

## **Oxford City Local Plan Pre-Submission Consultation December 2018 CPRE Oxfordshire Response**

### **POLICY G3 - Green Belt**

**CPRE Oxfordshire considers this policy to be unsound on the grounds that it is not justified, effective or consistent with national policy.**

#### **Summary**

The City's long-term strategy has been and remains expansionist. Since the City is surrounded by Green Belt, which was created both to contain urban sprawl and protect the vital setting of historic Oxford, physical expansion of the City can only be at the Green Belt's expense. Indeed, it is probably intended to be, as the City has continually chafed at the constraints imposed by the Green Belt and has a longstanding submission to the Local Government Boundary Commission that the City boundary should be extended over and beyond Oxford's peripheral Green Belt, which is presently within the areas of surrounding authorities.

As we argue elsewhere (see responses to overall Spatial Strategy and Policy H1 in particular) there is no justification for this. To the contrary, the best interests of both the County and the City itself are for the City to remain constrained - in its own interest due to its topographical situation crossed with rivers and floodplains, because of its infrastructure inevitably constrained by the heritage which makes it distinct, and because it is in the wider interest to share the proceeds of the growth potential of the University's scientific initiatives amongst the wider community.

The City's expansionist growth-centred strategy is inappropriate. It should instead be aiming to satisfy its own housing need, through releasing land earmarked for prospective employment and higher densities, rather than, as in this Plan, targeting Green Belt release both within the City and on land immediately adjacent to the City, but within other Authorities' areas, for urban extensions of the City. Neither is justified by the evidence, and there are no exceptional circumstances to outweigh the harm that it is acknowledged would be caused. Furthermore, there is no public support for Green Belt release.

#### **Public Opinion**

Opinion Research commissioned by CPRE Oxfordshire in 2015, with a very large sample size, asked the balanced question: *the key reason green belts exist is to prevent urban areas spreading out across the countryside. 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 Oxford Green Belt should remain open and undeveloped, and building on it not allowed?*

76% of the population of Oxfordshire agreed that the Green Belt should remain open and undeveloped, despite having been made aware of the pressure for building. For Oxford City itself 73% of respondents opposed Green Belt development, 48% strongly.

Oxford City Council consultation responses (from their Consultation Response paper) do not have the same validity as their sample is self-selected not - as the CPRE sample is - representative but nevertheless broadly support the Green Belt. It is not a reasonable interpretation of its own consultation responses for the City to refer to the outcome as “polarised” since charts published in their own background paper show 63% of full respondents disagreeing, 54% strongly, with the City’s proposal to develop Green Belt land within the City. Even the result from the City’s leaflets, which can be given little weight, had twice as many strongly disagreeing with the City’s proposal than strongly agreeing.

Since the CPRE commissioned survey was of a carefully selected sample and since our overall result for Oxfordshire was echoed very closely in each of the separate areas; its result confirmed similar research previously undertaken; and it is supported by the less valid, because self-selected, City consultation responses, it can be confirmed without hesitation that **a clear and substantial majority of the public do not believe the Green Belt should be built on, whatever the pressures to do so.**

**This means at the very least that circumstances that are truly exceptional must be obtained before any decision to release Green Belt can be considered. There are none.**

### **Exceptional Circumstances**

The City states that there is no formal definition of, or assessment criteria for “exceptional circumstances” which are therefore at the discretion of the Authority to determine. That has certainly been the case up to and including the original NPPF, under which this Plan is likely to be examined, though no doubt the Government had assumed that the word “exceptional” taken together with the assumption that Green Belt boundaries should be permanent, indicated clearly enough the weight of evidence that should be required to necessitate Green Belt release. Under the new NPPF a sequence of steps and considerations is identified at 137/8 which determine the situation in which circumstances can be considered exceptional. Given that these are the Government’s up-to-date advice they must carry weight in any current decision making.

These are briefly (137) that all reasonable alternatives should be exhaustively considered, including higher densities on other land, and then, but only if no reasonable alternative exists, (138) that first consideration should be given to previously developed land or land well-served by public transport.

There is no evidence that reasonable alternatives have been considered. In the case of the group of small sites within the City, non-Green Belt land ring-fenced for future housing

development could have been used instead, or alternatively a modest uplift in densities across the City. The eight sites proposed for release total 18 hectares. We have been unable to identify a specific housing number associated with them. Assuming this would be at the lower end of the Plan's indicative density scale at 35 dph, the sites would yield just 630 dwellings. Given that the total number of dwellings proposed for the City is 8,620, that would be equivalent to just a 7% increase in densities elsewhere, which, especially as those are in any case set at the lower end of the density range, should be readily achievable.

The urban extension sites proposed outside the City to accommodate Oxford's "unmet need" (at the Kidlington Gap in Cherwell District, and at the time of writing at Elsfield, Northfields and Grenoble Road in South Oxfordshire) are all in the Green Belt and therefore fall to be considered under the same NPPF 137 criteria.

In all cases there are alternative sites, which in Cherwell's case are specifically identified in the emerging District Plan.

Although the new NPPF at 138 requires the relative sustainability of Green Belt sites to be a consideration only if alternative sites are not available, the Oxford Plan puts the sustainability argument first.

Their case is that firstly there is unmet need which the City cannot satisfy and secondly that the only sustainable location where Oxford's unmet need can be met is right up against the edge of the City in the Green Belt.

CPRE argues firstly that there is in fact no "unmet need" to be satisfied and secondly that the Government's para 137 presumption - which we share - must be that it can be sustainably met in alternative locations should these be available.

We argue the case that there is no unmet need in our response on the overall Spatial Strategy, but in summary we demonstrate that the City has the potential to meet all of its Strategic Housing Market Assessment (SHMA) requirement within the City itself; that in any case unmet "need" can only be real need, not the SHMA calculation that conflates need with accelerated growth strategies; and that the best available calculation of real "need" (even within the SHMA) is the Government household projection forecast. That is for just 10,000 houses over the Plan period which Oxford could comfortably accommodate. There is no reasonable argument that Oxford has "unmet need" at all, certainly none sufficient to overcome the high hurdle that is Green Belt release.

It is also relevant to recall that the Inspector into the Vale Part 1 struck out a whole swathe of Green Belt sites on our submission that no housing allocation had been made to them, and there therefore there could not be exceptional circumstances. We can find no evidence of allocations to Green Belt sites within the City in this Plan.

**There is therefore no basis for moving to consider whether there are exceptional circumstances as no legitimate unmet need exists.**

For the sake of good order, it is nevertheless appropriate to address the exceptional circumstances the City advances.

#### **a. High Cost of Housing**

High housing cost depends on a number of factors but as Kate Barker established in her seminal 2004 report there is no conceivable rate of new housebuilding that would do more

than slow house price inflation. That said however, Oxford City has created a perfect house price storm by deliberately restricting supply whilst simultaneously ratcheting up demand. This pressure cooker effect could be halted tomorrow by changing strategy to accommodate housing rather than creating demand for more of it. It would not be addressed by the Green Belt incursions proposed as the Plan still calls for employment growth ramping up demand.

**b. Imperative to meet as much of Oxford's housing need as possible**

Agreed, but Oxford's real housing need can be met within the City boundaries and without use of Green Belt land.

**c. Oxford's potential for growth**

The City refers to Oxford as a "global brand" and though this is to an extent the case, in that the City's name and characteristics are widely known, the essence of a global brand is that it is global. Apple's products are made in China, and BMW's are made in America. This does not make Apple less American or BMW less German. Oxford's ideas would still be Oxford's wherever they were exploited. There is a difference between creating growth and accommodating it. This does not need to be, and desirably should not be, in the City itself.

The Green Belt was created specifically to constrain urban areas potential for lateral growth. Oxford has recklessly expanded until the limit is almost reached but there is still time for a change of strategy. There is no reason to suppose that any net growth would be lost by physically constraining Oxford since there is no reason to suppose it could not be achieved elsewhere in the County.

Conversely if achieving growth of the City were an acceptable aim, and given the City's claim that it could be achieved only by expanding over the Green Belt, then the Green Belt would be peeled open like segments in an orange (as we have said elsewhere) doing irreparable harm to the setting of the City, to the surrounding settlements that would be subsumed, and to the County as a whole.

Constraining Oxford would maintain its attractiveness to the originators of ideas for growth that others can develop. In any case the medieval layout of Oxford is unsuitable to support a larger City.

**d. Lack of housing is a barrier to economic growth**

This is a rephrasing of ( c ) above.

**e. Promotion of sustainable patterns of growth**

Removing land from the Green Belt is in principle the very opposite of sustainability as it prevents future generations from enjoying the benefit. This is especially the case when there is no evidence to justify it or to counter the harm it would cause.

The City Council says it "has been arguing for years that a feature of its lack of housing is extended commuting".

Whilst it has indeed been arguing this for years, during the same years it has been creating the very problem it complains of, by prioritising creating housing demand ahead of meeting it.

It argues too that *housing should be in sustainable locations*. There is little argument about that but the routes to sustainability are to use earmarked employment land within the City for housing and to relocate new jobs together with the necessary housing elsewhere.

### **Green Belt Site Assessments**

In recent years there has been a trend towards assessing the whole of the Green Belt and/or that part of it falling within a particular authority for the performance of each parcel against the five purposes of the Green Belt. The Vale of White Horse District Council at its Part 1 Enquiry advanced the view that sites could be released purely on the basis that a poor subjective assessment was of itself an exceptional circumstance, of which it was disabused by the Inspector on our submission.

The Site assessments in the Green Belt Study are inevitably subjective and it is relevant that they can differ from those in the earlier County's Oxfordshire wide Study in 2015, accepted at the time as definitive. The land itself has not changed in the meanwhile, only the assessor's interpretation of it.

As an instance, of St. Frideswide Farm, site 107, the City's Green Belt study says *release of this land would constitute encroachment on the countryside but the size of the parcel and its links with the existing urban form are such that the impact on the integrity of the wider Green Belt would be limited*.

The Oxfordshire Green Belt Study of 2015 (in which it forms part of a larger parcel) on the other hand states that *There are two farms within the parcel, neither of which are considered to be urbanising influences. The land is flat and very open, with excellent views of the surrounding countryside. The parcel plays a moderate role in the setting of Oxford in terms of its physical extent and degree of visibility and/or its contribution to Oxford's special character*.

CPRE's assessment of the St.Frideswide farm site against the five purposes, being up against the City, and between the City and open countryside, is that it is preventing urban sprawl and protecting the countryside (of which it is a part) from encroachment, absolutely, not as a matter of degree. All Green Belt land assists in regeneration. St. Frideswide's is in the crucial Kidlington Gap between the City and the very large village of Kidlington and its release would directly contribute to coalescence. Sited as it is on an approach to the City it is contributing to its setting, which is not just a matter of view cones but of the whole physical approach to the dreaming spires.

This is not the place to review the qualities of all the Green Belt sites targeted for release in the City or as urban extensions, except to say that for Cherwell this is almost entirely within the critical Kidlington Gap and in the same parcel as St Frideswide's; and the three Green Belt releases adjacent to the City proposed in the emerging South Oxfordshire Plan are all acknowledged to be urban sprawl, and to be important to the setting of the City.

## **Conclusion**

**There are no exceptional circumstances to justify any review of the Green Belt and both the sites within the City and the references to Green Belt urban extensions should be struck out of the Plan.**