

This topic addresses: The Green Belt, Greenfield land and building densities and layout.

SA Objective: 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

SEA Theme: Material assets and population.

Introduction

The Green Belt is an important strategic planning policy tool implemented to prevent urban conurbations from growing too much, a process often referred to as 'urban sprawl'. Within a localised context, the Oxford Green Belt offers protection to the historic setting of Oxford and to areas surrounding the city.

It remains crucial that the Green Belt remains protected and sites are only released from this designated area after a thorough consideration of all other options. Areas in the Green Belt are protected in line with the National Planning Policy Framework.

Current plans, policies and programmes

National Planning Policy Framework (February 2019)

The government attaches great importance to Green Belts, with the NPPF including significant protections against development within it. It sets out the five purposes of the Green Belt:

- I. to check the unrestricted sprawl of large built-up areas;
- II. to prevent neighbouring towns merging into one another;
- III. to assist in safeguarding the countryside from encroachment;
- IV. to preserve the setting and special character of historic towns; and
- V. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The NPPF generally resists alterations to Green Belt boundaries. New Green Belts or alterations to existing Green Belts should only occur in exceptional circumstances, and where changes are made to existing Green Belts these alterations should endure beyond the plan's period. When a Council is considering making changes to Green Belt boundaries they must consider all other reasonable options for meeting its development needs, including:

- I. making as much use as possible of brownfield sites and underutilised land;
- II. optimising densities, including in city and town centres, as well as other locations well served by public transport; and
- III. liaising with neighbouring authorities about whether they could accommodate some of the development needs.

Local authorities should promote sustainable patterns of development in reviewing Green Belt boundaries, considering the consequences of focussing development within urban areas or villages

inset within the Green Belt, or other locations beyond the Green Belt boundary. If releasing land from the Green Belt, local authorities should prioritise areas that are previously developed or well served by public transport. They should also set out what compensatory measures could be put in place to offset removing land from the Green Belt.

When defining Green Belt boundaries, local plans should:

- I. ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;
- II. not include land which it is unnecessary to keep permanently open;
- III. 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;
- IV. 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;
- V. be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and
- VI. define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

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 and derelict land.

National Planning Practice Guidance

The NPPG provides additional guidance for plan makers on securing compensatory measures for land removed from the Green Belt. It states these policies may be informed by supporting evidence of landscape, biodiversity or recreational needs and opportunities including those set out in local strategies, and could for instance include:

- I. new or enhanced green infrastructure;
- II. woodland planting;
- III. landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);
- IV. improvements to biodiversity, habitat connectivity and natural capital;
- V. new or enhanced walking and cycle routes; and
- VI. improved access to new, enhanced or existing recreational and playing field provision.

Identifying the scope for compensatory improvements is likely to require early engagement with landowners and other interest groups, once the areas of land necessary for release have been identified. Consideration will need to be given to:

- I. land ownership, in relation to both land that is proposed to be released for development and that which may be most suitable for compensatory improvements for which contributions may be sought;

- II. the scope of works that would be needed to implement the identified improvements, such as new public rights of way, land remediation, natural capital enhancement or habitat creation and enhancement, and their implications for deliverability;
- III. the appropriate use of conditions, section 106 obligations and the Community Infrastructure Levy, to secure the improvements where possible. Section 106 agreements could be used to secure long-term maintenance of sites.

Oxfordshire Green Belt Study (2015)

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 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. Oxfordshire County Council (on behalf of the Oxfordshire Local Authorities) 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.

Oxford Green Belt Study (2017)

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.

LUC Oxford City Council: Identification of Opportunities to Enhance the Beneficial Use of Green Belt Land Report (2018)

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. These compensatory measures were incorporated into the policies of these site allocations.

Oxfordshire Plan 2050

The Oxfordshire Local Planning Authorities (including Oxford City Council), working together through the Oxfordshire Housing and Growth Deal, are working towards the development of a Joint Statutory Spatial Plan (JSSP), known as the Oxfordshire Plan 2050, which will set out strategic policies for the county to 2050. An initial consultation was launched on the Plan in February 2019 and a further consultation is being launched in the summer of 2021.

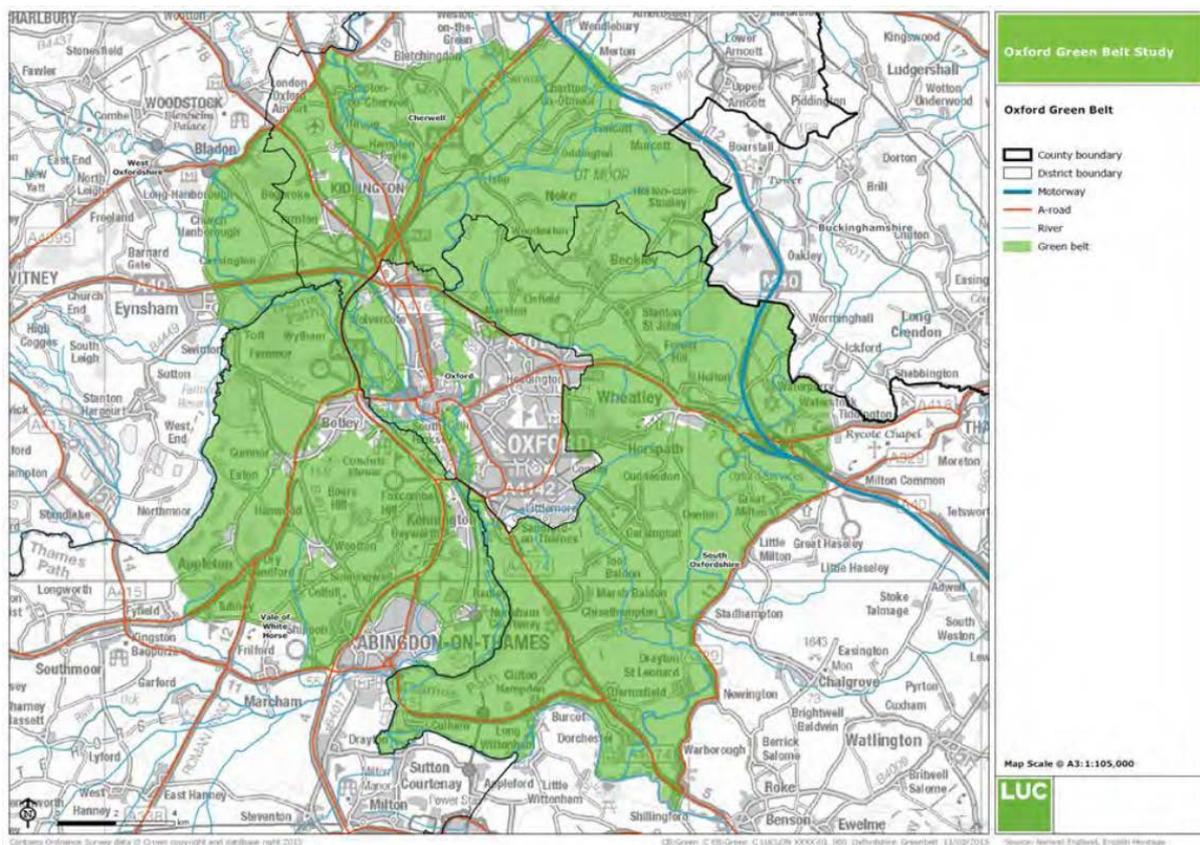
The summer 2021 consultation will include a number of options looking at various possible patterns of growth across Oxfordshire, particularly where new housing and economic development should be concentrated. Following consultation on the preferred options for the Oxfordshire Plan, a draft plan will need to be developed; there will be further consultation on the draft Oxfordshire Plan in May/June 2022. This will include identifying broad locations for development, based on the spatial strategy selected. This may lead to looking at the potential for Green Belt or making decisions to protect Green Belt or leave decisions on whether to review it entirely to the districts' local plans.

The Oxfordshire Plan will be submitted to the Secretary of State for examination in September 2022. It will be important to ensure that the Oxfordshire Plan and the Oxford Local Plan 2040 work closely together; there will be many common themes and objectives and much shared evidence behind the two plans. At this point the degree of influence of the Oxfordshire Plan on the Green Belt is unknown, but it could be significant.

Current situation

The extent of the Oxford Green Belt can be seen in Figure 1 below.

Figure 1: Oxford Green Belt (LUC 2015)¹



¹<https://www2.oxfordshire.gov.uk/cms/sites/default/files/folders/documents/communityandliving/partnerships/GrowthBoard/OxfordGreenBeltStudyFinalReport.pdf>

Green Belt reviews have led to removal of some areas of Green Belt through local plan processes across Oxfordshire. The following summarises the sites removed from the Green Belt on adoption of the most recent local plans in each district.

Oxford Local Plan 2036

The Oxford Local Plan removed the following sites from the Green Belt to assist in meeting our housing needs between 2016 and 2036:

- Policy SP23. Marston Paddock (minimum of 39 homes)
- Policy SP24. St Frideswide Farm (minimum of 125 homes)
- Policy SP25. Hill View Farm (minimum of 110 homes)
- Policy SP26. Land west of Mill Lane (minimum of 75 homes)
- Policy SP27. Park Farm (minimum of 60 homes)
- Policy SP28. Pear Tree Farm (minimum of 122 homes)
- Policy SP29. Land east of Redbridge Park and Ride (minimum of 162 homes)
- Policy SP30. St Catherine's College Land (minimum of 31 homes)

The Local Plan concluded that exceptional circumstances exist to release these sites from the Green Belt, and this was confirmed by the examination process. The Local Plan followed a process of considering all other reasonable options to Green Belt release including a thorough examination of brownfield land capable of, and available for accommodating additional housing within the plan's period. The plan also increases densities in the city and district centres (Cowley Centre, Cowley Road, Summertown, Headington, and Blackbird Leys Centres) to achieve a minimum of 100 dwellings per hectare.

To meet the assessed housing needs, liaison with neighbouring authorities was required, with Cherwell and South Oxfordshire District Councils also releasing land within the Green Belt on the edge of Oxford for housing. This is explored further below.

In reaching the decision to remove land from the Green Belt the plan considered that the following exceptional circumstances existed:

- I. High cost of housing
- II. The imperative to meet as much of Oxford's housing need as possible
- III. Oxford's potential for growth
- IV. Lack of housing as a barrier to economic growth
- V. Promoting sustainable patterns of growth.

South Oxfordshire Local Plan 2011 to 2035

The South Oxfordshire Local Plan makes provision for 4,950 homes of Oxford's unmet housing need. It allocates three housing sites in excess of this number on the southern and eastern edge of Oxford: Land south of Grenoble Road (3,000 homes); Land at Northfield (1,800 homes); and Land North of Bayswater Brook (1,100 homes). Policy H9 of the South Oxfordshire Local Plan requires these sites to provide 50% affordable housing. These sites have been removed from the Green Belt.

Cherwell District Council Local Plan

The Cherwell Local Plan Part 1 Partial Review also identifies housing allocations to help address Oxford's unmet need. Like the sites in South Oxfordshire, these sites have been removed from the Green Belt:

- Land East of Oxford Road (690 homes)
- Land at Stratfield Farm (120 homes)
- Land South of East of Kidlington (430 homes)
- Land East of the A44 (1,950 homes)
- Land West of Yarnton (540 homes).

Vale of White Horse Local Plan Part 2

The Vale of White Horse Local Plan Part 2 allocates the following housing sites to help address Oxford's unmet housing needs, removing them from the Green Belt:

- North-West of Abingdon (200 homes)
- North of Abingdon (800 homes)
- South of Kennington (270 homes)
- North-West of Radley (240 homes).

West Oxfordshire Local Plan

The West Oxfordshire Local Plan makes a strategic allocation of 2,200 homes to the north of Eynsham to address Oxford's unmet need. Another site, the West Eynsham Strategic Development Area will deliver around 1,000 new homes by 2031, a proportion of which (550 homes) will contribute towards meeting the housing needs of Oxford City with the remainder (450 homes) contributing towards West Oxfordshire's own identified housing needs. These sites are outside the Green Belt however and are only referenced here to show a comprehensive picture of how Oxford's needs are being met across the county.

Likely trends without a new local plan

Green Belt is protected by national policy, therefore even without a new Local Plan, it would be very difficult to justify allowing development on land designated as such.

Paragraph 11 of the Framework states that whilst strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, land designated as Green Belt is considered to be one of the areas of protection that may provide a strong reason for restricting the overall scale, type or distribution of development in the plan area.

If there was no new Local Plan in place, due to its protection by national policy, it's unlikely that much would change. For example, when determining planning applications, very special circumstances have to exist in order to justify development proposals in the Green Belt. However, Oxford does suffer from acute housing pressures, not just in terms of affordability and need but also from a lack of space on which to develop due to its tightly constrained nature. If the City Council were in a position where it

no longer had a five year housing land supply, the Council could find itself in a situation where planning applications which lie within the Green Belt are granted permission, because on balance, the level of harm of not granting permission to increase the supply of housing in Oxford could be assessed to be more harmful than developing on land within the Green Belt, even if (significant) harm to the Green Belt has been identified.

In addition, it is likely that there would be further development in neighbouring districts if the question of housing need is left unanswered.

What could our plan do to meet the objectives of plans, policies, and programmes?

In the existing Oxford Local Plan 2036, it was considered that exceptional circumstances existed to justify alterations to the Green Belt boundary, due to the acute housing need, housing affordability and inequality. It resulted in eight sites being de-designated from the Green Belt and largely allocated for housing.

A new local plan would allow us the opportunity to plan for housing need and to explore the possibility of whether any further land should and would need to be released from the Green Belt.

Paragraph 137 of the Framework notes that 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 before it can conclude that exceptional circumstances exist to justify changes to Green Belt boundaries. As such, the City Council will be expected to ensure it has made as much use as possible of suitable brownfield sites and underutilised land, optimised the density of development including whether a significant uplift in minimum density standards in town and city centres and other locations well served by public transport. In order to ensure we comply with national policy, we can use our Brownfield Register to make sure we are identifying as many sites as we can on brownfield sites but also recognise that due to the limited amount of land within the city that this will be limited. Through the new local plan we can undertake further work to ensure that that we optimise our density standards, particularly around the most suitable locations that are well accessed by public transport.

It would be helpful if a comprehensive approach to the existing Oxford Green Belt was undertaken through a strategic review, perhaps through the Oxfordshire Plan. This could identify if there were any parts of the Oxford Green Belt that could be released should sufficient development not be able to be achieved through brownfield sites, optimising density including a significant uplift at suitable locations or by locating development in another part of the county that is perhaps less restricted. A clearly defined strategy for locating new development around the county that is based on achieving the vision and objectives, should inform whether an assessment of Green Belt should take place. The impacts on the integrity of remaining Green Belt if any is to be removed should be fully understood and should inform decisions. These decisions about whether or not to meet needs on Green Belt would need to be informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through a statement of common ground.

Conclusion

Economic: The implementation of the Green Belt encourages developers and public bodies to maximise the use of available Brownfield sites in existing urban conurbations and prevents the process of 'urban sprawl'. The policy means that development projects undertaken in the city have the ability to increase the value of land which may have been previously underutilised or simply derelict. The Green Belt also maintains the arguably priceless value of the natural environment and protects the extremely valuable agricultural trade.

Social: Protecting the Green Belt ensures that Oxford's residents will always have natural spaces to engage with and enjoy outside of the city. Many residents feel very strongly about the protection of the natural environment as it contributes significantly to their mental and physical health.

Environmental: Protecting the Green Belt guarantees that a richly diverse area of land is protected, maintained and in many cases enhanced.

Sustainability/Plan issues

- The plan must aim to utilise suitable Brownfield sites and other underutilised land as a preferred option for development.
- The City Council should only release land from the Green Belt or alter the boundary in exceptional circumstances.
- Consideration should be made whether there should be an uplift in minimum housing density requirements where a sufficient level of infrastructure is present.
- The plan should consider whether a more comprehensive approach to Oxford's Green belt should be completed.