

## Oxford Local Plan 2016-2036 Examination CPRE Oxfordshire response to Inspectors' Matters & Issues

### MATTER 3 - The Green Belt

#### A. Introduction and Summary

CPRE is grateful for the opportunity to comment on the proposed Green Belt releases as a consequence of the Plan.

These include not just the scattering of sites within the City itself but the swathes of the Oxfordshire Green Belt which neighbouring authorities have seen themselves as effectively forced to release under the pressure of the City's deliberately created "unmet need".

**In CPRE Oxfordshire's view no exceptional circumstances for the release of any Oxford Green Belt land currently exist.** This is partly because on a proper appreciation of the City's capacity to accommodate its own need there would be no requirement to even consider releasing Green Belt and partly because in any case we believe that the harm to sustainability from losing Green Belt land overcomes any argument that the Green belt is the most sustainable location to accommodate unmet need.

#### B. Non-City sites

Green Belt outside the City targeted for the City's "unmet need" includes open Green Belt land between Dalton Barracks and the ring of Cothill SAC/SSSIs in the Vale for 1200 houses, already released through adoption of Vale Plan Part 2.; the critical Kidlington Gap proposed for 3,950 houses in the suspended Cherwell Plan; and the 4950 houses in the emerging South Oxfordshire Plan, in the Green Belt to

the North of the City at Elsfield and to the South at Northfield and Grenoble Road (a site part owned by the City itself).

In the case of the Kidlington Gap, and Elsfield sites particularly, releases are compounded by the City's plans to release Green Belt land "on the other side of the road" at for instance St Frideswide's Farm for the Kidlington Gap and Elsfield Road for Elsfield (although these complementary harms are not highlighted in the Oxford Plan).

**In our view, and for the reasons above, the whole proposed impact on the Green Belt arising from the Oxford Plan should be reviewed as a piece. Although it is much appreciated that the same Inspectors are reviewing both Oxford and South Oxfordshire, we recommend that a single review considers the impact as a whole.**

### C. Public Appreciation of the Green Belt

CPRE commissioned an independent survey of opinions on the Green Belt across Oxfordshire, with a large sample size, in 2015 at the start of this Plan cycle.

The question was:

*Green belts are defined areas of countryside surrounding our largest towns and cities*

*including Oxford where building of houses, out-of-town shopping centres, offices, warehouses and other kinds of development is usually not allowed. According to legislation the key reason green belts exist is to prevent urban areas spreading out across the countryside and eventually joining up. But some would argue that Green Belts*

*are preventing necessary development from happening in the best place. How much, if at all, do you agree or disagree that the green belt around Oxford should remain open and undeveloped, and building on it not allowed?*

48% strongly agreed with only 3% strongly disagreeing. 28% tended to agree with only 9% tending to disagree. Only 11% of respondents were undecided. **Use for housing was not seen as a benefit but as the greatest threat.** These responses were broadly similar across age groups and locations, including within the City itself.

As the City's Green Belt background paper at page 14 remarks, a similar but much more slanted question in the Preferred Options consultation drew a similar polarised (as the City put it) response to their much more leading proposition that "some" "low impact" Green Belt sites should be allocated for housing being rejected by 43 to 12 on the long comments form and even by 348 to 233 on the short form.

Not that the consultation response made any difference to the City's plans, but it did confirm CPRE's finding on public appreciation for the Green Belt, and the necessity of maintaining its integrity in the face of housing pressures (as portrayed).

It is of course the case that it has been recognised from the start of the Oxford Green Belt (in 1958 incidentally, not 1975 as the City keeps averring) that its essential characteristic is its permanence, a message that the public has clearly taken to its heart.

#### D. Do Exceptional Circumstances exist?

The Council suggest that these are:

High cost of housing; imperative to meet as much of Oxford's housing need as possible; Oxford's potential for growth(!); lack of housing; promotion of sustainable patterns of growth.

In response, as we have shown elsewhere, the high cost of housing will not be reduced by seeking to build more houses, but even if it would, the high cost of housing is specifically the rationale for the inflation factor in the standard method, and on the standard method Oxford has the capacity to meet its requirements without using Green Belt land.

It is laudable that at least in this context the City understands the imperative to satisfy as much need as possible and to make optimal use of the development potential of each site through higher densities, but there is no evidence that that requires or justifies the use of the Green Belt. That is especially the case because this is not "need" as commonly understood but the housing requirement which would result from an unconstrained growth of population and the housing to accommodate it, when the whole character of the City lies in its constraints.

As for Oxford's potential for growth, the words of the founding Green Belt Act are salutary. ***Every effort should be made to prevent any further building for industrial or commercial purposes, since if this is allowed it would lead to a demand for more labour and in turn a demand for the development of additional land for housing.*** The exact purpose of the Green Belt Act was to constrain growth as expressed in the urban sprawl that encroachments on to the Green Belt represent.

The final "exceptional circumstance" the promotion of sustainable patterns of growth is particularly hard to understand. What could be less sustainable than removing the protective designation that future generations might otherwise have enjoyed, and building on the open countryside it once protected?

It is clear from the documentation though that the Council also justifies the releases on the grounds that they are only small ones. The release of the Green Belt sites within the City, the Background Paper says, would entail only 1.4% of the City's Green Belt (given that most of the rest is floodplain). But it would be more valid to say that the few hundred houses proposed to be built on the Green Belt land represent less than 2% of the City's total housing.

Since as the City shows, the release of each of them will be damaging to the Green Belt to a greater or lesser extent; since releasing Green Belt land is the very definition of unsustainability, and since in relation to the harm they make so insignificant a contribution to the housing capacity, there is no argument to release them at all.

### E. Green Belt Studies

The Green Belt studies conducted by both the City and separately by the County accept that all Green Belt sites contribute to the purposes of encouraging recycling of derelict land; and assisting in safeguarding the countryside from encroachment.

They seek to make Green Belt sites compete against each other in terms of the extent to which they prevent urban sprawl, prevent neighbouring towns merging, and preserve the setting of the historic town (city) of Oxford.

This is necessarily almost entirely a subjective process about which two observers might have different views - in fact the County and the District surveys do differ in detail - but that is not its overriding fault.

That is that it is easy to see that a process of comparing one site with others will quickly end up with just one site standing, since subjectively one of the two remaining fields must be judged better than the other. It is a recipe for the death of a thousand cuts and in CPRE's view has no place in a proper planning system, especially where it is effectively being used to find exceptional circumstances.

All Green Belt land is precious because, once released, it is not just the status that is lost but the open landscape the designation was protecting.

That said, and even on its own terms, the Review finds that of the selected sites, four are "moderately" damaging (Frideswide Farm which would with the Cherwell sites, close the important Kidlington Gap) Redbridge, Pear Tree and Old Marston.

The rest of the Marston sites Mill Lane, The Paddock and Park Farm are all found Low/Moderate.

Only St Catherine's college (just 0.69 hectare) is classified low in impact and that is because of presumably permitted building works destroying the integrity of the site.

**Given that even a Low classification acknowledges damage, and that the rest of the selected sites are acknowledged to be more damaging, the presumption must be that they should not be released.**

## F. Conclusion

The public is clearly and strongly opposed to releasing Green Belt land and sees housing as the greatest threat.

The planning presumption is that Green Belt will be permanent unless clear exceptional circumstances exist for release after the methodology in para 137 of the NPPF has been followed.

**CPRE says that if that methodology was properly followed, and if it was measured against the standard OAN method, which the Green Belt amongst other constraints would indicate, then capacity will be more than adequate to meet need without considering use of Green Belt land.**

Even then the contribution from the release of the Green Belt sites in the City would be so insignificant and the damage caused to the sustainability of the Green Belt so great that it should not in fact be contemplated.

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We received the Secretary of State's called-in Burley decision APP/W4705/V/18/320820 just as our Hearing Statements were being finalised and too late to include an informed evaluation of it. However, it deals with the circumstances in which NPPF Para 11 is not engaged; the "scoring" of Green Belt sites; and the harm from merger of settlements amongst other matters in ways that appear to support the case we make on these issues.

We are likely therefore to rely on it at the EIP.