

March 23rd 2020

Introduction – The Covid-19 pandemic and possible changes to the Planning system

As the Covid-19 epidemic reaches Oxford, this OGBN Newsletter is sent out to all the Parish Councils within, or partially within, the Oxford Green Belt, for forwarding to individual Councillors together with a reminder that the annual subscription for a Parish Council to be a formal member of the Oxford Green Belt Network remains unchanged at a modest £15 p.a., which is still sufficient to cover the normal expenses of running this organisation by volunteers.

The work of our Parish Councils will now be focussed for several months on protecting the vulnerable people in our villages from this dangerous virus, rather than launching any new campaigns to save the Oxford Green Belt from inappropriate development. Nevertheless, the Committee of the Oxford Green Belt Network will continue to monitor the recently forecast changes to Planning legislation and to Planning procedures which central government may well make very soon to maintain the functioning of a Planning system during the period of this public health emergency. Some of the government's initial ideas can be read in the paper '*Planning for the Future*' which is available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/872091/Planning_for_the_Future.pdf

The Oxfordshire Plan 2050

By adopting a dangerous agenda of 'economic growth at any price' as an apparent starting assumption to shape the overall strategy of the emerging Oxfordshire Plan 2050, as promoted by the Oxfordshire Growth Board, the National Infrastructure Commission and England's Economic Heartland, enormous pressure has been placed upon the five District Councils in Oxfordshire to make provision for building houses in the Green Belt, and in numbers which far exceed the most generous calculations of our future housing needs using the government-approved standard method. The idea that Oxfordshire should double its housing stock and population by the year 2050 is fantastical, unsustainable, undeliverable, and it has never been approved as policy by any democratic public vote. As this Plan will become the over-riding top tier Plan for development in Oxfordshire, OGBN has responded robustly to expose the inappropriateness of the basic vision for the Plan, and the text of OGBN's formal response to the initial public consultation on this Plan may be read here: <http://www.oxfordgreenbelt.net/pdfdocs/OGBN-Response-to-Oxfordshire-Plan-2050.pdf>

The controversial Oxfordshire Housing and Growth Deal will provide a mere £215 million from central government funds as a small contribution towards cost of the infrastructure to support the additional 100,000 new houses targeted to be built as part of the Deal by 2031. This is not a significant contribution to the realistic cost of the future infrastructure which even the County Council itself calculated would be close to £9 billion. If the population of Oxfordshire is to be doubled by 2050, one is bound to ask how realistic are any plans to provide all the additional healthcare infrastructure needed to support even the routine needs of such an increased population – presumably with a 2nd John Radcliffe Hospital, a 2nd Churchill Hospital, a 2nd Nuffield Orthopaedic Centre, and a 2nd Horton General Hospital, as well as more than double the number of GP practices? The unprecedented rate of house building proposed in this Housing and Growth Deal is likely to be undeliverable in practice, and the housing to be built in the Green Belt would carry a high cost in terms of irreparable damage to the natural environment, its biodiversity, and to public health. In the emergency of the Covid-19 epidemic we are sadly seeing the results of the long-term under-funding of our presently very stretched NHS services in Oxfordshire, and despite the conscientious and highly motivated efforts of our NHS staff, it is patently obvious that we currently need a far greater provision of NHS facilities in Oxfordshire, before any thought should be given to doubling the county's population.

OGBN Committee – representations made for OGBN members

Our OGBN Committee will not be meeting together physically during the Covid-19 epidemic, but will be sharing any important ideas and information by e-mail and telephone because there is a lot of unfinished business which the Covid-19 epidemic has now interrupted:

The Oxford Cambridge Expressway – The OGBN Committee established OGBN as an officially registered Highways England consultee for the Oxford-Cambridge Expressway, and has made formal and informal representations directly to Highways England on behalf of all the parishes in the Oxford Green Belt, to express our objections to the routing of this Expressway through the Oxford Green Belt. We have held a series of meetings over the past two years to communicate this to Highways England's senior management team for this project, and to their environmental engineers from Jarvis Inc. OGBN's position has consistently been to **object to any Expressway being built across any part of the Oxford Green Belt**, (i.e with no preference for any specific route). While OGBN has also supported the strong campaign against this unnecessary motorway mounted by the CPRE Oxfordshire, OGBN is also a member of the *No Expressway Group* and the *No Expressway Alliance*, and some OGBN Committee members support the *Expressway Action Group* as representatives of their own Parish Councils. However, we have restricted our OGBN representations to objecting to the construction of this Expressway solely in Oxfordshire, whereas some of the other campaigning groups have adopted a much broader remit to attack the whole concept of the Expressway in all the counties which it might cross. We have made a strong and convincing case against the Expressway. Our position has been that the East-West Rail link should be completed and electrified first as a sustainable transport link between Oxford and Cambridge before any consideration is given to an Expressway, which we consider would be unnecessary if some overdue improvements are made to those main road junctions in Oxfordshire where traffic congestion is now a daily problem.

We were promised a public consultation on a selection of Expressway routes last summer, then postponed into the autumn, but those consultations never took place, and then the Transport Minister Grant Shapps stated, when he visited Oxford, that it would all be reviewed, especially if it lacked local support or provided a poor return on investment. No policy decision on the Expressway appeared in the Budget, and the next National Infrastructure Strategy, which must obviously deal with the issue, is not now expected until May. The potential effects of the Expressway passing through the Oxford Green Belt would have enormous implications for all of the Local Plans, by rendering them unsound, as they currently take no account of its possible impact, and would need major revision to integrate it together with the vast swathe of housing development proposed alongside it at an average distribution of about 10,000 dwellings per mile. We currently expect that the section of the Expressway through Oxfordshire will eventually be cancelled, but there is absolutely no reason to close down any campaign to oppose it until that is formally confirmed.

Cherwell Local Plan 2011-2031 – The interests of OGBN were represented very competently by a professionally qualified OGBN Committee Member in the hearings of the Examination in Public of the emerging Cherwell Local Plan 2011-2031. The crucial issue of the Council's controversial proposal to build more than 4,000 houses in the Green Belt, to meet a grossly inflated unmet housing need, was very surprisingly approved by the presiding Inspector Mr. Paul Griffiths, who holds a professional qualification in Architecture and seemed not to appreciate the sound logic of the criticism raised of the faulty methods used in Oxfordshire and in Oxford City to calculate housing need. Cherwell Development Watch Alliance (CDWA) was supported in these hearings by a specialist Planning barrister and by the compelling evidence from its specialist consultant on the calculation of housing need from Opinion Research Services (ORS). Aside from the faulty calculation of housing need in this Plan, it was illogical for a District Council to be planning to accommodate Oxford City's claimed unmet housing need before the Oxford City Local Plan 2036 had any confirmed and agreed figures for this.

Oxford City Plan 2036 – The OGBN Committee Member representing Cherwell Development Watch Alliance (CDWA) at the relevant hearings of the Examination in Public of the emerging Oxford City Local Plan 2036 generously agreed to also represent OGBN's interests, since the interests of CDWA and OGBN

in the protection of the Oxford Green Belt are identical, and because the crucial arguments about the City's miscalculation of its housing need had already been well researched by CDWA. CDWA again presented a clear and compelling case to indicate that Oxford City Council had incorrectly calculated its own future housing need, and therefore also its unmet housing need which it wished to see exported into the adjacent Districts. The specialist housing need consultant from ORS produced and presented a wholly professional report showing in convincing detail how the City Council had grossly exaggerated its housing need, and therefore the projected annual house building rates up until 2036 to achieve this. ORS proved that a very generous rate of house building sufficient to meet the City's properly calculated housing need would be 776 new dwellings per year, whereas the City Council claimed to need 1,400 dwellings per year. To the great dismay of several OGBN Committee Members who attended these EiP hearings, the presiding Planning Inspector, Mr. Jonathan Bore, accepted the City's erroneously calculated future housing need, and accepted that with such a shortage of housing and the need for the City to meet its growth obligations under the Oxfordshire Housing and Growth Deal, "exceptional circumstances" exist to build housing in the Green Belt to meet that need. Mr. Bore also made it clear in discussion at the EiP that he accepted that it was national policy to accelerate economic growth in this region, which indicates that OGBN will have some problems persuading him otherwise when he also presides over the long-delayed Examination in Public of the controversial South Oxfordshire Plan 2034.

South Oxfordshire Local Plan 2034 – The strange saga will be well known to most Parish Councils of how in 2018 SODC abandoned a perfectly reasonable Local Plan 2033 on which a meaningful Regulation 18 public consultation had been properly carried out, and in which the policy to protect the Oxford Green Belt was a high priority, then to substitute it in 2019 with a very hastily produced Local Plan 2034, which prioritised building strategic housing in the Green Belt, and omitted a Regulation 18 consultation about it. Proposing major strategic housing sites in the Green Belt was claimed to be a sustainable solution for accommodating the claimed unmet housing need of Oxford City, but the existence of any 'exceptional circumstances' for allowing them will be debated in the eventual Examination in Public. While the lawfulness of that major change in strategy without a further meaningful public consultation is still open to question, the great volume of objections to the policies in that Local Plan 2034 on its publication under Regulation 19 was some indication of the strong public rejection of it. This rejection became evident when the May 2019 Local Elections returned a majority of Lib Dems and Greens to run SODC and to produce a more appropriate Local Plan. When the Lib Dems and Greens in SODC decided to abandon the controversial Local Plan 2034 produced by the Conservatives, the Rt. Hon. Robert Jenrick MP, the Conservative Secretary of State in the Ministry of Housing, Communities and Local Government, used his legal powers very controversially to prevent SODC from working towards a new Local Plan, and forbade all work on it for 5 months. He finally threatened SODC with a further directive to continue to progress the controversial Local Plan 2034 to an Examination in Public, against the will of the majority of the new Councillors who were elected in 2019, or he would hand over the responsibility for progressing the Local Plan to Oxfordshire County Council. SODC was thus forced to surrender to Robert Jenrick, and yet another blow was struck against democracy for the people of Oxfordshire. The onset of the Covid-19 virus epidemic has intervened before a date for the Examination in Public of this unpopular Local Plan 2034 has been set, but this delay will provide OGBN with additional time to refine its strategy for objecting to it.

Oxford Flood Alleviation Scheme - This elaborate engineering project (OFAS), costing £150 million, to excavate 400,000 cubic metres of material along the Thames flood plain to create a new 5 km long flood overflow channel from Osney to Sandford-on-Thames, will destroy the rich natural environment of Hinksey Meadows, and it will involve a stream of lorry movements every day during a 3-year-long period of construction, with the eventual greater excavated volume of the material piled in a vast heap in a beautiful part of the Green Belt. OGBN does not deny that Oxford has a flooding problem, but has objected to OFAS because of its negative impact on the Green Belt while delivering only a partial and temporary solution to this flooding problem. Although OFAS is claimed to present an engineering solution viable for 100 years, OGBN has criticised the Scheme for more likely being a relatively short-term and partial solution to a long-

term flooding problem when climatic change is clearly occurring more rapidly than was originally forecast. With progressively increasing amounts and intensities of rain forecast to fall into the catchment of the upper Thames in the next few decades, it may not be able to provide total protection for Oxford against flooding. The need to replace the railway bridge at Kennington and incorporate the OFAS channel beneath it will delay this project since additional Planning Applications will be required to cover this complication.

The enhanced functions and health benefits of the Green Belt – It is clear that the Oxford Green Belt will be under threat of being seriously eroded by inappropriate development until its enormously valuable contribution to the sustainability of Oxford itself is fully recognised by Planning Inspectors, and until some the Green Belt's enhanced functions are explicitly protected in new Planning legislation. If the ridiculous aim of doubling the population of Oxfordshire by 2050 is imposed by central government on our District Councils as part of the national policy to develop the so-called 'Knowledge Arc' between Oxford and Cambridge, it will be necessary for OGBN members to demonstrate that the protection of the Oxford Green Belt should be a high priority for a wide range reasons which enhance and explain in objective terms why the concept of "openness" is still valuable. The protection of the "openness" of the Green Belt is still fundamental to OGBN's campaigns, but its beneficial consequences for public health are not yet detailed in Planning legislation. Inappropriate developments which significantly reduce this required "openness" within the Green Belt are still routinely refused Planning permission, but increasingly, a wider range of "exceptional circumstances" are being allowed by Planning Inspectors who have accepted that a shortage of housing for economic growth has greater importance than the protection of the "openness" still required in a Green Belt by national Planning policy and guidance. The value of "openness" is often sadly regarded in the media as being a benefit which only those living in the Green Belt can enjoy, and so those living in Green Belt villages tend to be labelled in some debates as NIMBYs. With clever lawyers and planning consultants to assist with the presentation to Planning Inspectors of developers' intentions to build in the Green Belt, the real value of this "openness" to the residents of our historic city is often submerged in the discussions at Planning Appeal Inquiries and Examinations in Public between the developers and the environmental groups like OGBN and CPRE Oxfordshire. So at the time of this terrible coronavirus epidemic it will be appropriate to start emphasising the health benefits to Oxford of maintaining and enhancing the Green Belt, rather than allowing it to be progressively bitten into by the expansion of the urban area of Oxford City:

1. **A 'Climate Emergency' has been declared in Oxfordshire**, and the confidently predicted future episodes of very high daytime summer temperatures of around 40 degrees Celsius will have their most severe impact on public health in Oxford City, rather than in the surrounding Green Belt. One very important way to prevent a city getting any hotter is to restrict its geographical spreading into the surrounding countryside, and in our case to protect the inner boundary of the Oxford Green Belt so that cool air from the vegetated surrounding area can enter the city by the shortest route to dilute the hot air inevitably generated there by the sun's heating of the city's buildings and roads. The relationship between high urban temperatures and increased death rates in heat waves was well-established during the 2003 heat waves in London and in French cities, when the UK lost an additional 5,000 vulnerable people, and France lost 15,000. If London Airport's plans for a third runway can be found unlawful and unsound for not recognising and taking proper account of the Climate Emergency, then Parish Councils within the Oxford Green Belt should be ready to use similar reasoning to keep the Green Belt "open".
2. **It is now well established that some 40,000 people in the UK die each year as a result of over-exposure to air pollution.** The focus of much research into this causal relationship has been on concentrations of oxides of nitrogen from the exhausts of motor vehicles with combustion engines. Oxford City experiences higher air pollution levels near its centre, and while the elimination of motor vehicles there will reduce the health risks from that source, pollution levels in the city centre, and in different suburbs according to the wind direction, will increase if the city is allowed to expand geographically into the Green Belt, and thus increase the time it takes for fresh air from the Green Belt

to reach the city centre and dilute the air pollution concentrated there. The longer the trajectory of air from the Green Belt into the city centre, the warmer it will be when it arrives there, which is no advantage for cooling the extreme hot spots now expected there in a heat wave. As more scientific and medical evidence emerges about the human impact of the full range of PM10 and PM2.5 microparticles, the same argument for limiting the geographical expansion of Oxford into the Green Belt should apply. More data is needed to become detailed objective evidence of the contrast in pollution concentrations between Oxford City centre and the “open” well-vegetated areas of the surrounding Green Belt.

3. **It is now well-established that for an urban population to have easy direct access to open green space is of enormous benefit for physical and mental health.** Easy and free access for the urban population of Oxford to the open countryside of the Oxford Green Belt has already provided people of all ages with the safe and unpolluted environment which they need for enough physical exercise to stay healthy, for appropriate rehabilitation exercise after medical or surgical treatment, and for de-stressing and relaxation therapy for those with mental illness. The development of Primary Care Networks (PCNs) in Oxfordshire, which incorporate several GP practices into each PCN with an average total in each PCN of around 30,000 patients, has now facilitated the appointment of Social Prescribers. Social Prescribers in Oxfordshire can prescribe the use of the countryside for patients who might otherwise need more traditional medical treatment for their conditions. In Oxford, the pioneering charity, the Centre for Sustainable Healthcare <https://sustainablehealthcare.org.uk/what-we-do/green-space/green-health-routes> has already set up Green Health walking routes in Jericho and Marston, and it will be advantageous and strategic to encourage this initiative to be copied throughout our other Green Belt Parishes. The case for preserving the “openness” of the Green Belt, and restricting the threatened outward sprawling of Oxford City, will be stronger when more such schemes are actually in operation.
4. **In the present coronavirus pandemic the easy access to the Oxford Green Belt by people living under the regime of self-isolation is proving to be vitally important.** The “openness” and space available for recreation in the Green Belt allows people recovering from the virus, or in high risk groups from this virus, to take exercise and keep to the guidance of being separated from any other persons by a distance of 2 metres. This epidemic is likely to be slow to be finally contained, and recommended long-term self-isolation in people’s houses and their back gardens is likely to feel like a burden for many people, but access to the Green Belt for safe excursions from home will become increasingly important. As this unexpected health emergency has occurred once, it is important to provide ways to mitigate it in case it occurs again, so the high value of keeping the Oxford Green Belt “open” should be recognised.

This short list of some of the health benefits of the Oxford Green Belt is not intended to be exclusive or exhaustive, but is offered merely as an illustration of the kind of additional arguments and evidence which OGBN may need to use when defending the essential “openness” of the Green Belt which is currently protected in the NPPF and other Planning legislation, but without this specific emphasis on health.

The Oxford Green Belt Committee will continue to monitor major Planning policy developments in Oxfordshire which may be relevant to the Oxford Green Belt, and within the limits of OGBN’s resources, will attempt to respond appropriately. The Oxford Green Belt Network has been fighting to protect all of the Oxford Green Belt since 1997, and the present Committee of only 9 people includes one of the Network’s original founders and several Parish Councillors who are very experienced in Planning matters in other organisations, but they would also warmly welcome some more volunteer representatives from our Parish Councils to bring the Committee strength up to 12, especially if any new volunteers also have some knowledge of the complexity of our Planning system.