

This is the consultation response from the Oxford Green Belt Network to the public consultation on the Vision set out for the Oxfordshire Plan 2050

Dear Sir or Madam,

The Oxford Green Belt Network (OGBN) is a non-profit-making community organisation which attempts to represent the interests of the majority of the interests the 61 parish councils and parish meetings of villages within the Oxford Green Belt in their efforts to protect the Green Belt for the greater benefit of Oxford City and Oxfordshire as a whole. OGBN is non-political and is advised by a committee of residents experienced in town and country planning, in environmental planning, and in community-led planning.

This consultation on the vision for Oxfordshire in this Plan 2050 does not provide enough scope for any respondent to propose a different future vision for the county other than that of very rapid economic expansion to 2050 with a faster rate of demographic growth to 2050 than has ever been recorded before in the county's history, largely to be achieved by immigration into the county and by the establishment of new areas of high density settlement in rural areas, all of which is dependent upon the availability of the required investment in the county's infrastructure, and by investment in new employment – none of which can be forecast with any accuracy, even before the implications of Brexit are considered. This adoption of a fundamental strategy for very rapid growth in the county has not yet been offered for public consultation and reasoned debate through any of the normal processes of the Planning system available to the Local Planning Authorities operating in Oxfordshire, and while the current consultation is open to everyone, the fundamental choice of a strategy to promote such rapid growth in the county has apparently already been taken by unelected bodies:- sequentially by the National Infrastructure Commission, by OxLEP, and by the Oxfordshire Growth Board – none of which fairly represent the full range of interests of all the residents of Oxfordshire, nor are lawfully given the responsibility for structure planning in the county. Thus from its very inception, the governance of the Oxfordshire Plan 2050 will be faced with an already restricted range of choices for planning the sustainable development of the county. The future governance and accountability for the Oxfordshire Plan 2050 needs to be more transparent and locally accountable, and the way this will be achieved is not made clear in this Plan. While we appreciate the great advantages of developing the Oxfordshire Plan 2050 as a Joint Statutory Spatial Plan for Oxfordshire, we feel that the proposed governance of this Plan is insufficiently democratic, and that local Planning policy should be more firmly rooted in the Planning Services of the Local Planning Authorities. In the immediate focus of this consultation, we are concerned that the results of this public consultation may be indicators of only such very general public preferences that they will lack value in determining the spatial strategy required to address specific problems in Oxfordshire.

The proposed level of growth would be transformational to Oxfordshire and may have massive and possibly negative environmental and social impacts, and yet there has so far been no open public

debate on its merits or demerits – the growth targets for this Plan are already assumed to be the appropriate ones, and it is dangerous to assume that they are even achievable. Such phenomenal growth must be justified in terms of the benefits it will bring to the people who live in Oxfordshire, and the vision and potential scenarios for development in the Plan should show how they might actually be delivered here; ambitious growth should not simply be represented in the vision as an end in itself. This Plan is dependent for its viability on getting large numbers of people to move into Oxfordshire. However, the OxIS estimates that an investment of approximately £9 billion is required in the basic infrastructure in Oxfordshire, and with regard to this infrastructure deficit, the Oxfordshire Plan 2050 should have set more realistic limits to the future vision of economic growth and reduced the aspiration for such a large population explosion in the county.

The expressed vision of doubling the number of houses in Oxfordshire by 2050 is clearly not based on an understanding of the infrastructure required to support such a population explosion, or on any realistic vision of how the new high density settlements to be required in the county would be accommodated into the existing settlement pattern of the county. The National Infrastructure Commission had clearly accepted the notion, probably originating from the Treasury, that the so-called Oxford-Cambridge Knowledge Arc of settlements could be made even more productive in terms of tax revenue, by installing an East-West Rail link along the whole of the Arc and by building a new motorway to be called the “Oxford-Cambridge Expressway” through this Arc around 50 miles radius from London to improve connectivity and accelerate economic growth.. The notion of some kind of linear city, or at least a linear arc of suburbia, to be built at a radius of about 50 miles out from London is not new, but its practical implementation is entirely experimental. Furthermore, its value as a generator of new economic growth in Oxfordshire is unproven, given that this Arc would be well within the radius of London commuters and the alleged local benefit from the provision of the excess housing proposed here would be diluted as much of it could go to accommodate commuters to London. In the absence of any clear Planning guidance on the creation of a linear arc of settlement, the NIC invited suggestions in a useful report from the 5th Studio/SQ5 planning and design consultancy on how it might be built as an agglomeration of distinctive neighbourhoods, and it is at that level of comparing and evaluating these various styles for future urban living that the size of the problem produced by the growth agenda in the Oxfordshire Plan 2050 should be assessed and consulted upon. This Plan 2050 does not set out the various options for different styles of low and high density living in the county, so it is therefore an important omission that no options for these proposed alternative styles for new settlements have so far been offered in this consultation as their consideration would form an important part of any resident’s vision for the development of Oxfordshire to 2050.

From the perspective of the Oxford Green Belt Network (OGBN), the vision expressed in the Oxfordshire Plan 2050 seems to focus too heavily on the continued expansion of economic enterprise in Oxford itself, whereas OGBN considers that any further geographical extension of

Oxford City into the Green Belt would be seriously detrimental to both the attractive character of this historic university city and to the health of its residents. Oxford is approached by 5 radial arterial roads, 3 of which cross rivers into the city centre on the only 3 main road bridges, and in the city itself, the historic street pattern developed over hundreds of years around many buildings of high historic, architectural and cultural importance, is not capable of modification to accept more vehicular traffic. There is insufficient land within the Oxford City boundary for any significant further expansion of economic employment in the city, and with such great physical constraints on the infrastructure for surface transport in the city, it is unsustainable for any more employment to be created there. The radial and arterial by-pass roads serving Oxford are already blocked by road traffic for hours on every working day because of a flawed policy by the City Council to increase employment up to its present maximum without building appropriate high density housing for city employees within the city and thereby reduce the need for 47,000 workers to commute in from all over Oxfordshire. Not only must it be accepted in a vision for Oxfordshire 2050 that the geographical expansion of Oxford City must be arrested to sustain the attractiveness of this city as a place in which to work, live and study, but also that sustainable growth in other settlements must be prioritised to locate future housing near future employment so that sustainable means of transport can be used for the journey to and from work. The development of Didcot Garden Town is an impressively successful model of integrated development in the Science Vale which could be applied elsewhere in Oxfordshire to bring economic growth in a sustainable way to areas of the county and away from Oxford City itself. So our criticism of the Plan is that it tends to be focussed too closely on Oxford itself, which is unnecessary when even for spin-off science and technology enterprises from the city's universities are concerned, very few of the entrepreneurs need to physically visit their parent universities when fast fibre optic Internet connectivity now provides most of the communications which they need.

The priority of environmental sustainability should have been embedded in the Oxfordshire Plan 2050, with environmental and social sustainability given at least equal status to that of economic growth. The challenge of climate change to various future scenarios in the development of Oxfordshire to 2050 has not been addressed in the Plan. Global atmospheric warming is an established fact, and its progress is well documented over the last 100 year, but the consequences of this producing greatly contrasting extremes of weather in a single decade, and even within a single year in Oxfordshire have not been taken account of in this Plan. For example, in central Oxfordshire the Oxford Flood Alleviation Scheme will provide only temporary and partial protection against the increased risk of flooding in parts of Oxford City near the flood plain, and long-term settlement planning will need to avoid more areas with an increased flood risk, which will mean the relocation of some of the county's established riverside developments to higher ground, and the strategic priorities for doing this, as well as the societal implications of such a strategy, need to be considered in an Oxfordshire Plan 2050, but they are unfortunately omitted from this initial introduction to the Plan. The variability of weather which comes with accelerated climate change will become a major challenge to

reliable food production in the county, where agriculture is based on a wide variety of clay and calcareous soils with different sensitivities to climate change in their ability to support the high yielding food crops needed to feed an increased population in the county, so that productive agricultural land will have a high value, acting as a barrier to its use for any other economic activity. The current population of Oxfordshire will currently have barely enough water for healthy living if the county experiences two consecutive years of winter and autumn drought when the aquifers supplying water would normally recharge after depletion during hot summers, and if the population is increased at the rate set out in the Oxfordshire Plan 2050, the risk to public health would be severe during a persistent heat wave in the second summer in such a very likely short 2-year sequence of weather. With the increased risk of periods of very high summer temperatures in towns in Oxfordshire as a result of climatic change, there comes the risk of increased premature mortality in an ageing population, often with multiple co-morbidities, and in a future vision for Oxfordshire in 2050 we ought to examine the various options for innovative urban design and for sustainable energy-saving building design which will increase the survival prospects of the projected increased urban population which, to achieve the Plan's targets, will be living at higher densities of dwellings per hectare than ever before experienced in Oxfordshire. In planning human settlements with a priority for optimising human health, the value of green space within urban developments and the value Green Belts around cities is very high in controlling dangerous extremes of air temperature and air pollution, and the value of extensive woodland and a continuous network of green and blue wildlife corridors in rural areas is important in protecting the high biodiversity as a natural capital asset which supplies such ecosystem services as clean air and water. The Oxfordshire Plan 2050 envisages such an unprecedented increase in the county's population that the priorities for competitive land use will need to be set by policy, and in the Plan offered for consultation there is unfortunately little indication of what options may exist for adopting the most appropriate policies for land use to address the combined challenge of satisfying the essential survival needs of a vastly increased population in a rapidly changing climate and the need to render any development sustainable in more frequently occurring extreme weather that is certainly capable of causing loss of life.

Overall this Oxfordshire Plan 2050 sets out in the Vision and Aspirations sections some very worthy but very general aims, and it is only in the Potential Spatial Scenarios section that there is some focus on the kinds of choices between different types of development which must be made, but the options are still described there as generalities which do not appear specific to Oxfordshire. It is only in the last paragraphs 60-78 that the Plan begins to address specific planning options which are essential ingredients of a meaningful Oxfordshire Plan to 2050. It is to be hoped that some of the specific infrastructure projects like East-West Rail, the Oxford-Cambridge Expressway, the re-design of NHS service provision in Oxfordshire, and Thames Water's strategic plan for Oxfordshire will soon report more definite progress to allow a more focussed Oxfordshire Plan 2015 to emerge.