



The countryside charity
Oxfordshire

Campaigning to protect our rural county

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Oxford Local Plan 2040 – Issues Consultation, Summer 2021 **CPRE Oxford – Outline Response**

Oxford City's emerging Local Plan for 2040 might at first appear to be a necessary response to the very rapidly evolving environment following Brexit, the Covid pandemic, and evidence of accelerating climate instability.

This is most welcome in principle, were it not for the fact that the underlying driver remains growth: of the population, the local economy, the universities. The contradiction between this ambition, and the City's 2019 recognition of the Climate Emergency is inadequately explored, other than to highlight the risks of each to the other. Demography, working practices, retail preferences – all are changing, and changing in unpredictable ways. Using historical – or even current – data may lead to decisions which might become irrelevant even before the 2040 Plan is approved. This will require a cautious approach, focusing on qualitative rather than quantitative assessments, and building in the careful phasing of any proposed land release.

We need to celebrate our key assets and prioritise land for housing not further economic growth

There remains the underlying tension between the City, with its undoubted but poorly quantified unmet housing need and unaffordability, and its surrounding Districts, which is not clearly addressed – perhaps awaiting Oxfordshire 2050 to declare. The City is described as 'constrained': by its heritage; by its geography and rivers; and by its Green Belt - all of which should instead be seen as its key assets! Yet it still aspires to grow beyond its own limits, persisting with the assumption that any growth it cannot fully accommodate should be accommodated in countryside elsewhere, burdening the neighbouring Districts. **The proposals in the document fail to recognise that for as long as land is prioritised for economic growth over housing, the shortage of suitable homes for its residents and workforce will worsen, more green spaces will be permanently lost, and the unique character of the area that draws people in will be irrevocably damaged.**

Much is made of maintaining City residents' quality of life through access to green spaces whilst simultaneously suggesting yet another review of possible building sites in the Green Belt, already reduced within the City boundaries following the last review. (See Appendix 1 for detailed comments on the Green Belt Topic Paper published alongside this consultation.) What remains is precious and use of it for commercial residential developments that attract new residents from elsewhere into the City will never address Oxford's own unmet housing need, much of which is for social and genuinely affordable housing. This continuing arrangement is seen as the best solution to meeting the 5-year land supply, an absence of which would supposedly threaten the Green Belt! Meanwhile yet more agricultural land which can help support local food security is lost, and the setting for the City's exceptional architectural heritage is further threatened.



Brownfield sites must be prioritised

Where significant areas of the City's Green Belt have already been previously allocated for development, but building has yet to begin, there is still an opportunity to rethink. There must be no further loss of green space, and instead the urgent identification of new brownfield sites for development within the City must become a far greater priority than is presently the case. The current brownfield register must be actively updated to reflect the rapidly changing commercial property environment, as large retailers increasingly become non-viable, and decreasing requirement for office space arises as working from home increases. **Commercial landlords of underused low density sites, especially where there are extensive car parks, should be proactively challenged to submit these for redevelopment into efficient and high quality mixed housing and business communities.**

Figs 1-3 – Inefficient use of brownfield land - Botley Road retail sites



***We need housing for people
not cars***

Compact housing would save land and help achieve more affordable, climate friendly neighbourhoods

Compact housing remains a key issue and the priority for all future development in the City should be high density, low cost, low land take, compact units to re-balance existing stock in favour of the growing number of smaller households.



High density does not mean high rise. Tower blocks are less space efficient than the terraces which many of them replaced. It does mean smaller units, closer together, than recent distanced developer-led building patterns. A target density of 100 dwellings per hectare would support self-sufficient, climate friendly neighbourhoods minimising heating, insulation and travel costs.

Green spaces, within and around the City, are vital to resilience, including flooding issues

The statement of Climate Emergency is welcomed as a recognition of the urgent need to change the way things are done to achieve carbon neutrality. However, there is insufficient evidence of a genuine will to do things differently in order to develop the necessary resilience to avoid the possible consequences of climate change. Oxford is a city located on a complex flood plain [the clue is in the name]. Increased flooding, both locally from surface water problems in an urban area, and more widely from river and ground water flooding, were both acknowledged in the 2017 Strategic Flood Risk Assessment as a future threat which it may only be partly possible to mitigate. In addition local foul water flooding from insufficient sewerage capacity and resulting river contamination is increasingly likely. All the above will be significantly exacerbated by development on green field sites, notwithstanding any proposed design mitigations, whereas redevelopment of brownfield sites can offer an opportunity actually to improve flood risks. **We must not wait for the flooding tragedies witnessed elsewhere to happen here, but must recognise the role of undeveloped countryside in providing protection.**

Although the critical importance of both green [and blue] nature networks and biodiversity are strongly acknowledged in the document, there is no clear commitment to preserve what is currently available. In particular there is a concerning lack of commitment to the Green Belt, instead considering options for 'off-site' biodiversity gain in communities where development is undertaken at the expense of local facilities. Such initiatives would be of little value to local residents, and anyway would be at risk of slippage if not monitored. Threats to a field in Iffley Village, and to Bertie Park are notable examples of proposed development on valued local green network sites. However even open land which is not accessible to residents has value in terms of setting and in supporting natural networks, and should not be considered for development simply for reasons of inaccessibility. The NPPF recognises such sites have potential value to wildlife, and in local food production, in flood protection, carbon storage, and cooling, all contributors to climate mitigation but inadequately addressed [or even recognised] in the relevant sections. For example other cities, such as London and Bristol, are well advanced in developing local food strategies, in line with a recommendation from the National Food Strategy that all local authorities should now be putting such policies in place.

The next Local Plan is an opportunity for the City to step up to the urgent challenge of the climate emergency by re-thinking its past fixation with growth, reconsidering its impact on its neighbouring communities, and aiming to become better, not simply bigger. Perhaps most importantly of all, we must not wait a further four years to act, but must start to do so now.



Appendix 1 – CPRE Oxford Detailed Comments on Green Belt Topic Paper

(See: https://www.oxford.gov.uk/downloads/file/7640/3_green_belt)

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The Sustainability Appraisal objective should not just be to minimise use of Green Belt but ‘to avoid use of Green Belt land except in exceptional circumstances and minimise use of green field’.

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 **weighted in line with the statutory assumption that the Green Belt should be permanent.**

When a Council is considering making changes to Green Belt boundaries, as well as the other reasonable options that must be considered first, the Council must **take into account the intended permanence of the Green Belt and ensure that any changes are capable of enduring beyond the Plan period** (ie changes should be rare rather than a regular part of every Local Plan review).

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If releasing land from the Green Belt, local authorities should prioritise areas that are previously developed or well served by public transport, **and sites that have already been released with future potential.**

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. **Although desirable, lack of such facilities does not affect land's Green Belt status in comparison with other Green Belt land, and is not to be taken into account in considering release.**

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. **For the avoidance of doubt this is only improvement of other Green Belt land, not actions elsewhere: Plans... should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. (NPPF, July 2021)**

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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 **and that the need for development clearly outweighs the intended permanence of Green Belt land.**



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 should consider firstly whether any forecast need outweighs the statutory assumption of Green Belt permanence, especially given the ready availability of sites outside the Green Belt as well as within the City.**

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Economic: The ~~implementation~~ **continuation** 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 Green Belt also maintains the ~~arguably~~ **unarguably** priceless value of the natural environment and protects the extremely valuable agricultural trade.

The Green Belt provides a backdrop to the City; protects it from outgrowing its compact dimension; and supports a pattern of surrounding villages each of individual character; all of which attracts and maintains high value business.

Social: Protecting the Green Belt ensures that Oxford's residents will always have natural spaces to engage with and enjoy **within and** outside of the city.

Environmental: Protecting the Green Belt guarantees that a richly diverse area of land is protected, maintained and in many cases enhanced, **and also protects the City's historic setting, both in views and approaches.**

The City Council should only release land from the Green Belt or alter the boundary in exceptional circumstances **when no other option, including forgoing the development, is available.**

Consideration should be made whether there should be an uplift in minimum housing density requirements where a sufficient level of infrastructure is present. **Before any release of Green Belt land is contemplated consideration must be given to the extent to which densities can be increased and other measures identified in the NPPF.**

~~The plan should consider whether a more comprehensive approach to Oxford's Green Belt should be completed.~~ **The Oxford 2040 Plan will await and adopt the outcome of the Oxfordshire 2050 plan rather than consider any independent review of the Green Belt which is an Oxfordshire asset.**