



Campaign to Protect  
Rural England  
OXFORDSHIRE

CPRE Oxfordshire  
Punches Barn  
Waterperry Road, Holton  
Oxfordshire  
OX33 1PP  
01865 874780  
campaign@cpreoxon.org.uk  
www.cpreoxon.org.uk

20.08.08

Planning Policy Team,  
South Oxfordshire District Council,  
Crowmarsh Gifford,  
Wallingford,  
OX10 8NJ.

Dear Planning Policy Team,

I attach CPRE's response to the consultation on the South of Oxford urban extension.

I hope we make it very clear that we don't believe that any incursion into the Green Belt is warranted, and that there is no credible evidence to justify it. We would also like to confirm our support for the District Council's stance against this development.

The consultation response is intended to be helpful not only in answering the question which GOSE has apparently instructed the Council to address, but in assisting in the opposition to any such development in principle.

Do let us know if you see a way in which we can help further.

Yours sincerely,

Michael Tyce  
For the Oxfordshire Branch of CPRE.

## **Response from Campaign to Protect Rural England (CPRE) to SODC Consultation re the Secretary of State's proposal for a South of Oxford Urban Extension**

The Oxfordshire Branch of CPRE considered its response to this consultation at a meeting at our Holton offices on Thursday 12<sup>th</sup> August 2008.

### **A General**

1. CPRE opposes in principle any inappropriate development in the Oxford Green Belt, or any review intended to remove land from it. We applaud the District Council's strong stance on this matter.
2. Our general policy is that the Green Belt should be extended where feasible rather than reduced in size, particularly South of the City where the gaps between settlements need to be preserved and re-inforced. We therefore oppose all of the schemes consulted on.
3. The Green Belt was created to preserve the setting of the historic City of Oxford; to prevent the coalescence of settlements which would lead to the loss of their unique and valuable individual characters; and to prevent urban sprawl. Any of the urban extension plans indicated here would conflict with all of these objectives. Indeed the very purpose of the review required by the Secretary of State is to allow urban sprawl by the City.
4. Should there at some time be a need for development to satisfy Oxford's reasonable requirements which cannot be met within the City, CPRE strongly supports the original County Structure plan, and the SEERA plan, which saw the extension of the Country Towns as being the more viable option, recognising as it does the infrastructure constraints inevitable within the City and the need to spread the economic growth generated by university innovation widely through the community.

### **B The Urban Extension/SDA**

5. It is understood that GOSE required SODC to show how it would accommodate an urban extension before the Secretary of State's proposed changes to the SE Plan were published. Little guidance was given by GOSE, and there is little specific guidance from the Secretary, as to the extent and composition of the extension to be accommodated. The map referred to in the Secretary's proposals, CO1, gives only a vague indication of location and no assistance at all in terms of size.
6. It is known that it is a Strategic Development Area (SDA). It is understood that there is not a tight definition of an SDA except that it is a development containing at least 4000 houses.
7. If only 4000 houses are envisaged then the 180 hectare footprint appears overlarge. At a built density of 60 dwellings to the hectare, the SODC urban standard, a development of only around 67 hectares would be required for the dwellings themselves. Allowing a further 20% for the services required, taking into account that these are not self-standing developments but in effect adjuncts to the Leys, would give a total of 80 hectares, less than half of the footprint indicated here.

8. It is understood that the three alternative footprints identified in the consultation are essentially representative and the hectareage required for the development could in principle be anywhere within the whole consultation area. It is however useful to be able to compare the alternatives through the method provided.
9. However it seems clear that the scheme in the Secretary's mind, as in the Inspectors, is the blue area, the "Grenoble Road" mixed development scheme as proposed at the Enquiry, including the extension of the Magdalen Science Park. If this is the proposal then it would again compound the claimed housing problem by creating more jobs and thus greater housing need.
10. Whilst it is understood that SODC have been put in the position of having to proceed with a consultation with only limited guidance as to what they are consulting about, it would be inappropriate for the outcome of a consultation to be relied on when the nature and scope of the development involved is unclear.
11. We are concerned though that SODC may have "put on the table" a far larger area of the Green Belt than necessary, and a larger footprint than is needed, and that this may have the effect of making the risk to all the surrounding villages greater rather than less.

## **C Detailed Responses**

12. It is reasonable to be concerned that responding to a consultation essentially asking for a choice between one area and another for removal from the Green Belt is invidious for an organisation which strongly believes that the Green Belt should remain intact. Against that background, these are the responses to the questions asked:

### **1) How much housing should go into the urban extension?**

- There is no requirement for the City to spread beyond its present boundaries to satisfy housing need. The City Council accepted at the Enquiry in Public in February that it had sufficient development land within the City boundaries to accommodate its housing needs if it used land solely for housing rather than for mixed development as it intended.
- Specifically no need for any specific number of houses has been shown, nor what types of accommodation in terms of eg flats, houses, number of rooms, are required.

For these reasons no justification presently exists for any level of development within an urban extension, and certainly not for a greater level of development than envisaged in the consultation.

Further, if SODC is nevertheless to be required to create such an extension it cannot be properly integrated into the plan without sound and fact-based evidence on the level and nature of the need.

- It is clear however from SODC's consultation paper that the essential need within Oxford is for affordable housing. It is recommended that an affordable element of 60% or more be considered given the nature of the need and the high density of development appropriate in an urban extension. The proximity of the extension to the existing built area would help ensure the housing mix which would have to be created in a new self-standing development.
- It is also clear that the rationale for the development is based on provision for "key workers" already employed in the City. Every effort should be made to ensure that the residents fall only into that category.

**2) What/which area of land should be removed from the Green Belt and why.**

It is invidious for CPRE, committed as we are to the protection of the Green Belt in its present form, to attempt to determine which parts of it would be most appropriately removed.

Neither do we subscribe to a strictly limited review of the kind ordered by the Secretary of State as the failure to consider the Green Belt in its entirety is first of all unreasonable to those parishes identified for review by a method unknown; secondly it fails to recognise the essential unity of the Green Belt as a whole.

Nevertheless if the loss of some part of the Green Belt is inevitable as an outcome of the limited review it is appropriate to assist in the process.

The SODC consultation limits the review to a "pink outline" essentially arcing from the South to the East of Blackbird Leys. This includes land, eg part of Nineveh Farm which it would not be appropriate to develop as it is not only very well tended (in sharp contrast to the adjacent Magdalen College owned land) and has high quality views into Oxford, but is not available for development.

Within the pink area three parcels of land, blue, yellow and pink, are identified to represent the approximate size of the SDA (although this is in our view considerably overstated and should be nearer 100 hectares than 180).

The “blue” area is directly South of Grenoble Road and is effectively the Magdalen/Thames Water development which the Inspector had in mind when she made her report and is presumed to be the location in the Secretary’s mind when she made her proposed amendments to the SE Plan.

### **Relative merits of these three areas.**

None of the areas has any merit, and the removal of any of them would be an unacceptable loss of Green Belt and harmful to the purposes for which the Green Belt was created. This applies particularly to the landscape quality that would be lost, especially in relation to views available across the land into the City.

The transport considerations are considered to be effectively the same for each. None will be convenient in terms of access either to Oxford Centre, or to the wider road network. All will put further strain on an already overloaded ring road, and on surrounding rural roads.

All will have equal access to the facilities within the Leys development.

- **The blue area** is the area assumed to be “designated” by the Secretary of State.

Whilst the land immediately to the South of Grenoble Road, within the blue hatched area, has been allowed to run down, the adjacent land within the pink outline at Nineveh Farm is farmed to a very high standard. Loss of prime agricultural land must be avoided especially close to conurbations where distribution costs are low, even if it has not to date been very well cared for.

The Nineveh Farm land also forms an important part of the setting of the historic City, providing important albeit private views which would be damaged by further development towards it.

The blue area poses some threat to the Baldons and to Sandford.

It is however adjacent to the service complex at Kassam Stadium providing restaurants, bowling alley, a multiplex and a weekend market.

### **The pink and yellow areas**

The two Easterly areas most directly threaten to merge the City with adjacent settlements, bringing the built environment very close to Garsington and to the narrow gap which is all that presently separates Horspath from the City.

The pink area particularly threatens the identity of the Baldons.

Again important views into the City would be affected, especially by development at the Northern end of these footprints, but in this case the famous views from Shotover, which is well-used by the public.

There must also be concern that whilst any development may provide accommodation for commuters working outside the City, this may be more likely to the East, nearer Garsington and Horspath.

However, whilst further from the Kassam complex, these areas would probably have an easier access to Cowley.

Overall the “blue” area would be likely to cause less landscape damage and less risk of merger of settlements than the pink or yellow. Its proximity to the existing Kassam complex puts services close at hand.

Removing the sewage farm should it be needed would involve high capital cost to be borne by Thames Water’s customers and its new location might in itself damage the Green Belt.

This operation is however probably not necessary as in our view the footprint required by say a 4000 house development would not require it and the extension of the Business Park which it would facilitate would be a positively undesirable development for the reasons considered below.

3). **Should Employment Land be provided as well?**

Definitely not.

- The panel report recommended that there should be no additional land for employment if it worsened the excess of jobs over housing which already exists. In our view any development land available should be positively used to correct the imbalance.
- Development for employment should be undertaken in the Country Towns as recommended in the SEERA plan, to spread the benefits of growth more evenly in line with Government Policy and to prevent the cycle of mixed development which has proved so damaging to Oxford and which, if unchecked at some point, will threaten the whole of the Green Belt
- Should Green Belt land be identified for an SDA in the review it should be used only for affordable or low cost housing to correct Oxford’s jobs/housing imbalance.

4). **What facilities should be provided within the development?**

Facilities are available in the adjacent Blackbird Leys, which the City Council’s emerging core strategy seeks to improve. Whilst we have not undertaken a full assessment of what may be required the working assumption should be that Blackbird Leys facilities should where possible service the needs of the SDA.

This will not only be more efficient but assist the integration of the new housing.

5). **How can we best integrate the development to reduce car travel and give opportunities for bus, cycling and walking?**

Blackbird Leys is very well served by public transport and the restrictions on private vehicles in the City encourage its use.

Any new development should be laid out in a way which facilitates use of public transport and encourages walking and cycling, perhaps through dedicated tracks.

6). **How can we mitigate the traffic impacts of this development on surrounding villages and the approaches to Oxford?**

One of the purposes of this development would be to reduce the commuting in to Oxford and consequently this, if successful, should reduce private car use.

However commuting out from Oxford at present is also substantial, despite the present excess of jobs in relation to housing within the City, and this development may well contain a similar percentage of out-commuters to the city as a whole.

This will inevitably increase the strain on local roads, including the “rat-run” through Horspath and South through the Baldons.

It is hard to see what measures could be available to mitigate this which would not have equally adverse effects on those communities.