
EXAMINATION INTO THE OXFORD CITY LOCAL PLAN 2036

STATEMENT ON BEHALF OF L&Q ESTATES & BRASENOSE COLLEGE

MATTER 3 – GREEN BELT

Introduction

1. This Matter Statement is made on behalf of L&Q Estates and Brasenose College. We have requested to participate in the Examination hearing for Matter 3 – Green Belt.
2. Our Client is promoting the land at Northfield, which is a proposed allocation for strategic residential development in the emerging South Oxfordshire Local Plan (eSOLP). This site is a logical and sustainable location for residential development on the edge of Oxford City which would help to address the unmet housing need arising from Oxford as well South Oxfordshire’s own needs.
3. It is our case that the Oxford City Local Plan 2036 needs to identify the appropriate housing requirement for Oxford City, to ensure these housing needs are met over the Plan period, and Oxford City’s unmet needs are identified and capable of being met by its’ neighbouring authorities, in a sustainable way, through Duty to Cooperate. This includes the need to consider Green Belt land.
4. L&Q Estates and Brasenose College consider they can contribute to the Examination hearing for this Matter and contribute to the preparation of a sound Plan.

Questions

Whether there are strategic and local level exceptional circumstances that justify the release of sites from the Green Belt for development, and whether the approach towards compensatory improvement is sound.

Strategic Level Exceptional Circumstances

5. Oxford City is an extremely desirable and sought-after place to live and work. The City is renowned worldwide for its history and top-class Universities. Coupled with the thriving economy, potential for growth and close proximity to London, these key factors make Oxford a very attract place to live.
6. The current housing requirement of 1,400 dwellings per annum reflects its desirability as a place to live and work. In our Matter Statement to Matter 1: Housing Requirement, we support the housing requirement of 1,400 to meet Oxford City’s housing need.
7. Oxford City’s historic undersupply of housing is well documented and has resulted in a housing shortage in the City. The Government have outlined their concerns that the

continuing undersupply of adequate housing stock could hinder growth and economic prosperity in the City, wider Oxfordshire and the UK.

8. The Oxfordshire Housing and Growth Deal was announced by the Government on the 22nd November 2017, whereby the Council County and 5 Local Authorities would receive funding to support infrastructure delivery and therefore support the delivery of 100,000 homes by 2031.
9. Underpinning the Deal is the economic contribution that Oxfordshire contributes to the UK economy. The Growth Deal Outline Agreement (GDL.1) states:

“Oxfordshire has a strong and growing knowledge intensive economy and is a net contributor to the UK exchequer, delivering £21 billion per year to national output. It competes on a global stage as a centre of science and innovation, with two universities and unique research organisations and activities. Oxfordshire is a high demand housing area with a house price to earnings ratio of 10.23 - well in excess of the national average of 7.72.”

10. The National Planning Policy Framework (NPPF, 2019) is clear that the planning system should do everything it can to support sustainable economic growth and should plan proactively to meet the development needs of business. It is clear from the above statement within the Outline Deal that there is wide concern that a lack of ‘affordable’ and appropriate housing in the City and wider Oxfordshire could threaten its future economic growth.
11. Furthermore, in 2017 the National Infrastructure Commission (NIC) published a report on the potential for growth in the geographic corridor containing Oxford, Milton Keynes and Cambridge. As stated in the Growth Deal Outline Agreement (GDL.1):

“Oxfordshire has a major role to play in delivering on the Government’s ambitions for this area, and beyond.”

12. The shortfall of housing in Oxford City and across Oxfordshire as a whole could hinder the success of the Oxford - Milton Keynes - Cambridge Arc.
13. The above sets out the strategic level exceptional circumstances for releasing sites from the Green Belt to accommodate the housing needs of Oxford City and safeguard the sustainable economic growth of the City.

Local Level Exceptional Circumstances

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14. The local physical and historical constraints, alongside the tightly drawn boundaries, of Oxford are a barrier to growth in the City and has resulted in Oxford struggling to accommodate it's required housing growth.
 15. The Oxford City Green Belt Review Background Paper (BGP 11), highlights local physical constraints to development within the administrative area include the Thames and Cherwell floodplains and designated nature conservation sites (several SSSI and a SAC).
 16. Historical constraints to development also exist within the City. These comprise the Central (City and University) Conservation Area, with its iconic skyline and architecture of the limestone colleges and towering spires, and the ridges outside of the City which provide an important backdrop to Oxford's Cityscape. These historical constraints to development are further reasons why Oxford struggles to meet its housing requirement.
 17. The NPPF, 2019 sets out at paragraph 137 that:

"Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development."
 18. Oxford City have demonstrated that all available non-Green Belt sites have been thoroughly assessed through a process set out in the "Assessing and Meeting the Housing Need Background Paper". Therefore, there is no realistic alternative than releasing land from the Green Belt within Oxford City.
 19. It is therefore considered that local level exceptional circumstances exist to justify Green Belt release.

Oxford Unmet Housing Need
 20. The Oxford Green Belt, which was designated in 1975, was specifically designated to preserve the historic setting and prevent the urban sprawl of Oxford. It also protects the individual towns and villages around Oxford ensuring that they retain their separate identities.
 21. As referenced in the Green Belt Review Background Paper (paragraph 1, BGP.11), there are approximately 1,287 hectares of Green Belt land within the Oxford City administrative area.
 22. The Green Belt Review Background Paper (BGP.11) states that:

“The majority of Green Belt land in Oxford forms the river corridors of the Thames and Cherwell, and acts as a floodplain and is also designated for its nature conservation value.”

23. In view of the above it was concluded in the Oxford City Housing and Employment Land Availability Assessment (HELAA) (2016) (HOU2) that the majority of Green Belt land in Oxford is unsuitable for development due to the flooding and nature conservation constraints.
24. Eleven sites within the Green Belt, which were identified through the HELAA (2016) (HOU2), were considered appropriate to consider further by the Council. The Green Belt Review confirms that only these sites were included as there was explicit interest from the landowner to bring them forward for development (i.e. therefore potentially deliverable) and they have no insurmountable environmental constraints.
25. These eleven sites have also been assessed in the Oxford City Green Belt Study (May 2017) (GRS.1) in terms of their contribution to four of the five nationally defined Green Belt purposes in the NPPF (2019); as measuring the contribution of parcels to the recycling of derelict and other urban land is problematic. Following the review, eight of the sites have been proposed for development in the Oxford City Local Plan 2036.
26. Notwithstanding, Oxford City’s robust case for releasing sites from the Green Belt, the City will still not be able to meet its housing requirement within the City boundaries.
27. Neighbouring authorities are therefore helping to address the City’s unmet housing need, under Duty to Cooperate.
28. The Oxfordshire Growth Board produced a report in September 2016, agreeing on the amount of unmet need and the apportionment between the five neighbouring authorities (GDL.13).
29. The requirement for neighbouring authorities to help address the unmet housing need is resulting in further sites being released from the Green Belt in other administrative areas. This approach to releasing further Green Belt sites to meet the housing need by promoting sustainable patterns of growth accords with the NPPF and has been found sound by the Inspectors of Cherwell and Vale of White Horse; which we refer to below.
30. The Inspectors of the Cherwell Local Plan Partial Review and the Vale of White Horse Local Plan Part 2 agreed that the unmet housing need being accommodated within areas closet and therefore well connected to Oxford City amounts to exceptional circumstances to justify the release of Green Belt land. In particular, the Inspectors state:

“The Council has set out why it considers that the exceptional circumstances to justify the removal of land from the Oxford Green Belt are in place. I agree that the pressing need to provide homes, including affordable homes, to meet the needs of Oxford, that cannot be met within the boundaries of the City, in a way that minimises travel distances, and best provides transport choices other than the private car, provide the exceptional circumstances necessary to justify alterations to Green Belt boundaries.” (Cherwell Local Plan Partial Review – Inspector’s Post Hearings Advice Note of 10th July 2019; Core Document PC5)

“The quantum of additional housing now needed for Oxford City, and the locational requirement for this to be closely connected to Oxford, amounts to exceptional circumstances that justify the principle of one or more further alterations to the Green Belt” (Paragraph 36 – Vale of White Horse Part Two Inspector’s Report of 25th June 2019; in Examination Library, but no CD no.)

31. The Inspectors when reaching this conclusion have had regard to the guidance in the NPPF 2019 at paragraph 138 which states:

“When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account.”

32. The land at Northfield in Oxford’s neighbouring authority of South Oxfordshire is proposed for release from the Green Belt in the eSOLP. This approach by South Oxfordshire District Council is in accordance with the NPPF (paragraphs 137 and 138) for promoting sustainable patterns of development, and the need to release land from the Green Belt being recognised as an exceptional circumstance; as accepted by the Inspectors for the Cherwell Local Plan Partial Review and the Vale of White Horse Local Plan Part 2.

Compensatory Improvements to Environmental Quality and Accessibility of remaining Green Belt land

33. Oxford City’s - Identification of opportunities to enhance the beneficial use of Green Belt Land Report (September 2018) (GRS.3) outlines compensatory improvements proposed

to enhance the Green Belt land surrounding the eight Green Belt sites proposed for allocation in their Plan.

34. The NPPF at paragraph 138 sets out that when it has been concluded that it is necessary to release Green Belt land for development

“They should also 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.”

35. Furthermore, the NPPF at paragraph 141 states:

“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 recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.”

36. Oxford City’s ‘Identification of opportunities to enhance the beneficial use of Green Belt land’ report (September 2018) (at paragraph 1.7, GRS.3) robustly demonstrates that the compensatory measures are in line with NPPF paragraphs 138 and 141.

Summary

37. In line with the NPPF there are both strategic and local level exceptional circumstances, which justify the release of sites from the Green Belt for residential development. The housing shortage in Oxford City must be addressed to enable future sustainable economic growth which contributes to the success of Oxford and Oxfordshire as a whole, as well as the wider UK economy. The Oxfordshire Growth Deal is a key indicator of how important the Oxfordshire economy is to the UK.
38. The unmet housing need which Oxford City cannot meet within its boundaries must be met in a sustainable manner by its’ neighbouring authorities through the Duty to Cooperate and their Local Plans. Sites on the edge of Oxford City are a logical and sustainable solution to addressing Oxford City’s unmet housing need. This approach has been endorsed in Cherwell and the Vale of White Horse and accords with the guidance in the NPPF for achieving sustainable development.

39. In accordance with NPPF paragraph 138, Oxford City have set out how improvements to the environmental quality of the remaining Green Belt land is proposed to be achieved, to compensate for the proposed release of eight sites from the Green Belt.
40. Overall, the Oxford City Local Plan has demonstrated that there are exceptional circumstances to justify the release of Green Belt land, and propose appropriate compensatory improvements to the remaining Green Belt land in line with the NPPF.