INTRODUCTION

1. Oxford’s Green Belt was formally designated in 1975 to specifically preserve the historic setting and prevent the urban sprawl of Oxford. It also protects the individual towns and villages around Oxford allowing them to retain their separate identities. Within the Oxford city administrative area there are approximately 1,287ha of Green Belt land.

2. The NPPF (2019), states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The NPPF (paragraph) also sets of the purposes of the Green Belt. These have been used as a set of assessment criteria against which potential development sites are assessed. They are as follows:
   a) To check the unrestricted sprawl of large built-up areas;
   b) To prevent neighbouring towns from merging into one another;
   c) To assist in safeguarding the countryside from encroachment;
   d) To preserve the setting and special character of historic towns; and
   e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

3. Part of the importance of the Green Belt is the impression of permanence. Nevertheless Green Belt boundaries are not set in stone; the NPPF states: “Once established Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or updating of plans. Strategic plans should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been demonstrated through a strategic plan, detailed amendments to those boundaries may be made through local policies, including neighbourhood plans.” The Local Plan 2036 is a strategic plan as defined in the Glossary to the NPPF.

EXAMINATION OF ALL OTHER REASONABLE OPTIONS

4. The NPPF sets out that the strategic plan making authority should have examined all other reasonable options for meeting its identified need for development before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries.

5. The criteria to be considered are whether the plan’s strategy:

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1 Paragraph 133, NPPF (2019)
2 Paragraph 134, NPPF (2019)
3 Paragraph 136, NPPF (2019)
4 Paragraph 137, NPPF (2019)
a) Makes as much use as possible of suitable brownfield sites and underutilised land;
b) Optimises the density of development, including whether policies promote a
significant uplift in minimum density standards in town and city centres, and other
locations well served by public transport; and
c) Has been informed by discussions with neighbouring authorities about whether they
could accommodate some of the identified need for development, as demonstrated
through the statement of common ground.

BROWNFIELD SITES AND UNDERUTILISED LAND

6. Oxford has had a long-standing policy of focussing the delivery of new housing on
brownfield land. The NPPF defines previously developed land as: “Land which is or was
occupied by a permanent structure, including the curtilage of the developed land
(although it should not be assumed that the whole of the curtilage should be developed)
and any associated fixed surface infrastructure.”

7. Excluded from the definition is “land in built-up areas such as residential gardens, parks,
recreation grounds and allotments”. Figure 1 shows the percentage of residential
development that took place in Oxford on previously developed land (PDL).

Figure 1: Residential completions on previously developed land

![Bar chart showing residential completions on previously developed land]

Source: City Council Annual Monitoring Report

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5 NPPF (2019) Glossary
6 NPPF (2019) Glossary
8. The NPPF is clear that private residential gardens in built up areas cannot be considered PDL. However, the Core Strategy target for the proportion of new homes to be delivered on PDL was set before garden land was removed from the definition. The target of 75% of new dwellings to be delivered on PDL therefore includes both PDL and garden land.

9. Given Oxford’s limited land availability, the development of larger residential gardens can make better use of underutilised land, although this land is not strictly speaking, previously developed land. The Oxford Local Plan 2036 contains policies on both previously developed land and developing on residential gardens. Given Oxford’s housing need it is important that appropriate development is continued to be located on both underutilised land and previously developed land.

10. The Local Plan 2036 approach is to ensure that underutilised sites are modernised and intensified and to focus development on brownfield sites in the city. The Plan includes no new site allocations for employment sites, instead the broad strategy is to only allocate new sites for housing and to modernise and intensify business uses at existing employment sites that support the Oxford’s key strengths. The plan also looks at how certain employment sites that do not meet Oxford’s key strengths could be lost to other uses including housing.

DENSITY

11. The NPPF is clear that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. The use of significantly higher minimum densities for city and town centres should be used as well as a base minimum density for the plan area. Densities in the city and district centres have historically been higher than those in the remainder of the city. The Local Plan 2036 encourages appropriate densities and expects the city and district centres to be able to accommodate higher density development than the rest of the city. The plan cites 100 dwellings per hectare as an appropriate density for the city and district centres while recognising that given Oxford’s historic core this may not always be appropriate. More information can be found on this topic in the Efficient Use of Land Background Paper.

DISCUSSIONS WITH NEIGHBOURING AUTHORITIES

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7 Paragraph 123, NPPF, Feb 2019
12. The Oxfordshire Strategic Housing Market Assessment (SHMA) (2014) suggested that 100,060 additional new homes were needed in the Oxfordshire Housing Market Area between 2011 and 2031. The SHMA concluded that 1,200-1,600 dwellings per year are needed to meet Oxford’s housing need (equating to between 24,000 and 32,000 across the 20 year period). This is based on meeting the housing need identified, supporting committed economic growth and delivering affordable housing in line with the Planning Practice Guidance (PPG).

13. Following the publication of the SHMA in 2014, the Oxfordshire Growth Board commissioned a project team to address the unmet housing need of Oxford. In September 2016, the Growth Board (with the exception of South Oxfordshire District Council) endorsed the proposed apportionment across the Districts of 15,000 homes for the period to 2031.

14. Cherwell District Council and Vale of White Horse District Council are both in the process of producing plans that include their apportionment of Oxford’s unmet housing need. West Oxfordshire District Council has just adopted their plan, which includes their agreed apportionment of Oxford’s housing need. Oxford City Council has produced a background paper documenting the Duty to Co-operate setting out more details of the commitment already being shown by neighbouring authorities, to accommodate some of the identified need for development in their areas. Oxford’s agreed apportionment of unmet housing need to the surrounding districts represents the maximum level of unmet need which the other Oxfordshire authorities will accommodate. At this stage therefore, this source of supply is exhausted.

**EXCEPTIONAL CIRCUMSTANCES**

15. In order to establish the need for any changes or alterations to Green Belt boundaries, a set of exceptional circumstances needs to first be demonstrated. Demonstrating exceptional circumstances requires the presentation of a set of factors that come together to override the normal presumption that Green Belt boundaries should endure. There is no formal definition or stand set of assessment criteria for assessing ‘exceptional circumstances’. Rather it is for the local planning authority to determine whether exceptional circumstances exist to justify removing land from the Green Belt.

16. Although national planning policy does not explicitly define the phrase “exceptional circumstances”, there is a considerable amount of case law on its meaning in the context of reviewing Green Belt boundaries through the Local Plan process. Once a

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8 Paragraph 136, NPPF (2019)  
9 Planning Advisory Service Plan-Making Case Law Update Main Issue 4: Green Belt (2014) No. 5 Chambers
Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration\textsuperscript{10}.

17. Oxford City Council considers that the following make up the set of factors that come together to override the normal presumption that Green Belt boundaries should endure (exceptional circumstances):
   - High cost of housing;
   - Imperative to meet as much of Oxford’s housing need as possible;
   - Oxford’s potential for growth;
   - Lack of housing as a barrier to economic growth (at the local, sub-regional and national level);
   - Promotion of sustainable patterns of growth.

18. This section provides a discussion on each of the above. Firstly what makes up each individual factor is set out. The section concludes by summary of the contribution that each factor makes towards the exceptional circumstances to justify the alteration of Green Belt boundaries within the Oxford City Council administrative area.

**HIGH COST OF HOUSING**

19. Over the last decade, Oxfordshire’s cumulative growth has been higher than any other Local Area in the UK. This success brings with it challenges – not least housing affordability with Oxfordshire the 5\textsuperscript{th} least affordable housing market in the country relative to earnings, with median prices to median earnings ratio over 10, but also recruitment, transport congestion and pressure on other physical and social infrastructure\textsuperscript{11}.

20. Oxford city’s tight administrative boundary, combined with environmental constraints on development such as nature conservation designations; flood plain; and the city’s unique historic landscape setting and heritage, have resulted in an even more acute impact on house prices. In Oxford buying a home costs on average 16 times a person’s salary (figure 2 shows the ratio of average house prices to average earnings); this makes it the least affordable place in the country to buy a home. This has many impacts, including on employers and key services who struggle to keep staff, such as schools and hospitals, and on families and communities who might be split up as a result of housing costs. It also impacts young families seeking homes of their own.

\textsuperscript{10} Gallagher Estates Ltd v Solihull MBC [2014] EWHC 1283 (Admin) (30 April 2014)

\textsuperscript{11} Oxfordshire Housing and Growth Deal Delivery Plan

21. High house prices have resulted in a large privately rented sector in the city as many people simply cannot afford a home of their own. However rent levels are high – so high in fact that renting a home on the private market is also out of reach for some people. Accordingly the ‘social rent’ of housing (housing rented from the City Council or from a Housing Association, usually at about 40% of market costs) plays an important role in meeting housing need in the city.

22. The evidence from the centre for cities (Figure 3) shows Oxford’s market housing is clearly unaffordable to most while the city’s policy approach favouring social rented housing, benefits Oxford’s residents in the greatest housing need. These affordability issues mean that only certain sectors (those that can afford market housing and those that are eligible for social rented housing) can afford to live in Oxford. The high house prices which are the cause of this polarisation are not sustainable for the successful running of the city.

Figure 3: Indicative incomes required to purchase or rent properties in Oxford

<table>
<thead>
<tr>
<th>Area</th>
<th>Lower quartile purchase price</th>
<th>Lower quartile private rent</th>
<th>Affordable rent</th>
<th>Lower quartile social rent</th>
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<tbody>
<tr>
<td>Cherwell</td>
<td>£52,900</td>
<td>£24,900</td>
<td>£19,900</td>
<td>£15,600</td>
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<tr>
<td>Oxford</td>
<td>£61,700</td>
<td>£36,900</td>
<td>£29,500</td>
<td>£15,800</td>
</tr>
<tr>
<td>South Oxon</td>
<td>£67,100</td>
<td>£30,700</td>
<td>£24,500</td>
<td>£16,700</td>
</tr>
</tbody>
</table>

12 Extract from SHMA (2014), Table 43: Indicative income required to purchase/rent without additional subsidy
23. Increasing unaffordability of housing has significant impacts for people living and working in the city. It puts pressure on welfare spending and housing benefit. The constrained supply of housing brings also impacts people living and working in the city and it is imperative that as much of Oxford’s housing need is met as possible. One of the reasons for Oxford’s high cost of housing is housing delivery not keeping pace with economic growth.

<table>
<thead>
<tr>
<th>VoWH</th>
<th>£56,900</th>
<th>£26,600</th>
<th>£21,300</th>
<th>£17,600</th>
</tr>
</thead>
<tbody>
<tr>
<td>West Oxon</td>
<td>£53,700</td>
<td>£26,600</td>
<td>£21,300</td>
<td>£18,000</td>
</tr>
</tbody>
</table>

**IMPERATIVE TO MEET AS MUCH OF THE CITY’S HOUSING NEED AS POSSIBLE**

24. Oxford’s historic housing need is well-documented. The previous Strategic Housing Market Assessment (2007)\(^{13}\) showed that Oxford has not been able to deliver sufficient housing within its administrative boundary for many years. The most recent SHMA (2014) suggests that 100,060 additional homes are needed in the Oxfordshire Housing Market Area between 2011 and 2031. The SHMA concludes that 1,200-1,600 dwellings per year are needed (equating to between 24,000 and 32,000 new dwellings across the plan period). This is based on meeting the housing need identified, supporting committed economic growth and delivering affordable housing in line with the Planning Practice Guidance. Later in 2014 following the publication of the SHMA, the Oxfordshire Growth Board commissioned a project team to address the unmet housing need of Oxford. In September 2016 the Growth Board (with the exception of South Oxfordshire District Council) endorsed the proposed apportionment across the District Councils of 15,000 homes for the period to 2031.

25. Oxford City Council produced a Housing and Employment Land Availability Assessment, (HELAA) in 2016. The HELAA does not allocate land for residential development. Instead it identifies sites with development potential. For the period 2016-2036 the HELAA identified a capacity of 7,511 homes (6,356 from identified sites which met the HELAA criteria). The HELAA included assumptions that Green Belt sites would be reviewed and released. It is worth noting that the majority of the housing delivered within the HELAA has the expected timescale 0-15 years. The HELAA was updated in 2018, and found that Oxford’s development potential had increased to 8,620.

26. Given the tight administrative boundary around the city, a wealth of environmental assets (including the internationally protected Oxford Meadows SAC), heritage assets

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\(^{13}\) Strategic Housing Market Assessment, Tribal Consulting (2007) showed that annual demand for housing in Oxford the first 5 years of the assessment (2006-11) was between 4,197 and 5,722 dwellings. Although this SMHA used a different methodology (predicting demand as opposed to need) it nonetheless shows that Oxford historically has not been able to deliver sufficient housing within its boundary.
and the special character of Oxford which intrinsically links the city to the surrounding landscape, and an impressive history, most of which is buried below ground, Oxford is restricted in its growth up, out and down. This has led to an undersupply of housing which has been widely recognised as a key constraint to unlocking Oxford’s potential for economic growth.

27. Oxford plays a pivotal role in the Government’s post-Brexit economic strategy and ensuring that the city overcomes the barriers to growth, is paramount. The Oxfordshire Local Infrastructure Strategy recognises Oxfordshire as a globally-renowned region with one of the strongest economies in the UK, and a successful record in securing investment to promote growth. The Oxfordshire Growth Deal is a strong beginning and signals the potential to unlock Oxford’s growth by reducing the barriers to growth – principally the historic undersupply of housing. As Oxford’s housing need is already being promoted through the Local Plans of neighbouring authorities, Oxford must demonstrate that it is doing all that it can to locate as much of its own housing need as can be sustainable accommodated within the city, without resulting in detrimental impacts to the special character and historic setting, which give Oxford some of its unique qualities – qualities important to maintain in order that Oxford remains an attractive place to both live and work.

OXFORD’S POTENTIAL FOR GROWTH

28. Oxford’s potential for growth has been well-documented and addressing the barriers to this growth is imperative for the national, sub-regional and local economy. Oxford is an international city, it is successful, vibrant and a national economic asset: the focus of a world-class knowledge economy with one of the most important concentrations of high-value businesses in Europe. It is a global brand, known all over the world for its academic excellence and historic significance. Oxford contributes £7.34 billion to the national economy annually. Its GVA (Gross Value Added) per head is seventh highest GVA per capita of all UK cities and unemployment is less than 1%. Its success is therefore essential to the sub-region and the wider success of the UK economy.

29. The Good Growth for Cities Report (2017) placed Oxford as the highest performing city. Oxford’s place at the top of the index reflects the continued improvement across a range of measures including jobs, income and skills. According to a report by Irwin Mitchell (UK Powerhouse Report, February 2019) Oxford, alongside Cambridge,
Reading, Ipswich and Milton Keynes will have the fastest growing economies in 2019. Oxford, according to the report is expected to grow at 2.0% annually in Q3 2019.

30. The Government has recognised the enormous economic potential of both Oxford and Oxfordshire. The Oxfordshire Housing and Growth Deal, was confirmed in the Budget Statement on 22 November 2017. The Deal offers Government funding over a five year period to support Oxfordshire’s ambition to plan and support the delivery of circa 100,000 new homes across the county between 2011 and 2031. This is to address the city and county’s severe housing shortage and expected economic growth. The Deal commits to on-going Government support to strengthen Oxfordshire’s total economic output, which already delivers £22 billion a year – a significant net contribution to the exchequer. A new Local Industrial Strategy is proposed – one of the first in the country – to back the county’s science and innovation assets and grow new sectors. The Local Industrial Strategy will provide the building blocks for success to maximise Oxfordshire’s chances of securing the investment needed to achieve its vision and be a trailblazer for the UK economy. The strategy promises to:
   - Think innovatively and disruptively about Oxfordshire’s future – about important emerging sectors new technological trends and innovative ways to be technologically competitive;
   - Have a robust evidence base that demonstrates granular understanding of the Oxfordshire economy, its challenges and opportunities; and
   - Have a broad base of support from stakeholders across Oxfordshire, including business leaders.

31. Oxford is a key centre in the UK’s knowledge economy, and initiatives such as the Oxford-Cambridge ‘brain belt” will support the development of the city region so that the unique resources, only available in Oxfordshire, are capitalised upon. The Growth Board recognises that one of the city and county’s attractions for investors is the quality of the environment and its cultural offer.

32. The National Infrastructure Commission (NIC) provided Government with proposals and options to maximise the potential of the Cambridge-Milton Keynes-Oxford arc as a connected, knowledge-intensive cluster that competes on a global stage, protecting the area’s high quality environment, and securing the homes and jobs that are needed. The NIC Report, entitled, “Partnering for Prosperity: A new deal for the Cambridge-Milton Keynes-Oxford Arc”, considers that east-west infrastructure enabling new settlements

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(in the form of East-West Rail and the Oxford-Cambridge Expressway” have the potential to “unlock land for new settlements”\(^{21}\). The report also considers that development in and around existing towns and cities will be required. As such the report suggests Government should enable local areas with the powers and resources to shape high quality, well-connected places that respect the environment, and enhance the quality of life for new and existing residents. The Government has not only recognised but supports the level of growth proposed by the NIC in order that growth is not jeopardised by “a chronic undersupply of homes”\(^{22}\).

33. The Government recognises the importance and potential of Oxfordshire’s knowledge intensive economy for the UK with two universities and world-class research institutions. It is committed to help Oxford and Oxfordshire attract investment through the Growth Deal. This is to sustain and develop global leadership in critical emerging sectors that will have an impact for trade and investment post-Brexit.

**LACK OF HOUSING AS A BARRIER TO ECONOMIC GROWTH IN OXFORD**

34. Oxford’s historic undersupply of housing has resulted in a housing shortage. This housing shortage of is widely recognised as one of the key barriers to economic growth facing not only the city, but also the sub-region and more widely the UK. The Oxfordshire Innovation Engine Report Update\(^{23}\) (2016) recognises that there are still significant issues to address, including the cost and supply of housing; and road congestion. The report does recognise, that despite the barriers remaining, “the direction of travel is strongly positive”.

35. The Investing in Britain Report\(^{24}\) ranks Oxford the city with the second highest growth potential in the UK. It measured the unique strengths and weaknesses of cities across the UK and identified key levers for attracting future investment for social and economic growth. The report underlined the importance of the Oxford to Cambridge corridor in improving investment potential through reducing congestion, making housing more affordable (reducing the ratio of average house prices against average earnings) and enhancing airport connectivity.

36. The high cost of housing is widely recognised as a key barrier to economic growth. The Oxford Business Survey (2015)\(^ {25}\) found that Small Medium Sized Enterprises (SMEs) –

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\(^{21}\) ibid

\(^{22}\) ibid

\(^{23}\) SQW (2016) Oxfordshire Innovation Engine Update


businesses with less than 250 employees – found that expensive housing (12%), unsuitable premises (9%) and transport costs (9%) were the main issues restricting the growth of these businesses. The survey also found that SMES had difficulty attracting and retaining staff and one the main reasons for this were the cost of living (58%), commuting (23%) and the cost of purchasing a property (32%).

37. The Oxfordshire Local Enterprise Partnership (OxLEP) produces regular updates about the Oxfordshire Labour Market. The most recent issue recognises that nearly 4 in 10 vacancies are deemed hard-to-fill and most of these are due to skills shortages. This is above the national average. The percentage of hard-to-fill vacancies that are considered to be due to skills shortages is 27 per cent.

PROMOTION OF SUSTAINABLE PATTERNS OF GROWTH

38. Housing is best located in sustainable locations. In the context of Oxford’s housing need, such locations include within, or as close to the city as possible. Providing homes within (and close to) Oxford will enable residents to travel shorter distances to employment and services (many of which are located in the city), and give people greater opportunities to travel by sustainable modes of transport than from development more remote from the city.

39. The City Council has been arguing for many years that a feature of the lack of housing in the city is extended commuting, with work journeys needing to ‘jump the Green Belt’, and well beyond. Over half the city’s workforce travels into Oxford and with commuting distances increasing, the pressure on infrastructure is not sustainable, even with improvements to roads and public transport. In contrast, residents within the city exhibit some of the highest proportions of public transport and cycle use for journeys to work in the UK.

40. The Oxford Economic Profile 2018 showed that there had been an increase in the number of inbound commuters travelling from outside the district to work in Oxford by car for most of the journey from 27,700 to 30,600 (+10%) resulting in two thirds of commuters traveling to Oxford arriving by car in 2011. Figure 4 shows travel to work patterns by Oxford residents in employment 2001-2011.

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27 UKCES Employer Skills Survey, 2015
41. Figure 4 shows Oxford residents increased their use of sustainable transport, with greater use of bicycle or on foot and public transport. It also shows that there has been an increase in the proportion of people working from home.

42. Figure 5 shows Oxford has the highest proportion of people commuting to work by public transport, greater even than Reading and Cambridge and almost double that of Milton Keynes, Swindon and Norwich.

43. The Post-SHMA Strategic Work Programme was developed by the Oxfordshire Growth Board to address the challenge of meeting the housing need established by the 2014 2001 Census and 2011 Census. 

City comparison of commuting by public transport, Census 2001, Centre for Cities data monitor
SHMA and to take account of the Duty to Cooperate. This joined-up and collaborative approach provided a county-wide spatial picture and strategy and included a number of projects including the Oxfordshire Green Belt Study.

44. Oxfordshire County Council (on behalf of the Oxfordshire Local Authorities\(^{30}\)) commissioned LUC to assess how the land within the Oxford Green Belt performs against the purposes of the Green Belts as set out in the NPPF. The study was the first of its kind since the Oxford Green Belt was formalised in the 1970s and gave a comprehensive picture of how well the Green Belt is performing in Oxfordshire.

**Consultation at Issues Stage (Summer 2016)**

45. The Issues Stage Consultation Document\(^{31}\) considered using Green Belt sites to address Oxford’s housing requirements recognising that Oxford is a small city with a tight urban boundary and that there is limited land available for development. Suggestions were made including whether urban extensions close to Oxford on the Green Belt could help meet Oxford’s housing needs.

46. At the close of the consultation, 608 responses had been received. 267 responses were received via the online questionnaire, 263 responses were posted in reply to the leaflet questionnaire and 78 other written responses were received. The results of the online questionnaire and leaflet questionnaire were analysed separately. The leaflet questionnaire included a number of suggestions in relation to “making the best use of our limited resources”. Over 140 (53%) of respondents supported the statement that urban extensions close to Oxford (on the Green Belt) would help to meet future housing needs. The online questionnaire considered the same statement and respondents were asked to consider whether they strongly supported/ supported, disagreed/ strongly disagreed with or were neutral. Out of the 246 respondents who chose to give their opinion on this statement 120 (49%) supported or strongly supported it and 92 respondents (37%) disagreed or strongly disagreed. This clearly shows that opinions on the idea of a Green Belt review with the possibility of urban extensions were clearly mixed. Numerous written responses were also submitted and they too show mixed opinions regarding the Green Belt.

**Consultation at Preferred Options Stage (Summer 2017)**

47. The Preferred Options Stage Document was consulted on during summer 2017. The document included 106 options for various elements of the Local Plan including a set of options for the Green Belt.

\(^{30}\) Oxfordshire County Council, Cherwell District Council, Oxford City Council, South Oxfordshire District Council, Vale of White Horse District Council and West Oxfordshire District Council

\(^{31}\) Issues Stage Consultation Booklet (2016)

[https://www.oxford.gov.uk/downloads/file/2617/first_steps_consultation_booklet_and_questions](https://www.oxford.gov.uk/downloads/file/2617/first_steps_consultation_booklet_and_questions)
48. Option 31 of the Preferred Options Document set out the preferred option which was to “review the Green Belt boundaries and be predisposed to allocate Green Belt sites within the city for housing (taking into account other relevant considerations) that are rated as having a moderate and how impact on the Green Belt, as determined by the GB study 2017. Do not review the GB boundary or allocate sites where the impact would be high”. The responses to this option were polarised, either in support of development in the Green Belt or strongly opposed to it. Some respondents recognised that some development in the Green Belt is inevitable if Oxford is to meet its housing need, although recognition was given to the need to maintain sufficient levels of open space for people’s enjoyment and well-being. On the long comments form 12 responses strongly agreed with the preferred option and 43 strongly disagreed. On the short leaflet we received 233 responses strongly supporting the preferred option and 348 strongly disagreeing with it.

Assessment of Land - Oxford Green Belt Study (2017)

49. Land Use Consultants (LUC) was commissioned by the City Council to prepare the Oxford Green Belt Study (2017) as part of the evidence base for the Local Plan 2036. The study reviewed eleven parcels of land within the city boundary against the five nationally defined purposes of the Green Belt. The study drew conclusions on the relative harm (or otherwise) to the Green Belt that may result from their potential release for development.

50. The Housing and Employment Land Availability Assessment (HELAA) (2016) identified over five hundred possible sites across Oxford, excluding areas where housing or employment development would be intrinsically unsuitable, i.e., Flood Zone 3b, the SAC, SSSIs and Town Greens. Included were all other brownfield or greenfield sites, including Green Belt, open air sports facilities and wildlife corridors.

51. The majority of the Green Belt in Oxford forms the river corridors of the Thames and Cherwell and acts as floodplain and is designated for its nature conservation value. The HELAA (2016) ultimately considered that the majority of Green Belt land in Oxford was unsuitable for development because of its location (in a flood zone or covered by a nature conservation designation). The remaining eleven sites were considered worth looking at more closely in terms of Green Belt impacts. These sites were identified through from the HELAA (2016), and the subsequent call for sites in 2017. The eleven sites were identified from the 2016 Housing and Employment Land Availability Assessment (HELAA), and the subsequent call for sites in 2017.

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32 Aecom, (2016) Oxford City Housing and Employment Land Availability Assessment, Paragraph 2.1.2
52. Much of the Green Belt land within Oxford is undevelopable due to environmental constraints such as floodplain and SSSI designations. The Oxford Green Belt Study (2017) therefore focused on only those sites/parcels within the Green Belt that were potentially developable and deliverable in the plan period to 2036. Sites were only included in the study where there was explicit landowner interest in bringing the site forward, and there were no insurmountable environmental constraints.

53. The HELAA (2016) identified into all possible sites so greenfield was divided into a series of potential sites. Most were rejected due to biodiversity interest or floodplain. The remaining sites were considered worth looking at more closely in terms of the green belt impacts.

54. Three of the sites considered in the study were divided into smaller assessment parcels on the basis of existing landscape features, such as fields or road boundaries. The subdivision into assessment parcels was undertaken where the initial site analysis found that different parts of a site were likely to make different levels of contribution to Green Belt purposes.

55. The overall assessment of potential harm (undertaken in the Oxford Green Belt Study (2017)) made judgements about the impact that each site would have on each of the relevant Green Belt purposes. It combined these judgements with an assessment of the parcel’s contribution to Green Belt purposes, taking into consideration boundary strength and the potential for mitigation. The assessment of potential harm was given as a rating using a 5-point scale and used professional judgement to weigh up the parcel assessment comments. A discussion about this methodology follows below.

56. Figure 6 shows the eleven sites (including their subdivisions) and the ratings associated with the release of each parcel of land. Figure 7 provides a spatial overview of the Green Belt sites in Oxford (figure 3.1 from the Green Belt Study (2017)).

**Figure 6: Green Belt sites and the relative harm to the Green Belt caused by their release for development**

<table>
<thead>
<tr>
<th>Site</th>
<th>Parcel</th>
<th>HELAA Site name</th>
<th>Size (ha)</th>
<th>Harm Rating</th>
</tr>
</thead>
<tbody>
<tr>
<td>107</td>
<td></td>
<td>St. Frideswide Farm</td>
<td>3.95</td>
<td>Moderate</td>
</tr>
<tr>
<td>112a</td>
<td>112a-1</td>
<td>Cherwell Valley/ Old Marston</td>
<td>3.47</td>
<td>Moderate</td>
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<tr>
<td>112a</td>
<td>112a-2</td>
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<td>High</td>
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<tr>
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<tr>
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<td>3.02</td>
<td>High</td>
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<tr>
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<td>Moderate*</td>
</tr>
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<td>Land at Old Marston</td>
<td>6.43</td>
<td>Moderate-High</td>
</tr>
<tr>
<td>Site</td>
<td>Parcel</td>
<td>HELAA Site name</td>
<td>Size (ha)</td>
<td>Harm Rating</td>
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</tr>
<tr>
<td>112b</td>
<td>112b-6</td>
<td>Land at Old Marston</td>
<td>19.11</td>
<td>High</td>
</tr>
<tr>
<td>112c</td>
<td>112c-1</td>
<td>Brasenose land in 112b</td>
<td>2.82</td>
<td>Moderate-High</td>
</tr>
<tr>
<td>112c</td>
<td>112c-2</td>
<td>Brasenose land in 112b</td>
<td>7.89</td>
<td>High</td>
</tr>
<tr>
<td>113</td>
<td></td>
<td>East of Redbridge Park and Ride</td>
<td>3.64</td>
<td>Moderate</td>
</tr>
<tr>
<td>114d</td>
<td></td>
<td>Marston Paddock</td>
<td>0.78</td>
<td>Low-Moderate</td>
</tr>
<tr>
<td>115</td>
<td></td>
<td>Land West of Meadow Lane</td>
<td>2.24</td>
<td>High</td>
</tr>
<tr>
<td>462</td>
<td></td>
<td>Park Farm, Marston</td>
<td>1.56</td>
<td>Moderate</td>
</tr>
<tr>
<td>464</td>
<td></td>
<td>Land adjacent to Seacourt P&amp;R</td>
<td>37.25</td>
<td>High</td>
</tr>
<tr>
<td>562</td>
<td></td>
<td>St. Catherine’s College</td>
<td>0.69</td>
<td>Low</td>
</tr>
<tr>
<td>590</td>
<td></td>
<td>Pear Tree Farm</td>
<td>2.03</td>
<td>Low-Moderate</td>
</tr>
</tbody>
</table>

*It is worth noting that although this site has a ‘moderate’ harm rating, the landowner has indicated that it is not available. It is therefore not considered ‘deliverable’ and as such has not been progressed further.*
Figure 7 – Overview of Green Belt Sites assessed as part of the Oxford Local Plan 2036
57. The preservation of Oxford’s special historic character and setting was prioritised as being of special importance in coming to a decision as to which Green Belt sites to consider for release for development through the Oxford Local Plan 2036. Oxford’s special character and setting was an inherent part of the creation of the Oxford Green Belt. “To preserve the special character” of Oxford was the main reason for the establishment of the Oxford Green Belt through the 1979 Structure Plan. The 1987 Structure Plan set out the purposes of the Green Belt more fully and its primary purpose remained – to “protect the special character of Oxford and its landscape setting”. National Planning Policy was introduced through PPG2 in 1988 (amended in 1995), and included as one of the purposes of the Green Belt “to preserve the setting and special character of historic towns”.

58. The Oxford Landscape Character Assessment (2002) considers that the landscape and its relationship to the built environment of Oxford, is of great significance. An important and distinctive feature of Oxford’s character is that despite the abrupt limits of the built form and closely encircling administrative boundary, the city remains intimately connected with its setting. Long uninterrupted views (many of which are historic) both from and to the surrounding hills (including Elsfield Hill, Boar’s Hill Shotover and Wytham) infiltrate the city along the main valleys providing visual, ecological and access connectivity.

“It has been termed an ‘iconic landscape’, and is recognised worldwide for its distinctive buildings, skyline of domes and ‘dreaming spires’; interweaving rivers meadows set within a rural framework, are contained by wooded ridges. The Oxford landscape consists, however of more than these ‘iconic’ features and the evolution of the urban form, cultural associations, relationships of the public and private realms, the density and massing of buildings, the architectural dialogue and vitality all make and important contribution to the character of the city’s built-up areas.”

59. The Oxford Heritage Plan also recognised the importance of Oxford’s green setting.

“The green setting of Oxford is one of its most renowned features, enjoyed by inhabitants and visitors throughout history”.

60. Given the importance of Oxford’s character and setting, sites that had a ‘high’ impact on the Green Belt were rejected at the Preferred Options Stage. The Sustainability Appraisal considered that the release of ‘high impact sites’ would be likely to have a

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Full text of option as follows: Review the Green Belt boundaries and be predisposed to allocate Green Belt sites for housing (taking into account other relevant considerations) that are rated as having a ‘high’, ‘moderate’ and ‘low’ impact on the Green Belt, as determined by the Green Belt Study.
significant negative impact on the SA Objective for Urban Design and Heritage, particularly on the green setting of Oxford. This was because the location of those sites would be likely to impact those green spaces which make the most important contribution to Oxford’s setting and special character.

**Overall Impact of the Release of Sites on the Green Belt**

61. The Local Plan 2036 Preferred Options Document considered a suite of Options relating to the Green Belt. The preferred option stated: “Review the Green Belt boundaries and be predisposed to allocate Green Belt sites within the city for housing (taking into account other relevant considerations) that are rated as having a 'moderate' and 'low' impact on the Green Belt, as determined by the Green Belt Study 2017, undertaken by LUC. Do not review the Green Belt boundary or allocate sites where the impact would be ‘high’.”

62. This approach strikes an appropriate balance between protecting the integrity of the Green Belt and ensuring sites come forward to meet the development needs of the city within the Oxford itself. Releasing only those sites with up to a moderate impact would result in the release of 17.96ha of Green Belt. There are approximately 1,287ha of Green Belt land within the Oxford city boundary. The release of 17.96ha represents 1.4% of the total Green Belt area within the city.

63. The Ministry of Housing Communities and Local Government (MHCLG) provides estimates of all the Green Belt in Local Authority areas across the country. The MHCLG document “Local Planning Authority Green Belt: England 2016/2017” states that the area of the Oxford Green Belt is 34,910ha. The release of those sites with a moderate to low impact on the Green Belt equates to a loss of 0.05% of the Oxford Green Belt.

64. This approach suggested to the release of Green Belt sites in the Preferred Options Document has been carried forward into the Proposed Submission document.

**Impact On Purposes Of The Oxford Green Belt**

65. The *Selection of Sites* section above discusses the critical importance of Oxford’s special historic character and setting and explains how these were assessed through the Sustainability Appraisal process. This section looks at how each parcel of land taken forward from the Preferred Option stage performs against all the relevant Green Belt purposes.

34 OPT31  
36 It should be noted that an often quoted CPRE report (The Oxford Green Belt – Key Facts (2016), CPRE Oxfordshire) estimates the total area of the Oxford Green Belt to be much higher at 66,868ha.  
37 Paragraphs 3.13 and 3.14 of the Oxford Green Belt Study (2017) explain which Green Belt purposes were assessed and why.
Each of the parcels of land was assessed to determine the impact on the relevant Green Belt purposes (individually) that would occur if that particular parcel was released. The Oxford Green Belt Study (2017) also provided a summary which looked at the overall impact on the Green Belt purposes as a whole for each parcel. The following sections first look at the impact of the individual Green Belt purposes and then show the overall conclusions.

**Purpose 1: To Check the Unrestricted Sprawl of Large Built-Up Areas**

Table 8 below shows the impact of each parcel of land against the first purpose of the Green Belt. What is clear from the assessment is that the release of the majority of the sites would only represent a limited amount of urban sprawl. Site 562, Park Farm, Marston was found to have a “degree” of sprawl, but it was recognised that this would not represent a ‘step change’ in settlement form and as such the City Council considers its release to be an acceptable impact on this Green Belt purpose.

### Figure 8: Impact of the parcels of land on the first purpose of the Green Belt

<table>
<thead>
<tr>
<th>Site Name</th>
<th>Ref:</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Green Belt land at St. Frideswide Farm</td>
<td>107</td>
<td>Release of this parcel would not extend the urban edge further north than housing to the west of the A4165, or any further east than the existing edge of Cutteslowe, so perception of development as sprawl would be limited.</td>
</tr>
<tr>
<td>Green Belt land at Cherwell Valley/ Old Marston</td>
<td>112a-1</td>
<td>Development would represent an expansion of the urban form, with the existing ‘urban village’ of Marston occupying a low ridge between the Cherwell and Bayswater Brook, but the northward containment provided by the A40 limits the extent to which this would be perceived as unconstrained sprawl.</td>
</tr>
<tr>
<td>Land at Old Marston</td>
<td>112b-1</td>
<td>Development of this parcel would not represent a significant expansion of the urban form. It relates strongly to existing development to the west of Mill Lane on Cumberlege Close, and would not extend the settlement edge much further downslope. It would not extend the defined urban area any further northward</td>
</tr>
<tr>
<td>Green Belt land at Redbridge Park &amp; Ride</td>
<td>113</td>
<td>Development in the parcel would extend the settlement form more strongly southward than the parallel Redbridge Park and Ride, which retains more visual openness than would be the case with higher built development, but the parcel's strong eastern and southern boundaries would limit the extent to which any development would be perceived as sprawl.</td>
</tr>
<tr>
<td>Marston Paddock</td>
<td>114d</td>
<td>Development would not constitute significant sprawl.</td>
</tr>
</tbody>
</table>
Development here would represent a degree of sprawl but not, particularly given the small size of the parcel, a 'step change' in settlement form.

Any additional built development within the parcel would not therefore be viewed as uncontained sprawl.

The A34 and the railway line provide strong containment around the site and the adjacent field, which would limit the extent to which any development would be perceived as sprawl.

### Purpose 2: To Prevent Neighbouring Towns from Merging into One Another

The release of the majority of the parcels of land for development would lead to limited impact on this Green Belt purpose. Site 113, Green Belt land at Redbridge P&R will have some detrimental impact with regard to this purpose however the degree of impact is reduced as the parcel plays less of a contribution as the open floodplain meadowland between New Hinksey and Iffley accounts for the majority of the gap. The site is one of the few sites within the city where residential moorings are acceptable and the policy requires their delivery. The inclusion of residential moorings at this site is likely to soften the impact of built development at this site on this Green Belt purpose. The impact of the release of this site is therefore considered to be acceptable. Table 9 provides a summary of the impact of each of the parcels on this Green Belt purpose.

### Figure 9: Summary of the impact of the parcels of land this the second Green Belt purpose

<table>
<thead>
<tr>
<th>Site Name</th>
<th>Ref:</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Green Belt land at St. Frideswide Farm</td>
<td>107</td>
<td>Any development is likely to be very exposed in this visually open landscape, but little more so than the existing settlement edge</td>
</tr>
<tr>
<td>Green Belt land at Cherwell Valley/ Old Marston</td>
<td>112a-1</td>
<td>The parcel does not represent a significant proportion of the settlement gap between Marston and the Sunnymead suburb to the west of the Cherwell.</td>
</tr>
<tr>
<td>Land at Old Marston</td>
<td>112b-1</td>
<td>The parcel does not represent a significant proportion of the settlement gap between Marston and the Sunnymead suburb to the west of the Cherwell.</td>
</tr>
<tr>
<td>Green Belt land at Redbridge Park &amp; Ride</td>
<td>113</td>
<td>Any expansion of the urban form into this area will have some detrimental impact with regard to this Green Belt purpose. However this parcel plays less of a contribution as the open floodplain meadowland between Weirs Mill Stream and the Thames accounts for the majority of the gap between New Hinksey and Iffley. The parcel also contributes to the gap between the New</td>
</tr>
</tbody>
</table>
Hinksey suburb of Oxford and the separate settlement of Kennington, to the south. Built development would have a greater impact on openness than is the case with the Redbridge Park and Ride, which already extends the defined urban area south to the A423, but the A423, the railway line and a block of woodland would all serve to preserve a sense of separation from Kennington were the parcel to be developed.

<table>
<thead>
<tr>
<th>Site Name</th>
<th>Ref:</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Marston Paddock</td>
<td>114d</td>
<td>The strong relationship between the parcel and the urban area means that it makes no contribution to settlement separation.</td>
</tr>
<tr>
<td>Park Farm, Marston</td>
<td>462</td>
<td>The parcel makes no significant contribution to this purpose.</td>
</tr>
<tr>
<td>St. Catherine’s College</td>
<td>562</td>
<td>The parcel therefore no significant contribution to this purpose.</td>
</tr>
<tr>
<td>Pear Tree Farm</td>
<td>590</td>
<td>The re-release would of this parcel would constitute only a minor reduction in the gap between the settlements, as perceived from the A34 and the railway line.</td>
</tr>
</tbody>
</table>

**Purpose 3: To Assist in Safeguarding the Countryside from Encroachment**

69. The relationship of the majority of the sites to the existing urban form limits the contribution that they make to the countryside and as such their release would have a limited impact on this Green Belt purpose. Given the existing urban features – the A40 and the proximity to the existing settlement edge mean that both of the sites in the Cherwell Valley/ Old Marston (sites 112a-1, 112b-1) have a limited relationship with the wider countryside. Table 10 provides a summary of the impact of each site on this Green Belt purpose.

**Figure 10: Summary of the impact of the parcels of land for the second Green Belt purpose**

<table>
<thead>
<tr>
<th>Site Name</th>
<th>Ref:</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Green Belt land at St. Frideswide Farm</td>
<td>107</td>
<td>Development here would constitute a degree of encroachment, but would still relate strongly to the urban form.</td>
</tr>
<tr>
<td>Green Belt land at Cherwell Valley/ Old Marston</td>
<td>112a-1</td>
<td>Development here would represent encroachment on countryside, with the field forming part of a broader landscape of similar hedged, mostly pasture fields, but proximity to the settlement edge means that there is some urban influence, and the A40 also serves to limit this field's relationship with the wider countryside.</td>
</tr>
<tr>
<td>Land at Old Marston</td>
<td>112b-</td>
<td>Development here would represent encroachment on</td>
</tr>
</tbody>
</table>

Page 23 of 52
1. countryside, with the field forming part of a broader landscape of similar hedged, mostly pasture fields, but proximity to the settlement edge means that there is some urban influence - there are three-storey blocks of flats across the road at Bradfields - and the A40 also serves to limit its relationship with the wider countryside.

| Green Belt land at Redbridge Park & Ride | 113 | The parcel is undeveloped but the three-storey houses to the north and the adjacent main roads to the west and south have an impact on countryside character. The adjacent stream provides a relationship with the wider Thames Valley floodplain meadows, but the containment of this parcel also makes it distinct from the wider countryside.

| Marston Paddock | 114d | The parcel is undeveloped but has a stronger relationship with the urban area than the wider countryside, and it forms part of an area of Green Belt that is dominated by urban fringe uses.

| Park Farm, Marston | 462 | The parcel's peripheral location within the open valley means that there is some urbanising influence, but there is a consistent urban/open edge to the north and south of the parcel so its relationship with the open landscape is stronger than its relationship with the urban area.

| St. Catherine’s College | 562 | The site itself is too developed to be considered to play any significant role in safeguarding countryside.

| Pear Tree Farm | 590 | This is physically and visually part of a fairly contained area that does not relate strongly to the wider countryside. The Pear Tree Farm buildings are not an urbanising influence, but proximity to the A34 and railway line does detract from countryside character.

**Purpose 4: To Preserve the Setting and Special Character of Historic Towns**

70. This Green Belt purpose is critical for Oxford. The city is in a somewhat unique position in that its special character and setting are intrinsically linked. The *Selection of Sites* section, above, provides a wide variety of evidence on this point. In summary, when the Oxford Green Belt was established, its initial purpose was to protect the special character of Oxford and its landscape setting. The additional purposes were subsequently added when national planning policy on the subject was drafted. The Oxford Landscape Character Assessment (2002) considers that the landscape and its relationship to the built environment of Oxford, is of great significance and the Oxford Heritage Plan also recognises the significance of Oxford’s green setting as one of the city’s most renowned features.
71. When selecting which sites to remove from the Green Belt, it was important to ensure that none of the sites selected played more than a limited contribution to the setting and special character of the city. Figure 11 summarises the contribution that each site/parcel plays on the special character and setting of Oxford.

**Figure 11: Contribution of the sites/parcels on the special character and setting of Oxford**
Source: Oxford Green Belt Study (2017), LUC

<table>
<thead>
<tr>
<th>Site Name</th>
<th>Ref:</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Green Belt land at St. Frideswide Farm</td>
<td>107</td>
<td>Site plays a more limited contribution to Oxford’s setting and special character than the valley floor.</td>
</tr>
<tr>
<td>Green Belt land at Cherwell Valley/ Old Marston</td>
<td>112a-1</td>
<td>This parcel is peripheral within the Cherwell Valley. High buildings could encroach on the perceived openness of the valley.</td>
</tr>
<tr>
<td>Land at Old Marston</td>
<td>112b-1</td>
<td>This parcel is peripheral within the Cherwell Valley and some distance from the valley floor.</td>
</tr>
<tr>
<td>Green Belt land at Redbridge Park &amp; Ride</td>
<td>113</td>
<td>Parcel contains a degree of separation from the river valley’s core. Adjacent 20th and 21st century development detracts from the historic setting. Iffley retains a historic village that has a positive impact on historic settlement character.</td>
</tr>
<tr>
<td>Marston Paddock</td>
<td>114d</td>
<td>Not in a location that makes any contribution to Oxford’s historic setting or character.</td>
</tr>
<tr>
<td>Park Farm, Marston</td>
<td>462</td>
<td>The location, adjacent to modern residential development limits the contribution this parcel plays to the setting and special character of Oxford.</td>
</tr>
<tr>
<td>St. Catherine’s College</td>
<td>562</td>
<td>The parcel makes no significant contribution to Oxford’s setting or special character.</td>
</tr>
<tr>
<td>Pear Tree Farm</td>
<td>590</td>
<td>No relationship between this area and Oxford’s historic core however the openness of this parcel makes a limited contribution to the city’s setting.</td>
</tr>
</tbody>
</table>

**Summary**

72. What is clear from the above tables is that none of the sites proposed for release from the Green Belt have a significant impact on any of the Green Belt purposes. Critically, the sites do not play more than a limited contribution to the fourth Green Belt purpose (to preserve the special character and setting of historic towns) and so their impact on this important purpose for Oxford is minimal.
Defining Green Belt Boundaries

73. When reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Oxford’s tightly drawn administrative boundary, the majority of which coincides with the inner edge of the Green Belt, has resulted in a long history of development on brownfield land, predominantly within the urban area of the city. Being a city, Oxford is an inherently sustainable location and there are very few areas of the city that are not well-served by public transport.

74. The Oxford Green Belt Study (2017) took the following approach when assessing the potential of alternative Green Belt boundaries.

75. Where a review has taken place the alignment and location of the proposed new boundary must be carefully considered in order that the revised Green Belt and its boundary are robust. The NPPF sets out six criteria that should be taken into account when defining Green Belt boundaries:

When defining Green Belt boundaries, plans should:

a) Ensure consistency with the development plan’s strategy for meeting identified requirements of sustainable development

b) Not include land which it is unnecessary to keep permanently open;

c) Where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;

d) Make clear that the safeguarded land is not allocated for development at the present time; planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;

e) Be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and

f) Define boundaries clearly, using physical features that readily recognisable and likely to be permanent.39

76. The Local Plan 2036 strategy uses a capacity-based approach and a minimum housing target. The plan uses a range of policy levers to provide as much housing as possible given the scale of housing required to deliver the affordable housing necessary to meet the identified need, whilst ensuring that the other needs of a sustainable city are provided for. The plan allocates 66 sites to try and facilitate delivery of development even on relatively small sites. 58 of the allocated sites include a residential/housing

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38 NPPF, Paragraph 137
39 paragraph 138
allocation. No new employment sites are allocated, with the preference for new sites
given to housing. Employment need will be accommodated through redevelopment
and intensification of existing employment sites. The plan also makes provision for sites
currently in other uses to come forward for housing. The Local Plan recognises that the
use of appropriate Green Belt land for housing should be considered and it is in this
context, given the demonstration of exceptional circumstances aforementioned in this
Background Paper, that the Green Belt boundaries are being reviewed.

b) Not include land which it is unnecessary to keep permanently open

77. The NPPF states that the fundamental aim of Green Belt policy is to prevent urban
sprawl by keeping land permanently open. The previous discussion in this Background
Paper on “Impact on purposes of the Green Belt” reviewed the findings of the Oxford
Green Belt Study (2017) on the first purpose of the Green Belt “to check the
unrestricted sprawl of built up areas”. This assessment showed that none of the parcels
of land that were taken forward as allocations were found to result in more than a
moderate degree of urban sprawl and as such it was not necessary to keep them
permanently open. It is worth noting that sites to the northern edge of the city (Land at
Frideswide Farm and Land at Pear Tree Farm) are contingent on the release of Green
Belt land within Cherwell District Council. A fuller discussion relating to these sites
occurs later in this background paper.

c) Where necessary, identify areas of safeguarded land between the urban area and the
Green Belt, in order to meet longer-term development needs stretching well beyond the
plan period

78. The Local Plan 2036 does not allocate Safeguarded Land. In the context of the scale of
the objectively assessed need for housing and the use of a capacity based housing
target, Oxford does not have the luxury of identifying sites for development beyond the
plan period. If a site is suitable, available and achievable it has been allocated. More
specifically in terms of Green Belt, any Green Belt site where development is likely to be
less than moderate in impact has been identified for removal from the Green Belt and
allocated for housing. The removal of more sites from the Green Belt in addition to
those identified would be likely to cause an unacceptable level of harm to the character
and historic setting of Oxford. The remaining parcels and sites are considered to make
“more than a moderate” contribution to the Green Belt purposes, in particular the
character and historic setting of Oxford.

d) Make clear that the safeguarded land is not allocated for development at the present
time; planning permission for the permanent development of safeguarded land should
only be granted following an update to a plan which proposes the development;

79. As the plan does not allocate safeguarded land this provision does not apply.

40 paragraph 132
e) Be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period

80. The majority of land within the Oxford Green Belt is constrained from development by residing within environmentally sensitive areas such as flood plain or environmental/landscape designations (e.g. SAC/SSSIs/view cones). The remaining Green Belt land was assessed as part of the Oxford Green Belt Study (2017). This Green Belt background paper has stressed the importance of the fourth Green Belt purpose “to preserve the special character and setting of historic towns”. The remaining sites and parcels assessed as part of the Oxford Green Belt Study (2017) are all considered to make a “more than moderate” contribution to the preservation of the city’s historic setting and special character. The City Council’s desire to preserve Oxford’s historic setting and special character demonstrates that Green Belt boundaries will not need to be altered at the end of the plan period.

81. It is worth noting that one parcel of land (112b-4 - Land at Old Marston) does not meet the NPPF test of deliverability as the landowner does not want to bring it forward within the plan period however this site was assessed as having a moderate harm rating and so may be suitable for future allocation at the appropriate time.

f) Define boundaries clearly, using physical features that readily recognisable and likely to be permanent

82. The Oxford Green Belt Study (2017) looked at potential alternative boundaries to the Green Belt. The role of a parcel’s boundary features in influencing the contribution to Green Belt purposes, through their role as a separating or connecting feature formed part of the assessment process. Features considered to be strong Green Belt boundaries include natural features such as substantial watercourses and waterbodies, and man-made features such as motorways, A and B roads and railway lines. Less prominent or less permanent features such as walls, woodland, hedgerows, tree lines, streams and ditches are considered to constitute moderate strength boundaries, and edges lacking clear definition on the ground form weaker boundaries.

83. In the next section each of sites proposed for release from the Green Belt are identified and the proposed new boundaries are explained.

GREEN BELT REVIEW - SITES PROPOSED FOR RELEASE

Site 107: Green Belt Land at St Frideswide Farm

Moderate

84. Site size: 3.95ha
85. **Current land use:** The site is farmland adjacent to the urban edge along the A4165 and the northern edge of Oxford at Cutteslowe. The site is approximately two-thirds of an arable field. There is no development within the site.

86. **Adjoining land:** The site adjoins just a small number of dwellings east of the A4165, but also faces the urban edge to the west of the main road. Hockey pitches and tennis courts abut most of the southern edge of the site: several tennis courts together with a car park are included within the defined urban area at the western end of the complex, whilst the remaining courts and pitches are designated part of the Green Belt but have fencing and lighting that gives them some urbanising influence.

87. **Current boundary:** The site has a hedged boundary to the north but no physical definition of the site edge to the east, where it follows the district boundary.

88. **Proposed new boundary:** The outer edges of the parcel are hedgerows, which do not constitute strong boundary features however the existing settlement edge at Cutteslowe is not strongly defined either.

89. **Conclusion of impact assessment:** The parcel relates strongly to the wider Cherwell valley countryside, but also to the settlement edge. Release of this land would constitute encroachment on the countryside but the size of the parcel and its links with the existing urban form are such that the impact on the integrity of the wider Green Belt would be limited.

**Figure 12:** Map showing location of Green Belt site 107 (Site Allocation Policy SP25)

90. The City Council considers that the form and scale of development envisaged by Policy SP25 can be successfully implemented and that any impact to the Green Belt in relation to this allocation is acceptable.
91. Policy SP25 (set out below) is the site allocation policy that relates to this parcel of Green Belt land. The policy allocates the site for residential development with an allowance for 10% on-site public open space.

**Policy SP25: St Frideswide Farm**

*Planning permission will be granted for residential dwellings at the St Frideswide Farm site. Planning permission will not be granted for any other uses.*

*Development should be designed with regard to potential adjacent development in Cherwell district, ensuring connectivity and integration.*

*The St Frideswide Farm site will be expected to provide 10% new public open space, which must be sited to be welcoming to existing residents. Development proposals should encourage active frontages to the new public open space. A hedgerow with native planting should be established to the east. Compensatory improvements should be made to surrounding areas of remaining Green Belt in accordance with the Identification of Opportunities to Enhance the Beneficial Use of Green Belt Land Report (LUC, 2018).*

92. The Oxford Green Belt Study (2017) recognises that release of this site would lead to “moderate” harm to the Green Belt and the conclusion of the impact assessment (above) acknowledged that release of this land in isolation from any other Green Belt release proposed through neighbouring authorities plans (see Interrelationship between proposed sites for release in Cherwell and Oxford City section below) would constitute countryside encroachment. However, given the size of the parcel and its links with the existing urban form, the impact on the integrity of the Green Belt would be limited.

93. A report was produced which looked at opportunities to enhance the beneficial use of the Green Belt land adjacent and close to those sites that were released. The policy makes explicit reference to the “Identification of Opportunities to Enhance the Beneficial Use of Green Belt Land Report (LUC, 2018)”, which sets out a suite of compensatory improvements to surrounding areas of Green Belt bespoke to each specific policy. The section below, “Offsetting the release of Green Belt” provides further discussion.

**Site 112a-1: Green Belt land at Cherwell Valley/ Old Marston**

**Moderate**

94. **Site size:** 3.47ha

95. **Current land use:** The site consists of three grazing pastures and, located between two of them, agricultural buildings associated Hill View Farm
96. **Adjoining land:** The site adjoins the defined urban edge at its south-eastern corner, on Mill Lane, next to Hill View Farm house and an associated property, which are in the Green Belt but outside of the site.

97. **Current boundary:** The A40 Northern Bypass defines the north-eastern edge of the site; there is a small field, with a well-hedged boundary, to the north-west; and hedgerows separate the site from similar farmland to the south. A hedgerow and drainage channel, which also mark the edge of the Thames floodplain, define the western boundary.

98. **Proposed new boundary:** The hedges along the western and southern edges of the parcel are not strong boundary features. Mill Lane is a stronger boundary feature, but it does not mark a consistent boundary edge, with inset housing on Cumberledge Close, c.130m to the south, located to the west of the road. Use of the A40 as the northern boundary would be consistent with the existing Green Belt edge at Marston.

99. **Conclusion of impact assessment:** Release of the parcel would represent countryside encroachment and a degree of sprawl. Taller buildings could potentially have a greater impact on the perceived openness of the valley, but otherwise harm to the wider Green Belt would be limited, with the A40 forming a strong edge to the north and a considerable area of open land remaining to the west. The new boundary would however be weaker than the existing one. Release would weaken the contribution of the field to the south (assessed as parcel 112b-1), by increasing its containment, and there would also be little justification for retaining the Green Belt status of Hill View Farm house and the adjacent dwelling.

Figure 13: Map showing location of Green Belt Site 112a-1 (Site Allocation Policy SP26)
100. The City Council considers that the form and scale of development envisaged by Policy SP26 can be successfully implemented and that any impact to the Green Belt in relation to this allocation is acceptable.

101. Policy SP26 (set out below) is the site allocation policy that relates to this parcel of Green Belt land. The policy allocates the site for residential development with an allowance for 10% on-site public open space.

**Policy SP26: Hill View Farm**

Planning permission will be granted for residential dwellings at the Hill View Farm site. Planning permission will not be granted for any other uses.

Careful design must ensure that development proposals contribute towards the character of the conservation area. Development in the parcel must be kept low to minimise the effect of encroachment on the perceived openness of the valley.

The Hill View Farm site will be expected to provide 10% new public open space, which must be sited to be welcoming to existing residents. Development proposals should encourage active frontages to the new public open space. Compensatory improvements to should be made to surrounding areas of remaining Green Belt in accordance with the Identification of Opportunities to Enhance the Beneficial Use of Green Belt Land Report (LUC, 2018).

102. The Oxford Green Belt Study (2017) report recognised that development could be accommodated on this site but that taller buildings could have a greater impact on the perceived openness of the valley, but otherwise harm to the wider Green Belt would be limited. Policy SP26 mitigates this potential impact by ensuring that development is “kept low”. The policy also requires careful design to ensure that proposals contribute towards the character of the conservation area.

103. A report was produced which looked at opportunities to enhance the beneficial use of the Green Belt land adjacent and close to those sites that were released. The policy makes explicit reference to the “Identification of Opportunities to Enhance the Beneficial Use of Green Belt Land Report (LUC, 2018)”, which sets out a suite of compensatory improvements to surrounding areas of Green Belt bespoke to each specific policy. The section below, “Offsetting the release of Green Belt” provides further discussion.

**Site 112b-1: Green Belt land at Old Marston**

**Low Moderate**

104. **Site size:** 1.84ha
105. **Current land use:** A small field that wraps around the north and west of Cumberlege Close.

106. **Adjoining land:** The site is predominantly adjacent to fields to the north, east and south whereas to the south-west the site is adjacent to an existing residential development.

107. **Current boundary:** The current boundary is marked by existing hedgerows with a firm boundary where the site meets the settlement edge.

108. **Proposed new boundary:** The north-western boundary - Mill Lane - is a stronger edge than the hedgerow that defines the parcel’s outer boundaries, but its role is weakened by the Cumberledge Close development that has crossed it.

109. **Conclusion of impact assessment:** Release of this small parcel would represent only limited urban sprawl and countryside encroachment. The new boundary would be slightly weaker than the existing one, and release would weaken the contribution of the field to the north (assessed as parcel 112a-1) and Hill View Farm house, by increasing their containment, but impact on the wider Cherwell Valley Green Belt would be limited.

**Figure 14: Map showing location of Green Belt Site 112b-1 (Site Allocation Policy SP27)**

110. The City Council considers that the form and scale of development envisaged by Policy SP27 can be successfully implemented and that any impact to the Green Belt in relation to this allocation is acceptable.

111. Policy SP27 (set out below) is the site allocation policy that relates to this parcel of Green Belt land. The policy allocates the site for residential development with an allowance for 10% on-site public open space.
112. The Oxford Green Belt Study (2017) concluded that the release of this site, given its proximity adjacent to the existing urban area, that the impact on the wider Cherwell Valley would be limited. This limited impact was reflected in the sites overall rating of “Low-Moderate”.

**Policy SP27: Land west of Mill Lane**

*Planning permission will be granted for residential dwellings on the Land West of Mill Lane site. Planning permission will not be granted for any other uses.*

*A minimum of 10% of the site should be for public open space which should be accessible for existing residents of Marston. The development should be designed to ensure active frontages face onto the open space. Compensatory improvements should be made to surrounding areas of remaining Green Belt in accordance with the Identification of Opportunities to Enhance the Beneficial Use of Green Belt Land Report (LUC, 2018).*

113. A report was produced which looked at opportunities to enhance the beneficial use of the Green Belt land adjacent and close to those sites that were released. The policy makes explicit reference to the “Identification of Opportunities to Enhance the Beneficial Use of Green Belt Land Report (LUC, 2018)”, which sets out a suite of compensatory improvements to surrounding areas of Green Belt bespoke to each specific policy. The section below, “Offsetting the release of Green Belt” provides further discussion.

**Site 113: Green Belt land east of Redbridge Park & Ride**

**Moderate**

114. Site size: 3.64ha
115. **Current land use:** The site consists of rough grassland situated to the west of Weirs Mill Stream
116. **Adjoining land:** Residential land to the north, river to the east and roads to the south-west and west of the site. The Redbridge Park and Ride site is also to the west of the site.
117. **Current boundary:** The site is contained by the A4144 Abingdon Road to the west, the A423 Eastern By-Pass to the south and residential development on Elgrove Close to the north.
118. **Proposed new boundary:** The A4144 is a strong landscape element but its role as a boundary feature is weakened by the fact that development has taken place on either side of the road, adjacent to the parcel. The Weirs Mill Stream forms the Green Belt boundary to the urban area to the north of the parcel, and so could equally form a strong boundary to the parcel itself. The A423 constitutes a strong boundary to the south.
119. **Conclusion of impact assessment:** The parcel is undeveloped and has some relationship with the wider countryside, and contributes to the prevention of sprawl and to maintenance of settlement gaps between New Hinksey and both Iffley and Kennington. However the parcel also has a strong relationship with the adjacent urban edge, and a degree of containment that would limit the harm to the wider Green Belt that would result from any release of land.

Figure 15: Map showing location of Green Belt Site 113 (Site Allocation Policy SP30)

120. The City Council considers that the form and scale of development envisaged by Policy SP30 can be successfully implemented and that any impact to the Green Belt in relation to this allocation is acceptable.

121. Policy SP30 (set out below) is the site allocation policy that relates to this parcel of Green Belt land. The policy allocates the site for residential development with an allowance for 10% on-site public open space.

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**Policy SP30: Land East of Redbridge Park & Ride**

Planning permission will be granted for residential dwellings at the land East of Redbridge Park and Ride site. Proposals should include residential moorings and associated servicing facilities. Development should include public open space. Planning permission will not be granted for any other uses.

A minimum of 10% of the site should be for public open space, which should be accessible for existing residents of Marston. The development should be designed to ensure active frontages face onto the open space.
A biodiversity survey will be expected to assess the biodiversity value of the site and it should be demonstrated how harm will be avoided, mitigated or compensated. Compensatory improvements should be made to surrounding areas of remaining Green Belt in accordance with the Identification of Opportunities to Enhance the Beneficial Use of Green Belt Land Report (LUC, 2018).

Planning permission will only be granted if it can be proven that there would be no adverse impact upon surface and groundwater flow to the Iffley Meadow SSSI. Development proposals should reduce surface water runoff in the area and should be accompanied by an assessment of groundwater and surface water. Development proposals must incorporate sustainable drainage with an acceptable management plan. A buffer zone should be provided during the construction period to avoid disturbance to the SSSI.

122. The Oxford Green Belt Study (2017) concluded that the parcel has some relationship with the wider countryside but that it also has a strong relationship to the adjacent urban edge and that the harm to the wider Green Belt that would result from the release of land at this location would be limited.

123. A report was produced which looked at opportunities to enhance the beneficial use of the Green Belt land adjacent and close to those sites that were released. The policy makes explicit reference to the “Identification of Opportunities to Enhance the Beneficial Use of Green Belt Land Report (LUC, 2018)”, which sets out a suite of compensatory improvements to surrounding areas of Green Belt bespoke to each specific policy. The section below, “Offsetting the release of Green Belt” provides further discussion.

**Site 114d: Marston Paddock**

<table>
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<th><strong>Low Moderate</strong></th>
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124. **Site size:** 0.78ha

125. **Current land use:** A single pasture field, with a scattering of young trees and shrubs, contained to the east and south by well-treed hedgerows.

126. **Adjoining land:** The site abuts the defined urban edge to the north (the St Nicholas Park residential ‘park homes’) and to the east (Butts Lane). The A40 runs adjacent to the eastern boundary hedgerow, other than at its southern end where a small remnant triangle of land lies between the site and the road. Two Green Belt fields, a small one to the south and a larger one to the south-east, lie between the site and Elsfield Road.

127. **Current boundary:** The A40 represents a strong barrier between the site and the wider countryside to the east and north, and although there are open fields to the south/south-east these also have a degree of separation from the wider countryside, being contained by the B4150 Marsh Lane and subdivided by Elsfield Road. Most of Green Belt to the south of Elsfield Road and west of the M40, to both sides of Marsh
Lane, has recreational uses associated with the urban fringe: allotments and sports pitches.

**128. Proposed new boundary:** The hedgerow along the southern edge of the parcel would not be a weaker boundary than the existing Green Belt edge. Elsfield Road, c.150m to the south, would constitute a stronger edge.

**129. Conclusion of impact assessment:** The parcel has a strong relationship with the urban form, and is part of an area of Green Belt that also has a strong relationship with the urban area and is separated from the wider countryside by the A40. Release of this parcel would not weaken the Green Belt boundary but would slightly weaken the Green Belt contribution of the small fields immediately to the south and east.

**Figure 16: Map showing location of Green Belt Site 114d (Site Allocation Policy SP24)**

![Map showing location of Green Belt Site 114d](image)

**130.** The City Council considers that the form and scale of development envisaged by Policy SP24 can be successfully implemented and that any impact to the Green Belt in relation to this allocation is acceptable.

**131.** Policy SP24 (set out below) is the site allocation policy that relates to this parcel of Green Belt land. The policy allocates the site for residential development with an allowance for 10% on-site public open space.

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**Policy SP24: Marston Paddock**

*Planning permission will be granted for residential dwellings at the Marston Paddock site. Planning permission will not be granted for any other uses.*
A minimum of 10% of the site should be used for public open space, which should be accessible for existing residents of Marston. The development should be designed to ensure active frontages face onto the open space.

Careful design must ensure that development proposals contribute towards the character of the conservation area. Compensatory improvements should be made to surrounding areas of remaining Green Belt in accordance with the Identification of Opportunities to Enhance the Beneficial Use of Green Belt Land Report (LUC, 2018).

132. The Oxford Green Belt Study (2017) concluded that this parcel has a strong relationship with the urban form. It is part of an area of Green Belt that also has a strong relationship with the urban area and is separated from the wider countryside by the A40. This was reflected in the overall “low-moderate” impact rating.

133. A report was produced which looked at opportunities to enhance the beneficial use of the Green Belt land adjacent and close to those sites that were released. The policy makes explicit reference to the “Identification of Opportunities to Enhance the Beneficial Use of Green Belt Land Report (LUC, 2018)”, which sets out a suite of compensatory improvements to surrounding areas of Green Belt bespoke to each specific policy. The section below, “Offsetting the release of Green Belt” provides further discussion.

Site 462: Park Farm, Marston

| Moderate |

134. Site size: 1.56ha

135. Current land use: A pasture field, along with a small area of hardstanding contained by a dense conifer line. There is no built development within the site. One dwelling, on a plot taken from the south-eastern corner of the field, lies within the Green Belt, distinct in character from the residential urban edge beyond.

136. Adjoining land: The site is located in between the urban edge at New Marston and the buildings of Park Farm.

137. Current boundary: The hedged field adjoins Hertford College Recreation Ground to the north, and a small, hedged pasture field to the south, separated by the access road leading to Park Farm and to Exeter College Recreation Ground.

138. Proposed new boundary: Although not defined by a strong boundary feature, the Green Belt follows a consistent edge to the north and south of the parcel. The access road to Park Farm would provide a clear feature to define an extended southern and western edge to the Green Belt, but its lengthened form would be weaker than the existing boundary.

139. Conclusion of impact assessment: This would constitute a relatively small release of Green Belt land but it would nonetheless represent a degree of sprawl beyond a
consistent boundary line. Impact on the wider Green Belt would be limited, and development would not encroach any closer to the river than the housing to the east. There would be some additional containment of the recreation grounds to the north, and also the small field to the south, which would have the effect of weakening their contribution to Green Belt purposes, and there would also be less justification for retaining the Park Farm buildings in the Green Belt, were they to lack separation from the new urban edge.

**Figure 17: Map showing location of Green Belt Site 462 (Site Allocation Policy SP28)**

140. The City Council considers that the form and scale of development envisaged by Policy SP28 can be successfully implemented and that any impact to the Green Belt in relation to this allocation is acceptable.

141. Policy SP28 (set out below) is the site allocation policy that relates to this parcel of Green Belt land. The policy allocates the site for residential development with an allowance for 10% on-site public open space.

**SP28: Park Farm**

Planning permission will be granted for residential dwellings at the Park Farm site. The site should include public open space. Planning permission will not be granted for any other uses. A minimum of 10% of the site should be for public open space, which should be accessible for existing residents from Marston. The development should be designed to ensure active frontages face onto the open space.
Planning permission will only be granted if it can be demonstrated that there would be no adverse impact on the integrity of the New Marston Meadows SSSI. Development proposals should be accompanied by an assessment of groundwater and surface water flows to the SSSI.

They must also incorporate sustainable drainage with an acceptable management plan. All proposals should minimise impact on air quality during construction phase and after implementation.

A planning application must be accompanied by a site-specific flood risk assessment and development should incorporate any mitigation measures. Compensatory improvements to should be made to surrounding areas of remaining Green Belt in accordance with the Identification of Opportunities to Enhance the Beneficial Use of Green Belt Land Report (LUC, 2018).

142. The Oxford Green Belt Study (2017) concluded that the impact on the wider Green Belt would be limited, even though its release would represent a degree of sprawl beyond a consistent boundary line. A report was produced which looked at opportunities to enhance the beneficial use of the Green Belt land adjacent and close to those sites that were released. The policy makes explicit reference to the “Identification of Opportunities to Enhance the Beneficial Use of Green Belt Land Report (LUC, 2018)”, which sets out a suite of compensatory improvements to surrounding areas of Green Belt bespoke to each specific policy. The section below, “Offsetting the release of Green Belt” provides further discussion.

Site 562: St. Catherine’s College

Low

143. Site size: 0.69ha

144. Current land use: The site is occupied by a series of accommodation blocks and a porters lodge / seminar block which form the eastern side, and part of the northern side, of a new quadrangle completed in 2005, to supplement the accommodation provided in the college's original quad to the south. To the north of the buildings, occupying the space between the northern end of the quad and a tree-lined drainage channel, the site consists of a roughly triangular area of lawn, with several young specimen trees.

145. Adjoining land: The college buildings to the west and south form part of the defined urban area, whilst land to the north of the site (Music Meadow) and to the east (Great Meadow) is part of the Green Belt.

146. Current boundary: A strip of lawn also runs along the western edge of the site, alongside the accommodation blocks, separating them from the car parking that occupies the centre of the quad. A surfaced track, hedged along its eastern side and
with a low wall to the west, forms the eastern edge of the site alongside Great Meadow, and a tarmac college access road forms the southern edge.

147. **Proposed new boundary:** The quad's boundary wall, and the fence and young hedge that form the short stretch of parcel edge to the north of this, clearly define the developed area. The existing Green belt edge to the west of the new buildings does not mark any distinction between urban and open land.

148. **Conclusion of impact assessment:** The construction of the eastern and northern sections of the new quadrangle at St Catherine's College has rendered the existing Green Belt boundary meaningless as a distinction between urban development and open land. Release of the parcel would result in a boundary that clearly distinguishes between the college and the adjacent riverside meadow. There would be no adverse impact on the contribution of adjacent land to Green Belt purposes.

Figure 18: Map showing location of Green Belt Site 562 (Site Allocation Policy SP31)

149. The City Council considers that the form and scale of development envisaged by Policy SP31 can be successfully implemented and that any impact to the Green Belt in relation to this allocation is acceptable.

150. Policy SP31 (set out below) is the site allocation policy that relates to this parcel of Green Belt land. The policy allocates the site for student accommodation and other university-related uses.

**Policy SP31: St Catherine’s College Land**

Planning permission will be granted for student accommodation and other university-related development at the St Catherine’s College site.
Careful design must ensure that development proposals contribute towards the character of
the conservation area and preserve and enhance nearby listed buildings and their setting.

A biodiversity survey will be expected to assess the biodiversity value of the site and it should
be demonstrated how harm will be avoided, mitigated or compensated.

Planning permission will only be granted if it can be proven that there would be no adverse
impact upon surface and groundwater flow to the New Marston SSSI. Development
proposals should reduce surface water runoff in the area and should be accompanied by an
assessment of groundwater and surface water. Development proposals must incorporate
sustainable drainage with an acceptable management plan. All proposals should minimise
impact on air quality during construction phase and after implementation, particularly if
they comprise of employment uses.

151. The Oxford Green Belt Study (2017) considered that the release of this parcel would
result in a boundary that clearly distinguishes between the college and the adjacent
riverside meadow. The Study concluded that there would be no adverse impact on the
contribution of adjacent land to Green Belt purposes. The impact of releasing this land
is considered to be low.

152. A report was produced which looked at opportunities to enhance the beneficial use of
the Green Belt land adjacent and close to those sites that were released. The policy
makes explicit reference to the “Identification of Opportunities to Enhance the
Beneficial Use of Green Belt Land Report (LUC, 2018)”, which sets out a suite of
compensatory improvements to surrounding areas of Green Belt bespoke to each
specific allocation. The section below, “offsetting the release of Green Belt” provides
further discussion.

Site 590 Pear Tree Farm

Moderate

153. Site size: 2.03ha


155. Adjoining land: The railway line and associated vegetation, and to south/west a belt of
trees marks the route of a former railway line and also the urban edge.

156. Current boundary: The tree belt between the Peartree Park and Ride and Pear Tree
Farm site is a relatively strong boundary feature, and the northern edge of the parcel is
a hedgerow which only partially bounds it, but the field beyond it (within Cherwell
District) is in turn strongly contained by the A34 and the railway line.

157. Proposed new boundary: The outer edge of the parcel would be a weaker boundary
than either the existing tree belt or the A34, which contains adjacent land in Cherwell
District. There is currently a very limited perception of built development from the A34, so there is not a strong sense that this marks a distinction between urban and rural areas; however this may potentially change with the development of the Oxford Northern Gateway on land including, and to the south of, the hotels and park and ride at the Pear Tree roundabout.

158. **Conclusion of impact assessment:** The development of the parcel would have little impact on countryside or the settlement gap, but by crossing a relatively strong boundary it would constitute a moderate degree of sprawl, and would weaken the Green belt contribution of adjacent land within Cherwell District. Containment of the two sites by the same strong landscape elements, the A34 and the railway line, means that harm resulting from the release of both areas would be limited, although it would to some extent weaken the Green Belt role of the adjacent North Oxford Golf Course by increasing development alongside the A34 and narrowing the gap to Oxford Parkway station.

**Figure 19: Map showing location of Green Belt Site 562 (Site Allocation Policy SP29)**

159. The City Council considers that the form and scale of development envisaged by Policy SP29 can be successfully implemented and that any impact to the Green Belt in relation to this allocation is acceptable.

160. Policy SP29 (set out below) is the site allocation policy that relates to this parcel of Green Belt land. The policy allocates the site for residential development and requires that a minimum of 10% of the site be used for public open space.
**Policy SP29: Pear Tree Farm**

Planning permission will be granted for residential dwellings at the Pear Tree Farm site. Planning permission will not be granted for any other uses.

A biodiversity survey will be expected to assess the biodiversity value of the site and it should be demonstrated how harm will be avoided, mitigated or compensated.

A minimum of 10% of the site should be for public open space, which should be accessible for existing residents of Marston. The development should be designed to ensure active frontages face onto the open space. Compensatory improvements to should be made to surrounding areas of remaining Green Belt in accordance with the Identification of Opportunities to Enhance the Beneficial Use of Green Belt Land Report (LUC, 2018).

Development proposals should be accompanied by an assessment of groundwater and surface water, and should show that agreement has been gained with Thames Water about foul water discharges.

161. The Oxford Green Belt Study (2017) concluded that development of this parcel would have little impact on countryside or the settlement gap. Harm from its release would be limited by the strong landscape elements of the A34 and railway line. A further discussion below examines the inter-relationship between this site and land proposed for release by Cherwell District Council.

162. A report was produced which looked at opportunities to enhance the beneficial use of the Green Belt land adjacent and close to those sites that were released. The policy makes explicit reference to the “Identification of Opportunities to Enhance the Beneficial Use of Green Belt Land Report (LUC, 2018)”, which sets out a suite of compensatory improvements to surrounding areas of Green Belt bespoke to each specific allocation. The section below, “Offsetting the release of Green Belt” provides further discussion.

**GREEN BELT REVIEW BY CHERWELL DISTRICT COUNCIL**

Partial Review of Cherwell Local Plan 2011-2031 – Oxford’s Unmet Housing Need

163. Oxford City has an unmet housing need (28,000-32,000 homes\(^41\)) and all of the Oxfordshire authorities have accepted that Oxford cannot fully meet its own housing need within its tightly constrained boundary. As a result, the authorities collectively committed to consider the extent of Oxford’s unmet need and how that might be

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\(^{41}\) Oxfordshire Strategic Housing Market Assessment (2014)
sustainably distributed to the neighbouring districts so that this could be tested through respective Local Plans. On 26 September 2016, the Oxfordshire Growth Board agreed an apportionment of Oxford’s unmet housing need to the Oxfordshire Districts. Cherwell District Council is undertaking a Partial Review of their Local Plan Part 1 to look at how to address their apportionment, endorsed by the Growth Board of 4,400 additional homes to meet Oxford’s unmet housing need.

164. LUC were originally jointly commissioned in 2015 by the Oxfordshire authorities to undertake a Green Belt Study to assess how large parcels of land within the Oxford Green Belt performed against the purposes of the Green Belt as set out in National Planning Policy. Thereafter both Cherwell District Council and Oxford City Council individually employed LUC to undertake an assessment of Green Belt land within their authority’s boundaries. The same consultants were used to ensure a consistent approach in the methodology of the assessment process. The Cherwell Green Belt Study (2017) appraised potential strategic development sites within Cherwell against the five nationally defined purposes of the Green Belt as set out in the NPPF and draws conclusions on the relative harm (or otherwise) to the Green Belt that may result from the release of sites for development.

165. The Cherwell Green Belt Study (2017) considered three possible scenarios for accommodating their agreed apportionment of Oxford’s unmet housing need:
- Releasing sites that make a lower contribution to the Green Belt;
- Release of ‘fragile’ Green Belt; and
- Release of land for the development of new settlements.

*The Cherwell Green Belt Study (2017) provides the following on what is meant by ‘fragile’ Green Belt at paragraph 4.16: “Green Belt that occupies only a small/ narrow area between separate urban settlements will tend to rate highly in terms of its role in preventing settlement coalescence. However, if environmental assessment determines that this land lacks significant value the a case could be made for accepting the coalescence, or near coalescence, of settlements in order to maximise the scale of development in one area, and consequently to minimise the number of separate locations in which ‘exceptional circumstances’ for Green Belt release would need to be demonstrated.” Appendix 1 shows an excerpt from the Cherwell Green Belt Study in relation to the sites North of Oxford.

166. The strategy of the Partial Review of the Cherwell Plan does not propose the release of land for the development of new settlements. Instead it focuses on the release of Green Belt sites that makes a lower contribution to the Green Belt and the release of ‘fragile’ Green Belt. The Cherwell Green Belt Study (2017) recognises that there are two locations for the potential release of ‘fragile’ Green Belt:
- Between Oxford and Kidlington; and
- In the Yarton/ Begbroke/ Kidlington area.
167. Both of these locations were taken forward in the Cherwell Local Plan partial review as the Cherwell Plan demonstrated that they were in support of the vision and objectives. The sites were taken forward because they are located in sustainable locations on the urban fringe, close to Oxford. The sites have good transport connectivity and accessibility to the city and in order to maximise the scale of development in each area, a case was made for accepting the coalescence-based impacts given that there were no significant environmental impacts and no significant impacts on Oxford’s special character and setting. The sites are both proposed in highly sustainable locations, connected and well-served by modes other than the private car – bus, cycle and rail. The Cherwell Plan considered that a certain amount of Oxford’s unmet need could be met through the release of Green Belt land in these locations.

168. The Partial Review of the Cherwell Plan proposes the release of six Green Belt sites and one site adjacent to the outer Green Belt edge (south east of Woodstock). The Plan has been submitted to the Secretary of State for Examination. The Plan proposes removing two sites from the Green Belt North of Oxford - Policy PR6a (Land East of Oxford Road) and Policy PR6b (Land West of Oxford Road). The Plan also proposes safeguarding the land south of the A34 and west of the railway line (west of the proposed allocation PR6b). It also proposes safeguarding the land comprising the existing Oxford Parkway Station and Water Eaton Park & Ride site.

Figure 20: Map showing proposed release of Green Belt sites within Cherwell District Council Local Plan Part 1 Partial Review Proposed Submission Draft

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42 Cherwell Local Plan Part 1 Partial Review Submission Draft

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169. It is worth noting that the Sustainability Appraisal (SA) for the Cherwell Partial Review assessed the effects of the Green Belt policy on a range of indicators. The SA did not highlight any significant impacts of the release of Green Belt in relation to Oxford’s setting and special character.

**Interrelationship between proposed sites for release in Cherwell and Oxford City**

170. There are two areas where the proposed Green Belt release in Cherwell has an effect on the potential release of Green Belt sites in Oxford:

- Land at Pear Tree Farm; and
- Land at Frideswide Farm

**Land at Pear Tree Farm**

171. This is a small parcel of land on the administrative boundary of the city. The Oxford Green Belt Study considered that this land makes a limited contribution to Oxford’s setting and has no relationship with the city’s historic core. The adjacent Green Belt land (to the north) in Cherwell is proposed for removal from the Green Belt as part of the Partial Review. The draft policy for that land safeguards it for future development beyond the existing plan period. The delivery of this policy approach in Cherwell would result in a small parcel of Green Belt within the city removed from and non-contiguous with the remainder of the Oxford Green Belt. It is considered that this would be inappropriate and thus the Oxford Local Plan seeks removal of this parcel from the Green Belt.

172. Before the Partial Review of the Cherwell Plan was drafted, the issue of whether the site within Oxford (“land at Pear Tree Farm”) should be removed from the Green Belt was considered at the Northern Gateway Area Action Plan Examination (2015). The AAP proposed retention of this site within the Green Belt on the basis that the alternative was a new Green Belt boundary defined by the city’s administrative area with no physical definition on the ground. The Inspector concluded (at the time) that that lack of a clear and defensible boundary was a strong reason for not removing the site from the Green Belt. However, now with the proposed removal from the Green
Belt of the parcel to the north by Cherwell, retention of the Oxford Pear Tree site would result in a small isolated parcel of Green Belt. In this context, there is little justification for retaining this parcel of land in the Green Belt. As the purpose of Cherwell’s Partial Review is solely to accommodate Oxford’s unmet housing need, it is particularly important that there is consistency between the two plans. As such it is recommended that the Land at Pear Tree be removed from the Green Belt and allocated for development.

173. It is the City Council’s position that this site should come forward for development in the context of the larger parcel within Cherwell. Both authorities agree that the design of sites in the North Oxford location must have regard to the policies and guidance of both Local Plans and associated SPDs and that development briefs prepared with the agreement of both authorities would be appropriate. Both authorities agree that it is important that sites in this area are designed in terms of forming an urban extension to the city, that it is fully integrated to the neighbouring communities and infrastructure, maximizing opportunities for new residents to access jobs and facilities in Oxford by sustainable travel modes. These sites in combination would provide an important entrance into the Oxford urban area.

174. If both the Land and Pear Tree Farm on the Oxford side of the boundary and the land at PR3c on the Cherwell side of the boundary are removed from the Green Belt, then the new Green Belt boundary would be formed by the A34 and A44 (Oxford Road) as set out in the Partial Review to the Cherwell Local Plan. The City Council agree with Cherwell District Council’s case that this would meet the NPPF’s requirements in terms of a clearly defined boundary using physical features that are readily recognisable and are likely to be permanent.

**Land at Frideswide Farm**

175. The Oxford Green Belt Study (2017) considered that this land plays a limited contribution to Oxford’s setting and historic character. The study recognised that the outer edges of this parcel are hedgerows, which do not constitute a strong boundary feature, however the existing settlement edge at Cutteslowe is not strongly defined either.
176. The adjacent land in Cherwell has been proposed for removal from the Green Belt and its allocation as a strategic development site in the Partial Review. The application of Cherwell’s policy in isolation of Oxford City’s, would result in leaving a parcel of Green Belt land in Oxford’s administrative area within the Green Belt and cut off from the wider Green Belt land in Cherwell District Council’s administrative area. It is considered that in those circumstances, the land at Frideswide Farm would no longer perform one of the key purposes of the Green Belt – namely openness. Should the proposed release of Green Belt land in Cherwell go ahead, there would be little justification for leaving this small parcel of land within the Green Belt. Notwithstanding the above, there is sufficient justification to release this land from the Green Belt and as such the land at Frideswide Farm has been proposed for release and allocation for development.

Offsetting the release of Green Belt (NPPF paras 138 & 141)

177. The NPPF (2018) provides guidance to Local authorities on how to consider the release of land within the Green Belt. Paragraph 138 states that where it has been concluded that it is necessary to release Green Belt land for development, plans should:

“...set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.”

178. The NPPF goes on to state in Paragraph 141 that:

“Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged or derelict land.”


179. A supplementary Green Belt Report was commissioned in 2018 to undertake a review of the opportunities to enhance Green Belt land surrounding the eight Green Belt sites proposed for allocation for housing development in the Oxford Local Plan 2036. This report identified opportunities to enhance the Green Infrastructure on Green Belt land adjacent, or in close proximity to the sites proposed for release. Green Infrastructure, as defined in the NPPF is:

“a network of multifunctional green space urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities”.

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180. The NPPF makes it clear that planning policies and decision-making should seek to protect and enhance natural and heritage assets and encourage multiple benefits from land use. Green Infrastructure is multi-functional as it can provide a wide range of environmental and social benefits. This includes improving health and wellbeing, climate change adaptation, enhancing landscape, heritage and sense of place, as well as improving biodiversity. As such the report focussed on improvements to Green Infrastructure, and demonstrates the multifunctional benefits that the enhancement of this land could bring.

181. The report clearly sets out how compensatory improvements can be made to each of the sites in accordance with paragraph 138 of the NPPF and addresses how the City Council proposes to plan positively to enhance the beneficial uses of the Green Belt as set out in paragraph 141 of the NPPF.
APPENDIX 1: CHERWELL GREEN BELT SITES: NORTH OF OXFORD

<table>
<thead>
<tr>
<th>Site</th>
<th>Parcel</th>
<th>Site Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>PR38</td>
<td>PR38a</td>
<td>North Oxford Triangle (Policy PR6c – safeguarded land)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Size (ha)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>6.26</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Harm Rating</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Moderate</td>
</tr>
<tr>
<td>PR38</td>
<td>PR38b</td>
<td>North Oxford Triangle (Policy PR6b)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Size (ha)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>31.60</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Harm Rating</td>
</tr>
<tr>
<td></td>
<td></td>
<td>High</td>
</tr>
<tr>
<td>PR38</td>
<td>PR38c</td>
<td>North Oxford Triangle (Policy PR6a)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Size (ha)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>47.78</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Harm Rating</td>
</tr>
<tr>
<td></td>
<td></td>
<td>High</td>
</tr>
</tbody>
</table>

Cherwell Green Belt Sites: Preventing merger of settlements

<table>
<thead>
<tr>
<th>Site Name</th>
<th>Ref:</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>North Oxford Triangle</td>
<td>PR38a (Policy PR6c)</td>
<td>The parcel’s containment limits its contribution to the settlement gap between Oxford and Kidlington, but its release would nonetheless reduce the distance between the settlements, as perceived from the A34 and the railway line</td>
</tr>
<tr>
<td>North Oxford Triangle</td>
<td>PR38b (Policy PR6b)</td>
<td>The golf course is a principal element in the gap between Oxford and Kidlington. Its size, extensive tree cover and topography – the souther half of the course is location on a hill – makes it a physical and visual barrier between the settlements, the development of which would leave a gap offering very little physical or perceptual separation. It therefore plays a critical role in settlement separation.</td>
</tr>
<tr>
<td>North Oxford Triangle</td>
<td>PR38c (Policy PR6a)</td>
<td>The parcel occupies most of the gap between Oxford and Kidlington to the east of the A4165, and development is likely to be very exposed in this visually open landscape. There is a moderate slope down northwards from the road to Water Eaton Manor which currently prevents inter-visibility between the northern and southern parts of the parcel and strengthens its settlement-separating role; development encroaching on this slope would have a significant impact in reducing the settlement gap.</td>
</tr>
</tbody>
</table>

Cherwell Green Belt Sites: Potential alternative Green Belt boundary

<table>
<thead>
<tr>
<th>Site Name</th>
<th>Ref:</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>North Oxford Triangle</td>
<td>PR38a (Policy PR6c)</td>
<td>The A34 would constitute a strong physical Green Belt boundary to this parcel. There is currently very limited perception of built development from the A34, so there is not a strong sense that this marks a distinction between urban and rural areas; however this may potentially change with the development of the Oxford Northern</td>
</tr>
</tbody>
</table>
Gateway on land including, and to the south of, the hotels and park and ride at Pear Tree roundabout. **Release would also leave the Pear Tree Farm buildings isolated from the rest of the Green Belt, with little justification for remaining in the designated area.**

<table>
<thead>
<tr>
<th>North Oxford Triangle</th>
<th>PR38b (Policy PR6b)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>This parcel has strong outer boundary features, the railway and A4165, with both of these and the A34 combining to form a dense block of infrastructure at the northern tip. There are no existing east-west boundary features within the golf course, so a new edge would need to be created were a partial release to be considered. Limiting Green Belt release to the southern tip of the parcel would reduce adverse effects on the settlement gap, but not to any great extent because the hilltop landform here greatly increases its visual contribution. Only the lower, western side of the hill is more contained within the landscape.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>North Oxford Triangle</th>
<th>PR38c (Policy PR6a)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>The outer edges of the parcel are hedgerows which do not constitute strong boundary features, but the existing settlement edge at Cutteslowe is not strongly defined either. There would be potential to define an alternative Green Belt boundary within the south-western part of the parcel, releasing land that would result in less harm to the Green Belt purposes than release of the parcel as a whole. <strong>This assumes that the Green Belt area adjacent to the settlement edge alongside the A4165 that lies within the City of Oxford is also released.</strong></td>
</tr>
</tbody>
</table>