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Ian Kemp  
Programme Officer  
Cherwell LP Part 1 Review  
16 Cross Furlong  
Wychbold  
Droitwich Spa  
Worcestershire  
WR9 7TA

## **Cherwell Local Plan 2011-2031 Part 1 Partial Review - Oxford's Unmet Housing Need**

### **MATTER 3 - SPATIAL STRATEGY**

**3. If the 'working assumption' of 4,400 homes remains the correct apportionment of Oxford's unmet need to Cherwell, is the strategy of directing the majority of the development designed to meet that need to land that is currently in the Green Belt soundly based?**

#### **Public Support for Green Belt principles**

1. The Green Belt is popular, and its purpose is easily understood and appreciated. Opinions about it are also well-informed.
2. In opinion research commissioned by CPRE, but conducted by an independent research company, as recently as 2015 (the very time the location of Oxford's "unmet need" was being considered) a large sample of respondents across the County were asked whether, given that many people thought that the Green Belt was an appropriate location for needed new housing, it should remain open and undeveloped.<sup>1</sup>

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<sup>1</sup> <http://www.cpreoxon.org.uk/news/item/2447-cpre-survey-shows-majority-don-t-want-to-build-on-green-belt?highlight=WyJncmVlbilslmdyZWVuJyIsIidncmVlbilslmJlbHQiLCJiZWx0JywiLCJiZWx0JyIsImJlbHQnLilslmJlbHQncyIsInN1cnZleSIsImdyZWVuIGJlbHQiLCJncmVlbiBiZWx0IHN1cnZleSIsImJlbHQgc3VydmV5IIO=>

3. Three quarters of the sample considered it should not be built on, even in those circumstances, and this was true equally of City and country dwellers and of home owners and non-home owners.

4. Recognising this, the Land Use Consultants report for the Growth Board stated, at 2.8, *The balancing act between providing sufficient homes to meet growing demand and economic aspirations for Oxfordshire, and the constraints to development presented by the Green Belt, has proved to be a constant challenge for the five local planning authorities in Oxfordshire. The political popularity of the Green Belt also results in resistance to development within each of the four neighbouring districts.*<sup>2</sup>

5. They are right about the political popularity but their “balancing act” is false. Land outside the Green Belt is available to accommodate any “Oxford unmet need” that might exist and equally to accommodate the deliberate employment growth strategy which generates it.

#### **Growth Board site selection process.**

6. A team of officers supported by Landscape Use Consultants assessed the sites to which Oxford’s unmet need should be allocated and their report to the Growth Board is in the Reports Pack for the Meeting on 26<sup>th</sup> September 2016<sup>3</sup>. At Point 3 they stated their brief to be:

*‘An agreed apportionment for the unmet need for Oxford, based upon the working assumption that this unmet need totals 15,000 for the purposes of the Programme and that **this figure would be confirmed through an update of Oxford’s Local Plan.**’* (Although no such update has subsequently occurred).

7. As described above the process did not begin from a clean slate but was only an exercise in grading the sites submitted by the various District Councils. In the case of Cherwell this was, apart from Woodstock, only Green Belt sites.

8. Land Use Consultants was commissioned to assess the merits of each site. At 5.86 a series of maps summarised conclusions against its chosen criteria:

- i. In relation to “convenient access to Oxford’s cultural offer via existing transport links” the Cherwell Green Belt sites between Kidlington and the City qualified but those to the West did not. Although still close to the City they were graded equally with Drayton St Leonard in South Oxfordshire a considerable distance away.
- ii. None of the sites were “well connected to universities etc. via existing transport”, although the situation improved when “proposed” transport was considered.

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<sup>2</sup> PR14 Oxfordshire Growth Board - Oxford Spatial Options Assessment

<sup>3</sup> PR27 Oxfordshire Growth Board - Public Reports Pack 26 Sept 2016

- iii. None were “well connected to employment sites”.
- iv. None “would contribute to regeneration of deprived areas”.
- v. None were considered readily “deliverable” or “viable”, these being the final two criteria.

9. It is clear from the above that Landscape Use Consultants did not consider mere physical proximity to Oxford as a determinant of the merit of a site, but practical accessibility, delivery and viability. On all the criteria the Cherwell Green Belt sites scored badly or less well than other more distant sites in other Districts.

10. Since Cherwell did not submit other sites further from Oxford which it had identified as available and with the necessary capacity it cannot be known whether these would have scored better, especially with “proposed” transport links.

11. It is clear that physical proximity alone, and therefore Green Belt release, is not, as Cherwell claim the over-arching factor in determining the location of Oxford’s unmet need.

12. Nor was this a basis on which the Growth Board’s site selections was made. It is relevant that when in the end South Oxfordshire offered no Green Belt sites close to the City to meet its apportionment of “unmet need” the Growth Board did not demur.

## **Sustainability**

13. If the Cherwell argument that Oxford’s “unmet need” must be accommodated as close to the City as possible, and that as the land nearest to Oxford is all Green Belt, the Green Belt must be the most sustainable place to accommodate it, each increase in City housing demand would remove more Green Belt land until it was effectively eroded.

14. This is to turn on its head the founding principle of the Green Belt, that urban sprawl is itself unsustainable - particularly for historic cities like Oxford with medieval hubs - and should be prevented by designation.

15. It is also argued (by agencies like Land Use Consultants) that since not all Green Belt land performs all the purposes of the Green Belt to the same degree, then to the extent some land performs worse it can be released, whether or not there is any housing need for it. It is easy to see that this argument would lead

eventually to just two fields remaining of which one would be “worse” than the other. The Vale of White Horse District in Oxfordshire advanced exactly that argument for releasing Green Belt land in its part one plan, for it to be defeated on CPRE representations at their EIP.

### **Fitness for Purpose**

16. In fact, every piece of Green Belt land performs at least two Green Belt functions - preventing encroachment and encouraging urban regeneration. Additionally, all Green Belt land contributes to the setting of Oxford, not necessarily directly through views, but also by providing a rural approach to the historic City.

17. The nearer Green Belt land is to the City the more it prevents urban sprawl - the founding principle. The Green Belt release proposed by Cherwell at the strategic and long fought over Kidlington Gap would directly cause the merger of the neighbouring towns of Kidlington and Oxford. (It may be argued that Kidlington is a village not a town, but it is larger than Thame and has all the characteristics and facilities of a town. For that matter Oxford is not a town either, but a City).

### **Policy**

18. Paragraph 83 of the original NPPF clearly allows for Green Belt review in “exceptional circumstances” which must by definition be circumstances where there is no reasonable alternative.

19. This is elaborated in 136 of the new NPPF as requiring proposals to be “fully evidenced and justified”.

20. Paragraph 137 describes the steps required to establish whether all reasonable alternatives have been considered. These include:

- a) *making as much use as possible of suitable brownfield sites and underutilised land;*
- b) *optimising the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport.*

21. These would be steps for Oxford to have taken prior to asking neighbouring authorities for help. As we have shown, Oxford did not take these steps, and, as we have also shown, there is very reason to suppose that if it had done the “unmet need” would have ceased to exist.

22. Should any “unmet need” have existed, the same steps would be required of neighbouring authorities in determining how to meet it.
23. There is no evidence in the LUC study or elsewhere that they were, and particularly that serious attention was given to the potential to uplift densities.
24. Furthermore, Cherwell had identified in its own plan-making process sites outside the Green Belt capable of accommodating its allocation of “unmet need”.
25. There has therefore been no demonstration of “exceptional circumstances” as required by the NPPF, not least as none exist.
26. Turning to the requirement in the NPPF that any change which might be made to Green Belt boundaries could endure beyond the plan period, requires consideration not just of the circumstances of the current plan but also what is over the horizon.
27. The Government is targeting Oxfordshire as part of the Ox Cam Growth Corridor which in the NIC’s Partnering for Prosperity Report of November 2017<sup>4</sup> envisages a doubling of both the Corridor’s population and housing stock.
28. Through the Growth Board Local Councils are setting up a Joint Strategic Spatial Plan process to accommodate the extra 300,000 houses the Government’s plans imply for Oxfordshire. The Corridor Development is planned to begin in 2031, within the present Plan period, though little reference is made to it in Local Plan submissions.
29. It is therefore a known development, not just beyond but within the Plan period, which any realignment of Green Belt boundaries must be capable of accommodating.
30. It implies a potential further doubling of Oxfordshire’s housing stock.
31. It is clear that, if the same policy (of accommodating unmet need on Green Belt land) were to be pursued to accommodate this level of expansion, the Green Belt would be fatally eroded.
32. To avoid this, it is necessary to consider whether Oxford can be allowed to continue generating unrequired employment within its boundaries, and the consequent explosion of “unmet need” that would result.
33. CPRE say that it should not. SQW, who were partners with Cambridge Econometrics in the Growth Strategy have informally agreed with us that spin-off

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<sup>4</sup> <https://www.nic.org.uk/wp-content/uploads/Partnering-for-Prosperty-Report.pdf>

growth from the City's academic institutions does not need to be accommodated within the City itself. A constrained City like Oxford should not define itself as a County shopping centre, creating more employment as well as traffic on unsuitable roads.

34. As we advocate, Oxford should be required to use the land it has to accommodate its own housing need, rather than for employment which will exacerbate it, and further employment growth should be directed elsewhere in the County together with the housing it will require.

35. We suggest that that is the appropriate way to interpret advice in the NPPF.

### Summary

36. Neither the allocation of 4,400 houses nor their proposed siting in the Oxford Green Belt are soundly based or in line with Government Policy or the clearly expressed wish of the people of the District or the County.

37. This is not an objection to a Growth Objective for the County in principle but to the Strategy chosen to implement it.

38. Oxford has the capacity to accommodate all its housing need within its borders and without using Green Belt land. The Growth Board strategy of encouraging Oxford employment growth at the expense of housing need, and of rolling back the Green Belt to accommodate it, is fatally flawed and requires urgent review.