

SEP REFRESH CONSULTATION

Response from the OXFORD GREEN BELT NETWORK

The Oxford Green Belt Network (OGBN) was set up 20 years ago in response to a perceived need both to protect the Oxford Green Belt from inappropriate forms of development and to make its nature and benefits more widely known. We work principally with parish councils and with amenity groups that share our aims.

Question 1 - Content

We are pleased to note in the Foreword that Oxfordshire's key asset is recognized as being its beautiful environment and the quality of its natural capital resources. The latter are said to include the county's landscape and its open spaces in city, town and villages. It is also said that these assets, including the environment, 'flow through' the Plan.

Sadly we have to say that we do not find this latter statement to be supported by the text that follows. There is one reference to the Green Belt, on page 12, under 'Creating the Environment for Growth', but this is simply descriptive of the Green Belt's function in preventing sprawl and preserving the setting and character of Oxford. There is no recognition of the role of the Green Belt in contributing to the quality of life of the population and no attempt to set out any kind of policy for the Green Belt, this despite a reference to the need to recognize, respect and conserve the particular spatial characteristics of the county.

A Plan, if it is to be more than a description of characteristics, should give some indication of what is actually envisaged by way of respecting and conserving environmental assets, including the Green Belt.

Indeed the omission is all the more striking when one notes in Box 2 on page 45 (the annex referring to SEEIP) that the environmental '**assets are in decline**' (our emphasis). It seems to us extraordinary that the SEP should draw attention to the environmental assets of the county and, at the same time, do nothing at all to address the issue of the decline in these asset that is drawn attention to in the SEEIP.

If the SEP is really intended to be a Plan, it strikes us that it is disingenuous, even one might say dishonest, to claim that Oxfordshire benefits from its environmental assets without explaining why they are in decline and without saying what should be done to reverse the decline. We are left to conclude that it

is the growth agenda being promoted by the LEP that accounts for the decline in environmental assets and that it is intentional on the part of the LEP to ignore this fact in the SEP.

Question 2 - People

Population predictions are notoriously difficult and we would have liked to have seen some analysis of the extent to which further growth is local, i.e. derived from the existing population, and how much is due to external factors, i.e. the consequences of promoting growth. We get the impression that the latter is taking place with minimal concern for where future employees will live and what services they will require. The mismatch between jobs and housing at Oxford's 'Northern Gateway' is a good example of this, the consequence of which is the export of Oxford's housing need to neighbouring authorities, with consequential impacts on travel to work and transport issues, as well as on the Green Belt where it is being suggested that a lot of these people will need to live.

We have noted that the LEP takes no responsibility for the housing figures in the SHMA, leaving it to the local authorities in their Local Plans to determine what to do. Although you say that they are not bound by the SHMA's figures, these authorities find that their freedom of action is constrained by planning inspectors who abide by what is in the SHMA. It is a vicious circle in which no-one appears to take any responsibility, and everyone hides behind someone else.

Question 3 - Place

We are left wondering what the commitments referred to in the question actually are and where they appear in the Plan.

We have commented above in answer to Question 1 that no attempt is made to set out any kind of policy or strategy for addressing environmental needs and, in particular, the decline in Oxfordshire's environmental assets due to growth pressures. There is nothing, for example, under 'Priorities to 2020' about protection of environmental assets.

We regret the failure in the Plan to pay any attention to the Green Belt beyond the factual statement on page 12. The role of the Green Belt in preserving the setting and character of Oxford is too important to be ignored. We have to ask where in the Plan is the commitment to ensuring that the Green Belt does, in fact, perform this role? It is absent and, instead, we see the consequences of this commitment vacuum in the form of local authorities being obliged in their own Local Plans to set aside disproportionately large areas of Green Belt in order to accommodate the economic and demographic growth over which the SEP unquestioningly presides.

Question 4 - Enterprise

Reference to a 'knowledge spine' is redolent of those abstract spatial concepts which were favoured by geographers and others in the 1970s and which lack any more meaning than notions like that of a northern powerhouse. We recognize the potential for growth in knowledge-based industries, but call for a more realistic assessment of the merits of actual locations and of the need to spread the benefits of job creation more widely.

Question 5 - Connectivity

This section of the Plan is full of bland statements about existing and future transport infrastructure without any real recognition of the related issues. It is well known, for example, that there are severe problems on many parts of the existing road network, but no attention is given in the Plan to the difficulty of addressing this problem without causing significant damage to the environment.

A major failing of the Plan is the lack of attention given to the problem of air pollution. Air is named as part of the county's natural capital (page 45) but the World Health Organization has recently named Oxford as one of the most polluted cities in the country. Yet planning for growth continues without any apparent concern for this major health problem. Ignoring this cannot be justified.

Question 6 - Role and Responsibilities of OxLEP

We get the impression that OxLEP is prepared to abdicate responsibility for any of the data that forms the basis of the growth agenda on which the SEP is predicated, and that what it does is driven solely by its role in attracting the funding required to facilitate that growth. This does not seem to us to provide the grounds on which any kind of sound economic plan can be based, hence the failure of the SEP to present anything other than a promotional view of an idealised county.

Question 7 - Additional Comments

In conclusion, we find little in the SEP by way of a Plan. It appears to us to be a document which is designed to attract potential employers to the county and which, in consequence, is blind to the problems brought about by the envisaged scale of growth. These problems relate particularly to the environment, including those concerning the Green Belt, and as the SEEIP points out, they are only going to get worse without policies in place to address them. The LEP should not be presiding over an over-ambitious drive for expansion that risks destroying the very assets which they claim are one of the county's major attractions.