



Campaign to Protect  
Rural England  
OXFORDSHIRE

The Secretary of State  
Department for Communities and Local Government  
Eland House  
Bressenden Place  
London SW1E 5DU

Dear Secretary of State,

12<sup>th</sup> January 2009

I am writing on behalf of the Campaign to Protect Rural England (CPRE), Oxfordshire Branch, to request that you consider suspending publication of the South East Plan in the light of the recommendations made in the House of Commons Environmental Audit Committee's report "Greener homes for the future? An environmental analysis of the Government's house building plans", published 3 November 2008.

As you are no doubt aware the Committee expresses concern that national house building targets and regional plans, during a market downturn, are making it impossible for local authorities to prevent planning permission being granted for development on land that is not currently needed and would not otherwise be granted. They further state that this trend is leading to greenfield sites being developed in preference to brownfield sites, a consequence which is clearly contrary to Government policy.

The matter to which the Committee draws attention in its report is a source of considerable concern to the CPRE, a leading environmental campaign group that is concerned with the protection of rural Oxfordshire, including the Oxford Green Belt, from inappropriate forms of development. We are sure that it is not the Government's intention to encourage land-banking or to force local authorities into granting unnecessary planning permissions on greenfield sites, but this appears to be the consequence of handing down existing housing targets to local authorities.

These targets are passed down to local authorities via regional spatial strategies and the Environmental Audit Committee therefore recommends (paragraph 18 on page 12) that the Government suspends the implementation of its regional spatial strategies until it has carried out and published an environmental appraisal of its house building targets.

The CPRE is aware that, following consultation on the proposed changes, you are soon to publish the final version of the South East Plan which will then become the spatial strategy for the South East. It seems to us that if you are considering following the Committee's advice and suspending implementation of regional spatial strategies, the case is even stronger for delaying publication of the South East Plan until such time as the environmental appraisal of the house building targets contained within it have been carried out. We trust that you will be willing to give serious consideration to this suggestion, so avoiding the unexpected and damaging consequences for our greenfield spaces that present house building targets are having.

In conclusion, and with specific reference to Green Belts like that which serves Oxford, we would like to point out that paragraphs 65-67 of the report make it clear that the problems we have referred to above apply equally to Green Belt as to other greenfield sites. In paragraph 65 it is stated specifically that "national house building targets have led to pressures on local authorities to weaken protection of the green belt, in order to find land for the extra developments" We have also noted, and fully support, the recommendation in paragraph 67 that planning policy and guidance be amended to strengthen the "exceptional" test in order to emphasise the importance of protecting the Green Belt in these circumstances. We are afraid that the Government's stated commitment to the principle of the Green Belt is being undermined at present by the unreasonable pressures on local authorities noted above and by the weakness of the exceptional circumstances test to offset these pressures.

I trust that you will take our request into consideration.

Yours sincerely,

Bruce Tremayne, Chairman, CPRE Oxfordshire