and must be protected.

The Green Belt designation has served us well in the past decades and we need a firm commitment to the protection of the Oxford Green Belt.

Proposed Prioritisation Criteria (p210)

“Given the inevitable funding gap, the Oxfordshire Growth Board will have to prioritise clusters or portfolios of projects to focus on those that have the greatest impact and contribution to growth alongside socio-economic and environmental objectives.”

Thus, prioritisation will be of *“projects, focusing on their deliverability, scale of growth enabled and potential to leverage funding”.*

This extremely worrying statement indicates that areas of the County, whether by geography or other factors, will be deprived of sufficient infrastructure. The infrastructure required as shown in this Strategy is at the bare minimum (e.g. school places), and less than the bare minimum would be a serious deficiency. If it is necessary to phase, or slow, growth until finances are accrued to support it, then a safe and realistic plan would be to do just that. The alternative is for this time of growth to be accompanied by degraded services for our citizens i.e. economic growth actually leading to reduced prosperity and wellbeing.

The final OXIS document must set out what steps will be taken to phase, or even reduce, growth targets if funding for the necessary infrastructure is not achievable.

Yours Sincerely

Helen Marshall
Director, CPRE Oxfordshire